



Entergy Services, Inc.  
639 Loyola Avenue 70113-3125  
P.O. Box 61000  
New Orleans, LA 70161-1000  
Tel 504 576 2984  
Fax 504 576 5579

Harry M. Barton  
Senior Counsel  
Legal Services - Regulatory

May 11, 2018

Via Hand Delivery

Ms. Lora W. Johnson, CMC, LMMC  
Clerk of Council  
Room 1E09, City Hall  
1300 Perdido Street  
New Orleans, LA 70112

RECEIVED  
MAY 11 2018  
BY: CWR

**Re: *Investigation of the Potential Costs and Benefits of Entergy New Orleans, Inc. and Entergy Louisiana, LLC Joining a Regional Transmission Organization Versus Continuation of the Entergy Independent Coordinator of Transmission with Enhancements***  
**(CNO Docket No. UD-11-01)**

Dear Ms. Johnson:

Please find enclosed an original and three copies of the Public Version of Entergy New Orleans, LLC's ("ENO") Fourth Annual Post-MISO-Integration Monitoring Report to be filed in the above-referenced docket. Please file an original and two copies into the record in the above referenced matter, and return a date-stamped copy to our courier.

In connection with ENO's filing, a Confidential Version of the above-described documents bearing the designation "Highly Sensitive Protected Materials" are being provided to the appropriate Reviewing Representatives pursuant to the terms and conditions of the Official Protective Order adopted in Council Resolution R-07-432. Portions of the information included in the filing consist of highly sensitive information, the disclosure of which may subject not only the Company, but also its customers, to a substantial risk of harm. As such, these confidential materials shall be exempt from public disclosure, subject to the provisions of Council Resolution R-07-432.

Thank you for your assistance with this matter.

Sincerely,

  
Harry M. Barton

Enclosure

cc: Official Service List UD-11-01 (via Electronic mail)

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**BEFORE THE  
COUNCIL OF THE CITY OF NEW ORLEANS**

**INVESTIGATION OF THE )  
POTENTIAL COSTS AND BENEFITS )  
OF ENTERGY NEW ORLEANS, INC. )  
AND ENTERGY LOUISIANA, LLC )  
JOINING A REGIONAL )  
TRANSMISSION ORGANIZATION )  
VERSUS CONTINUATION OF THE )  
ENTERGY INDEPENDENT )  
COORDINATOR OF TRANSMISSION )  
WITH ENHANCEMENTS )**

**DOCKET NO. UD-11-01**

**ENTERGY NEW ORLEANS, LLC’S FOURTH ANNUAL  
POST-MISO-INTEGRATION MONITORING REPORT**

Pursuant to, and in compliance with, Council of the City of New Orleans Resolution R-15-139, dated April 9, 2015, Entergy New Orleans, LLC (“ENO” or the “Company”)<sup>1</sup>, submits its Fourth Annual Post-MISO-Integration Monitoring Report (“Report”) related to the integration of ENO into the Midcontinent Independent System Operator, Inc. (“MISO”) regional transmission organization (“RTO”) on December 19, 2013. The headings and sub-headings set forth below correspond to the headings and sub-headings contained in the Summary of Proposed Post-MISO-Integration Reporting Guidelines, in Exhibit 4 to the Agreement in Principle attached to Council Resolution R-15-139.

On December 14, 2017, the Council adopted Resolution R-17-627 in Docket No. UD-17-02, that found, among other things, that ENO’s continued membership in MISO beyond December 19, 2018, is in the public interest at this time. The Resolution also directed the Advisors to work with ENO to establish the framework for a more streamlined annual report as

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<sup>1</sup> Effective December 1, 2017, Entergy New Orleans, Inc. underwent a Council-approved corporate restructuring to become a limited liability company. Accordingly, the utility formerly operating as Entergy New Orleans, Inc. is now operating as Entergy New Orleans, LLC.

set forth in the accompanying Agreement in Principle.<sup>2</sup> As of the date of this filing, the Advisors and ENO have initiated this process as directed and agreed to discuss an updated methodology for calculating the benefits to ENO customers resulting from the Company's continued membership in MISO. ENO will supplement this Fourth Annual Report at such time as the updated analysis is available.

**a. Resource Adequacy**

**1. The following related to resource adequacy in MISO for ENO<sup>3</sup> for the current Planning Year including:**

**i. The Results from MISO's Planning Resource Auction for the current Planning Year**

MISO's Resource Adequacy Construct, including the Planning Resource Auction ("PRA"), is conducted on an annual basis coinciding with the MISO Planning Year, which begins on June 1 of a given year and concludes on May 31 of the following year. The Resource Adequacy Construct establishes capacity requirements for specific geographic areas, known as Local Resource Zones ("LRZs"), which can be met through participation in the PRA. ENO is located in LRZ 9, which covers Louisiana and Texas. ENO has long-term contracts with generating resources located in LRZ 8 (Arkansas) and LRZ 10 (Mississippi). The PRA results in a clearing price for each LRZ, which is used for both capacity purchases and capacity sales for auction participants within each LRZ. The 2017-2018 PRA resulted in a clearing price of \$1.50/MW-day for all of MISO (LRZs 1-10).<sup>4</sup>

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<sup>2</sup> Resolution R-17-627, Ordering Paragraph #4. *See also*, AIP, Paragraph 2.e., at page 4, "ENO shall develop, in consultation with the Advisors, a detailed framework and content for future reporting that is better suited to assess the annual historic costs and benefits of MISO membership."

<sup>3</sup> Resolution 15-139 contemplated the "System Agreement Operating Companies," which included ENO and the other Entergy operating companies (ELL, ETI, EMI, and EAI). Because the Entergy System Agreement terminated on August 31, 2016, the information and data in this and each subsequent Report shall only be provided for ENO.

<sup>4</sup> ENO notes that the 2018-19 PRA resulted in a clearing price of \$10/MW-day, an increase from \$1.50 per MW-day the prior year.

**ii. A list of the capacity purchases, by amount and cost, made by ENO**

Certain information responsive to this component of the filing has been designated as Highly Sensitive Protected Material (“HSPM”), has been redacted from the Public Version of this filing, and will be provided only to Reviewing Representatives authorized and designated under the confidentiality agreement executed in this docket.

ENO has been participating in MISO’s Resource Adequacy market for the 2017-2018 Planning Year since June 1, 2017. From June 1, 2017 through May 31, 2018, ENO was [REDACTED] [REDACTED] reflecting the clearing price of \$1.50/MW-day.

Please see HSPM Attachment 1 titled “ENO 2017-2018 Auction Results.pptx” for more detailed information regarding ENO’s participation in the 2017-2018 PRA.

**b. Market Operations**

**1. A breakdown of the energy mix used to supply ENO’s customers, for the previous twelve month period, showing the MWh and average cost by month, as supplied by resources owned or controlled (through limited or long-term bilateral purchase power agreements) by ENO, and purchases from the MISO markets**

Please see HSPM Attachment 2 titled “ENO\_Energy\_Mix\_2017 HSPM.xlsx” for a breakdown of the energy mix used to serve ENO’s customers in 2017.

**2. The following related to congestion hedging for the System Agreement Operating Companies, collectively and individually:**

**i. The allocation of Auction Revenue Rights (“ARRs”) and Financial Transmission Rights (“FTRs”) received by ENO**

Please see HSPM Attachment 3, titled “ENO Annual ARR Allocation Results\_PY17\_18 HSPM.pptx” which outlines the allocation of ARR and FTRs to ENO.

**ii. The cost of any ARR and FTRs purchased by ENO in the MISO market processes**

The information responsive to this component of this filing has been designated as HSPM. [REDACTED]

[REDACTED]

[REDACTED]

**iii. The annual net congestion charges (net of congestion revenues which will be identified and quantified separately), if any, paid by ENO to MISO**

The Company's net congestion charges are shown in the table below, with positive numbers reflecting net congestion charges and negative numbers reflecting net congestion revenues. Congestion charges represent the cost of delivering owned and contracted generation to load. This can be calculated by subtracting the Marginal Congestion Component ("MCC") of the Locational Marginal Price ("LMP") of the generator source from the MCC of the LMP of the load sink.

The HSPM table below reflects congestion charges (net of revenues from ARRs and FTRs) from resources owned or under contract by ENO prior to MISO integration on December 19, 2013 ("pre-MISO integration resources").<sup>5</sup> After the termination of the Entergy System Agreement on August 31, 2016, ENO has modified its net congestion calculation. While the System Agreement was in effect, ENO was allocated a share of the total net congestion incurred by the System Agreement Operating Companies. This calculation included both Day-Ahead and Real-Time market effects, with the specifics of the calculation dictated by the System Agreement for purposes of allocating costs among the System Agreement Operating Companies. As a result of ENO operating as a standalone entity outside of the System Agreement, ENO is

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<sup>5</sup> The pre-MISO integration resources include Ninemile Unit 6 because that resource was granted transmission service by the Independent Coordinator of Transmission prior to MISO integration.

able to produce a simplified congestion calculation that only includes Day-Ahead market effects. ENO has chosen to exclude the Real-Time market effects because: (1) FTRs hedge congestion incurred in the Day-Ahead market only and (2) over 97% of ENO's load needs have been served through the Day-Ahead market since joining MISO. The following table reflects ENO's net congestion charges from its pre-MISO integration resources utilizing the new Day-Ahead only methodology.

<b>ENO's Net Congestion from Pre-MISO Integration Resources</b>	
<b>Period</b>	<b>Net Congestion Charge/(Revenue)</b>
Jan. 1, 2017 – Dec. 31, 2017	██████████

**3. Net Revenue Sufficiency Guarantee charges (net of any make whole payment revenues, which will be identified and quantified separately), if any, paid by ENO to MISO**

The HSPM table below provides a summary of ENO's Revenue Sufficiency Guarantee ("RSG") charges and Make Whole Payments for the period from January 1, 2017 through December 31, 2017. Positive numbers reflect amounts paid to MISO, and negative numbers reflect amounts received from MISO.

<b>Charge/Determinant Name</b>	<b>Description</b>	<b>Charge/(Credit) to ENO (1/1/2017 – 12/31/2017)</b>
Day-Ahead RSG Distribution (DA_RSG_DIST)	The total Day-Ahead RSG Distribution amount obligation for an Asset Owner	██████████
Day-Ahead RSG Make Whole Payment (DA_RSG_MWP)	The total Day-Ahead Revenue Sufficiency Make Whole Payment credit for all assets of an Asset Owner	██████████
Real-Time First Pass RSG Distribution (RT_RSG_DIST1)	The charges related to funding first pass distribution of Real-Time RSGs	██████████
Real-Time Second Pass RSG Distribution (RT_RSG_DIST2)	The charges related to funding second pass distribution of Real-Time RSGs	██████████
Real-Time RSG Make Whole Payment (RT_RSG_MWP)	The total credits received for Real-Time RSG Make Whole Payments	██████████
<b>Grand Total</b>		██████████

**4. A summary of the types of ancillary services purchased by ENO from MISO as well as those provided by ENO to MISO and the compensation received by ENO from such services**

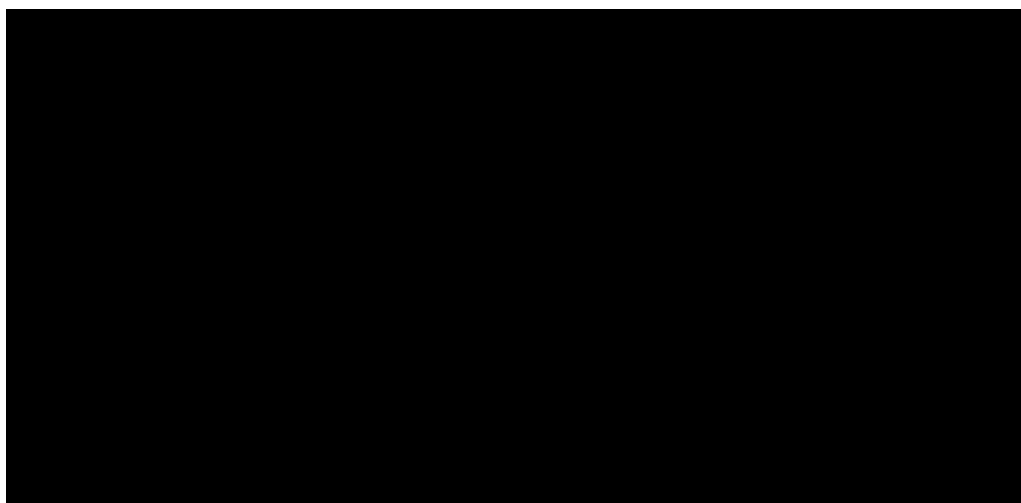
The HSPM table below provides a summary of ENO's charges and revenues related to MISO ancillary services from January 1, 2017 through December 31, 2017, with positive numbers reflecting amounts paid to MISO and negative numbers reflecting amounts received from MISO.

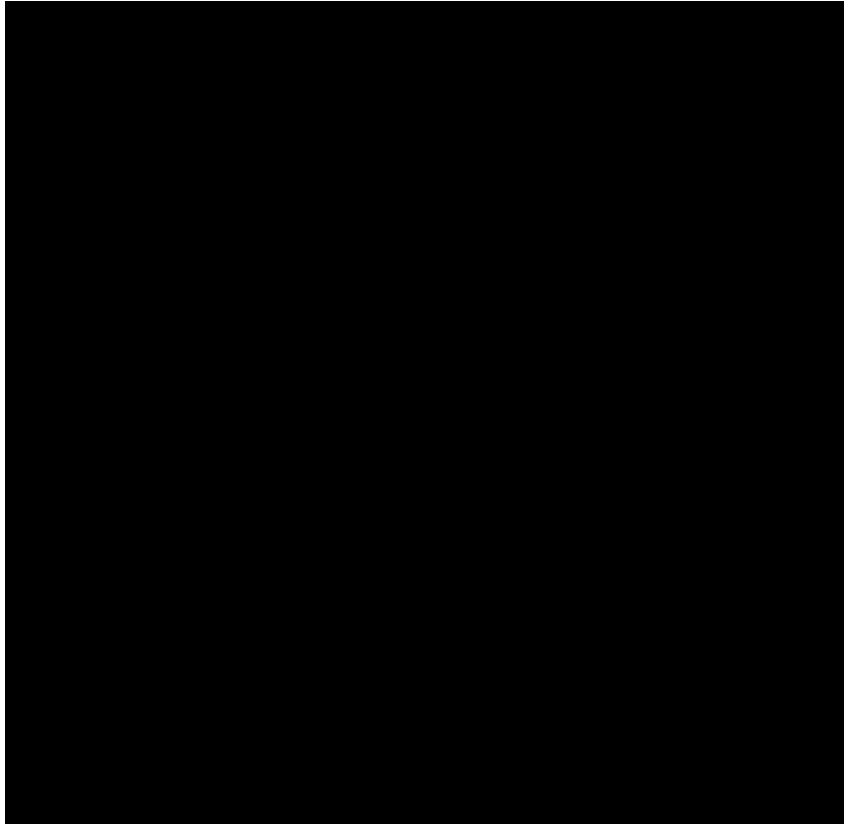
<b>Charge /Determinant Name</b>	<b>Description</b>	<b>Charge/(Credit) to ENO (1/1/17-12/31/17)</b>
Day-Ahead Regulation (DA_ASM_REG)	The total daily amount due to Asset Owners that own the Regulation Qualified Resources with Day-Ahead Schedules for Regulating Reserves.	██████████
Day-Ahead Spinning Reserves (DA_ASM_SPIN)	The total daily amount due to Asset Owners that own the Spin Qualified Resources with Day-Ahead Schedules for Spinning Reserves.	██████████
Day-Ahead Supplemental Reserves (DA_ASM_SUPP)	The total daily amount due to Asset Owners that own the Supplemental Qualified Resources with Day-Ahead Schedules for Supplemental Reserves.	██████
Day-Ahead Ramp Capability Amount (DA_RC_AMT)	The total daily amount due to Asset Owners for Up Ramp Capability and/or Down Ramp Capability in the Day-Ahead Energy and Operating Reserve Market.	██████████
Contingency Reserve Deployment Failure Charge (RT_ASM_CRDFC)	The total daily net charge for an Asset Owner that owns Resources that was unable to deploy the specified amount of Contingency Reserve within the Contingency Reserve Deployment Period following a Contingency Reserve Deployment Instruction.	██████
Excessive/Deficient Energy Deployment Charge (RT_ASM_EXE_DFE_DEP)	The total daily Asset Owner charge associated with the Asset Owners that was unable to follow Setpoint Instructions and are assessed a share of the cost of procuring regulation service.	██████████
Real-Time Net Regulation Adjustment Amount (RT_ASM_NRGAA)	Charges or credits to a Resource providing deployed Regulation Service such that the Resource is indifferent to deploying Energy above or below its Dispatch Target for Energy to provide the Regulation Service.	██████
Real-Time Regulation (RT_ASM_REG)	The total daily net charge or credit for an Asset Owner that owns Regulation Qualified Resources with cleared hourly Real-Time Regulating Reserve delta MW.	██████████

Real-Time Regulation Cost Distribution (RT_ASM_REG_DIST)	The total daily charges or credits to an Asset Owner for Day-Ahead and Real-Time Regulating Reserve procurement costs.	██████████
Real-Time Spinning Reserves (RT_ASM_SPIN)	The total daily net charge or credit for an Asset Owner that owns Spin Qualified Resources with cleared hourly Real-Time Spinning Reserve delta MW.	██████████
Real-Time Spinning Reserve Cost Distribution (RT_ASM_SPIN_DIST)	The total daily charges or credits to an Asset Owner for Day-Ahead and net Real-Time Spinning Reserve procurement costs.	██████████
Real-Time Supplemental Reserves (RT_ASM_SUPP)	The total daily net charge or credit for an Asset Owner that owns Supplemental Qualified Resources with cleared hourly Real-Time Supplemental Reserve delta MW.	██████
Real-Time Supplemental Reserve Cost Distribution (RT_ASM_SUPP_DIST)	The total daily charges or credits to an Asset Owner for Day-Ahead and net Real-Time Supplemental Reserve procurement costs.	██████████
Real-Time Ramp Capability Amount (RT_RC_AMT)	The total daily charges or credits to an Asset Owners for Ramp Capability in the Real-Time Energy and Operating Reserve Market, net of Ramp Capability amounts in the Day-Ahead Energy and Operating Reserve Market.	██████████
Real-Time Ramp Capability Cost Distribution (RC_DIST)	The total daily charges or credits to an Asset Owners for Day-Ahead and net Real-Time Ramp Capability procurement cost.	██████████
<b>Grand Total</b>		██████████

**5. A summary of ENO's transmission charges and revenues from the previous twelve month period**

The HSPM table below provides a summary of ENO's transmission charges and revenues from the previous twelve month period.





- 6. Any changes approved by the ENO Operating Committee to the principles, practices, and protocols utilized to procure capacity and energy in MISO, including:**
- i. The manner of offering in generation and bidding and scheduling load into the Day-Ahead and Real Time Markets**

The information responsive to this component of the filing has been designated as HSPM.



- ii. ARR nominations**

The information responsive to this component of the filing has been designated as HSPM.



**iii. Other material aspects of any MISO-administered market interaction, if requested by the Advisors to the Council.**

The Companies are not aware of any further information requested by the Advisors to the Council.

**7. Any unexpected material costs or market impediments that ENO is encountering within MISO**

ENO has not encountered unexpected material market impediments since MISO integration. Starting February 1, 2016, ENO was billed monthly for JOA Settlement charges on a load ratio share basis, and ENO's share through January 31, 2017 was approximately \$149,000. MISO completed rebilling of MISO market participants, including ENO, in 2017, using the allocation method provided under the May 2, 2017 settlement (and the associated Schedule 49—Cost Allocation for Available System Capacity Usage), for the period that began February 1, 2016. ENO was rebilled an additional \$103,000 for the February 1, 2016 to January 31, 2017 period. MISO also passed through the adjustment that reflects MISO's higher capacity factor usage for the period February 1, 2016 to January 31, 2017. ENO was rebilled an additional \$106,000 for that adjustment. Finally, for the period February 2017 to January 2018, ENO was billed approximately \$405,000 pursuant to Schedule 49.

**8. A list identifying any existing, enhanced and/or supplemental records series to be incorporated under the Entergy System Records Management and Retention Policy necessary to facilitate retention of data required to support SPO operations in MISO on behalf of ENO**

No further record series have been added beyond those reported previously.

**c. MISO's Transmission Expansion Planning Process**

**1. Any proposed transmission projects by ENO and directives received by ENO from MISO to construct transmission**

The transmission projects planned and proposed by ENO are posted on the Company's OASIS page<sup>6</sup> and are generally updated on a monthly basis. The posted report includes the status of the projects in the MTEP process.

On December 7, 2017, the MISO Board of Directors approved two ENO transmission projects for MTEP17, Appendix A. Approval of the Hartburg-Sabine Junction 500 kV Market Efficiency Project was delayed pending a ruling from FERC on a filing to establish a new, separate Texas Cost Allocation Zone ("CAZ"). FERC approved the request for the Texas CAZ, effective January 30, 2018, and the MISO Board of Directors approved the Hartburg-Sabine Junction 500 kV Market Efficiency Project on February 2, 2018. The details of these projects are included in MISO's MTEP17 Report, Appendix D1-South.<sup>7</sup>

One MTEP18 Target Appendix A project was submitted by ENO to MISO on September 12, 2017, and reviewed at the December 11, 2017 MTEP17 South Subregional Planning Meeting. MISO's presentation on this project is posted with the meeting materials.<sup>8</sup>

**2. The status of developments within the MISO stakeholder process that could have a material effect on the allocation of MISO costs, including the cost of transmission investment included by MISO in its MTEP, to ENO.**

With respect to transmission cost allocation principles, no material changes have been adopted since the Entergy Operating Companies joined MISO. However, in response to several FERC filings, stakeholders have been engaged in discussions on several matters that could have a material effect on the allocation of MISO costs. There are several proceedings at FERC related to cost allocation in connection with MISO-PJM interregional planning:

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<sup>6</sup> [http://www.oasis.oati.com/EES/EESdocs/Construction\\_Plan.htm](http://www.oasis.oati.com/EES/EESdocs/Construction_Plan.htm)

<sup>7</sup> <https://www.misoenergy.org/planning/transmission-studies-and-reports/#nt=%2Freport-study-nalysistype%3AMTEP%2Fmtepdctype%3AMTEP%20Report%2Fmtepreportyear%3AMTEP17&t=10&p=0&s=&sd=>

<sup>8</sup> <https://cdn.misoenergy.org/20161208%20SSPM%20Item%2005b%20Reliability%20Projects%20LA124017.pdf>

- **MISO/PJM Order 1000 Compliance, Docket No. ER13-1943.** On April 5, 2016, FERC accepted the MISO-PJM Order No. 1000 interregional compliance proposal and denied rehearing of its earlier order in the proceeding. *PJM Interconnection, L.L.C.*, 149 FERC ¶ 61,250 (2014), *order on reh'g and compliance*, 155 FERC ¶ 61,008, *order on reh'g and compliance*, 157 FERC ¶ 61,065 (2016). MISO Transmission Owners sought appeal of those orders in the U.S. Court of Appeals for the D.C. Circuit, *MISO Transmission Owners v. FERC*, No. 16-1449. The court is holding the appeal in abeyance pending the D.C. Circuit's resolution of a related case, *Ameren Services Co., v. FERC*, No. 16-1150.
- **NIPSCO Complaint, Docket No. EL13-88.** As reported in the prior Post-MISO-Integration Monitoring Report, On September 11, 2013, Northern Indiana Public Service Company ("NIPSCO") filed a complaint at FERC regarding Interregional Planning between PJM and MISO that FERC granted in part on April 21, 2016. In that order, FERC required, among other things: (i) the allocation of costs of MISO-PJM market efficiency interregional projects based on the total benefits calculated for each RTO, using each RTO's method for calculating regional benefits; (ii) the removal from MISO's Tariff of the \$5 million MEP threshold; and (iii) lowering the 345 kV MEP threshold to 100 kV, as these thresholds apply to MISO-PJM interregional projects.

In response to a request for clarification, on January 19, 2017, FERC directed MISO to make a compliance filing to clarify whether the regional cost allocation that applies to MEPs also applies to the lower voltage threshold MISO-PJM interregional MEPs, and in particular, directed MISO to explain whether it is just and reasonable to regionally allocate such projects with voltage levels between 100 kV and 345 kV using a

20 percent postage stamp allocator. FERC granted an extension requested jointly by MISO and the MISO Transmission Owners, and MISO's compliance filing is now due on October 31, 2018. MISO is taking this matter through a stakeholder process in its Regional Expansion Criteria and Benefits Working Group.

- **Targeted Market Efficiency Projects: Docket Nos. ER17-718, ER17-721, and ER17-729.** In December 2016, MISO and PJM jointly filed proposed revisions to the MISO-PJM Joint Operating Agreement (“JOA”) to create a new interregional transmission project type that facilitates the development of low cost, high value transmission projects (“Targeted Market Efficiency Projects” or “TMEPs”) intended to reduce historical congestion on known Reciprocal Coordinated Flowgates along the MISO-PJM border. This initial filing was approved by FERC, but did not contain a regional cost allocation method. MISO had committed to making this filing no later than April 28, 2017, but no filing was made because there was not stakeholder consensus on the allocation methodology.

**3. Material changes, if any, proposed by MISO or MISO stakeholders to MISO's governance structure or allocation principles for the cost of transmission investment**

Please see ENO's response to number 5.c.2 above. In addition, MISO continues with the cost allocation and benefits discussions that commenced in late 2015 with the release of a draft Market Efficiency Project (“MEP”) issues paper on which stakeholder feedback was solicited, followed by an issues ranking exercise. This discussion has focused on lowering the voltage threshold of MEPs and considering additional benefit metrics for these projects. Granularity of benefits-based cost allocation is also a component of this effort. The development of a filing is targeted for the 4th quarter of 2018 for implementation following the expiration of the MISO South transition period which is anticipated at the conclusion of the MTEP18 study cycle.

At the February 15, 2018 meeting of the Regional Expansion Criteria Benefits Working Group (“RECB WG”), MISO presented its Cost Allocation proposal. The details of this proposal are included in the materials presented at that meeting.<sup>9</sup> MISO is working with stakeholders to evaluate (1) a construct for regional cost allocation of interregional economic projects on its seams with PJM and SPP down to 100kV; (2) criteria for changing Cost Allocation Zones, and (3) cost allocation for lower voltage economic projects (between 100 - 230kV).

**d. Interim Cost-Benefit Analysis**

Energy- and capacity-related savings resulting from the Company’s membership in MISO will be provided once the new framework for calculating those savings has been determined as discussed on page 2, above.

**1. Identification of any material changes to ENO’s generation portfolio, such as the retirement or addition of a long-term resource, and an estimate of the impact of that change (if any) on the savings identified in the Interim Cost-Benefit Analysis**

There were no material changes to ENO’s generation portfolio in 2017.

Respectfully Submitted:

By: 

Timothy S. Cragin, Bar No. 22313  
Brian L. Guillot, Bar No. 31579  
Harry M. Barton, Bar No. 29751  
639 Loyola Avenue, Mail Unit L-ENT-26E  
New Orleans, Louisiana 70113  
Telephone: (504) 576-6571  
Facsimile: (504) 576-5579

**ATTORNEYS FOR  
ENERGY NEW ORLEANS, LLC**

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<sup>9</sup> <https://cdn.misoenergy.org/20161208%20SSPM%20Item%2005b%20Reliability%20Projects%20LA124017.pdf>

## CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that a copy of the above and foregoing has been served on the persons listed below by facsimile, by hand delivery, by electronic mail, or by depositing a copy of same with the United States Postal Service, postage prepaid, addressed as follows:

Ms. Lora W. Johnson, CMC, LMMC  
Clerk of Council  
Council of the City of New Orleans  
City Hall - Room 1E09  
1300 Perdido Street  
New Orleans, LA 70112

W. Thomas Stratton, Jr., Director  
Connelly Reed  
City Council Utilities Regulatory Office  
City Hall - Room 6E07  
1300 Perdido Street  
New Orleans, LA 70112

Rebecca Dietz  
Bobbie Mason  
City Attorney Office  
Law Department  
City Hall – 5<sup>th</sup> Floor  
1300 Perdido Street  
New Orleans, LA 70112

Beverly Gariepy  
Department of Finance  
City Hall - Room 3E06  
1300 Perdido Street  
New Orleans, LA 70112

Hon. Jeffrey S. Gulin  
Hearing Officer  
3203 Bridle Ridge Lane  
Lutherville, MD 21093

Clinton A. Vince  
Presley R. Reed, Jr.  
Emma F. Hand  
Dentons US LLP  
1900 K Street, NW  
Washington, DC 20006

Basile J. Uddo  
J. A. "Jay" Beatmann, Jr.  
c/o Dentons US LLP  
650 Poydras Street  
Suite 2850  
New Orleans, LA 70130

Walter J. Wilkerson  
Kelley Bazile  
Wilkerson and Associates, PLC  
The Poydras Center, Suite 1913  
650 Poydras Street  
New Orleans, LA 70130

Philip J. Movish  
Joseph W. Rogers  
Victor M. Prep  
Legend Consulting Group Limited  
8055 East Tufts Avenue  
Suite 1250  
Denver, CO 80237-2835

Errol Smith  
Bruno and Tervalon  
4298 Elysian Fields Avenue  
New Orleans, LA 70122

Gary E. Huntley  
Vice President – Regulatory Affairs  
Entergy New Orleans, Inc.  
1600 Perdido Street  
Mail Unit L-MAG-505B  
New Orleans, LA 70112

Polly S. Rosemond  
Manager, Regulatory Affairs  
Entergy New Orleans, Inc.  
1600 Perdido Street  
Mail Unit L-MAG 505B  
New Orleans, LA 70112

Joseph Romano, III  
Suzanne M. Fontan  
Therese Perrault  
Entergy Services, Inc.  
639 Loyola Avenue  
Mail Unit L-ENT-4C  
New Orleans, LA 70113

Harold Marchand  
Sewerage and Water Board of New Orleans  
625 St. Joseph Street  
Room 201  
New Orleans, LA 70165

Mark Zimmerman  
Air Products and Chemicals, Inc.  
7201 Hamilton Boulevard  
Allentown, PA 18195-1501

Mr. Fred M. Muzurski, CEM, CDSM  
Senior Manager  
Entergy USG Corporation  
550 West Adams Street  
Chicago, IL 60661-3676

Seth Cureington  
Manager, Resource Planning  
Entergy New Orleans, Inc.  
1600 Perdido Street  
Mail Unit L-MAG 505B  
New Orleans, LA 70112

Timothy S. Cragin  
Brian L. Guillot  
Alyssa Maurice-Anderson  
Harry M. Barton  
Entergy Services, Inc.  
639 Loyola Avenue  
Mail Unit L-ENT-26E  
New Orleans, LA 70113

John H. Chavanne  
Chavanne Enterprises  
111 West Main Street  
Suite 2B  
New Roads, LA 70760-3509

Ernest L. Edwards, Jr.  
The Law Offices of Ernest L. Edwards, Jr., APLC  
300 Lake Marina Avenue  
Unit 5BE  
New Orleans, LA 70124

James R. Dauphinais  
Brubaker & Associates, Inc.  
16690 Swingley Ridge Road  
Suite 140  
Chesterfield, MO 63017

Rick Boyd  
The Folger Coffee Company  
14601 Old Gentilly Road  
New Orleans, LA 70129

Logan Atkinson Burke  
Forest Wright  
Sophie Zaken  
Alliance for Affordable Energy  
4505 S. Claiborne Avenue  
New Orleans, LA 70125

David L. Guerry  
Jamie Hurst Watts  
Long Law Firm, L.L.P.  
1800 City Farm Drive  
Building 6  
Baton Rouge, LA 70806

Walter C. Ferguson  
MISO Senior Corporate Counsel  
Two Lakeway  
3850 N. Causeway Boulevard  
Suite 442  
Metairie, LA 70002

Erin E. Cullum  
Southwest Power Pool, Inc.  
201 Worthen Drive  
Little Rock, AR 72223

Andrew B. Ezell  
Ezell Law Firm, LLC  
10761 Perkins Road  
Suite A  
Baton Rouge, LA 70810

Frederick H. Ritts  
F. Alvin Taylor  
Holland & Knight LLP  
800 17<sup>th</sup> Street N.W.  
Suite 1100  
Washington, DC 20006

New Orleans, Louisiana, this 11<sup>th</sup> day of May 2018.



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Harry M. Barton