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January 23, 2017

**Via U.S. Mail and/or Email**

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

Mr. Timothy S. Cragin  
Entergy Services, Inc.  
Legal Department  
Mail Unite L-ENT-26E  
639 Loyola Avenue  
New Orleans, LA 70161

RE: Application of Entergy New Orleans, Inc. for Approval to  
Construct New Orleans Power Station and Request for Cost  
Recovery and Timely Relief  
**Council Docket No. UD-16-02**

Dear Gary & Tim:

Please find enclosed the Advisors to the Council of the City of New Orleans' Fourth Set of Requests for Information directed to Entergy New Orleans, Inc. in the above referenced proceeding. For your convenience, we are including a copy of these requests in Word format.

With best regards, I remain

Sincerely,

**WILKERSON & ASSOCIATES, PLC**

  
Walter J. Wilkerson

WJW/krb

Enclosures

cc: Official Service List

**ADVISORS TO THE COUNCIL OF THE CITY  
OF NEW ORLEANS  
FOURTH SET OF REQUESTS FOR INFORMATION TO  
ENTERGY NEW ORLEANS, INC.**

**IN RE: APPLICATION OF ENTERGY NEW ORLEANS, INC. FOR APPROVAL TO  
CONSTRUCT NEW ORLEANS POWER STATION AND REQUEST FOR COST  
RECOVERY AND TIMELY RELIEF**

**UTILITY DOCKET NO. UD-16-02**

**Definitions**

1. “And” means and/or.
2. “Affiliates” has the meaning as defined in City Council Resolution R-01-676.
3. “Any” shall be understood to include and encompass “all.”
4. “Application” means the Application of Entergy New Orleans, Inc. for Approval to Construct New Orleans Power Station and Request for Cost Recovery and Timely Relief and any supplemental applications thereto.
5. “CNO” means City of New Orleans.
6. “Communications” means any verbal or written exchange of information between individuals, regardless of mode, and includes all verbal and written communications of every kind, including but not limited to, telephone calls, conferences, and correspondence, and all memoranda concerning the requested communications. Where a communication that is requested is not in writing, provide copies of all memoranda and Documents made relating to the requested communication and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and Documents provided.
7. “Company” means Entergy New Orleans, Inc.
8. Documents.
  - a. “Documents” or “Documentation” includes all writings and records of every type in your possession, control or custody, produced by any means, conveying visible and/or audible and/or electronic information, including, but not limited to: testimony and exhibits, memoranda, contracts, agreements, correspondence, emails, letters, reports (including drafts, preliminary, intermediate and final reports), statutes, ordinances,

resolutions, articles, textbooks, treatises, pleadings, briefs, data responses currently or previously under the custody, care and/or control of plaintiffs, plaintiffs' counsel and/or anyone acting on behalf of plaintiffs or plaintiffs' counsel, surveys, analyses, studies, summaries, comparisons, tabulations, charts, books, pamphlets, photographs, maps, bulletins, corporate or other minutes, notes, diaries, log sheets, ledgers, transcripts, microfilm, microfiche, computer data, computer files, computer tapes, computer inputs, computer outputs and printouts, vouchers, accounting statements, budgets, work papers, engineering diagrams (including "one-line" diagrams), mechanical and electrical recordings, telephone and telegraphic communications, speeches, and all other records, written, electrical, mechanical or otherwise and drafts of any of the above.

- b. "Documents" or "Documentation" includes copies of Documents, where the originals are not in your possession, custody, or control.
- c. "Documents" or "Documentation" includes every copy of Documents which contains handwritten or other notations or which otherwise does not duplicate the original or any other copy.
- d. "Documents" or "Documentation" also includes any attachments or appendices to any document.

9. "Each" shall be understood to include and encompass "every."

10. "EAI" means Entergy Arkansas, Inc.

11. "ELL" means Entergy Louisiana, LLC

12. "EMI" means Entergy Mississippi, Inc.

13. "ENO" means Entergy New Orleans, Inc.

14. "Entergy Operating Companies," or "EOC" means ENO, ELL, EAI, and EMI.

15. "Entergy" or "Entergy System" means Entergy Corporation (formerly Middle South Utilities), any affiliates or subsidiaries, any merged or consolidated predecessors in interest, past or present employees, officers, directors, agents, contractors, consultants, attorneys, and representatives, and any other person who has in the past or is now acting or purporting to act on its behalf.

16. "Enterprises" means Entergy Enterprises, Inc.

17. “EOI” means Entergy Operations Services, Inc.
18. “EPD” means Entergy Power Development Corp.
19. “EPI” means Entergy Power, Inc.
20. “ESI” means Entergy Services, Inc.
21. “Identify” or “Identifying” means:
  - a. With respect to a natural person, the person’s full name, present employer, title, job description, and professional or home address.
  - b. With respect to documents, the title (if any), nature, substance, date and source of origin on the document, all described with sufficient particularity to enable the document to be specified or recognized.
22. “Information” means any knowledge, fact, data, or intelligence whether contained in a Document or unrecorded.
23. “Interveners” means all parties who filed an intervention request with the Clerk of the Council, with a copy submitted to the Director of the Council Utilities Regulatory office, and whose interventions were subsequently granted.
24. “MCF” means thousands of cubic feet of natural gas.
25. “MISO” means Midcontinent Independent System Operator, Inc. or predecessor entities, its operations, its assets, its member organizations, its territory of operations, the territory of operations of its member organizations, Entergy operations within or under MISO authority, its marketplaces related to energy, its planning mechanisms, or other assets or operations related to MISO.
26. “MW” means megawatts.
27. “MWh” means megawatt hours.
28. “NOPS” means the New Orleans Power Station and all related plant as described in the Application.
29. “Or” means and/or.
30. “Parties” means ENO, CNO’s Advisors, and all parties to Docket No. UD-16-02.
31. “Person” includes any individual, corporation, business or governmental entity whatsoever, and every other type of entity or organization.

32. "Relating to" shall be understood to include pertaining to, referring to, having as its subject matter, constituting, supporting, analyzing, discussing, evaluating, or bearing upon, directly or indirectly the subject matter of the specific Request.
33. "Respondent" means ENO and any of its representatives including any other Entergy representative.
34. "SEC" means Securities and Exchange Commission.
35. "SERI" means System Energy Resources, Inc.
36. "SFI" means System Fuel, Inc.
37. "System Agreement" means the System Agreement revised January 16, 1992 among Arkansas Power & Light Company, Gulf States Utilities Company, Louisiana Power & Light Company, Mississippi Power & Light Company, New Orleans Public Service Inc., and Entergy Services, Inc., as most recently amended.
38. "Testimony" means any verbal or written declaration made under oath in connection with any regulatory, administrative or adjudicative proceeding or other judicial process or formal dispute resolution process (*e.g.* arbitration) for any purpose, including but not limited to depositions, hearings or trial.
39. "UPS" means the Union Power Station in Union County near El Dorado, Arkansas
40. "Publications" include, but are not limited to, articles, books, reviews, papers, presentations, studies, reports, analyses, or other documents released for publication.
41. "You" and "Your" means Entergy, ENO, any affiliates or subsidiaries, any merged or consolidated predecessors in interest, past or present employees, officers, directors, agents, contractors, consultants, attorneys, and representatives and any other person who has in the past or is now acting or purporting to act on its behalf.
42. As used herein, the singular shall include the plural and the plural shall include the singular.

## Instructions

1. Data Requests, interrogatories, and requests for production of documents or any other discovery requests (collectively “Requests” or individually “Request”) call for all information, including information contained in documents, which is known or available to the Respondents in this proceeding.
2. Where a Request has a number of separate parts or aspects, a complete response is required to each part or aspect. The response should separately address each part by its individual designation: “(CNO 4-1)(a),” “(CNO 4-1)(b),” etc. Any objection to a part or aspect of a Request should clearly indicate the part or aspect to which it is directed.
3. If a Request specifically seeks an answer in response that is not contained in the Document, an answer is required.
4. The person who prepares and is responsible for providing the response should be identified on the response.
5. If a Request can be answered in whole or in part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other response or part or aspect thereof which is responsive to the instant Request and by specifying whether the response to the other request is a full or partial response to the instant Request. If the response to the other Request constitutes a partial response, the balance of the instant Request must be answered.
6. If a Request cannot be answered in full after exercise of due diligence to secure the information requested, state the answer to the extent possible, state why the Request cannot be answered in full, and state what information or knowledge you have concerning the unanswered portions.
7. If, in answering any of these Requests, you feel that any Request or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using in responding to the Request.
8. If a document requested is unavailable, identify the document, describe in detail the reasons that the document is unavailable, state where the document can be obtained, and specify the number of pages it contains.
9. If no document is responsive to a Request which calls for a document, then so state. In some instances, the Request should be treated as an interrogatory.
10. All responses to the Requests are to be amended or supplemented if any person answering the requests obtains information upon the basis of which: (a) the party making the response knows that it was incorrect when made and (b) the party making the response knows that the response, though correct when made, is no longer true or is misleading.

11. All Requests are considered to be continuing in nature, and thereby require you to produce by supplemental responses any document within the scope of the Request that you obtain, acquire, or discover subsequent to your initial response to the Request.
12. If the data or Documents responsive to a Request exist, to any extent, in a native electronic form (e.g., Excel file), provide the original native electronic file as part of your response. To the extent data or Documents responsive to any part of a Request may be extracted, saved, prepared, or presented in a tabular electronic format (e.g., Excel or Access file), provide that part of the response in a tabular electronic file (e.g., Excel or Access file).

**ADVISORS TO THE COUNCIL OF THE CITY  
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FOURTH SET OF REQUESTS FOR INFORMATION TO  
ENTERGY NEW ORLEANS, INC.**

**IN RE: APPLICATION OF ENTERGY NEW ORLEANS, INC. FOR APPROVAL TO  
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**UTILITY DOCKET NO. UD-16-02**

CNO 4-1 Please refer to ENO’s response to Advisor’s 1-19d including the attached table, and the Direct Testimony of Charles W. Long, the answer to Q9 at page 7, which says “the exclusion of NOPS would likely involve new construction of multiple new transmission facilities into the greater New Orleans area...”, and further states “If NOPS is approved and constructed, such transmission projects to address these issues likely will be avoided.

a. Has ENO performed any studies showing that the transmission projects identified in ENO’s response to Advisors 1-19d that most likely would satisfy NERC Standard TPL-001-4 if NOPS is not constructed would completely address the reliability issues that would otherwise occur if such transmission projects were not constructed?

i. If the answer is in the affirmative, please provide copies of all such studies along with power flow and voltage plots covering the results of the 2019, 2022, and 2027 study years, assuming the occurrence of the specific NERC P2.3, P2.4, and P6 contingencies, as were performed and detailed in Entergy’s presentations titled “Results of the transmission analyses performed in support of the NOPS...”, dated November 2, 2016, which are marked “Contains Critical Energy Infrastructure Information” as was provided to the Advisors in this docket.

ii. If the answer is in the negative, please provide the reason(s) that these transmission studies in support of Mr. Long’s assertion were not performed.

CNO 4-2 Please refer to the Direct Testimony of Charles W. Long, the answer to Q12 at page 9, which says “A smaller resource would not completely address the reliability concerns. Virtually the entire 226 MW of capacity that is planned for NOPS is needed to completely mitigate the reliability



issues described above for the ten year planning horizon without additional mitigation measures being needed.”

- a. Has ENO performed any studies to determine the transmission upgrades and associated estimated capital costs that would be required to completely mitigate the reliability issues with the installation of a smaller CT, such as the 100 MW and 170 MW units modeled by ENO, assuming the occurrence of the specific NERC P2.3, P2.4, and P6 contingencies, as were performed and detailed in Entergy’s presentations titled “Results of the transmission analyses performed in support of the NOPS...”, dated November 2, 2016, which are marked “Contains Critical Energy Infrastructure Information” as was provided to the Advisors in this docket?
  - i. If the answer is in the affirmative, please provide copies of all such studies along with power flow and voltage plots covering the results of the 2019, 2022, and 2027 study years.
  - ii. If the answer is in the negative, please provide the reason(s) that these transmission studies in support of Mr. Long’s assertion were not performed.

CNO 4-3 Referring to ENO’s response to Advisor’s 1-15b, which says “The Company is in the process of developing an estimate to include black start capability.”

- a. Please provide a copy of the capital cost estimate for installation of black start capability for NOPS.

CNO 4-4 Has ENO performed any studies investigating the feasibility of black starting NOPS with power delivered from other generating resources in DSG?

- a. If the answer is in the affirmative, please provide copies of all such studies.

CNO 4-5 Has ENO performed any studies which have identified the specific feasible transmission paths for black starting NOPS with power delivered from other generating resources in DSG, assuming the occurrence of the specific NERC P6 contingency, which was modeled in the studies detailed in Entergy’s presentations titled “Results of the transmission analyses performed in support of the NOPS...”, dated November 2, 2016, which

are marked "Contains Critical Energy Infrastructure Information" as was provided to the Advisors in this docket?

- a. If the answer is in the affirmative, please provide copies of all such studies.
- b. If the answer is in the negative, please provide the reason(s) that these transmission studies were not performed.

CNO 4-6 In response to Advisors 1-15, ENO indicated that it was in the process of developing an estimate to include black start capability.

- a. Please provide a copy of the estimate and a narrative discussing the general design and scope of work associated with the estimate for black start capability.
- b. If ENO has not completed the estimate to include black start capability, please indicate when the Advisors can expect to receive the information requested in part "a" of this question.

Respectfully submitted,



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### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Third Set of Requests for Information has been served upon "The Official Service List" via electronic mail and/or U.S. Mail, postage properly affixed, this 23<sup>rd</sup> day of January, 2017.



Walter J. Wilkerson