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October 2, 2017

By Hand Delivery

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

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

Dear Ms. Johnson:

Entergy New Orleans, Inc. (“ENO”) hereby submits for your further handling and filing an original and three copies of ENO’s Objections to the Advisors’ Tenth Set of Requests for Information. Please file an original and two copies into the record in the above referenced matter, and return a date-stamped copy to our courier.

Should you have any questions regarding the above matter, please don’t hesitate to contact me. Thank you for your assistance with this matter.

Sincerely,


Brian L. Guillot

Enclosures

cc: Official Service List (*via electronic mail*)

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

**IN RE: APPLICATION OF ENTERGY)
NEW ORLEANS, INC. FOR APPROVAL)
TO CONSTRUCT NEW ORLEANS) DOCKET NO. UD-16-02
POWER STATION AND REQUEST FOR)
COST RECOVERY AND TIMELY)
RELIEF)**

**ENTERGY NEW ORLEANS, INC.’S OBJECTIONS
TO THE ADVISORS’ TENTH SET DISCOVERY REQUESTS**

Entergy New Orleans, Inc. (“ENO” or the “Company”) objects to the Advisors’ Tenth Set of Requests for Information to ENO (the “Requests”) propounded in the above-captioned proceeding, as follows:

I.

GENERAL OBJECTION AND RESERVATION OF RIGHTS

1. Although ENO has sought to identify all applicable objections, it may become apparent later that additional objections may be appropriate. ENO reserves its rights to make such objections.
2. ENO objects to the “Instructions” to the extent that they purport to impose obligations for responding to the Requests beyond those established by the Louisiana Code of Civil Procedure, the City of New Orleans Home Rule Charter, the City Code, and/or Council Resolution No. R-16-104.
3. ENO objects to the Requests to the extent that they exceed thirty-five in number, including subparts, without leave of the Council, in violation of La. Code Civ. P. art. 1457(A).

II.

SPECIFIC OBJECTIONS

At this time, the Company has identified the following Specific Objections:

Request CNO 10-6:

Please refer to the DNV GL Energy presentation titled “Independent Assessment – NOPS Steady State Study” delivered at the September 13, 2017 UCTTC meeting.

- a. Please provide copies of the results of each loadflow case performed in support of the referenced presentation, similar in form to the loadflow results provided by ENO in response to the Advisors’ DR CNO 9-9 in Council Docket No. UD-16-02, including loadflow flow diagrams and voltage degradation diagrams.
- b. Were the loadflow studies supporting the referenced presentation independently performed by DNV GL, or do such studies reflect DNV GL’s independent assessment of the loadflow studies performed by ENO in support of its Supplemental and Amending Application filed by ENO in Council Docket No. UD-16-02?
- c. At approximately 1h:16m into the video record of the referenced UCTTC meeting, Dr. Tabrizi, indicates that the DNV GL study was based on unmodified ENO data. Please confirm that DNV GL’s NOPS Steady State Study reflects the same modeling assumptions and system topology as ENO’s studies performed in support of its Supplemental and Amending Application filed in Docket No. UD-16-02.
- i. If the answer is in the negative, please provide detail on all differences in modeling assumptions and system topology in comparison to the modeling assumptions and system topology reflected in ENO’s studies performed in support of its Supplemental and Amending Application filed in Docket No. UD-16-02.
- d. Please provide the results of DNV-GL’s Steady State loadflow study reflecting the installation of the RICE units at Michoud for the 2019 study year.

Objection:

ENO objects to this Request on the basis that it is unduly burdensome and seeks information not reasonably calculated to lead to discovery of admissible evidence in this proceeding. The request also seeks information, analyses and/or calculations that ENO has not

performed and/or does not maintain in its care custody or control. Dr. Tabrizi's presentation was conducted by his company and presented to the Council for informational purposes only, as noted by the Council at the September UCTTC meeting. ENO will work with the Council's Advisors regarding this request.

Request CNO 10-7:

Please refer to the DNV GL Energy presentation titled "Independent Assessment – NOPS Steady State Study" delivered at the September 13, 2017 UCTTC meeting, slide 6, which says, "Energy has engaged DNV GL to perform an Independent Assessment to verify and confirm the results associated with the study performed by ENO", identifies the tasks of "verify and validate" certain ENO observations and proposals, and at slide 7 says, "Studies were performed using the data & models provided by ENO".

- a. Please identify and describe each conclusion, recommendation, or observation in the referenced study performed by ENO with which DNV GL does not agree or concur.
- b. Please identify and describe each conclusion, recommendation, or observation in the referenced study performed by ENO which DNV GL was unable to validate.

Objection:

ENO objects to this Request on the basis that it is unduly burdensome and seeks information not reasonably calculated to lead to discovery of admissible evidence in this proceeding. The request also seeks information, analyses and/or calculations that ENO has not performed and/or does not maintain in its care custody or control. Dr. Tabrizi's presentation was conducted by his company and presented to the Council for informational purposes only, as noted by the Council at the September UCTTC meeting. ENO will work with the Council's Advisors regarding this request.

Request CNO 10-8:

Please refer to the DNV GL Energy presentation titled “Independent Assessment – NOPS Steady State Study” delivered at the September 13, 2017 UCTTC meeting, where at approximately 1h:22m into the video record of the referenced UCTTC meeting, Dr. Tabrizi claims that local generation provides for operational flexibility.

- a. Please provide copies of all documents related to Dr. Tabrizi’s evaluation of ENO’s operational flexibility relative to local generation additions.
- b. Please provide copies of all documents related to DNV GL’s evaluation of ENO’s operational flexibility relative to local generation additions.

Objection:

ENO objects to this Request on the basis that it is unduly burdensome and seeks information not reasonably calculated to lead to discovery of admissible evidence in this proceeding. The request also seeks information, analyses and/or calculations that ENO has not performed and/or does not maintain in its care custody or control. Dr. Tabrizi’s presentation was conducted by his company and presented to the Council for informational purposes only, as noted by the Council at the September UCTTC meeting. ENO will work with the Council’s Advisors regarding this request.

Request CNO 10-9:

Please refer to the DNV GL Energy presentation titled “Independent Assessment – NOPS Steady State Study” delivered at the September 13, 2017 UCTTC meeting at slide 8, which says “Local generation helps to prevent/delay the long-term congestion, hence better rates for consumers.”

- a. Please provide copies of all documents, studies, or workpapers supportive of the referenced statement specific to ENO’s circumstances.

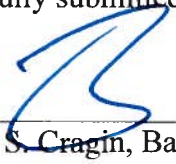
- b. Please provide copies of all forecasts of congestion as a component of the ENO's LMP both with and without local generation as contemplated in the referenced statement.
- c. Please provide copies of all studies related to potential or expected ratepayer savings due to reduced congestion as a result of constructing local generation as contemplated in the referenced statement.

Objection:

ENO objects to this Request on the basis that it is unduly burdensome and seeks information not reasonably calculated to lead to discovery of admissible evidence in this proceeding. The request also seeks information, analyses and/or calculations that ENO has not performed and/or does not maintain in its care custody or control. Dr. Tabrizi's presentation was conducted by his company and presented to the Council for informational purposes only, as noted by the Council at the September UCTTC meeting. ENO will work with the Council's Advisors regarding this request.

Respectfully submitted:

BY:



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**ATTORNEYS FOR ENTERGY
NEW ORLEANS, INC.**

CERTIFICATE OF SERVICE
CNO Docket No. UD-16-02

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:

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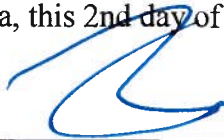
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New Orleans, Louisiana, this 2nd day of October, 2017.



Brian L. Guillot