



4. With respect to documents or information that may be protected by the attorney-client privilege and/or the attorney work product doctrine, if any, that may be responsive to one or more of the Requests, the Advisors object to providing such material and reserve their right to make such objections as they deem necessary to protect such documents or information from disclosure.

5. The provision of a response by the Advisors to a Request should not be construed as a waiver of any claim that the Advisors may have regarding the admissibility of the response in this proceeding or other proceedings, or a waiver of any substantive rights that the Advisors may have.

## II.

### RESPONSES

Subject to the foregoing General Objections, the Advisors submit the following responses:

#### **AAE 1-1:**

Refer to Mr. Movish's direct testimony at page 8, lines 10-11, where he states that "major storm events ... historically have resulted in significant transmission disruptions." Have "major storm events" resulted in significant local generation disruptions in ENO's service territory?

- a. If yes, please describe the event including:
  - i. Date of event;
  - ii. Specific generator effected; and
  - iii. Length of disruption.

#### **RESPONSE TO AAE 1-1:**

Mr. Movish has no information responsive to this request.

**AAE 1-2:**

Refer to Mr. Movish’s direct testimony starting at page 9, lines 13-16. Please confirm that ENO has not demonstrated that NOPS (under either proposed alternative) could provide power to the Sewage & Water Board of New Orleans’ Carrollton pumping plant.

**RESPONSE TO AAE 1-2:**

Though this was a correct statement as of the filing date of Mr. Movish’s direct testimony, Mr. Movish currently disagrees with/does not confirm this assertion. Review of ENO witness Charles Long’s rebuttal testimony filed on November 16, 2017 at pages 44 – 45 indicates that on a preliminary basis ENO has identified a suitable cranking path from Michoud to power the Sewerage & Water Board of New Orleans’ (“S&WB”) Carrollton pumping plant. Mr. Long’s rebuttal testimony further states that the results of its steady-state analysis indicated no-over-voltages, and that the proposed RICE units would have more than sufficient generating capacity to serve the entire S&WB’s Carrollton load. Mr. Long also testifies that ENO’s stability analysis determined that the RICE units would be able to successfully start the S&WB’s largest motor. Mr. Long’s testimony notes that more detailed analysis would be required to “ensure that no additional steps may be needed to implement such a plan”

**AAE 1-3:**

Is it Mr. Movish’s understanding that ENO currently is violating the NERC TPL-001-4 Standard? Please explain including when the violation, if any, first occurred.

**RESPONSE TO AAE 1-3:**

No.

**AAE 1-4:**

Refer to Mr. Movish’s direct testimony at page 13, lines 13-15. Please state the probability (in quantifiable terms) of a NERC Category P2.3 contingency occurring in ENO’s service territory in:

- b. 2019
- c. 2022
- d. 2024
- e. 2027.

**RESPONSE TO AAE 1-4:**

Mr. Movish has no information responsive to this request. However, in Mr. Movish's professional experience the occurrence of a NERC P2.3 contingency is not uncommon.

**AAE 1-5:**

Refer to Mr. Movish's direct testimony at page 13, lines 13-15. Please state the probability (in quantifiable terms) of a NERC Category P6 contingency occurring in ENO's service territory in:

- f. 2019
- g. 2022
- h. 2024
- i. 2027

**RESPONSE TO AAE 1-5:**

Mr. Movish has no information responsive to this request. However, in Mr. Movish's experience the occurrence of a NERC P6 contingency is a low probability event. However, the impact of such a contingency on ENO's system would be significant.

**AAE 1-6:**

Refer to Mr. Movish's direct testimony at page 15, line 7 through page 16, line 19, where Mr. Movish discusses ENO's inconsistent DSM and solar input assumptions and the result that ENO's transmission reliability analysis reflects a load condition that inaccurately increases the stress on ENO's transmission lines in the event of a transmission contingency. Please explain how, if at all, the inaccurate increase in stress on ENO's transmission lines impacts the probability of a transmission reliability violation.

**RESPONSE TO AAE 1-6:**

Mr. Movish's referenced testimony relates to increases in transmission line loading greater than those which would occur with the use of correct input assumptions, and the potential increase in impacts to the transmission system in the event of the occurrence of a contingency. Generally, the higher the loading the greater the potential for equipment failure.

**AAE 1-7:**

Refer to Mr. Movish's direct testimony at page 24, lines 17-20. Would an event that triggers a P6 contingency also impact the performance of generation?

**RESPONSE TO AAE 1-7:**

The event that triggers a P6 contingency would not impact the physical performance of generation. However, the cascading transmission line outages stemming from the P6 contingency, would likely reduce the amount of load that could be served by local generation.

**AAE 1-8:**

Refer to Mr. Movish's direct testimony at page 8, lines 19-20, through page 9, lines 1-2. Please provide the analyses and any work papers that resulted in the "belief" that a cranking path potentially exists for local generation located at the Michoud site to potentially provide power to the Sewage & Water Board pumping station.

**RESPONSE TO AAE 1-8:**

Mr. Movish reviewed the CEII attachments to ENO's response to AAE 8-6 to identify a potential cranking path. He has no workpapers responsive to this request.

**AAE 1-9:**

Refer to Mr. Movish's direct testimony at page 10, lines 7-8. What is the basis for the conclusion that Mr. Movish "fully expects" the gas plant alternative to be designed as voltage and local reliability units.

**RESPONSE TO AAE 1-9:**

Given that historically ENO's Michoud plant was designated by Entergy as a "Reliability Must Run" unit operated to support the reliability of the DSG load pocket, and MISO's designation of the Michoud plant as a "Voltage and Local Reliability" ("VLR") unit upon ENO joining MISO in December 2013 to be operated similarly, it is reasonable to expect that new local generation in ENO's system would receive a VLR designation.

**AAE 1-10:**

Refer to Mr. Vumbaco's testimony at page 8, lines 7 through 12 (Conclusion No. 7). Please describe the amount of renewable generation and DSM that is recommended for incorporation in ENO's service territory in this conclusion.

**RESPONSE TO AAE 1-10:**

Mr. Vumbaco made no such recommendation.

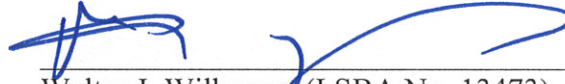
**AAE 1-11:**

Please provide a copy of the Advisors' September 19, 2016, request that ENO perform additional Integrated Resource Planning modeling which is referred to in City Council Resolution R-16-506 at page 8.

**RESPONSE TO AAE 1-11:**

See attached Advisors' correspondence of Monday, September 19, 2016.

Respectfully submitted:



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*Advisors to the City Council of New Orleans*

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

I hereby certify that a copy of the foregoing Objections and Responses of the Advisors to the Alliance for Affordable Energy's First 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 7<sup>th</sup> day of December 2017.



Walter J. Wilkerson

**Hand, Emma F.**

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**From:** Hand, Emma F.  
**Sent:** Monday, September 19, 2016 7:19 PM  
**To:** 'Wcbhurst@aol.com'; Vince, Clinton A.  
**Subject:** RE: Model  
**Attachments:** Alternate Runs to Inform Council on Pending and Upcoming Decisions.pdf

Billy,

Attached per our conversation a little over a week ago is the request from Legend for the alternate model. We are seeking four alternate runs -- one updated baseline and three alternate cases we believe would be informative to the Council.

Best,  
Emma



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Alternate Runs to Inform Council on Pending and Upcoming Decisions			
Case No. 1	Case No. 2	Case No. 3	Case No. 4
Informs Council Decision on CT	Informs Council on Energy Smart Target	Informs Council Decision on AMI	
Load Forecast Consistent with Business Plan 16 Update (BP16-U) and consistent with NOPS Application (include Algiers)	Load Forecast Consistent with Business Plan 16 Update (BP16-U) and consistent with NOPS Application (include Algiers)	Load Forecast Consistent with Business Plan 16 Update (BP16-U) and consistent with NOPS Application (include Algiers)	Load Forecast Consistent with Business Plan 16 Update (BP16-U) and consistent with NOPS Application (include Algiers)
BP16-U Forecast Natural Gas Price Forecast or BP16-U Forecast (All Stakeholders to Confirm if Appropriate)	BP16-U Forecast Natural Gas Price Forecast or BP16-U Forecast (All Stakeholders to Confirm if Appropriate)	BP16-U Forecast Natural Gas Price Forecast or BP16-U Forecast (All Stakeholders to Confirm if Appropriate)	BP16-U Forecast Natural Gas Price Forecast or BP16-U Forecast (All Stakeholders to Confirm if Appropriate)
Use Synapse Energy Economics 2016 CO2 Mid Case Price Forecast (\$20/ton in 2022, \$41/ton in 2035)	Use Synapse Energy Economics 2016 CO2 Mid Case Price Forecast (\$20/ton in 2022, \$41/ton in 2035)	Use Synapse Energy Economics 2016 CO2 Mid Case Price Forecast (\$20/ton in 2022, \$41/ton in 2035)	Use Synapse Energy Economics 2016 CO2 Mid Case Price Forecast (\$20/ton in 2022, \$41/ton in 2035)
Proposed NOPS CT	Proposed NOPS CT	Proposed NOPS CT	Proposed NOPS CT
Include 100 MW of Renewable Capacity (Solar)	No NOPS CT but necessary transmission solutions ensure compliance with NERC Standard TPL-001-4 Include 100 MW of Renewable Capacity (Solar)	Include 100 MW of Renewable Capacity (Solar)	Include 100 MW of Renewable Capacity (Solar)
Incorporation in run of implementing programs to increase Energy Smart Program Savings by 0.2 % per year until such time as program generates savings at a rate equal to 2% of annual kWh sales (R-15-599)	Incorporation in run of implementing programs to increase Energy Smart Program Savings by 0.2 % per year until such time as program generates savings at a rate equal to 2% of annual kWh sales (R-15-599)	Incorporation in run of implementing programs to increase Energy Smart Program Savings by 0.2 % per year until such time as program generates savings at a rate equal to 2% of annual kWh sales (R-15-599)	Incorporation in run of implementing programs to increase Energy Smart Program Savings by 0.2 % per year until such time as program generates savings at a rate equal to 2% of annual kWh sales (R-15-599)
Include Direct Load Control and Non-Enabled Dynamic Pricing Measures from Stakeholder Input Case	Include Direct Load Control and Non-Enabled Dynamic Pricing Measures from Stakeholder Input Case	Include Direct Load Control and Non-Enabled Dynamic Pricing Measures from Stakeholder Input Case	Include planned rollout of AMI and Expand/implement associated Load Control measures now capable with AMI
Include Planned and Recent Completed Transmission Upgrades	Include Planned and Recent Completed Transmission Upgrades	Include Planned and Recent Completed Transmission Upgrades	Include Planned and Recent Completed Transmission Upgrades
Include Effects of Planned new Generating Resources including the proposed St Charles Power Station	Include Effects of Planned new Generating Resources including the proposed St Charles Power Station	Include Effects of Planned new Generating Resources including the proposed St Charles Power Station	Include Effects of Planned new Generating Resources including the proposed St Charles Power Station
Incorporate Termination of the Entergy System Agreement	Incorporate Termination of the Entergy System Agreement	Incorporate Termination of the Entergy System Agreement	Incorporate Termination of the Entergy System Agreement
Unless otherwise identified, Use IRP Stakeholder Input Case Parameters	Unless otherwise identified, Use IRP Stakeholder Input Case Parameters	Unless otherwise identified, Use IRP Stakeholder Input Case Parameters	Unless otherwise identified, Use IRP Stakeholder Input Case Parameters
Perform runs through 2035, Provide Load and Capability tables by year, Provide annual results as well as NPV comparison, Provide Ratepayer Impact	Perform runs through 2035, Provide Load and Capability tables by year, Provide annual results as well as NPV comparison, Provide Ratepayer Impact	Perform runs through 2035, Provide Load and Capability tables by year, Provide annual results as well as NPV comparison, Provide Ratepayer Impact	Perform runs through 2035, Provide Load and Capability tables by year, Provide annual results as well as NPV comparison, Provide Ratepayer Impact
Identify any likely PPA or CHP resources and include as appropriate and agreed by the stakeholders	Identify any likely PPA or CHP resources and include as appropriate and agreed by the stakeholders	Identify any likely PPA or CHP resources and include as appropriate and agreed by the stakeholders	Identify any likely PPA or CHP resources and include as appropriate and agreed by the stakeholders
Include, as appropriate, battery storage alternatives as the technology matures and becomes cost effective during the 20 year run	Include, as appropriate, battery storage alternatives as the technology matures and becomes cost effective during the 20 year run	Include, as appropriate, battery storage alternatives as the technology matures and becomes cost effective during the 20 year run	Include, as appropriate, battery storage alternatives as the technology matures and becomes cost effective during the 20 year run