



October 16, 2020

**Via Electronic Mail**

Ms. Lora W. Johnson, CMC, LMMC  
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Council of the City of New Orleans  
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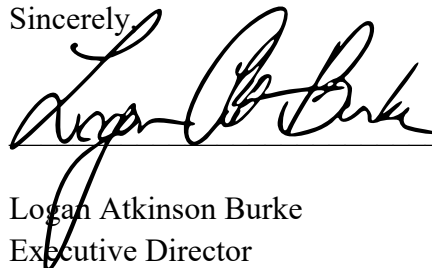
**In Re: RESOLUTION AND ORDER ESTABLISHING A DOCKET TO  
STREAMLINE ENERGY NEW ORLEANS REPORTING REQUIREMENTS TO THE  
NEW ORLEANS CITY COUNCIL AND ACCOMPANYING  
PROCEDURAL SCHEDULE**

Dear Ms. Johnson:

Please find enclosed Alliance for Affordable Energy's Motion to File Comments Out of Time, and Reply Comments in the above-mentioned docket. Please file the attached communication and this letter in the record of the proceeding. As a result of the remote operations of the Council's office related to COVID-19, the Alliance submits this letter electronically and will submit the requisite original and number of hard copies once the Council resumes normal operations, or as you direct. The Alliance requests that you file this submission in accordance with Council regulations as modified for the present circumstances. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention,

Sincerely,

A handwritten signature in black ink, reading "Logan Atkinson Burke". The signature is written in a cursive style and is positioned above a horizontal line.

Logan Atkinson Burke  
Executive Director  
Alliance for Affordable Energy  
Energy Future New Orleans

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

**RESOLUTION AND ORDER  
ESTABLISHING A DOCKET TO  
STREAMLINE ENTERGY NEW  
ORLEANS REPORTING  
REQUIREMENTS TO THE  
NEW ORLEANS CITY COUNCIL  
AND ACCOMPANYING  
PROCEDURAL SCHEDULE**

**Docket No. UD-20-01**

**ALLIANCE FOR AFFORDABLE ENERGY’S MOTION TO RESPOND OUT OF TIME AND  
REPLY COMMENTS REGARDING STREAMLINING OF REPORTING REQUIREMENTS  
TO THE CITY OF NEW ORLEANS**

The Alliance for Affordable Energy respectfully requests leave to respond out of time to the first round of comments related to streamlining reporting. The Alliance is an intervenor in this docket, however due to electronic-mail difficulties, our reply comments, intended to be filed Wednesday October 14, 2020, failed to be delivered to the service list.

**Introduction**

Pursuant to Resolution R-20-223, the Alliance for Affordable Energy (“AAE”) submits these comments in response to the filed comments made by Entergy New Orleans LLC (“ENO”), the Utility Advisors to the City Council of New Orleans, (“Advisors”), and the Crescent City Power Users Group (“CCPUG”) in this docket.

The Alliance is largely supportive of the comments previously filed by CCPUG on September 14, 2020. We agree that filing and reporting is a cost of doing business for ENO, and because many of the reports are already requirements of other agencies or regulatory bodies, the additional filing of these reports with the Council for additional oversight and transparency should not be considered a burden. We don’t disagree that streamlining, for example combining some reports like Community Solar and Net Metering reports into a single Distributed Resources report as suggested by the Advisors, may provide both an administrative benefit and a more cohesive picture of the energy landscape in New

Orleans, AAE’s view is similar to CCPUG: “most of the filing and reporting requirements should be maintained”<sup>1</sup> and the AAE supports the matrix provided by CCPUG. There are a few specific reporting requirements that should be preserved, however, to ensure the continued transparency that is enabled by these reports. Keeping in mind that these reports are not only about the regulatory oversight of ENO, but also, as a matter of public record, are valuable windows into the operations of the utility that serves the people of New Orleans.

**Specific Reporting Concerns:**

*Monthly Progress Report on ENO’s Collaboration with the Sewerage and Water Board of New Orleans to Improve Reliability of Electric Service to Improve Reliability of Electric Service. - R-19-78.*

The Alliance disagrees with the Advisors that the monthly progress report on discussions regarding power service to Sewerage and Water Board is now made less unnecessary by the fact of a “working group” that has been formed to facilitate collaboration. In fact, that there are on-going discussions which will impact ratepayers of both Entergy New Orleans and Sewerage and Waterboard and city tax payers makes publicly available records all the more important. Whether these reports remain as they are, or transition into something that can provide, as the Advisors describe in their comments, “significantly more and superior insight”<sup>2</sup> the public deserves this insight into these decisions. While the Alliance has advocated that Sewerage and Water Board planning should be made a more integral party to the Integrated Resource Planning process, especially if, the bulk of their generation is transitioned to Entergy through a new substation. This would be a significant change and any non-sensitive details should be publicly available.

Entergy has suggested that these reports should be reduced to quarterly filings due 45 days after the end of the quarter<sup>3</sup>. This is not timely enough information for the public to understand the changes happening between the two utilities on multi-million dollar and multi-decade decisions. On the other

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<sup>1</sup> September 14, 2020, Crescent City Power Users’ Group’s Initial Comments, Docket UD-20-01. Pg.2

<sup>2</sup> September 14, 2020, Advisors Comments, p 13.

<sup>3</sup> September 14, 2020, Entergy New Orleans, LLC’s Comments Regarding Streamlining its Reporting Requirements to the Council of the City of New Orleans p. 9 of 15

hand, AAE agrees with Entergy that these monthly reports could have a reasonable sunset date, which could occur after current discussions about any changes to existing service are complete.

*Energy Smart Quarterly Reports* – R-11-52, R-15-15, R-15-140, R-15-599

AAE agrees with the Advisors that Energy Smart’s quarterly reports may be reduced to bi-annually, with the caveat, that the Council reserves the right to request additional information in the interim on the progress of pilot programs.


*Bi-Monthly Report on Customer Outages*. R-17-427

AAE agrees that (timely) quarterly reporting on customer outages would still provide appropriate information as to ENO’s progress in improving customer outage rates. AAE also agrees that SAIDI and SAIFI reporting may be consolidated with customer outage reporting.

**Conclusion:**

The Alliance appreciates the opportunity to provide these reply comments in an effort to minimize administrative costs, while keeping in mind the importance of transparency in the regulation of such an important utility.

Respectfully Submitted,

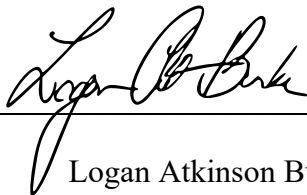


Logan Atkinson Burke  
Alliance for Affordable Energy

**RESOLUTION AND ORDER ESTABLISHING A DOCKET TO STREAMLINE  
ENERGY NEW ORLEANS REPORTING REQUIREMENTS TO THE  
NEW ORLEANS CITY COUNCIL AND ACCOMPANYING  
PROCEDURAL SCHEDULE**

**DOCKET NO. UD-20-01**

I hereby certify that I have on this 16th day of October, 2020 served the required number of copies of the foregoing correspondence upon all other known parties of this proceeding, by USPS or electronic mail.



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Logan Atkinson Burke  
Alliance for Affordable Energy

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