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**Timothy S. Cragin**Assistant General Counsel
Legal Services - Regulatory

December 3, 2020

Via Electronic Delivery

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

Re: Resolution Establishing a Docket to Streamline Entergy New Orleans Reporting Requirements to the New Orleans City Council CNO Docket No. UD-20-01

Dear Ms. Johnson:

Please find enclosed for your further handling Entergy New Orleans, LLC's Comments in Response to the Council Utilities Regulatory Office's Streamlining Docket Recommendations, which are being submitted for filing in the above-referenced docket. As a result of the remote operations of the Council's office related to COVID-19, ENO submits this filing electronically and will submit the requisite original and number of hard copies once the Council resumes normal operations, or as you direct. ENO requests that you file this submission in accordance with Council regulations as modified for the present circumstances.

Thank you for your assistance with this matter.

Sincerely,

Timothy S. Cragin

TSC\rdm

**Enclosures** 

cc: Official Service List (UD-20-01 via electronic mail)

#### **BEFORE THE**

### COUNCIL OF THE CITY OF NEW ORLEANS

RESOLUTION ESTABLISHING A DOCKET	)	
TO STREAMLINE ENTERGY NEW	)	DOCKET NO. UD-20-01
ORLEANS REPORTING REQUIREMENTS	)	
TO THE NEW ORLEANS CITY COUNCIL	)	

# ENTERGY NEW ORLEANS, LLC'S COMMENTS IN RESPONSE TO THE COUNCIL UTILITIES REGULATORY OFFICE'S STREAMLINING DOCKET RECOMMENDATIONS

Entergy New Orleans, LLC ("ENO" or the "Company") respectfully submits these very brief Comments in response to the Council Utilities Regulatory Office ("CURO") Recommendation Memorandum ("Memorandum") filed with the Council of the City of New Orleans (the "Council") in the above-captioned docket on November 18, 2020.

ENO is generally in agreement with the recommendations contained in the CURO Memorandum. With regard to a few of the reporting requirements, however, ENO asks for additional consideration and/or clarification by CURO and the Council with regard to the requirements. The specific reporting requirements for which ENO seeks additional consideration and/or clarification are set forth below:

1. In the matrix that ENO submitted with its Original and Reply Comments, item number 10, NOPS Quarterly Reports, and item number 20, Quarterly NOPS O&M Expenditures, appear, at first glance, to be similar in nature. Item 10, the NOPS Quarterly Reports have been submitted during NOPS construction and have focused on capital expenditures associated with the construction of NOPS and the progress of those construction efforts. ENO seeks to confirm that it can discontinue this report upon completion of the final closeout projects at the end of this year (just as it has suggested and CURO has recommended that it can discontinue the NOPS Bi-Monthly Reports relating to construction expenditures). Assuming Council approval of the CURO

recommendation with regard to item 20, ENO would then file a Semi-Annual Report on August 15<sup>th</sup> and February 15<sup>th</sup> summarizing NOPS year-to-date O&M expenditures through June 30<sup>th</sup> and December 31<sup>st</sup>, respectively.

- 2. With regard to matrix item number 35, Monthly Reports on Collaboration with the Sewerage and Water Board of New Orleans ("SWBNO"), ENO requests CURO and the Council's consideration that these reports be allowed to be communicated orally, at least monthly, via a conference call with ENO, SWBNO, the Council Advisors, CURO, and any other Council representatives that desire to be included, with a written summary of the reports submitted to the Council on a quarterly basis.
- 3. With regard to matrix item number 55, the Bi-Monthly Reliability Plan Progress Report, ENO re-urges its request to make this a quarterly report and to combine the report with the quarterly customer outages reliability report. No party objected to ENO's recommendation related to the frequency change or to combining these reports and ENO believes that it advances the Council's desire to streamline reporting requirements by reducing what would be 10 separate reports to 4 reports.

Finally, ENO re-urges its agreement with the Advisors' recommendation that the Council consider whether permitting greater use of electronic filing and service of reports might also help streamline reporting requirements. ENO believes comprehensive electronic filing protocols would promote administrative efficiency, and the Company is eager to work with the Council and its Advisors to develop such protocols should the Council determine that the development of an electronic filing system is a worthwhile endeavor. ENO believes that the electronic filing arrangements that were implemented due to the COVID-19 pandemic have worked well and have likely saved quite a few trees in the process.

### Respectfully submitted:

Y: Juno

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ATTORNEYS FOR ENTERGY NEW ORLEANS, LLC

## CERTIFICATE OF SERVICE <u>Docket No. UD-20-01</u>

I hereby certify that I have served the required number of copies of the foregoing report upon all other known parties of this proceeding, by the following: electronic mail, facsimile, overnight mail, hand delivery, and/or United States Postal Service, postage prepaid.

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New Orleans, Louisiana, this 3<sup>rd</sup> day of December, 2020.

Timothy S. Gragin