

February 25, 2022

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

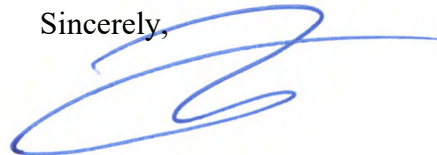
**Re: IN RE: SYSTEM RESILIENCY AND STORM HARDENING
Council Docket No. UD-21-03**

Dear Ms. Johnson:

Entergy New Orleans, LLC (“ENO”) respectfully submits its Reply Memorandum in Support of Amended Motion. 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 original and requisite 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.

If you have any questions or concerns about this request, please contact me at your convenience.

Sincerely,



Brian L. Guillot

BLG/kll

cc: Official Service List by Electronic Mail

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

**IN RE: SYSTEM RESILIENCY AND
STORM HARDENING**

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DOCKET NO. UD-21-03

ENTERGY NEW ORLEANS, LLC'S REPLY
MEMORANDUM IN SUPPORT OF AMENDED MOTION

Entergy New Orleans, LLC (“ENO” or the “Company”) respectfully submits this Reply Memorandum in Support of Amended Motion to extend the March 1, 2022 deadline contained in Resolution R-21-40. As stated in the Amended Motion, ENO has consulted with its experts and determined that a filing by July 1, 2022 is the earliest deadline that the submission of a plan consistent with Resolution R-21-40 can be achieved, but also cautions that supplemental analysis in the weeks or months that follow may be necessary. The Company also has committed to participate in two technical conferences (April 2022 and June 2022).

On February 18, 2022, Hearing Officer Gulin issued an Order requiring oppositions to be filed by February 23, 2022. Myron Katz, of ProRate Energy, Inc., was the only party to timely file an opposition to the Amended Motion, which opposition largely focuses on (1) predicting the contents of ENO’s future filing, (2) offering a preview of ProRate’s Storm Hardening and Resiliency Plan and arguing for its superiority, and (3) seeking to extract an agreement to bifurcate the consideration of certain potential solutions from the current docket in exchange for ProRate agreeing not to oppose the Amended Motion. What is clear, however, is that the Opposition offers no legal or factual basis for the objection to the Company’s legitimate and reasonable request for an extension.

While there is no way for Mr. Katz to know the contents of ENO's filing before it is made, and vice-versa, the Company reiterates that it intends to file a plan that is consistent with the requirements of Resolution R-21-401. The point of the Company's Amended Motion is that more time is reasonably needed to do so. Moreover, while Mr. Katz's request to bifurcate goes far beyond the scope of Resolution R-21-401 and seeks to create a new substantive docket, the Company notes that the language in Resolution R-21-401 does provide a sufficient path to address his stated desire to file ProRate's plan "as soon as possible" (Opposition at 6). Specifically, Resolution R-21-401 states as follows:

6. Parties are directed to submit to the Council a system resiliency and storm hardening plan **no later than** March 1, 2022. Such plans should include:
 - a. A detailed explanation of the specific investments to be made under the plans including a proposed timeframe for such investments;
 - b. A detailed explanation and, as appropriate, calculations of the benefits to be achieved through each investment, and
 - c. A detailed explanation of the estimated costs of the plans along with proposed cost recovery mechanisms and rate impact calculations

(emphasis added). Based on this explicit language, parties are not precluded from filing their plans earlier than the deadline and Mr. Katz is free to file without delay.

In summary, the Company made a showing in its Amended Motion that more time reasonably is needed to recommend an appropriate and optimal set of measures and to avoid unnecessary costs to customers. ENO respectfully suggests that no legitimate reason has been offered to reject the Company's reasonable request.

WHEREFORE, for the reasons set forth herein and in its Amended Motion, the Company requests that the current deadline be extended from March 1, 2022 to July 1, 2022, and that

technical conferences in April 2022 and June 2022 be ordered, with the exact dates to be determined through discussions among the parties.

Respectfully submitted,

By:



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**ATTORNEYS FOR
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CERTIFICATE OF SERVICE

I hereby certify that I have this 25th day of February, 2022, served the required number of copies of the foregoing pleading upon all other known parties of this proceeding individually and/or through their attorney of record or other duly designated individual, by: electronic mail, facsimile, hand delivery, and/or by depositing same with overnight mail carrier, or the United States Postal Service, postage prepaid.

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