# In the Matter of Entergy New Orleans, Inc. Application for Approval to Construct New Orleans Power Station and Request for Cost Recovery and Timely Relief

**CNO UD-16-02**

**The Alliance for Affordable Energy’s Eight Set of Requests for Information**

**September 28, 2017**

The Alliance for Affordable Energy (“Alliance”) hereby serves upon Entergy New Orleans, Inc. (ENO) this Eight Set of Requests for Information in connection with the above captioned docket and pursuant to New Orleans City Council Resolution R-16-332 as well as the Louisiana Code of Civil Procedure.

# Instructions:

1. Whenever possible, the Alliance prefers to receive electronic copies of data responses either by email or on CD.
2. Responses to any and all of the Alliance’s data requests should be supplied to the Alliance as soon as they become available to Entergy New Orleans and in any event within the delays allowed by the procedural schedule in this docket. Please contact counsel for the Alliance if you believe it is necessary for additional time to respond to any of these requests.
3. The requests herein shall be deemed to be continuing in nature and Entergy New Orleans is requested to supplement its responses as necessary and as additional information becomes available.
4. In responding to each data request, please consult every document source which is in your possession, custody, or control, including all documents in the possession of experts or consultants.
5. For each response, identify the person who prepared the answer to the data request as well as his or her position with Energy New Orleans or any Entergy New Orleans affiliate or parent.
6. Please reproduce the data request before your corresponding response.
7. If the responses include computer modeling input and output files, please provide those data files in electronic machine readable or .txt format.
8. If the responses include spreadsheet files, please provide those spreadsheet files in useable electronic Excel readable format.
9. In responses providing computer files, include the corresponding data request in the file name of the responsive computer file, and if necessary to the understanding of the data, provide a

record layout of the computer files. Computer files provided with a response must be in or compatible with the current version, or the immediately prior version, of Microsoft Office.

1. For each dollar amount provided in response to a discovery request please state if the amount is in nominal or constant dollars and what year’s dollars.

# Definitions:

* 1. “ENO” or “the Company” shall mean Entergy New Orleans, Inc.;
  2. “NOPS” shall mean New Orleans Power Station;
  3. “Document(s)” shall mean any written, typed, printed, computer produced, recorded or graphic matter, however produced or reproduced, of any kind, character, type or description, regardless of origin or location, including, without limitation, all correspondence, records, tables, charts, analyses, graphs, maps, schedule, summaries, reports, memoranda, notes (handwritten or otherwise), notations, drafts, lists, calendar and diary entries, letters (sent or received), telegrams, telexes, telecopies, faxes, Photostats, messages (including, but not limited to reports or notes of telephone conversations and conferences), studies, books, periodicals, magazines, booklets, circulars, bulletins, pamphlets, instructions, papers, files, minutes, Communications, other communications (including, but not limited to, inter and intra-office communications), questionnaires, contracts, memoranda or agreements, assignments, licenses, ledgers, books or account, financial statements, work sheets, work papers, spreadsheets, databases, orders, invoices, statements, bills, checks, check registers, vouchers, notebooks, receipts, acknowledgements, data processing cards, word processing documents, computer generated matter, computer printouts, electronically maintained or stored information, microfilm, contact manager information, internet usage files, network access information, photographs, photographic negatives, phonograph

records, tape or audio recording, compact discs, video tapes or dvds, wirer recordings, voicemail recordings, other mechanical recordings, transcripts or log of any such recordings, all other data compilations from which information can be obtained, or translated if necessary, and any other tangible thing of a similar nature. “Document(s)” shall include originals (or copies if originals are not available) and non-identical copies (whether difference from the original because of handwritten notes or underlining or otherwise) and any translation of any Document. Without limiting the generality of the foregoing, “Document(s)” specifically include telephone billing records, written or audio telephone messages, E-mail, evidence of facsimile transmissions, expense accounts, and other information not necessarily contained in files pertaining exclusively or directly to this matter; “Document(s)” also include, without limitation, materials maintained in magnetic or other storage media, including those maintained in computers, magnetic tapes or disks, and any onsite or offsite backup or so-called “erased” or “deleted” computer information that may be susceptible of retrieval.

# Requests for Information

AAE 8-1: Referring to the Direct Testimony of Charles W. Long, on page 10 on lines 4-7 it states:

Additionally, while the Attachment Y analysis performed by MISO covers most of the major contingency categories required by the NERC TPL 001-4 reliability standard, the analyses do not address every requirement of the NERC TPL Standard and thus are not as comprehensive as the Company’s annual reliability assessments.

1. Please describe every requirement of the NERC TPL Standard that is not addressed by the Attachment Y analysis.
2. Please discuss the findings of the Company’s most recent annual reliability assessment in the areas not addressed by the Attachment Y analysis.
3. Please provide a copy of any reports describing the results of the Company’s most recent annual reliability assessment.

AAE 8-2: Referring to footnote 3 on page 5 of Charles W. Long’s Supplemental and Amending Direct Testimony, provide a list of the instances during the last five years when there were not sufficient resources to redispatch that would mitigate the constraints in the system that affected the DSG load pocket.

AAE 8-3: Referring to footnote 3 on page 5 of Charles W. Long’s Supplemental and Amending Direct Testimony, provide details on NERC TPL violations in the long-term planning process that affect the DSG load pocket.

AAE 8-4: For each transmission line operating at 69 kV or higher in ENO’s service area, please provide:

1. The substation end points of each transmission line
2. The length of the line in miles, broken down into overhead miles and underground miles.
3. The voltage of each line
4. The date when the line initially went into service
5. The date of each major refurbishment or upgrade on the line and a description of the refurbishment and/or upgrade performed.
6. A description of which party owns the line. If owned by more than one party, give the portion owned by each party.
7. The maximum summer load carrying capability of each line under normal conditions and under contingency conditions
8. The loadings on each line for the peak hour of each month during the most recent five-year period.
9. A description as to whether the line supplies power into the DSG load pocket

AAE 8-5: For each generating unit in the DSG load pocket, please provide:

1. Its maximum summer and winter ratings,
2. A description of what entity or entities own the units and how much each owns
3. A description of the type of generating technology used by the unit
4. A description of the primary fuel used by the unit. If the unit has dual fuel capability, describe the secondary fuel as well.

AAE 8-6: Please provide a system map of ENO’s service area which shows:

1. Every generating unit with capacity of 50 MW or greater, with unit name and capacity indicated.
2. Every transmission line operating at 69 kV or higher with voltage indicated
3. Every substation that includes facilities operating at 69 kV or higher, with substation name and all voltages indicated.
4. An indication of which facilities serve the DSG load pocket.

AEE 8-7: Please provide an electrical one-line diagram of ENO’s electric system which shows:

1. Every generating unit with capacity of 50 MW or greater, with unit name and capacity indicated.
2. Every transmission line operating at 69 kV or higher with voltage indicated
3. Every substation that includes facilities operating at 69 kV or higher, with substation name and all voltages indicated.
4. An indication of which facilities serve the DSG load pocket.

AEE 8-8: For each generating unit in ENO’s service area, please provide:

1. Its maximum summer and winter MW ratings,
2. A description of what entity or entities own the units and how much each owns
3. A description of the type of generating technology used by the unit
4. A description of the primary fuel used by the unit. If the unit has dual fuel capability, describe the secondary fuel as well.

AEE 8-9: Provide the monthly peak demand for the DSG load pocket for the most recent five-year period.

AEE 8-10: Provide the monthly peak demand for each load-serving entity for their DSG load pocket for the most recent five-year period

AEE 8-11: Please describe whether either the Amite South or DSG load pocket suffered a NERC transmission planning violation during the most recent five years of planning. If yes, please describe the circumstances of and the timing of the violation, and describe any efforts made to address the cause of the violation.

AEE 8-12: Please discuss whether there were any generating units in the ENO service territory damaged by flooding during either Hurricane Katrina or any other flooding since Hurricane Katrina, describing

1. the units that were damaged,
2. when they were damaged,
3. the location of the units,
4. the cost to repair the damaged units, and
5. the time required to repair or replace the damaged units.

AEE 8-13: Please describe the damage the Company’s transmission lines experienced during Katrina and storms since Katrina including:

1. The line that was damaged,
2. When it was damaged
3. How long it was out of service
4. How many customers lost service due to the outage
5. What it cost to repair
6. Whether the damage occurred on an overhead or underground portion

AEE 8-14: Please describe the damage the Company’s distribution lines experienced during Katrina and storms since Katrina including:

1. When the storm occurred
2. The portion of the Company’s customers that lost service during the storm
3. How long it took to restore service to these customers
4. What it cost to repair the distribution system.
5. Please describe what percentage of the Company’s distribution system is underground in terms of circuit miles.
6. Please describe how the percentage of the Company’s distribution system that is underground has changed since Katrina, if at all.

AEE 8-15: Provide the most recent load forecast for ENO as well as the forecasts prepared in the previous five years.

AEE 8-16: Provide any ENO area load forecasts provided to or prepared by MISO during the most recent five years.

AEE 8-17: Regarding the transmission options that could replace the need for the 226 MW OPS, please discuss whether and to what extent those transmission options could utilize existing rights of way

AEE 8-18: Regarding the transmission options that could replace the need for the 226 MW OPS, please discuss whether and to what extent those transmission options would require additional right of way.

AEE 8-19: Regarding the transmission options that could replace the need for the 226 MW OPS, provide any analyses on the undergrounding of those facilities or the undergrounding of existing transmission facilities to increase reliability.

AEE 8-20: Provide all documents and analyses that provide detail on the reactive power benefits, black-start capability and storm support provided by the local generation discussed on page 17 of Mr. Long’s Supplemental and Amending Direct Testimony.

AEE 8-21: Provide any studies regarding the sufficiency of reactive power in the DSG load pocket for both the current period and future periods.

AEE 8-22: Provide a copy of the Company’s most recent load-resource forecast.

AEE 8-23: Provide a copy of the Company’s most recent integrated resource plan.

AEE 8-24: Regarding Question 8 of Mr. Long’s Supplemental and Amending Direct testimony, in what % of hours are the transmission elements leading into the ENO area loaded near capacity? Provide the information by month for the most recent five-year period.

AEE 8-25: Please discuss how often the Company performs planned maintenance on transmission lines or generating units in the ENO area during peak periods?

AEE 8-26: Please discuss whether and to what extent that each of the following would reduce the stresses to the transmission system that were discussed in Mr. Long’s response to Question 9 in his Supplemental and Amending Direct testimony:

1. increasing the import capability into the ENO area,
2. increasing the import capability into the DSG area,
3. increasing energy efficiency in the area,
4. increasing demand response in the area,
5. adding energy storage in the area or
6. increasing distributed generation such as solar arrays in the area

AEE 8-27: Please discuss how black start capability is provided in the ENO area currently.

AEE 8-28: Other than additional generation, what other options for providing black start capability have been investigated by the Company? Provide any analyses or documents that address other options.

AEE 8-29: Regarding the discussion on price separation in the response to Question 8 or Mr. Long’s testimony, wouldn’t additional transmission into the ENO area allow for increased imports of market-priced energy?