**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 Ninth Set of Requests for Information**

**December 1, 2017**

The Alliance for Affordable Energy (“Alliance”) hereby serves upon Entergy New Orleans, Inc. (ENO) this Ninth 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. “MISO” shall mean Midcontinent Independent System Operator
	3. “NERC” shall mean North American Electric Reliability Corporation;
	4. “NOPS” shall mean New Orleans Power Station;
	5. “OMS” shall mean Organization of MISO States;
	6. “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 9-1: Refer to Mr. Rice’s rebuttal testimony at page 24, lines 21-22.Please provide

 ENO’s Reliability Plan filed with the City Council on November 10, 2017.

AAE 9-2: With regard to the Request for Proposal issued by ENO seeking 20 MW of solar

 development in New Orleans, please provide:

1. A list of the entities who filed proposals;
2. A list of companies who were selected for negotiations of definitive agreements;
3. The status of negotiations with the selected companies

AAE 9-3: Refer to Mr. Jonathan Long’s Supplemental and Amending Direct testimony at page 7, lines 5 through 6, where he states with regard to the RICE generators that it “is a well known technology used in automobiles, trucks, machine propulsion and back-up power applications.”

Please provide reports and analyses regarding the use of the R.I.C.E. generators in the United States as peaker units or generating stations which serve customer load.

AAE 9-4: Refer to ENO’s response to the Advisors Request for Information 6-1 which

 states:

        The deactivation of the Michoud units is required to be reflected in the reliability  assessments the Company must undertake pursuant to NERC TPL-001-4. NERC Reliability Standard TPL-001-4 requires a Corrective Action. Plan to address reliability issues associated with the TPL-specified planning events. Because the standard rightfully recognizes that reliability needs may   arise more quickly than a solution can be implemented, a valid corrective action plan can include a plan to construct needed facilities, including a generating resource, even though there may be a lapse of time between the circumstance that created the need for the corrective action and implementation of the solution.

        Moreover, the potential cascading reliability problems in 2017 and 2018, following the retirement of Michoud Units 2 and 3 arise only if a NERC category P6 contingency event were to occur. To avoid this contingency while NOPS is under construction, the Company could use consequential and non- consequential load shed. This would not be a preferred long-term solution, however, and the prudent, permanent corrective action in response to the category P6 contingency is to construct NOPS.

        a.       Regarding the phrase........"a valid corrective action plan can include a plan to construct needed facilities....", please describe what the Company's corrective action plan includes for the possibility that a P6 contingency occurs in 2017 or 2018 prior to the completion of the construction of NOPS, including the use of load shedding.
        b.       Regarding the use of load shedding in the event that a P6 contingency occurs in 2017 or 2018 prior to the completion of the construction of NOPS, please describe the switching operations that would be performed and the number of customers likely to suffer a service interruption as a result.

        c.        Regarding the use of load shedding in the event that a P6 contingency occurs in 2017 at the time of the annual peak prior to the completion of the construction of NOPS, please describe the amount of customer load likely to suffer a service interruption as a result.

        d.       Please list the P6 contingencies experienced in the DSG over the past   ten years, giving, for each, the date, the contingencies involved, and the amount of firm customer load that was interrupted.

AAE 9-5: Refer to Mr. Cureington’s Rebuttal testimony at page 15, line 5-7, where Mr.

 Cureington states “There are over 3,200 MW of aging resources in Amite South

 alone, which is a relatively small geographic area compared to Zone 9, and some

 of those resources could deactivate early.

1. Please identify the resources included in this 3,200 MW figure;
2. Explain the basis for the claim that some of those resources could deactivate early; and
3. Provide a description of how each resource was treated in the MISO OMS Survey.

AAE 9-6: Refer to Mr. Cureington’s Rebuttal testimony at page 16, footnote 16 where Mr.

 Cureington states “The analysis considered the fact that 37% of projects withdraw

 from the queue and 26% of projects complete Generator Interconnection

 Agreements (“GIAs”). Thus, MISO concluded the possible pool of successful

 projects is therefore between 26% and 63%, and thus MISO proposed and

 stakeholders agreed to add 35% to the “Potential Capacity Projections.””

1. Please identify and produce any documents supporting the claim that the 35% figure was developed as described in footnote 16;
2. Please identify the figure Mr. Cuerington finds should be used instead of 35% and his analysis regarding that figure; and
3. Please identify and produce any analysis of what percent of projects in the Definitive Planning Phase end up coming online.

AAE 9-7: Refer to Mr. Cureington’s Rebuttal testimony at page 17, lines 4-6 and

 line 8, where Mr. Cureington states “In other words, included in the 1,300

 MW of “potential capacity” shown in the survey for Zone 9 in 2022 are

existing units that may retire or suspend operations… It includes some

existing capacity that may disappear.”

a)Please provide how much existing capacity "may disappear"?

b) Please explain how Mr. Cureington knows that the amount of capacity

provided in response to a) above is included in the 1,300 MWs.

AAE 9-8: Refer to Mr. Cureington’s Rebuttal testimony at page 17, lines 9 through 11, where Mr. Cureington states “Disregarding the 1,300 MW of potential new resources that may never be built and existing resources that may retire leaves only a projected surplus of 200 MW of “Committed Capacity” in Zone 9 in 2022.” What is the basis for Mr. Cuerington’s conclusion that none of this capacity will end up coming online? Please provide any analysis or workpapers supporting this conclusion.

AAE 9-9: Refer to Mr. Cureington’s Rebuttal testimony at page 18 lines, 4 through 7, where Mr. Cureington states “Having a signed interconnection agreement does not mean a unit has been built or guarantee that it will be built. That capacity also includes the legacy gas units in Amite South” Please identify any units in Zone 9 that are included in Committed Capacity because they have a signed interconnection agreement but have not yet been built. Please explain how Mr. Cureington knows all of these units are treated as "Committed Capacity" in the MISO OMS Survey?

AAE 9-10: Please provide every capacity value forecast for MISO that ENO has created, reviewed, or relied on since 2012.

AAE 9-11: Refer to Mr. Cureington’s Rebuttal testimony at page 22, lines 5 through 7 where Mr. Cureington states “ENO is in need of a long-term source of local peaking capacity with a known cost, which would hedge against annual capacity auction prices that can be volatile and may escalate sharply from today’s level. “

1. Has ENO attempted to determine the cost at which it could purchase on the market such peaking capacity through a Purchase Power Agreement, reverse capacity auction or other means.
2. If yes, what was the timeframe for the bids and what was the cost?

 AAE 9-12: What is the expected capacity factor for both the CT Alternative and the RICE Alternative?

 AAE 9-13: 1) How often is the CT Alternative projected to run each year?

 2) How often is the RICE Alternative projected to run each year?

3) Are these projected run time figures the same figures used to estimate income from market sales and to conduct the economic analysis between options?

 AAE 9-14: What would be the timeline for completion of transmission upgrades alternative to NOPS?

 AAE 9-15: As each planned transmission upgrade is completed, what is the expected effect on the P6 contingency in terms of probability, mitigation strategy, scope of outages impact, and restoration requirements?

 AAE 9-16: Concerning the risk tradeoff between turning off a CT ahead of a storm or running it during through the storm what are the potential consequences to a power plant that is damaged by a severe hurricane if it is running vs. not running? (In terms of cost, time to repair and readiness to deliver power).

AAE 9-17: Is there any overlap between the transmission upgrades that would be needed if NOPS was not built and transmission costs associated with the NOPS application for a RICE or CT?  If so, describe the transmission upgrades that are required in either event, what their cost is expected to be, and whether those costs are currently figured into costs in the NOPS proposal.

AAE 9-18: Refer to Mr. Charles Long’s Rebuttal testimony at page 44, line 17, through page 45, line 18. Please provide the preliminary assessment, analyses and any workpapers associated with ENO’s assessment of a scenario involving a complete loss of power in the City and within the S&WB’s facilities, incapacitating the storm pumps in the City.