

**Before
The Council of the City of New Orleans**

**In Re: RESOLUTION AND ORDER
ESTABLISHING A DOCKET AND
PROCEDURAL SCHEDULE WITH RESPECT
TO STORM HARDENING AND RESILIENCE**

DOCKET NO. UD-21-03

JULY 21, 2023

**FINAL COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY ON THE
REVISED RESILIENCE PROPOSALS OF ENTERGY NEW ORLEANS, LLC AND
TOGETHER NEW ORLEANS**

I. INTRODUCTION

On February 16, 2023, the New Orleans City Council (“the Council”) adopted Resolution R-23-74, amending the procedural schedule in the instant docket. The amended procedural schedule required both Entergy New Orleans, LLC (“ENO”) and Together New Orleans (“TNO”) to make filings by April 17, 2023 detailing various technical and financial aspects of their respective resilience proposals, with final party comments on the revised resilience proposals due by July 21, 2023. The Alliance hereby submits the following comments in response to the April 17, 2023 filings of ENO and TNO.

**II. COUNCIL APPROVAL OF RESILIENCE PROJECTS SHOULD BE
CONTINGENT UPON CERTAIN RATEPAYER PROTECTIONS**

Both ENO and TNO have divided their proposals into phases¹:

- ENO:
 - Phase I (2024-2028), \$559M
 - Phase II (2029-2033) \$441M

¹ TNO provided phasing in discovery response AAE 1-3, in AAE’s First Set of Data Requests to TNO, dated July 19, 2023.

- TNO:
 - Pilot Phase (16 sites), February 2023 - June 2024 – No utility systems funds required.
 - Phase 1 (20 locations), July 2024 - June 2025 - \$3.3 million in utility system funds.
 - Phase 2 (30 locations) July 2025 - June 2026 - \$4.84 million in system funds.
 - Phase 3 (20 locations) July 2026 - June 2027 - \$3.23 million in system funds.

Above all, AAE’s position is that approval of any resilience project costs to be recovered through rates must be contingent upon protections for residential ratepayers, who already suffer one of the highest energy burdens in the nation, and who are facing pending ENO applications for both \$170M in costs associated with Hurricane Ida and rate increases on both the electric and gas sides of their bills. This will require the Council to implement clear performance goals with associated metrics and stringent targets to ensure that project costs assessed to ratepayers result in real resilience benefits. AAE also suggests an annual plan review and, if necessary, modification. With regard to TNO’s proposal specifically, AAE recommends that the Council ensure that resilience hubs are accessible and provide real resilience benefits if they are to be funded in part by ratepayers.

AAE also supports the contribution of Commercial and Industrial ratepayers to resilience planning investments and concludes with a discussion of the rationale for this support.

III. THE COUNCIL SHOULD ESTABLISH PERFORMANCE GOALS, METRICS, AND TARGETS AND USE THEM TO ASSESS THE PERFORMANCE OF TNO’S AND ENO’S PROPOSED RESILIENCE PLANS

Performance goals, metrics, and targets for electric grid resilience investments are a relatively nascent and rapidly developing area of interest in many jurisdictions across the country. We define performance goals as qualitative objectives that can potentially be addressed through utility investments in electric grid resilience. We define performance metrics as the

information that utilities, regulators, and other stakeholders can use to monitor overall grid resilience and Resilience Plan investments, more specifically. We define performance targets as desired levels of resilience.

Summary of TNO's Resilience Plan Performance Goals, Metrics, and Targets

The performance goals of TNO's proposed Resilience Plan are stated on page 1 of its filing:

“The strategy, called Community Lighthouse, seeks to strengthen our utility system both toward the objectives of climate adaptation, by reducing the risk to life and health from long-duration power outages, and of climate action, by expanding renewable energy and reducing grid-related carbon emissions, in most cases to zero, at more than eighty community facilities across New Orleans.”

We summarize TNO's proposed performance metrics on pages 104-107 of its filing as follows:

1. **Affordability:** Cost of energy (\$/kWh), customer minutes interrupted (CMI), \$ benefits associated with CMI
2. **Resilience Hub:** Number of deaths and hospitalizations, avoided adverse health outcomes attributable to disaster-induced outages, population within a certain distance of resilience hubs, number of people accessing resilience hubs, ability to maintain resilience services, replacement/avoidance of gas diesel generators (including avoidance of noise and air pollution)
3. **Workforce:** New job training/apprenticeship programs developed specific to clean energy and storage, number and types of trainings/apprenticeships attended, number and types of direct jobs created, new partnerships developed with workforce development organizations and educational institutions, student involvement in educational opportunities, number of hiring agreements, and percentage of local employees hired

TNO's filing does not propose performance targets.

Summary of ENO's Resilience Plan Performance Goals, Metrics, and Targets

The performance goals of ENO's proposed Resilience Plan are stated on page 2 of its filing as follows:

“... The Resilience Plan is reasonably expected to reduce the cost to customers of restoring the electric grid in New Orleans after major storms, as well as to reduce the number and duration of outages that customers experience following those events.”

The filing describes monitoring and cost control measures on pages 60-64 of its filing. In summary, ENO proposes status updates every six months on project completion and cost, project schedule, business issues, and additional matters, including significant changes to the plan, schedule, and/or project scope. However, the filing does not propose specific performance metrics and targets associated with the goals.

Summary of Reliability/Resilience Metrics from Several Jurisdictions

If the Council approves any aspects of ENO's and TNO's Resilience Plans, the Council should set performance goals, performance metrics, and associated targets to ensure the performance goals are achieved. The Council can also consider establishing penalties if the performance goals are not achieved. . Reliability- and/or resilience-related performance metrics are established in Illinois (for Ameren), Connecticut, and Hawaii (for Hawaiian Electric).

Ameren (in Illinois) and electric utilities in Connecticut are required to report on system- and customer-related reliability/resilience performance metrics including:

- SAIDI (“System Average Interruption Duration Index”), the average duration of outages for customers in a year,
- SAIFI (“System Average Interruption Frequency Index”), the average number of outages for customers in a year,

- CEMI (“Customers Experiencing Multiple Interruptions”), the number of customers experiencing at least a certain number of interruptions in a year,
- CELID (“Customers Experiencing Long Interruption Durations”), the number of customers experiencing interruptions longer than a certain amount of time in a year, and
- CAIDI (“Customer Average Interruption Duration Index”), the average duration of an outage that a given customer experiences in a year.

Connecticut also requires reporting for other reliability metrics, including: CEMSMI (“Customers Experiencing Multiple Sustained Interruptions and Momentary Interruptions Events”), CEMM (“Customers Experiencing Multiple Momentary Outages”), and MAIFI (“Momentary Average Interruption Frequency Index”).² Utilities provide reporting for most of these metrics excluding and including major event days. Ameren’s reporting for these metrics is focused on vulnerable communities.³

Hawaiian Electric⁴ has three resilience metrics:

- the Critical Load Reported Metric, which is calculated as the sum of hours that critical loads are without power in a year,
- the National Incident Management System (NIMS) Certification Reported Metric, which is intended to increase employee certification of NIMS training, and

² Connecticut Public Utilities Regulatory Authority. Docket No. 17-12-03RE08. *PURA Investigation into Distribution System Planning of the Electric Distribution Companies - Resilience and Reliability Standards and Programs*. Decision. August 31, 2022. Pages 54-55. Available at:

[https://www.dpuc.state.ct.us/2nddockcurr.nsf/8e6fc37a54110e3e852576190052b64d/4bcecc163d47d814852588af005bca09/\\$FILE/171203RE08-083122.pdf](https://www.dpuc.state.ct.us/2nddockcurr.nsf/8e6fc37a54110e3e852576190052b64d/4bcecc163d47d814852588af005bca09/$FILE/171203RE08-083122.pdf)

³ Illinois Commerce Commission. Performance Metrics Plan for Ameren Illinois. Revised May 25, 2022. Page 7. Available at: <https://www.icc.illinois.gov/docket/P2022-0063/documents/325744/files/567074.pdf>

⁴ Hawaiian Electric. *PBR Scorecards and Metrics: Resilience*. Available at: <https://www.hawaiianelectric.com/about-us/performance-scorecards-and-metrics/resilience>

- the Emergency Response Training Reported Metric, which ensures completion of annual Industrial Control Systems (ICS) cybersecurity training.

Illinois and Hawaii emphasize environmental justice and equity. In addition to calculating resilience metrics for vulnerable communities, Ameren must report disconnections in their performance metrics, which may be broken out by zip code.⁵ Hawaii's metrics include calculations of low- and moderate-income (LMI) energy burden, the percent of customers entered into payment arrangements by zip code, and the percent of disconnections by customer class by zip code.⁶

Illinois and Hawaii also place additional emphasis on distributed energy resources (DERs). Ameren is required to report peak load reductions from demand response efforts.⁷ Hawaiian Electric reports several DER asset effectiveness metrics, including DER capability, enrollment, utilization, and curtailment (reported as the total MW and MWh of curtailment from DERs).⁸

In addition to establishing metrics, Connecticut and Illinois also specify targets. The primary target for Connecticut electric utilities is maintaining or improving top-quartile system reliability performance in blue-sky conditions, wherein top-quartile reliability performance for SAIDI, SAIFI, and other resilience metrics is performance that is better than 75 percent of other electric utilities in the country. Two additional targets include: improving system reliability during major storms in gray-sky and black-sky conditions (including

⁵ Illinois Commerce Commission. *Performance Metrics Plan for Ameren Illinois*. Revised May 25, 2022. Pages 23-24. Available at: <https://www.icc.illinois.gov/docket/P2022-0063/documents/325744/files/567074.pdf>

⁶ Hawaii Public Utilities Commission. *Docket No. 2018-0088. Instituting a Proceeding To Investigate Performance-Based Regulation. Decision and Order No. 37787*. April 18, 2018. Page 65. Available at: <https://dms.puc.hawaii.gov/dms/DocumentViewer?pid=A1001001A18D18B60624J02464>

⁷ Illinois Commerce Commission. *Performance Metrics Plan for Ameren Illinois*. Revised May 25, 2022. Pages 14-18. Available at: <https://www.icc.illinois.gov/docket/P2022-0063/documents/325744/files/567074.pdf>

⁸ Hawaii Public Utilities Commission. *Docket No. 2018-0088. Instituting a Proceeding To Investigate Performance-Based Regulation. Decision and Order No. 37787*. April 18, 2018. Page 102. Available at: <https://dms.puc.hawaii.gov/dms/DocumentViewer?pid=A1001001A18D18B60624J02464>

minimizing the frequency and duration of outages due to major storms classified as event level 4-5 and 1-3 emergencies, respectively).⁹ Ameren’s reliability targets are to reduce SAIFI by 20 percent, CAIDI by 15 percent, and the number of customers that do not meet service reliability targets by 75 percent over a decade.¹⁰ Ameren’s affordability target is a 10 percent annual reduction in residential disconnections over a five-year period in the top 20 zip codes with the highest historical disconnection rates.¹¹

Each of these jurisdictions faces different types of threats, risk, and consequences from major events and has different interests and priorities regarding potential solutions. However, some metrics that are in place in these jurisdictions may be relevant to New Orleans. In addition to metrics suggested in TNO’s Resilience Plan, we recommend considering metrics implemented in these jurisdictions.

Recommendations regarding TNO’s Performance Goals, Metrics, and Targets

If TNO’s Resilience Plan is approved, the Council should set performance metrics and associated targets to ensure TNO’s Resilience Plan performance goals are achieved. We recommend adopting many of TNO’s proposed metrics and adding several more metrics. We also recommend some changes regarding the categorization of those metrics. For example, we suggest:

- renaming the Resilience Hub category to Infrastructure so it could be applied to ENO’s investments and other types of investments moving forward,
- breaking out health and environment/climate metrics from the Infrastructure category

⁹ Connecticut Public Utilities Regulatory Authority. Docket No. 17-12-03RE08. *PURA Investigation into Distribution System Planning of the Electric Distribution Companies - Resilience and Reliability Standards and Programs*. Decision. August 31, 2022. Pages 43-44. Available at:

[https://www.dpuc.state.ct.us/2nddockcurr.nsf/8e6fc37a54110e3e852576190052b64d/4bcecc163d47d814852588af005bca09/\\$FILE/171203RE08-083122.pdf](https://www.dpuc.state.ct.us/2nddockcurr.nsf/8e6fc37a54110e3e852576190052b64d/4bcecc163d47d814852588af005bca09/$FILE/171203RE08-083122.pdf)

¹⁰ Illinois Commerce Commission. *Performance Metrics Plan for Ameren Illinois*. Revised May 25, 2022. Page 11. Available at: <https://www.icc.illinois.gov/docket/P2022-0063/documents/325744/files/567074.pdf>

¹¹ *Id.* Page 23.

into their own separate categories as they are important metrics,

- adding an Energy category to include reporting for energy consumption/generation/reduction, and
- adding a Resilience category to include reporting for resilience metrics, with a focus on vulnerable communities.

In summary, we recommend the following categories and associated metrics for TNO's

Resilience Plan:

1. Infrastructure: Number of resilience hubs and number of hubs by facility type, types (solar and battery) and sizing of solutions, services provided at each site and their costs, number of people that can be served by resilience hubs on major event days, number of community members served on major event days
2. Energy: Energy consumption on normal days, major event days, and for all days (in kWh), energy generated and used on-site on normal days, major event days, and for all days (in kWh), energy generated and provided back to the grid on normal days, major event days, and for all days, peak load reduction
3. Resilience: For example (but not limited to): the number of days when resilience hubs are in operation, customer minutes interrupted (CMI), CAIDI and CAIFI on normal days, major event days, and for all days, breakouts of CAIDI and CAIFI for vulnerable communities.
4. Health: Number of deaths and hospitalizations related to grid outages
5. Affordability: Costs for host customers¹² and ratepayers (\$), percent of costs allocated to LMI ratepayers, rate impacts for host customers and ratepayers (\$/kWh), bill impacts for host customers and ratepayers (\$), benefits for host customers and

¹² Host customers are the facilities where the solar and batteries will be installed.

ratepayers (\$), percent of benefits allocated to LMI ratepayers, benefit cost ratio for host customers and ratepayers

6. Environment/Climate: Air pollution avoided on normal days, major event days, and for all days (NO_x, SO_x, PM_{2.5}), greenhouse gas emission reductions on normal days, major event days, and for all days (CO₂e)
7. Workforce: Number of staff working on-site on major event days, jobs/trainings/apprenticeships related to construction and operation and maintenance of resilience hubs, participation in these opportunities by local community members including students, new partnerships

Targets for many of these metrics can be set using the forecasts provided in TNO's filing and used to measure the extent to which the proposed performance is achieved. Actual data from the performance of the 16 pilot sites can be used to adjust forecasts, as needed. Where TNO does not offer forecasts, targets can be set by the Council in consultation with TNO and other stakeholders.

TNO should report annually on whether its Resilience Plan is meeting the targets. If the Resilience Plan is not meeting the targets, TNO should propose adjustments to its Resilience Plan to meet the targets or work with the Council to adjust the targets.

Recommendations regarding ENO's Performance Goals, Metrics, and Targets

We recommend leveraging similar metric categories and metrics for TNO and ENO, where possible. We acknowledge that some categories may not be relevant to ENO's Phase I Resilience Plan, but recommend that the Council keep all categories as future phases of ENO's Resilience Plan may include different measures. For Phase I, we recommend that ENO note which categories are not applicable to the measures in their Resilience Plan. We

summarize our recommendations regarding the categories and associated metrics for ENO's Phase I Resilience Plan as follows:

1. Infrastructure: Number and types of investments and the costs of these investments, number of line structures, number of structures to be hardened, line miles, line miles to be undergrounded (as applicable), downstream customers (those addressed by investments)
2. Energy: Not applicable
3. Resilience: For example (but not limited to): customer minutes interrupted (CMI), SAIFI, SAIDI, CAIDI, and CAIFI on normal days, major event days, and for all days, breakouts of SAIFI, SAIDI, CAIDI, and CAIFI for vulnerable communities.
4. Health: Number of deaths and hospitalizations related to grid outages
5. Affordability: Cost for ratepayers (\$), percent of costs allocated to LMI ratepayers, rate impacts for ratepayers (\$/kWh), bill impacts for ratepayers (\$), benefits (\$), percent of benefits allocated to LMI ratepayers, benefit cost ratio
6. Environment/Climate: Not applicable
7. Workforce: Jobs/trainings/apprenticeships related to construction and operation and maintenance of investments, participation in these opportunities by local community members including students, new partnerships

Once performance metrics are established, the Council should define the baselines.

ENO should formally file the baselines using actual historical data. ENO, the Council, and other stakeholders should discuss the desired improvement relative to the baselines and set targets accordingly. The Council should consider directing ENO to conduct customer surveys to help define New Orleans' specific spending and resilience improvement targets for

Resilience Plan investments. The Council and other stakeholders should review these surveys to ensure the data collected can be used for this purpose. .

ENO can then indicate how its Resilience Plan can best meet the targets.

IV. THE COUNCIL SHOULD ESTABLISH A WORKING GROUP TO PROVIDE ANNUAL RESILIENCE PLAN REVIEW AND RECOMMENDATIONS FOR MODIFICATION

The proposed resilience investments are of significant magnitude as to require regular performance monitoring and evaluation. Also, ENO and TNO are still developing expertise in resilience planning and adjustments to the Resilience Plans may be needed along the way. Therefore, the Council should establish a working group of stakeholders to provide annual resilience plan review using the metrics outlined above. The working group could make recommendations for plan improvement over time. AAE has already proposed the creation of a demand-side management (“DSM”) working group under Council docket UD-22-04. That docket deals specifically with energy efficiency and demand-side management resources, which have a direct impact on resilience, and provides a model for how a working group could be established and tasked with evaluating resilience planning and making recommendations for improvements to the Council. This would ensure that ratepayers realize the promised resilience benefits associated with the projects the Council approves for recovery through rates.

V. THE COUNCIL MUST ENSURE THAT RATEPAYER-FUNDED RESILIENCE HUBS ARE ACCESSIBLE AND PROVIDE REAL RESILIENCE BENEFITS

Resilience hubs are a relatively new type of resilience investment and TNO has asserted that the design and scale of TNO’s resilience hubs is novel. While AAE is supportive of community-led efforts such as TNO’s Community Lighthouse project, as well as Feed the Second Line’s Get Lit Stay Lit program, that support is contingent upon their ability to demonstrate resilience benefits and establish ratepayer guarantees and protections. In its response

to AAE 1-4 from AAE's First Set of Data Requests to TNO, dated July 19, 2023, TNO states that it has commissioned an analysis to quantify resilience benefits not captured by FEMA's benefit-cost calculator, such as reduced greenhouse gas emissions, avoided cost of energy, or the value of demand response. The Council should review this analysis before approving recovery of associated costs through rates.

Furthermore, TNO, which will own the solar and battery equipment installed on each resilience hub, has proposed that each site sign a contract legally obligating it to operate as a resilience hub during major events. The Council, as regulator of ENO and the body with authority over ratemaking, must be a party to these agreements in order to ensure that ratepayer interests are protected.

VI. COMMERCIAL AND INDUSTRIAL RATEPAYERS MUST SHARE IN THE COSTS OF RESILIENCE PLANNING

At the last technical conference on May 25, 2023, representatives of Air Products indicated that the company would be unwilling to share in any non-transmission-related portion of the cost of a final resilience plan, citing its independence from the distribution system. To protect vulnerable residential ratepayers, who have been hammered by the recovery costs associated with repeated hurricanes, volatile fuel prices, and high energy burden, equity demands that commercial and industrial ratepayers share in the total costs of resilience planning. Air Products' claim that it operates independently of the distribution system, and therefore should not share in costs associated with resilience improvements at the distribution level, does not bear out if the Council takes into consideration the fact that Air Products cannot operate without its workers, who are residents of Greater New Orleans, and whose ability to work depends upon a functioning distribution system. When the distribution system is down for days following storms, forcing evacuations, this directly affects the workforces of Air Products and all other commercial

and industrial ratepayers. These companies have a direct financial interest in ensuring a functioning electric grid at all levels, and, accordingly, they should be made to share equally in the full cost of resilience planning.

VII. CONCLUSION

The Alliance thanks the Council for this opportunity to respond to ENO's and TNO's filings. We look forward to the Council's adoption of an equitable resilience plan that safeguards residents from the worst effects of climate disaster and ratepayers from undue financial burden.

Submitted respectfully,

Jesse S. George
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**Before
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ESTABLISHING A DOCKET AND
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DOCKET NO. UD-21-03

JULY 21, 2023

CERTIFICATE OF SERVICE

I do hereby certify that I have, this 21st day of July 2023, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

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