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Entergy Services, LLC
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P.O. Box 61000
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Tel 504 576 2603
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D. Skylar Rosenbloom
Senior Counsel
Legal Services - Regulatory

October 1, 2020

By UPS OVERNIGHT

Brandon Frey, Secretary
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North 5th Street
Baton Rouge, LA 70802

2020 OCT -2 AM 11:03
LA PUBLIC SERVICE
COMMISSION

Re: In Re: Notification of Deactivation and Retirement Decisions Pursuant to
Louisiana Public Service Commission's Deactivation General Order,
(Docket No. R-34407)
(LPSC Docket No. X-_____)

Dear Mr. Frey,

Please find enclosed the original and three copies of the Public Version of Entergy Louisiana, LLC's ("ELL" or the "Company") Compliance filing regarding ELL's decision to retire Waterford Plant Unit 1 ("Waterford 1"), effective February 1, 2021. This Compliance filing is being submitted to comply with Ordering Paragraphs 1-12 of General Order 10-19-2018, Docket No. R-34407 (the "Deactivation Order"), issued by the Louisiana Public Service Commission ("Commission") on October 19, 2018, to document and support the rationale of ELL's decision to retire Waterford 1.

Please retain the original and two copies for your files and return a date-stamped copy to me in the self-addressed stamped envelope.

I have also enclosed five copies of the Confidential Version of the referenced filing, which is being provided to you under seal pursuant to the provisions of the LPSC General Order dated August 31, 1992, and Rules 12.1 and 26 of the Commission's Rules of Practices and Procedures. The confidential materials included in the filing contains sensitive information, the disclosure would expose the Company and its customers to an unreasonable risk of harm. Accordingly, it is critical that this information remain confidential.

Please retain the original Confidential Version for your files and return a date-stamped copy to me in the self-addressed stamped envelope. Additional copies of the Highly Sensitive FROM

ROUTE TO
DEPT. Bull DATE 10/2 DEPT. _____
DEPT. _____ DATE _____ DEPT. _____
DEPT. _____ DATE _____ DEPT. _____

10/2/20

R-34407

Mr. Frey
Louisiana Public Service Commission
October 1, 2020
Page 2

Version of this filing will be provided to any intervenors after a suitable Confidentiality Agreement has been executed by the parties.

ELL respectfully requests that the following attorneys be entered as counsel of record for ELL and be added to the Official Service List in this docket:

Mark D. Kleehammer
Entergy Services, LLC
4809 Jefferson Highway
Mail Unit L-JEF-357
Jefferson, Louisiana 70121
Telephone: (504) 840-2528
Facsimile: (504) 840-2681
mkleeha@entergy.com

Lawrence J. Hand, Jr.
D. Skylar Rosenbloom
Entergy Services, LLC
639 Loyola Avenue
Mail Unit L-ENT-26E
New Orleans, Louisiana 70113
Telephone: (504) 576-2603
Facsimile: (504) 576-5579
lhand@entergy.com
drosenb@entergy.com

If you have any questions, please do not hesitate to call me. Thank you for your courtesy and assistance with this matter.

Respectfully submitted,



D. Skylar Rosenbloom

DSR/bkd
Enclosures

cc: Commissioners (public version only)

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

IN RE: NOTIFICATION OF DEACTIVATION AND RETIREMENT DECISIONS PURSUANT TO LOUISIANA PUBLIC SERVICE COMMISSION'S DEACTIVATION GENERAL ORDER, (DOCKET NO. R- 34407))))))))	DOCKET NO. X-_____
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**COMPLIANCE FILING OF ENTERGY LOUISIANA, LLC
IN ACCORDANCE WITH LPSC GENERAL ORDER 10-19-2018**

Entergy Louisiana, LLC ("ELL" or the "Company"), through undersigned counsel, submits this compliance filing regarding ELL's decision to deactivate Waterford Plant Unit 1 ("Waterford 1"), effective February 1, 2021. This compliance filing is being submitted to comply with Ordering Paragraphs 1-12 of General Order 10-19-2018, Docket No. R-34407 (the "Deactivation Order"), issued by the Louisiana Public Service Commission ("Commission") on October 19, 2018, to document and support the rationale of ELL's decision to deactivate Waterford 1. As demonstrated by the information and analyses discussed herein, this decision was based on sound analyses and reasoned decision making and undertaken in furtherance of the Company's efforts to provide reliable service at the lowest reasonable cost.

I. Deactivation of Waterford 1

Waterford 1 is located in St. Charles Parish, Louisiana, and entered commercial operation in June 1975. The facility has largely been operated as an intermediate load following unit. ELL owns 100% of Waterford 1, with 1.84% of the capacity and energy being sold to Entergy New Orleans, LLC on a life of unit basis. Waterford 1 is a conventional steam turbine unit having been designed to combust #6 fuel oil or natural gas as the primary heat input to the boiler. The unit

utilized #6 fuel oil as a fuel source throughout much of the early decades of its operating life. In recent years, the unit has utilized natural gas almost exclusively as its primary fuel source. Waterford 1 is currently active with its current generator verification test capacity rating of approximately 411 megawatts (“MW”).¹

Beginning in 2019 and continuing through the first half of 2020, an economic analysis was undertaken to study the economic status and viability of ELL’s legacy gas generation fleet, identify any legacy unit in the ELL fleet that the Washington Parish Energy Center could replace in the fleet without creating reliability issues, and identify the need and timing of economic deactivations for legacy units. This analysis concluded that it was possible to deactivate one Amite South generating unit without triggering any new transmission compliance obligation.² Further, the evaluation determined that the required investment to enable Waterford 1 to provide safe and reliable service through 2035 was uneconomic relative to alternatives.³ Furthermore, net capacity from Waterford 1 was bid into MISO’s 2020-21 Planning Resource Auction (“PRA”) but it did not clear the MISO PRA. Based on the economic analysis and unit and market conditions, the ELL Operating Committee approved the suspension of Waterford 1 effective February 1, 2021, and also provided corresponding approval to submit notice to MISO of the decision to deactivate the unit.⁴ In August 2020, ELL submitted to MISO the required Attachment Y Notice to facilitate the deactivation of Waterford 1.⁵

¹ 411 MW is the Waterford 1 capacity estimate at the time of ELL’s suspension request to MISO.

² The relevant economic analysis was presented to the ELL Operating Committee Meeting on July 14, 2020. A copy of the July 14, 2020 presentation is attached as HSPM Appendix A-1.

³ This determination was made, in part, based upon the independent condition assessment of Waterford 1, which is attached hereto as HSPM Appendix A-2.

⁴ A copy of the presentation made at the July 28, 2020 ELL Operating Committee Meeting regarding the deactivation of Waterford 1 is attached hereto as HSPM Appendix A-3. While the data available supports the deactivation of Waterford 1, there is not sufficient data available to currently support retirement of that unit. Analysis on this issue is ongoing.

⁵ A copy of the Attachment Y Notification submitted to MISO dated August 5, 2020 is attached hereto as Appendix A-4 and MISO’s acknowledgement dated August 10, 2020 is attached hereto as Appendix A-5.

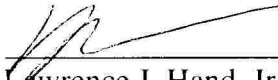
II. General Information Regarding Waterford 1

The anticipated February 2021 deactivation date for Waterford 1 aligns with the Company's current planning assumption that the unit would be deactivated in 2021. The February 2021 deactivation is not consistent with ELL's last Integrated Resource Plan ("IRP") submitted to the Commission in LPSC Docket No. I-34694, which anticipated a 2035 deactivation date.⁶ The net book value of Waterford 1 included in rate base can be found in the July 28, 2020 Operating Committee Meeting materials.⁷ There will be no accounting change when Waterford 1 is deactivated, as deactivated electric plant remains in FERC Account 101 (Electric Plant in Service) until retired. In further compliance with the Deactivation Order, detailed information about the planned, forced, and unforced outages for Waterford 1 that lasted longer than seven days from each of the previous five years (excluding the years when the unit was inactive) are provided as HSPM Appendix A-6. Waterford 1's operating characteristics for the past three years is attached as HSPM Appendix A-7. The Company's plan to maintain Waterford 1 during its deactivation is attached hereto as HSPM Appendix A-8.

⁶ Information developed subsequent to the filing of the IRP, including information presented in the independent condition assessment (HSPM Appendix A-2), the July 14, 2020 ELL Operating Committee presentation (HSPM Appendix A-1), and the July 28, 2020 ELL Operating Committee presentation (HSPM Appendix A-3), indicated that it was no longer economical to reliably operate Waterford 1 through the proposed 2035 deactivation date.

⁷ See HSPM Appendix A-1.

Respectfully submitted,

BY: 

Lawrence J. Hand, Jr., La. Bar No. 23770
D. Skylar Rosenbloom, La. Bar No. 31309
Mail Unit L-ENT-26E
639 Loyola Avenue
New Orleans, Louisiana 70113
Telephone: (504) 576-2603
Facsimile: (504) 576-5579

**ATTORNEYS FOR
ENTERGY LOUISIANA, LLC**

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

***IN RE:* NOTIFICATION OF)**
DEACTIVATION AND RETIREMENT)
DECISIONS PURSUANT TO LOUISIANA)
PUBLIC SERVICE COMMISSION'S)
DEACTIVATION GENERAL ORDER,)
(DOCKET NO. R-34407))

DOCKET NO. X-_____

APPENDIX A

Appendix A

Table of Contents

	Date	Description
A-1	July 14, 2020	ELL Operating Committee Meeting Presentation (HSPM)
A-2	August 21, 2017	Independent condition assessment of Waterford 1 (HSPM)
A-3	July 28, 2020	ELL Operating Committee Meeting Presentation (HSPM)
A-4	August 5, 2020	Attachment Y Notification submitted to MISO
A-5	August 10, 2020	MISO's Acknowledgement
A-6	October 1, 2020	Planned, Forced, and Unforced Outages for Waterford 1 (HSPM)
A-7	October 1, 2020	Waterford 1's Operating Characteristics (HSPM)
A-8	October 1, 2020	ELL's Plan to Maintain Waterford 1 (HSPM)

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

<i>IN RE:</i> NOTIFICATION OF)	
DEACTIVATION AND RETIREMENT)	
DECISIONS PURSUANT TO LOUISIANA)	
PUBLIC SERVICE COMMISSION'S)	DOCKET NO. X-_____
DEACTIVATION GENERAL ORDER,)	
(DOCKET NO. R-34407))	

APPENDIX A-1

**HIGHLY SENSITIVE
PROTECTED MATERIALS
FILED UNDER SEAL**

**INTENTIONALLY
OMITTED**

OCTOBER 2020

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

<i>IN RE:</i> NOTIFICATION OF)	
DEACTIVATION AND RETIREMENT)	
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PUBLIC SERVICE COMMISSION'S)	DOCKET NO. X-_____
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APPENDIX A-2

**HIGHLY SENSITIVE
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PUBLIC SERVICE COMMISSION'S)	DOCKET NO. X-_____
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(DOCKET NO. R-34407))	

APPENDIX A-3

**HIGHLY SENSITIVE
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OMITTED**

OCTOBER 2020

MISO
FERC Electric Tariff
ATTACHMENTS

ATTACHMENT Y
Notification of Resource/SCU/Pseudo-tied Out Generator Change
32.0.0

ATTACHMENT Y

Notification of Generation Resource/SCU/Pseudo-tied Out Generator

Change of Status,

Including Notification of Rescission

This is a notification of change of status of a Generation Resource, Synchronous Condenser Unit ("SCU"), or Pseudo-tied out Generator in accordance with Section 38.2.7.a of the Tariff. An electronic copy of the completed form will be accepted by the Transmission Provider, however, a form will not be considered complete until the original form containing an original signature, including all attachments, is received by the Transmission Provider at the following address: MISO, Attention: Director of Transmission Planning; 720 City Center Drive, Carmel, IN 46032.

The Transmission Provider may request additional information as reasonably necessary to support operations under the Tariff.

Owner of the Generation Resource, SCU or Pseudo-tied out Generator:

Entergy Louisiana, LLC (ELMP)

Name of Market Participant: Entergy Louisiana, LLC (ELMP)

Owner's state of organization or incorporation Texas

Generation Resource/SCU/Pseudo-tied Out Generator [plant and unit number(s)] Waterford Plant
Unit 1

Source/Identification of Generation Interconnection Service [name of agreement, parties, date, date filed and docket number, and any other information to identify an agreement] MISO South
Regio Market Transition Deliverability Study, May 15, 2013

Effective On: July 16, 2018

MISO
FERC Electric Tariff
ATTACHMENTS

Notification of Resource/SCU/Pseudo-tied Out Generator Chang
ATTACHMENT Y
32.0.0

Pursuant to the terms of the MISO Tariff, Owner hereby certifies that it will

- ☒ Suspend for economic reasons operation of all or a portion of the Generation Resource/SCU/Pseudo-tied out Generator commencing on 1st [day] of February [month] of 2021 [year]
☐ Rescind the current notice to Suspend
The facility is further described as follows:

Location: St. Charles Parish, LA

Unit Name	CPNode (if applicable)	Nameplate Capacity(MW)	Change in Capacity(MW)
Waterford 1	EES.WATRFD1	411.2	411.2

Owner understands and agrees that this notification is provided in accordance with Section 38.2.7 of the Transmission Provider's Tariff and will not be made public by the Transmission Provider except as provided for under Section 38.2.7 of the Tariff.

The undersigned certifies that he or she is an officer of the owner of the Generation Resource/SCU/Pseudo-tied out Generator, that he or she is authorized to execute and submit this notification, and that the statements contained herein are true and correct.



Signature

Name: Mark Kleehammer

Contact Information

Title: Vice President, ELL Regulatory & Public Affairs

Email: MKLEEHA@entergy.com

Date: August 5, 2020

Phone: 504-840-2528

STATE OF Louisiana

PARISH OF Jefferson

Effective On: July 16, 2018

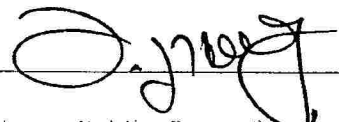
MISO
FERC Electric Tariff
ATTACHMENTS

ATTACHMENT Y
Notification of Resource/SCU/Pseudo-tied Out Generator Chang
32.0.0

Before me, the undersigned authority, this day appeared Mark Kleehammer, known by me to be the person whose name is subscribed to the foregoing instrument, who, after first being sworn by me deposed and said:

"I am an officer of Entergy Louisiana, LLC. I am authorized to execute and submit the foregoing notification on behalf of Entergy Louisiana, LLC, and the statements contained in such application are true and correct."

SWORN TO AND SUBSCRIBED TO BEFORE ME, the undersigned authority on this the 5th day of August, 2020


Notary Public, State of Louisiana

My Commission expires at death

Lawrence J. Hand, Jr., 23770
Notary Public in and for
the State of Louisiana.
My Commission is for Life.

From: Tung Nguyen
To: Naeher, Heather
Cc: Vikram Godbole; Adams, Elizabeth; Keehn, Ryan; *Resource Retirement
Subject: RE: [EXT] Attachment Y - Waterford 1 (dated 8/5/2020)
Date: Monday, August 10, 2020 10:23:01 AM

EXTERNAL SENDER. DO NOT click links, or open attachments, if sender is unknown, or the message seems suspicious in any way. DO NOT provide your user ID or password.

Heather,

This email is to confirm that we've received the updated Attachment Y for Waterford 1, and have discarded the older versions.

Thank you,
Tung

From: Naeher, Heather <hnaeher@entergy.com>
Sent: Thursday, August 6, 2020 11:22 AM
To: Tung Nguyen <ttnghuyen@misoenergy.org>
Cc: Vikram Godbole <VGodbole@misoenergy.org>; Adams, Elizabeth <eadams4@entergy.com>; Keehn, Ryan <rkeehn@entergy.com>
Subject: [EXT] Attachment Y - Waterford 1 (dated 8/5/2020)

External E-mail: Please be cautious and evaluate before you click on links, open attachments, or provide credentials or data.

Hi Tung,

As discussed, please see the appended Attachment Y for Waterford 1 executed by Mark Kleehammer on behalf of Entergy Louisiana. This version dated 8/5/2020 replaces the prior (dated 8/3/2020).

Additionally, can you please confirm that this form executed by Mark has replaced the prior and that the prior version with the administrative error has been discarded? The shipping notification shows that it should have arrived to your offices this morning.

I appreciate your guidance in resolving this administrative error.

Thanks,

Heather Naeher

Supply Planning & Analysis

Tel: [REDACTED]

Cell: [REDACTED]

This message is intended for the exclusive use of the intended addressee. If you have received this message in error or are not the intended addressee or his or her authorized agent, please notify me immediately by e-mail, discard any paper copies and delete all electronic files of this message.

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

<i>IN RE:</i> NOTIFICATION OF)	
DEACTIVATION AND RETIREMENT)	
DECISIONS PURSUANT TO LOUISIANA)	
PUBLIC SERVICE COMMISSION'S)	
DEACTIVATION GENERAL ORDER,)	
(DOCKET NO. R-34407))	

DOCKET NO. X-_____

APPENDIX A-6

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OCTOBER 2020

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

IN RE: NOTIFICATION OF)	
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DOCKET NO. X-_____

APPENDIX A-7

**HIGHLY SENSITIVE
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PUBLIC SERVICE COMMISSION'S)	DOCKET NO. X-_____
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APPENDIX A-8

**HIGHLY SENSITIVE
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OCTOBER 2020