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MISS. PUBLIC SERVICE
COMMISSION

BEFORE THE MISSISSIPPI PUBLIC SERVICE COMMISSION

ENTERGY MISSISSIPPI, LLC

IN RE: ENTERGY MISSISSIPPI, LLC'S
RP 29 NOTICE FILING

2019- **'19 -UA-232**

EC-123-0082-00

NOTICE OF IRP CYCLE

Entergy Mississippi, LLC ("Entergy Mississippi" "EML" or the "Company") files its "Notice of IRP Cycle" pursuant to Rule 29.105(1) of the Mississippi Public Service Commission and Public Utilities Staff's Public Utilities Rules of Practice and Procedure ("Procedural Rules"). In this Notice, Entergy Mississippi is seeking a waiver and extension of current deadlines and proposing a revised compliance schedule. The additional time will benefit stakeholders and better align EML's IRP Cycle with its resource planning process.

1. On November 22, 2019, the Mississippi Public Service Commission ("Commission") issued its Final Order Amending Rule 29 to Establish Integrated Resource Planning and Annual Energy Delivery Reporting Requirements ("Order"). The Order approved the Integrated Resource Planning and Reporting Rule ("IRP Rule"). The IRP Rule establishes reporting requirements and deadlines for electric utilities like Entergy Mississippi.

2. Rule 29.105 (1) requires electric utilities to file a Notice of IRP Cycle ("Notice") within 30 days of the Commission's approval of the final IRP Rule. This Notice is being timely filed.

3. The Notice initiates the IRP planning and reporting cycle; it also triggers additional deadlines, including, but not limited to:

a. The electric utility must hold an initial public workshop for interested parties within 30 days of filing the Notice. RP 29.105(2). "The purpose of the initial public workshop is for the electric utility and interested parties to exchange pertinent information concerning the IRP process, such as resource options, planning assumptions and inputs that may be used in the development of a utility's Integrated Resource Plan." *Id.* Interested parties that attend the workshop may provide written feedback to the electric utility and the Commission within 25 days following the workshop. *Id.* Under the current timeline, the initial public workshop is required to be held by January 22, 2020.

b. Electric utilities must file their Integrated Resource Plan no later than 12 months after the issuance of the Order. RP 29.105(4). Under the current timeline, the deadline to file an Integrated Resource Plan is November 22, 2020 ("IRP Deadline").

4. RP 29.109 provides that the Commission may grant exemptions to the requirements of the IRP Rule according to the Procedural Rules. EML is requesting a waiver and extension for the following reasons.

A. An extension will allow EML to maintain its current IRP cycle with the Commission and support the Company's comprehensive planning process.

5. As the Commission is aware, even before the IRP Rule, EML engaged in integrated resource planning and filed an IRP with the Commission.

6. A typical IRP timeline is approximately 18 months, given the time needed to develop some of the key inputs and assumptions and for the development of the analytical framework and evaluations required to support a comprehensive process.

7. Entergy Mississippi filed its most recent IRP in June of 2018. Given the typical IRP cycle of 3 years and the 18-month development timeline, EML is preparing to begin the 2021 IRP process in January 2020, to be finalized and filed with the Commission by June 2021.

8. An extension of RP 29 Cycle will allow EML to maintain its current IRP cycle and support its comprehensive resource planning process.

9. EML's IRP process involves a complex portfolio design.

10. Through EML's internal IRP process, the Company conducts an extensive study of customers' needs over the next 20 years based on the most current available data. In designing the IRP, EML develops and uses several factors and assumptions to guide its portfolio design analysis strategy, including:

- a. the development of a long-range load or demand forecast;
- b. analysis of the technological landscape;

- c. identifying and incorporating the effects of cost-effective demand-side programs;
- d. development of commodity/market price forecasts, including a natural gas forecast to serve as a model for future natural gas pricing; and
- e. considerations for the potential for carbon regulation for the energy sector.

11. In addition to the development of the assumptions and assessments that guide the design process, the analytical framework and evaluation are a multi-step process that includes the development of planning scenarios and strategies or futures, the development of market modeling, portfolio development, the development of total relevant supply costs, and the development of conclusions.

B. An extension of the RP 29 IRP Cycle deadlines will avoid duplication of effort and an inefficient process and ensure that key inputs and assumptions reported are current.

12. Entergy Mississippi employs work product efficiencies throughout its resource planning process to streamline the timeline and IRP development, where possible. However, the Company necessarily relies on external consultants and consultants' materials, which include their own refresh cycles to develop key inputs. These external refresh cycles may not align with the RP 29 IRP cycle. In some cases, the Company may use an alternative resource, but in other cases, the external refresh cycle needs to be considered and included in the EML IRP cycle.

Shortening the current timeline for EML's IRP process could result in the use of older data for inputs, which would be contrary to the purpose of the IRP rule to provide transparency and a current view of the utility's planning process. In order to achieve the purpose of the IRP rule under the RP 29 IRP cycle, Entergy Mississippi would have to update the inputs mid-way through the IRP process. If it could be done timely, this would be inefficient as it would require the Company to duplicate work. An extension of the RP 29 IRP cycle would support providing a transparent current view of the planning process and avoid unnecessary duplication.

C. A modified schedule would give interested parties and the Commission more time to review EML's IRP.

13. The current deadlines could create an unnecessarily compressed timeline for IRP review. Filing an IRP under the current cycle (a November IRP filing) would impact the Public Utilities Staff's and other interested parties' review time because of the holiday season. End of year is also one of the busiest times for the Commission because of annual fuel audits and filings, which are handled during the January Open Meeting.

14. A waiver and extension will not prejudice any stakeholder and, in fact, a modified schedule would be beneficial for stakeholders.

15. Accordingly, EML asks the Commission to approve the below, modified schedule:

- a. Public Workshop – no later than May 1, 2020

b. Technical Conference – no later than May 1, 2021

c. IRP Filing – no later than June 15, 2021

16. If the Commission grants the waiver and extension requested above, all future Integrated Resource Plans for Entergy Mississippi would be due on or before June 15 of every three-year cycle (June 15, 2024, June 15, 2027, etc.)

17. Pursuant to Rule 29.108, Entergy Mississippi submits and attaches to this Notice a non-disclosure agreement for the Commission to maintain on file.

WHEREFORE, PREMISES CONSIDERED, Entergy Mississippi requests that the Commission grant a waiver of the above-referenced deadlines in the IRP Rule and grant extensions as described herein, including an extension for the next IRP Cycle and a permanent deadline extension going forward.

The Company further prays for such other, further, and general relief as may be required, beneficial, or needed.

This the 23rd day of December 2019.

ENTERGY MISSISSIPPI, LLC

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ATTORNEYS FOR THE PETITIONER,
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RP 6.111 CERTIFICATE OF SERVICE

I, TIANNA H. RABY, one of the attorneys for Entergy Mississippi, LLC, hereby certify that on this day I have caused to be filed the foregoing Notice of IRP Cycle with:

Katherine Collier
Executive Secretary
Mississippi Public Service Commission

and that on this day I have caused to be delivered a copy of the foregoing filing to:

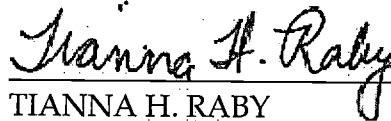
Virden Jones
Executive Director
Mississippi Public Utilities Staff

Tad Campbell
General Counsel
Mississippi Public Utilities Staff

Frank Farmer
General Counsel
Mississippi Public Service Commission

and that I have complied with Rule 6 of the Commission's Public Utilities Rules of Practice and Procedure.

This the 23rd day of December 2019.


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