

BEFORE THE
ARKANSAS PUBLIC SERVICE COMMISSION

IN THE MATTER OF ENTERGY)
ARKANSAS, INC.'S RESOURCE PLAN)
SUBMITTED PURSUANT TO) DOCKET NO. 07-016-U
RESOURCE PLANNING GUIDELINES)
FOR ELECTRIC UTILITIES)

MOTION FOR EXTENSION OF TIME UNDER SECTION 6.1
OF THE RESOURCE PLANNING GUIDELINES

COMES NOW Entergy Arkansas, Inc. ("EAI" or the "Company") and, for its Motion for Extension of Time Under Section 6.1 of the Resource Planning Guidelines states:

1. This Motion is made pursuant to Rule 3.10 of the Rules of Practice and Procedure ("RPP") of the Arkansas Public Service Commission ("APSC" or the "Commission").

2. Section 6.1 of the APSC Resource Planning Guidelines ("RPG") adopted in Order No. 6 in Docket No. 06-028-R provides that "a Resource Plan shall be submitted [by each utility] at least once in each three-year period." Consistent with that directive, EAI has filed Integrated Resource Plans ("IRP") with the Commission on October 31, 2009 and October 31, 2012. Pursuant to Section 6.1 of the RPGs, EAI is required to file its next IRP by October 31, 2015.

3. EAI respectfully requests that the Commission grant EAI an extension of time under which it must file its IRP pursuant to Section 6.1 and allow the Company to file its next IRP no later than October 31, 2016.¹ The Company submits that good cause exists for granting this extension and respectfully requests expedited consideration of the Company's Motion in order to avoid unnecessary expense and effort on this project by the Company and its Stakeholders.

4. Section 4.3 of the RPGs, states that, "[f]or incremental capacity needs, all reasonably useful and economic supply and demand resources that may be available to a utility or its customers should be considered." Currently, there are several anticipated or pending proceedings before the Commission that will greatly influence EAI's incremental capacity needs and the supply-side and demand-side resources that may be available to address those needs. EAI anticipates that most, if not all, of these proceedings will be completed by the end of 2015, and the decisions arising therefrom will provide a much sounder foundation upon which EAI's next IRP could be based.

5. One such proceeding is EAI's upcoming transition program plan filing for energy efficiency programs to be filed in Docket No. 07-085-TF in June 2015 pursuant to Order No. 25 in Docket No. 13-002-U. Although this filing only

¹ Assuming EAI's request for an extension of time is granted and EAI files its next IRP on or before October 31, 2016, EAI would then plan to file its subsequent IRP no later than three years from that filing (i.e., on or before October 31, 2019) pursuant to Section 6.1 of the RPGs.

represents a transition year pursuant to Order No. 25, EAI's anticipates that its June 2015 filing will largely reflect the programs and budgets contemplated for EAI's subsequent multi-year program plan filing due to be filed June 1, 2016. Accordingly, assuming that EAI's transition plan is approved by December 2015 as anticipated, EAI will have a better understanding of the level of energy and demand savings that can be anticipated from those programs and make a reasonable extrapolation of those figures in its IRP. The availability of demand-side resources is a critical element of EAI's IRP, but it is an element that is subject to wide variance depending upon the assumptions used for savings and the costs to achieve. The additional direction from the Commission anticipated later this year regarding EAI's energy efficiency programs will assist EAI and the other stakeholders in evaluating EAI's capacity and energy needs over the IRP planning period and the resource options available to address those needs.

6. With respect to supply-side resources, EAI has two dockets currently pending wherein EAI is seeking to add long-term resources to its portfolio. In Docket No. 14-118-U, EAI has requested approval to purchase Power Block 2, a 495 MW combined-cycle combustion gas turbine as well as associated common assets, at the Union Power Station located near El Dorado, Arkansas. In Docket No. 15-014-U, EAI has proposed to add to its portfolio of supply-side resources a long-term purchase power agreement ("PPA") associated with an 81 MW solar energy project to be located near Stuttgart, Arkansas. In both of those dockets, EAI has requested that the Commission

render its decision before the end of 2015, and, thus, more certainty regarding EAI's long-term portfolio of supply-side resources will be available in 2016.

7. Further, environmental regulations applicable to EAI's generating units materially influence the outcomes of EAI's IRPs. For several of these regulations, EAI expects there to be regulatory developments later in 2015 which may have a material influence on the IRP, including:

- The federal Environmental Protection Agency ("EPA") is expected to issue later this year² a final FIP relating to Regional Haze requirements for the White Bluff Steam Electric Station ("White Bluff"), Independence Steam Electric Station ("Independence"), and Lake Catherine power plants;
- The EPA has indicated that in the Summer of 2015, it will issue its final Clean Power Plan establishing carbon dioxide standards for existing sources pursuant to the Clean Air Act section 111(d);
- The State of Arkansas is under a deadline of September 2015 to provide to EPA a proposed attainment designation for the one-hour sulfur dioxide ("SO₂") National Ambient Air Quality Standard ("NAAQS") for the areas around White Bluff and Independence; and
- The EPA is expected to issue the final revised ozone NAAQS by October 1, 2015.

² A draft Federal Implementation Plan ("FIP") was issued on April 8, 2015. Pursuant to a consent decree, EPA is required to issue the final FIP by December 15, 2015.

Having the final Regional Haze FIP, final Clean Power Plan, state SO₂ attainment designation, and final ozone standard will provide greater clarity to EAI regarding reasonable assumptions to make for the operations and costs of EAI's fossil-fueled generating units, particularly White Bluff, as well as, potentially, Independence.

8. It is possible for EAI to make various assumptions regarding the outcome of all of these pending and upcoming matters before the Commission, and EAI was required to do just that in connection with its 2012 IRP. However, in the current circumstances, the pending and anticipated matters should be resolved by the end of 2015, with the opportunity to have much more certainty regarding EAI's portfolio of resources and future capacity needs, as well as its demand-side and supply-side options available to meet those needs, through a brief delay. Delaying EAI's next IRP filing one year will mitigate the potential that additional information anticipated later this year could render EAI's IRP out-of-date soon after it is filed. Accordingly, good cause exists to provide EAI with its requested extension of time.

9. EAI respectfully requests that, for good cause, the Commission provide EAI with an extension of time from which it is required to file its IRP pursuant to Section 6.1 of the RPG's and allow EAI to file its next IRP on or before October 31, 2016. Such a waiver, and the associated delay in filing EAI's next IRP, will allow numerous uncertainties to be resolved, providing a more

stable foundation upon which EAI and its stakeholders can work in developing EAI's next IRP.

10. EAI respectfully requests that the Commission consider this motion on an expedited basis. The process for developing an IRP contemplated by the RPG's requires numerous meetings and briefings between EAI and its Stakeholders. EAI will need to schedule and prepare for its Stakeholder meeting and begin working with Stakeholders to form the Stakeholder Committee as contemplated by Section 4.8 of the RPGs. Accordingly, expedited consideration of this Motion will assure that neither the Company nor its Stakeholders are required to expend more resources than necessary to address any issues associated with EAI's IRP filing, assuming EAI's requested waiver is granted by the Commission. EAI further notes that it has contacted representatives of the Staff, the Attorney General, and Arkansas Electric Energy Consumers, Inc. regarding the substance of this Motion, and each of those parties have authorized EAI to state that they have no objection to EAI's Motion.

WHEREFORE, Entergy Arkansas, Inc. respectfully requests that the Commission consider its Motion on an expedited basis, provide EAI with an extension of time within which to file its IRP pursuant to Section 6.1, allow the Company to file its next IRP no later than October 31, 2016, and granting the Company all other necessary and proper relief.

Respectfully submitted,
ENERGY ARKANSAS, INC.

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ATTORNEYS FOR ENERGY ARKANSAS, INC.

CERTIFICATE OF SERVICE

I, Matthew R. Suffern, do hereby certify that a copy of the foregoing has been served upon all parties of record by forwarding the same by electronic mail and/or first class mail, postage prepaid, this 1st day of May, 2015.

/s/ Matthew R. Suffern
Matthew R. Suffern