

June 6, 2017

BY HAND DELIVERY

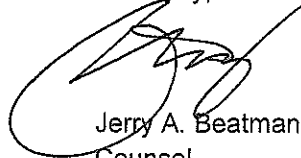
Ms. Lora W. Johnson
Clerk of Council
Council of the City of New Orleans
City Hall, Room IE09
1300 Perdido Street
New Orleans, LA 70112

In Re: *An Inquiry and Fact Finding Into ENO's and ELL's Post-Hurricane Isaac Response and Storm Recovery Matters: Review of ENO's Supplement to Final Storm Hardening Report*, CNO Docket No. UD-12-04

Dear Ms. Johnson:

Enclosed please find an original and four (4) copies of the Advisors' *Review of Entergy New Orleans, Inc.'s Supplement to Final Storm Hardening Report*, which we are requesting be filed on behalf of the Council's Utility Advisors. Please file the enclosed *Review* and this letter in the record of this proceeding in accordance with your normal procedure.

Sincerely,



Jerry A. Beatmann, Jr.
Counsel

JAB/dpm
Enclosures

cc: Official Service List

REVIEW
OF
ENTERGY NEW ORLEANS, INC.'S SUPPLEMENT TO FINAL STORM HARDENING REPORT
COUNCIL DOCKET No. UD-12-04

BACKGROUND

Pursuant to Council Resolution R-15-31 the Advisors conducted a series of meetings with representatives of ENO to discuss the Council's expectations in connection with its mandate to ENO to develop and propose a meaningful storm hardening plan that would improve the performance of the system in storms, and allow quicker recovery after storms.

ENO's initial discussions revolved mostly around pole inspections, vegetation management and limited undergrounding. This limited focus was reflected in ENO's periodic reports, which were roundly criticized by the Advisors as inadequate and largely nothing more than a commitment to do routine maintenance and ordinary upgrades that should be done independent of storm hardening concerns. Moreover, the interim proposals did not meaningfully advance storm hardening.

ENO was granted several extensions to file its final report, which was ultimately done on January 21, 2016. While the final report did adopt some changes urged by the Advisors, such as more full excavation pole inspections, it showed scant improvement over the interim reports and proposed little more than enhanced O&M practices. This led to Council Resolution R-16-263, which criticized ENO's efforts and, more specifically, the final report. The resolution directed ENO to show cause why its actions with respect to storm hardening, among other matters, were not imprudent.

As a result, ENO filed a supplemental storm hardening report on September 29, 2016. As discussed below, the Advisors believe that the supplemental report represents the first actual substantive proposal by ENO since the adoption of Resolution R-15-31. Much of what is incorporated into the supplemental report is the result of the urgings of the Advisors, including the incorporation of some storm hardening efforts used by Florida Power and Light made over the past decade.

SUMMARY CONCLUSIONS AND RECOMMENDATIONS

Based upon the Advisors review, and as noted in Resolution R-16-263, ENO's Final Storm Hardening Report¹("Final Report"), filed with the Council on January 21st, 2016 provided no detailed storm hardening plan, project specific capital costs or timeline for specific project accomplishments. As opposed to ENO's Final Report, the Company's Supplement to its

¹*Entergy New Orleans, Inc.'s Final Report in Response to Council Resolution R-15-31, January 21st, 2016.*

Review of ENO's Supplemental Report to Final Storm Hardening Report

Final Report² ("Supplemental Report") filed on September 29th, 2016 provides a well thought out effective storm hardening plan, which should positively support and improve the reliability and storm resiliency of ENO's distribution system, and should reduce the frequency and duration of outages to customers. ENO's current plan as detailed in the Supplemental Report is vastly superior to the Company's earlier proposed plans. Based upon the Advisors review of the Supplemental Report, the Council should consider directing ENO to proceed with the storm hardening measures it has proposed, along with a requirement for detailed periodic reporting to the Council as discussed herein.

REVIEW OF ENO'S SUPPLEMENTAL REPORT TO THE COUNCIL

Changes to Proposed Selective Undergrounding Projects

- The Company's Final Report proposed two selective undergrounding projects totaling approximately \$3 million: 1) installation of two new underground circuits in the Mid-City area from Midtown Substation through an existing duct bank along Interstate 10 in order to shift existing customer load presently served by overhead feeders, and to reduce its customer counts per feeder; and 2) a pilot program involving the selective undergrounding of an existing overhead feeder located in Algiers.
- In its Supplemental Report, ENO indicated that it has re-evaluated its Mid-City undergrounding proposal, and has determined that its goal of reducing customer counts per feeder could be accomplished more simply and less expensively by constructing minimal new overhead distribution facilities in the Midtown area, the addition of sectionalizing line switches, and the addition of two circuit breakers at Midtown Substation. ENO additionally determined that the spare duct capacity that would not be utilized with its revised proposal, could be better utilized in the future for new underground circuits to serve the new University Medical Center and VA hospitals, and expected economic development and load growth in the area.
- After its Final Report was filed with the Council, ENO determined that its proposed Algiers undergrounding project was infeasible for several reasons: 1) existing right-of-way ("ROW") documents would need to be amended to allow for installation of underground facilities, which would require the approval of all affected home/landowners; 2) the existing ROW is encumbered by storage sheds, plantings and swimming pools that would interfere with construction; 3) access to rear alley lines for construction would require removal of fences and other structures, possibly resulting in property damage claims; and 4) affected customers would have to bear the cost of undergrounding under ENO's Customer Installation Standards, and ENO customers that don't wish to convert to underground service would need to continue to be fed by existing overhead service. Based upon the problems identified by ENO, the Company withdrew any further consideration of its proposed Algiers undergrounding project.

²*Entergy New Orleans, Inc.'s Supplement to Final Storm Hardening Report in Response to Council Resolution R-15-31, September 29th, 2016.*

- As a result of the problems ENO identified concerning its proposed Algiers undergrounding project, ENO reassessed its project selection criteria in conjunction with its Supplemental Report, in an attempt to potentially eliminate some of the problems identified for its Algiers undergrounding project. ENO's new project selection criteria includes: 1) targeting poor-performing circuits for selective undergrounding; 2) identifying candidate undergrounding projects where underground feeder conductors can be installed in existing ROWs accessible by street; and 3) focused efforts to identify backbone distribution circuits and facilities prone to public inflicted damage affecting large numbers of customers.
- Based upon follow-on work performed in conjunction with its Supplemental Report, ENO has requested that the \$3 million originally allocated to selective undergrounding in Algiers in its Final Report, be reallocated to its proposed circuit reconfiguration project.

Observations: *As initially noted by the Advisors in their report filed April 29th, 2016³, ENO's selective undergrounding proposal in Algiers was NOT adequately thought out or investigated, and upon cursory review it should have immediately been eliminated from any further consideration. ENO's modified undergrounding project selection criteria may result in identifying better candidate undergrounding projects, offering reliability benefits to a greater number of customers. ENO's currently proposed circuit reconfiguration project in the Mid-City area can be accomplished in less time, is more cost effective than the project originally proposed by ENO in its Final Report, and should improve the reliability of service to area customers. In its Supplemental Report, ENO proposes reallocating all \$3 million capital and O&M dollars from selective undergrounding to circuit reconfiguration. ENO's current proposal is considerably superior to that proposed in its Final Report and should result in increased service reliability. ENO has indicated in its Supplemental Report that its presently proposed circuit reconfiguration project can be "accomplished more simply and less expensively" than its previously proposed project.*

Recommendations: *The Council should approve ENO's request to re-allocate \$3 million from Selective Undergrounding to Circuit Reconfiguration and direct ENO to proceed with its proposed project. The Council should further direct ENO to file with the Council progress reports on a quarterly basis to detail all steps taken to evaluate any new selective undergrounding projects. The report shall also provide detail on the Mid-City reconfiguration project as well as any other circuit reconfiguration projects proposed, in progress and completed.*

ENO's Plan for Prioritizing Work on Its Storm Hardening Proposal

- The Supplemental Report indicates that the primary focus of ENO's Storm Hardening

³ Advisors Report on ENO's Final Storm Hardening Report, April 29th, 2016.

Proposal will be to enhance the rigidity and resiliency of its feeders providing service to its Critical Customers. ENO notes that this is the approach that has been taken by Florida Power & Light Co. over the past ten years.

- ENO maintains a list of "Critical Customers" compiled with input from the New Orleans Office of Homeland Security and Emergency Preparedness in order to aid in its storm restoration efforts. ENO's Critical Customer List is updated as necessary. ENO distribution facilities serving Critical Customers are prioritized in five categories: 1) Priority Zero – facilities important to Entergy's restoration process such as supply lines to generation units, dispatch centers, and emergency response centers; 2) Priority One – facilities that impact public safety or public health, such as feeds to hospitals, local emergency preparedness centers, police/fire stations, major sewer/water systems, Red Cross and other potential emergency housing facilities; 3) Priority Two – facilities that impact Civil Defense (military facilities, radio/TV stations, airports, major telephone/cell facilities, oil/gas facilities); 4) Priority Three – facilities that serve customers on ENO's Medical Assistance list, including nursing homes, assisted living facilities and after-hour care facilities; and 5) Priority Four – facilities serving all other ENO customers.
- ENO proposes to use its Critical Customer List information as its primary criteria for prioritizing storm hardening work, taking into account the number of Critical Customers served by each feeder, and each feeder's prioritization category. In addition ENO proposes to also consider the total number of customers served by each feeder, number and location of structures identified for replacement as part of ENO's annual pole inspection program, and ENO's historical reliability performance of protective devices identified as part of ENO's tactical reliability review and inspection program.
- ENO proposes to update its storm hardening prioritization plan as the topology of its distribution system evolves, or as the number and location of Critical Customers changes. Hardening of each feeder on ENO's prioritized list will be addressed in the order of prioritization.

Observations: *ENO's proposed plan for prioritizing storm hardening work is well thought out, follows a time tested proven plan developed by Florida Power & Light, which is an industry leader in storm hardening, and should effectively support improvement of the reliability and resiliency of ENO's distribution system through time. The question remains: why didn't ENO already use a Critical Customer driven prioritization plan in place for performing its storm hardening work?*

Recommendations: *The Council should direct ENO to proceed with its currently proposed Storm Hardening Proposal following its proposed project prioritization plan. The Council should further direct ENO to file with the Council progress reports on a quarterly basis identifying the specific storm hardening projects currently in progress, detailing the specific storm hardening project work it has accomplished, associated capital and O&M project costs incurred, remaining budget amounts, and the number and duration of customer outages experienced on each distribution circuit for which storm hardening work has been accomplished. Furthermore, whenever ENO updates its Critical Customer list, ENO should file its updated list with the Council.*

Enhanced Pole Inspection

- In the Final Report, ENO proposed spending \$11.1 million on an enhanced pole inspection pilot program utilizing full excavation and treatment or replacement of poles as warranted. This was a recommendation made by the Advisors in 2013 at one of the early meetings with ENO on storm hardening which they arguably “pushed back on.”
- ENO’s pilot program was chosen to validate an expected increase in effectiveness in identifying reject poles from approximately fifty – sixty percent using ENO’s historical Sound and Bore methodology to approximately ninety-eight percent using full excavation.
- ENO subsequently agreed to initiate its enhanced pole inspection pilot program in 2016, using 2016 funds allocated to pole inspections without using any funds associated with its Storm Hardening Proposal.
- In its Supplemental Report, ENO indicates that it has completed enhanced full excavation inspections of approximately 2,000 poles in Orleans Parish, resulting in a pole rejection rate of approximately twelve percent. This compares to ENO’s historical pole rejection rate of approximately two percent based upon ENO’s use of a Sound and Bore inspection technique. ENO notes that an additional benefit of the enhanced full excavation inspection method is that it will allow ENO the opportunity of treating poles to significantly extend their serviceable life by as much as sixty percent.
- ENO proposes to focus future enhanced pole inspections on feeders serving Critical Customers.



Figure 1: Fallen Wood Pole in New Orleans East After February 7th, 2017 Tornado

Observations: *It should be noted that enhanced full excavation pole inspection has previously been recommended by the Advisors to which ENO arguably “pushed back on” as too expensive and non-meritorious. It should be noted that ENO’s pilot program of full excavation inspections increased its rejection rate by six hundred percent. ENO’s*

proposal to perform enhanced full excavation pole inspections going forward, will be a significant improvement over ENO's historical pole inspection program, and should identify a significantly greater number of poles requiring life extension treatment or priority replacement. Industry experience shows that enhanced full excavation pole inspection identifies 90 -95 percent of reject poles, as opposed to ENO's present pole inspection method which typically identifies 40 – 50 percent of reject poles, a fact borne out by its pilot program. ENO's proposed program should improve the reliability and resiliency of its poles, reduce outages caused by pole failures, and support the distribution system's ability to better withstand major storm events. ENO's proposal to focus on feeders serving Critical Customers makes sense and should be supported.

Recommendations: The Council should direct ENO to use the enhanced full excavation pole inspection method going forward as a replacement to its historical Sound and Bore pole inspection method in an accelerated manner, as shown by the condition of the poles in Figure 1. ENO should also be directed to submit quarterly reports to the Council indicating the number of poles inspected, condition found, rejection rates, number of treatments performed, and number of poles replaced.

Storm Hardened Pole Replacements and New Construction

- In the Supplemental Report, ENO reported that all new distribution poles set in ENO's service territory currently meet, at a minimum, the requirements of the National Electric Safety Code ("NESC") Rule 250B, setting the specified design conditions and loads for the New Orleans specific "light" loading district, outlined in the Storm Hardening Report.
- Following Council Resolution R-16-263, which among other things directed ENO to review the practices utilized by Florida Power & Light Company ("FP&L"), as included in FP&L's Electric Infrastructure Storm Hardening Plan⁴, ENO proposed to evaluate pole replacements and new construction projects using a software application called PoleForeman, or other appropriate tools, methods, or technology, for extreme wind speeds of 110 mph and to design to that standard going forward, where feasible and cost effective.
- ENO has indicated that it intends to use Class 3 poles or larger for any pole replacements and new construction, but that damage to poles could still result from wind driven object contacts from outside of the right-of-way during extreme weather conditions.

Observations: ENO's use of NESC Rule 250B to construct electric facilities follows standard practice in the electric utility industry and is prudent in use. The question remains: why didn't ENO utilize NESC Rule 250B historically given the risk of severe storm events impacting New Orleans? These standards ensure that all poles within the ENO service area are able to withstand the temperature, wind speed and radial thickness of ice loading reasonably anticipated on the electric system. As noted in Council-approved

⁴ Filed with the Florida Public Service Commission in compliance with Rule 25-6.0342, F.A.C.

Resolution R-16-263, FP&L is a national industry leader in storm hardening initiatives, making their practices respectable to follow. Understanding the need to maintain a cost effective solution, it is reasonable to evaluate pole replacements and new construction at wind speeds slightly lower than FP&L standards of 120 mph, but exceeding the 50-year Mean Recurrence Interval wind speed of 108 mph. Most notably, the question remains as to why ENO hasn't already been using class 3 poles for its pole replacements and new construction?

Recommendations: ENO should be directed by the Council to proceed with the use of NESC Rule 250B for replacement of new poles and the use of PoleForeman software to evaluate extreme wind speed pole replacements as described, where found to be cost effective. It should be noted, the Advisors had previously recommended that ENO provide a more detailed update of all proposed non-undergrounding storm hardening measures that were included in ENO's Final Report⁵. Accordingly, ENO should also be directed to submit quarterly reports to the Council indicating the number of poles replaced and new poles installed in compliance with NESC Rule 250B, and reporting on the results of the use of the PoleForeman software.

Targeted Storm Hardening Reliability Measures

- In its Supplemental Report, ENO has proposed allocating \$10.8 million to Targeted System Hardening measures, focusing these measures on infrastructure serving Critical Customers.
- Targeted Storm Hardening initiatives identify, through visual inspections, structures which have damaged equipment or which do not meet current Entergy reliability standards for Basic Insulation Level ("BIL")⁶ to mitigate effects of lightning strikes.
- Under ENO's proposed Targeted Storm Hardening initiative, structures with damaged equipment would be replaced and analyzed using the extreme wind analysis target for a designed wind loading of 110 mph. This may identify additional guying, anchoring and even upgrading the strength class of the pole, only to be completed where feasible and cost effective.

Observations: *Per Advisors recommendations, ENO's updated proposal related to Targeted Storm Hardening initiatives provided much more detail than was given in their Final Report and should result in decreasing the extent of equipment damage from major storm events in ENO's service area. Performing PoleForeman analyses with the updated extreme wind analysis target of 110 mph, allowing the potential to identify*

⁵ Id.

⁶ BIL is the basic voltage surge withstand level of electric equipment, such as lightning arrestors, transformers, etc. The BIL is the voltage level to which equipment should be designed to withstand lightning strikes without failing.

additional work necessary, will increase system reliability and lower the frequency of pole replacements from pole and distribution equipment failures during major storm events.

Recommendations: ENO should be directed by the Council to proceed with the use of the \$10.8 million for its proposed Targeted System Hardening measures. The Council should direct ENO to file quarterly reports with the Council describing the targeted storm hardening measures undertaken by ENO, the budget and schedule for each project, and the expected completed completion dates.

Sectionalization and Automation

- In its Supplemental Report, ENO proposes allocating \$5.2 million to Sectionalization and Automation storm hardening measures, intending to focus these measures on infrastructure serving critical customers.
- ENO proposes installing additional reclosers and fault indicators with Supervisory Control and Data Acquisition ("SCADA") capabilities on its backbone distribution feeders which will enable remote switching from ENO's Distribution Operation Center ("DOC").
- ENO indicates that the installation of more field reclosers will provide opportunities to install new Automated Load Transfer ("ATL") schemes, further minimizing customer interruptions and the duration of outages.

Observations: Per Advisors concerns and recommendations, in its Supplemental Report ENO provided more detail on sectionalization and automation measures than was given in their Final Report. ENO's proposed sectionalization and automation additions should reduce the number of customers affected by an outage, as well as the duration of the outage. Sectionalizing circuits into smaller segments reduces the number of customers per protective device, lowering the number of customers affected by an outage. Installation of ATL schemes should further minimize customer interruptions by automatically switching to serve customers from another source in the event of an outage. Installation of fault indicators will allow ENO's service crews to better determine the location of an outage rather than taking time to complete an inspection of the entire circuit downstream which should reduce service restoration time. It should be noted that sectionalization and automation measures have been standard good utility practice for many years. The question remains: why weren't such measures already in place on ENO's distribution system?

Recommendations: ENO should be directed by the Council to proceed with the use of the \$5.2 million to accomplish its proposed Sectionalization and Automation measures for ENO's distribution system as soon as practicable. The Council should direct ENO to file quarterly reports with the Council going forward indicating the number of sectionalization and automation projects completed, related capital and O&M costs,

remaining budget, and the schedule for accomplishment of continuing sectionalization and automation projects.

ENO's Use of Composite Poles

- Though not part of ENO's proposed Storm Hardening Plan, in response to Councilmember questions, ENO included a discussion in its Supplemental Report concerning the possible use of composite poles as a hardening measure.
- ENO reports that it has been investigating the feasibility, suitability, and possible benefits of using composite poles since 2015, and has discussed the use of such poles with a utility that has been using them for approximately ten years. From its investigations, ENO has determined the benefits and disadvantages of composite poles in comparison to wood poles.
- In late 2015, ENO provided composite pole specifications to manufacturers, ordered approximately 200 poles, and arranged training for ENO line crews on the handling, installation, and maintenance of such poles.
- ENO design engineers have designed 45 projects to install composite poles to replace wood poles in locations difficult to reach via bucket truck, areas where significant BIL⁷ improvements can be made, and locations where significant woodpecker impacts have occurred.
- ENO intends to look for locations during the course of its storm hardening work where composite poles can be used and tested to gain operating experience and determine if the use of such poles is compatible with ENO's operating environment.
- ENO proposes to come back to the Council in the future with additional information, based upon its experience in using and testing composite poles.



Figure 1: Composite Distribution Pole

Observations: *ENO's proposal to selectively install and gain experience with composite poles is responsive to Councilmember questions, and should provide valuable information upon which ENO can commit to further deployment of composite poles in the future.*

Recommendations: *The Council should direct ENO to report back to the Council by October 1, 2017 on the results of its experience with composite poles, including the location and quantity of composite pole installations, the cost of such installations, the resulting benefits to customers from each project, and the estimated improvement in*

⁷ Id.

system reliability. ENO should also be directed to include its recommendation to expand the deployment of such poles if found to be warranted, and if not a detailed explanation of why it believes such investments are not necessary.

Advanced Metering Infrastructure

- In its Supplemental Report, ENO indicates that it intends to file an Application with the Council seeking approval of an Advanced Metering Infrastructure ("AMI") Program that will provide additional system reliability and resiliency benefits that will compliment ENO's storm hardening initiatives, as proposed in its Supplemental Report.
- ENO filed its Application with the Council on October 18, 2016 in Council Docket No. UD-16-04.

Observations: *ENO's AMI program is currently being considered in Council Docket No. UD-16-04. .*

Coordination with City of New Orleans on Infrastructure Projects

- In its Final Report, ENO indicated that they have met with City Capital Projects Administration staff, Department of Public Works for the City of New Orleans and Sewage and Water Board of New Orleans staff to begin discussions on possible coordination regarding planned infrastructure projects.
- In the Supplemental Report, ENO has not provided any update on any potential projects or future planned meetings with the City regarding possible coordination of projects.

Observations: *None.*

Recommendations: *The Council should consider directing ENO, going forward, to report to the Council the results of its future meetings with the City including specific information concerning any identified circuit reconfiguration projects, or potential undergrounding projects, including the cost of such projects, the estimated time for undertaking and completing each project, the expected benefits to customers from each project, and estimated improvement in system reliability as a result of such projects. Such reporting to the Council should be filed quarterly.*

Vegetation Management Practices

- In their Final Report, ENO provided detailed information regarding their historical vegetation-specific System Average Interruption Frequency Index ("SAIFI")⁸ and System Average Interruption Duration Index ("SAIDI")⁹ reliability indices.

⁸ SAIFI measures the number of times the average customer experiences an electrical outage over a period of time.

⁹ SAIDI measures the number of minutes over the year that the average customer is without power. It is

- The Companies also provided detailed information concerning their present vegetation management program, including tree trimming specifications, and trimming cycle. For the East Bank, ENO performs tree trimming on City-owned trees every 2.5 - 3 years. ENO's average trim cycle in Algiers is 3.5 years. ENO trims trees to a four foot clearance in conformance with Department of Parks and Parkways specifications.
- In the Final Report, ENO indicated that though they had considered modifying their trimming standards to 6 – 10 ft. cutbacks in urban areas, and 10 – 15 ft. cutbacks in rural areas, or alternatively increasing its trim cycle, ENO ultimately concluded that the increased costs and anticipated public resistance to such changes did not warrant further consideration. Accordingly, ENO recommended that it adhere to its historical trimming practices at this time without any change.
- ENO has not provided any additional information concerning its vegetation management practices in the Supplemental Report.

Observations: *The Advisors review of ENO's vegetation-specific SAIFI and SAIDI data shows that vegetation does not appear to be a major cause of outages, and such outages are of relatively short duration. ENO's current trim cycle and adherence to Department of Parks and Parkways clearance specifications have resulted in very low vegetation specific SAIFI/SAIDI reliability indices, suggesting that the ENO's current vegetation management program is effective, and in support of the ENO's reliable system operation excluding major storm events.*

Recommendations: *The Council should direct ENO to continue the use of the current Vegetation Management Practices as recommended in ENO's Final Report with follow-up reporting to the Council annually, including the number and type of vegetation management projects completed, number of trees trimmed, number of trees removed, total cost of vegetation management activities accomplished, and vegetation management projects planned for the next twelve month period.*

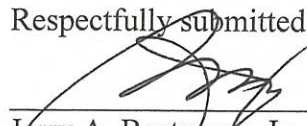
calculated by dividing the number of minutes customers were without power over the year by the number of customers served.

CERTIFICATE OF SERVICE

Docket No. UD-12-04

I hereby certify that I have this 6th day of June, 2017, served the required number of copies of the foregoing comments upon all other known parties of this proceeding, as listed below, by electronic mail.

Respectfully submitted



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Review of ENO's Supplemental Report to Final Storm Hardening Report

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