



Gulf States Renewable Energy Industries Association

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October 5th, 2017

By Hand Delivery
Lora W. Johnson
Clerk of Council
Room 1E09, City Hall
1300 Perdido St.
New Orleans, LA 70122

***Re: Entergy New Orleans, Inc. to Investigate and Remediate Electric Service Distributions and Complaints and to Establish Minimum Electric Reliability Performance Standards and Financial Penalty Mechanisms
(Docket No. UD-17-04)***

Dear Ms. Johnson,

Enclosed please find an original and three copies of the intervention of UD-17-04 in the above matter. Please file the attached intervention and this letter in the record of this proceeding and return one time-stamped copy to our courier, in accordance with normal procedures.

Thank you for your assistance with this matter.

Sincerely,

Jeffrey D Cantin
President, GSREIA
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**BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS**

DOCKET NO. UD-17-04

In Re: Entergy New Orleans, Inc. to Investigate and Remediate Electric Service Distributions and Complaints and to Establish Minimum Electric Reliability Performance Standards and Financial Penalty Mechanisms

PETITION OF INTERVENTION OUT OF TIME

NOW COMES the Gulf States Renewable Energy Industries Association (“GSREIA”) and respectfully request that the Council of the City of New Orleans (“The Council”) grant GSREIA the right to intervene in the above captioned docket and to participate as a party therein, as provided for by Resolution R-17-427.

I.

GSREIA is a New Orleans-based non-profit trade organization founded in August 2010 whose purpose it is to promote the benefits of renewable energy for the region’s economy and environment while representing the interests of consumers and renewable energy firms throughout Louisiana, Mississippi, and Alabama in matters of policy, regulation, and public relations.

II.

GSREIA’s membership works directly with utilities regulated by The Council, including Entergy New Orleans, Inc. (“ENO”), and serves individual and business customers who are directly affected by energy policies in the city of New Orleans.

III.

GSREIA requests intervention out of time in this proceeding for the following reasons:

IV.

GSREIA is a formal intervenor in multiple dockets pertaining to ENO regulatory and planning activities, including Docket No. UD-17-01 and Docket No. UD-16-02. GSREIA and its members have significant stakes in the actions of ENO pertaining to the dockets mentioned as well as those discussed in Docket No. UD-17-04.

V.

The items in this docket that are of interest to GSREIA include, but are not limited to, the expected improvements to improve reliability throughout ENO's service territory and the effect those changes may have on ENO's transmission and distribution system and resource planning. GSREIA is also interested in reliability to the extent that distributed generation and energy storage can improve reliability and resiliency for years to come.

VI.

GSREIA's membership and affiliates represent a wealth of experience and knowledge in the renewable energy field, and offer an informed and useful perspective on this complicated subject. The organization draws on national resources and relationships for guidance on the realistic potential of technologies such as solar photovoltaic and wind energy to provide a portion of our future energy needs.

VII.

There is no other party representing the interest of GSREIA and its members in matters related to this docket.

VIII.

As a practical matter, GSREIA is a not-for-profit organization with limited staff and financial resources. Due to this fact, no representative of GSREIA was in attendance at

the Utility Committee meeting when Resolution R-17-427 was introduced or at the meeting of the full City Council when it was approved, nor was a copy of the resolution provided to us. As a result, we were not in possession of the information detailing the purpose of the present docket, nor the guidelines for requesting status as an intervenor prior to the date for timely intervention. As we have a strong material interest in the matters covered by the present proceeding and believe we bring valuable insight to the subject at hand, we are therefore submitting this request for intervenor status out of time. We therefore pray that The Council will accept this petition to intervene out of time and grant GSREIA full rights of procedural due process before The Council in the aforementioned proceedings; and that we be given full and complete standing to participate in any and all meetings as an equal participant in the proceedings; and that all participants in this proceedings be required to serve future testimonies or other correspondence related to this docket to us.

IX

Additionally, because GSREIA is a non-profit organization representing the interests of its members, we request that all intervenor fees be waived.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'J. Cantin', with a stylized flourish at the end.

Jeffrey D Cantin, President
Gulf States Renewable Energy Industries Assn
400 Poydras St, Suite 900
New Orleans, LA 70130

CERTIFICATE OF SERVICE

This is to certify that the **MOTION FOR LEAVE TO INTERVENE OUT OF TIME AND FOR INCLUSION ON SERVICE LIST** as filed by the Gulf States Renewable Energy Industries Association has been sent to all parties on the Official Service List by electronic mail on this 5th day of October, 2017.

A handwritten signature in black ink, appearing to read 'J. Cantin', is written above a horizontal line.

Jeffery D Cantin, President

Gulf States Renewable Energy Industries Association

DOCKET NO. UD-17-04

***In Re: Entergy New Orleans, Inc. to Investigate and Remediate Electric Service Distributions and Complaints and to Establish Minimum Electric Reliability Performance Standards and Financial Penalty Mechanisms
(Docket No. UD-17-04)***

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