



Gulf States Renewable Energy Industries Association

WWW.GSREIA.ORG

January 26th, 2018

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

Re: Application of Entergy New Orleans, Inc. for Approval to Construct Distributed Generation-Scale Solar Photovoltaic Systems and Request for Cost Recovery and Related Relief (Docket No. 17-05)

Dear Ms. Johnson,

Enclosed please find an original and three copies of the intervention of UD-17-05 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,

Handwritten signature of Jeffrey D. Cantin.

Jeffrey D Cantin
President, GSREIA
400 Poydras St, Suite 900
New Orleans, LA 70130
504-383-8936
jcantin@gsreia.org

**BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS**

DOCKET NO. UD-17-05

In Re: Application of Entergy New Orleans, Inc. for Approval to Construct Distributed Generation-Scale Solar Photovoltaic Systems and Request for Cost Recovery and Related Relief

PETITION FOR INTERVENTION AND FOR INCLUSION ON SERVICE LIST

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.

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 in this proceeding for the following reasons:

IV.

Decisions in this docket will have a material impact on New Orleans' current and future renewable energy capacity, which will directly impact the possibility of renewable energy resources additions. As such GSREIA has substantial and bona fide interest in the subject matter of this docket, which may have substantial impacts on the business and regulatory environment of its members.

V.

GSREIA is an active participant in the Integrated Resource Planning (IRP) docket UD-17-03, whose purpose is the evaluation of resource alternatives. Of particular concern in the current and previous IRP proceedings have been assumptions and analyses of renewable energy resource alternatives by ENO that we consider to be biased and flawed. Therefore, GSREIA asserts that its interests in the IRP and the present docket are tied to one another and participation in one without the other would unduly limit GSREIA's

ability to appropriately represent its positions on matters concerning decision making between generation resource alternatives in New Orleans.

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.

For these reasons, we ask that GSREIA be granted 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 proceeding be required to serve future testimonies or other correspondence related to this docket to us.

IX.

Please note that as GSREIA is a renewable industry non-profit organization, thus pursuant to resolution R-16-265, we request that all intervenor fees be waived.

X.

All communications and pleadings in this docket should be directed to:

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William Feldman
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Pierre Moses
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(504) 383-8936

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'J. Cantin', with a long horizontal flourish extending to the right.

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 **PETITION FOR INTERVENTION 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 26th day of January, 2018.

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

Jeffery D Cantin, President

Gulf States Renewable Energy Industries Association

January 26, 2018

**Application of Entergy New Orleans, Inc. for Approval to Construct Distributed
Generation-Scale Solar Photovoltaic Systems and Request for Cost Recovery and Related
Relief**

Docket UD-17-05

Lora W. Johnson, lwjohnson@nola.gov

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