

February 11, 2019

VIA HAND DELIVERY

Ms. Lora W. Johnson, CMC
Clerk of Council
City Hall, Room 1E09
1300 Perdido Street
New Orleans, LA 70112

RE: *Revised Application of ENO for a Change in Electric and Gas Rate in the City of New Orleans Pursuant to Council Resolutions R-15-194 and R-17-504 and for Related Relief*
CNO Docket UD-18-07
Our File No.: 7717-46

Dear Ms. Johnson:

Please find enclosed the original and three copies of the Objections to the First Set of Requests for Information propounded by Entergy New Orleans, LLC on behalf of Air Products and Chemicals, Inc. which we request you file into the record in the above-referenced matter. Please file an original and two copies into the record and return a date-stamped copy to my office in accordance with normal procedures.

Should you have any questions regarding the above, please do not hesitate to contact me. Thank you for your assistance with this matter.

Very truly yours,



Carrie R. Tournillon

CRT/mpk

Enclosures

cc: Official Service List UD-18-07 (via electronic mail)

**BEFORE THE
NEW ORLEANS CITY COUNCIL**

IN RE: REVISED APPLICATION OF ENO)	
FOR A CHANGE IN ELECTRIC AND GAS)	
RATES IN THE CITY OF NEW ORLEANS)	DOCKET NO. UD-18-07
PURSUANT TO COUNCIL RESOLUTIONS)	February 11, 2019
R-15-194 AND R-17-504 AND FOR RELATED)	
RELIEF)	

**AIR PRODUCTS AND CHEMICALS, INC.'S OBJECTIONS TO THE FIRST SET OF
REQUESTS FOR INFORMATION PROPOUNDED BY
ENERGY NEW ORLEANS, LLC**

NOW COMES Air Products and Chemicals, Inc. ("Air Products") with the following objections to Entergy New Orleans, LLC's ("ENO") first set of requests for information to Air Products in the captioned proceeding, as follows:

I.

GENERAL OBJECTION AND RESERVATION OF RIGHTS

1. Air Products objects to ELL's data requests to the extent the information requested is irrelevant, not reasonably calculated to lead to discovery of admissible evidence, or otherwise seeks information beyond the scope of permissible discovery pursuant to the Louisiana Rules of Evidence, or the Louisiana Code of Civil Procedure.

2. Air Products further objects to ENO's data requests to the extent that the information requested is protected from discovery by attorney-client privilege or work-product doctrine.

3. Air Products objects to definitions and instructions, if any are included, to the extent that they purport to unilaterally alter the rules of discovery, or purport to modify or supplement the specific data requests set forth thereafter, or are unduly burdensome.

4. With respect to confidential and/or highly sensitive information, if any, that may be responsive to one or more of the requests and the production of which is not otherwise objectionable, Air Products will make such information available to appropriate signatories pursuant to the terms of a Protective Order in this proceeding.

5. The providing of a response by Air Products to a request should not be construed as a waiver of any claim that Air Products may have regarding the admissibility of the response in this proceeding or other proceedings, or a waiver of any substantive rights Air Products may have.

7. Although Air Products has sought to identify all applicable objections, it may become apparent later as responses are prepared or as documents are obtained, that additional objections may be appropriate. Air Products reserves its rights to make such objections.

II.

SPECIFIC OBJECTIONS

At this time, Air Products has not identified any specific objections to ENO's Requests for Information.

III.

Consistent with Ordering Paragraph 7 of Council Resolution R-18-434, counsel for Air Products is available to discuss the above objections with opposing counsel.

RESPECTFULLY SUBMITTED:

C-R-T

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Attorneys for Air Products and Chemicals, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the Official Service List via electronic mail.

New Orleans, Louisiana this 11th day of February, 2019.

C-R-T

Carrie R. Tournillon