

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

RESOLUTION DIRECTING)	
ENERGY NEW ORLEANS, INC. TO)	
INVESTIGATE AND REMEDIATE)	
ELECTRIC SERVICE DISRUPTIONS)	
AND COMPLAINTS AND TO)	DOCKET NO. UD-17-04
ESTABLISH MINIMUM ELECTRIC)	
RELIABILITY PERFORMANCE)	
STANDARDS AND FINANCIAL)	
PENALTY MECHANISMS)	

**ENERGY NEW ORLEANS, LLC'S MOTION TO EXTEND
THE DEADLINE TO FILE
COMMENTS AND REBUTTAL TESTIMONY**

Entergy New Orleans, LLC (“ENO” or the “Company”) respectfully submits this Motion to Extend the Deadline to file Comments and Rebuttal Testimony in the above-captioned Docket. ENO requests an extension of the current deadline for filing Comments and Rebuttal Testimony in this Docket from June 11, 2019, until June 28, 2019.

The Council Advisors’ and Intervenors’ Comments and Testimony were originally due to be filed on March 12, 2019, but, with ENO’s consent, and pursuant to Orders of the Honorable Jeffrey S. Gulin, that deadline was extended first to April 11, 2019, and then again to April 25, 2019. ENO’s Rebuttal Comments and Testimony originally were due on May 23, 2019, and a first extension was granted until June 11, 2019, to allow time for ENO to take the deposition of Joseph W. Rogers, P.E., who was deposed earlier this week on June 5, 2019.

In support of this extension request, ENO respectfully represents the following: (1) the parties have not completed discovery on the Advisors’ Comments and Testimony, but have been working in good faith to do so; (2) ENO’s rate case in Council Docket No. UD-18-07 is proceeding to hearing beginning on June 17, 2019, and continuing until June 24, 2019, and witness and issue overlap with this docket have put competing demands on ENO’s support personnel; (3) the

extension will allow the parties time to explore the possibility of settlement; and (4) a small fire in the building at 639 Loyola Avenue on June 5, 2019, resulted in damage to building's electrical system and closure of the building on June 6 and 7 and has displaced from their offices some employees of Entergy Services, LLC, who have been assisting with ENO's rebuttal filing. To address all of these issues and avoid interference with the parties' preparation for the hearing in Council Docket No. UD-18-07, ENO respectfully requests that the deadline for filing Comments and Rebuttal Testimony in this docket be extended to June 28, 2019.

ENO has contacted representatives of each of the parties to this proceeding by telephone or electronic mail, and, as of this filing, no party has indicated any opposition to the requested extension. The Council Advisors and the Alliance for Affordable Energy (the "Alliance") have affirmatively indicated that they have no opposition to the requested extension.

WHEREFORE, Entergy New Orleans, LLC, respectfully requests that its Motion to Extend Deadline to File Comments and Rebuttal Testimony be GRANTED and that the deadline for filing Comments and Rebuttal Testimony in Docket No. UD-17-04 be extended from June 11, 2019, to June 28, 2019.

Respectfully submitted:

BY:



Timothy S. Cragin, Bar No. 22313
Harry Barton, Bar No. 29751
Courtney R. Nicholson, Bar No. 32618
639 Loyola Avenue, Mail Unit L-ENT-26 E
New Orleans, Louisiana 70113
Telephone: (504) 576-2984
Facsimile: (504) 576-5579

-and-

W. Raley Alford, III, La. Bar #27354
Kathryn W. Munson, La. Bar #35933
of
STANLEY, REUTER, ROSS, THORNTON &
ALFORD, L.L.C.
909 Poydras Street, Suite 2500
New Orleans, Louisiana 70112
Telephone: (504) 523-1580
Facsimile: (504) 524-0069

**ATTORNEYS FOR ENTERGY
NEW ORLEANS, LLC**

CERTIFICATE OF SERVICE

Docket No. UD-17-04

I hereby certify that I have served the required number of copies of the foregoing report upon all other known parties of this proceeding, by the following: electronic mail, facsimile, overnight mail, hand delivery, and/or United States Postal Service, postage prepaid.

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

Erin Spears, Chief of Staff
Connolly A. F. Reed
Bobbie Mason
Council Utilities Regulatory Office
City of New Orleans
City Hall, Room 6E07
1300 Perdido Street
New Orleans, LA 70112

David Gavlinski
Council Chief of Staff
New Orleans City Council
City Hall, Room 1E06
1300 Perdido Street
New Orleans, LA 70112

Sunni LeBeouf
City Attorney Office
City Hall, Room 5th Floor
1300 Perdido Street
New Orleans, LA 70112

Norman White
Department of Finance
City Hall, Room 3E06
1300 Perdido Street
New Orleans, LA 70112

Hon. Jeffery S. Gulin
3203 Bridle Ridge Lane
Lutherville, MD 21093

Andrew Tuozzolo
CM Moreno Chief of Staff
1300 Perdido Street, Room 2W40
New Orleans, LA 70112

Clinton A. Vince
Presley R. Reed, Jr.
Emma F. Hand
Herminia Gomez
Dentons US LLP
1900 K Street, NW
Washington, DC 20006

Basile J. Uddo
J.A. "Jay" Beatmann, Jr.
c/o Dentons US LLP
The Poydras Center
650 Poydras Street, Suite 2850
New Orleans, LA 70130-6132

Joseph W. Rogers
Victor Prep
Byron S. Watson
Cortney Crouch
Legend Consulting Group
6041 South Syracuse Way, Suite 105
Greenwood Village, CO 80111

Errol Smith
Bruno and Tervalon
4298 Elysian Fields Avenue
New Orleans, LA 70122

Polly S. Rosemond
Derek Mills
Seth Cureington
Kevin Boleware
Entergy New Orleans, LLC
1600 Perdido Street
Mail Unit L-MAG-505B
New Orleans, LA 70112

Joseph J. Romano, III
Suzanne Fontan
Therese Perrault
Entergy Services, LLC
639 Loyola Avenue
Mail Unit L-ENT-4C
New Orleans, LA 70113

Logan Atkinson Burke
Sophie Zaken
Alliance for Affordable Energy
4505 S. Claiborne Avenue
New Orleans, LA 70125

Ian Dreyer
Parkview Neighborhood Association
432 N. Anthony Street, Suite 303
New Orleans, LA 70119

Abigail Sebton
Urban Conservancy Petition
1307 OC Haley Boulevard #307
New Orleans, LA 70113

Monique Harden
Deep South Center for
Environmental Justice, Inc.
3157 Gentilly Boulevard, #145
New Orleans, LA 70122

Brian Guillot
Vice President, Regulatory Affairs
Entergy New Orleans, LLC
1600 Perdido Street
Mail Unit L-MAG-505B
New Orleans, LA 70112

Timothy S. Cragin
Alyssa Maurice-Anderson
Harry M. Barton
Karen Freese
Entergy Services, LLC
639 Loyola Avenue
Mail Unit L-ENT-26E
New Orleans, LA 70113

Emily K. Leitzinger
Mid-City Neighborhood Organization
4313 Palmyra Street
New Orleans, LA 70119

Julianna D. Padgett
Carrollton Riverbend Neighborhood Assn.
935 Dante Street
New Orleans, LA 70118

Jacob Rickoll
Tulane Canal Neighborhood Association
2301 Conti Street
New Orleans, LA 70119

Keith Hardie
Maple Area Residents, Inc.
618 Audubon Street
New Orleans, LA 70118

Renate Heurich
350 Louisiana-New Orleans
1407 Napoleon Avenue, #B
New Orleans, LA 70115

Luke F. Piontek Judith Sulzer
Roedel, Parsons, Koch, Blache, Balhoff
& McCollister
8440 Jefferson Highway
Suite 301
Baton Rouge, LA 70809

Eric J. Songy
Algiers Neighborhood Presidents
Council
P.O. Box 740446
New Orleans, LA 70174

Arthur J. Johnson
Lower 9th Ward Center for Sustainable
Engagement and Development
5227 Chartres Street
New Orleans, LA 70117

Dawn Hebert
6846 Lake Willow Dr.
New Orleans, LA. 70126

James E. Thompson, III
Sewerage and Water Board
625 St. Joseph Street, Room 201
New Orleans, LA 70165

Warrenetta C. Banks
Lower 9 Resilient
5130 Chartres Street
New Orleans, LA 70117-3808

David Dalia
609 Dumaine Street
New Orleans, LA 70115-3210

Denise T. Turbinton
931 Mazant St.
New Orleans, LA 70117

New Orleans, Louisiana, this 7th day of June 2019.



W. Raley Alford, III