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Kimberly R. Silas  
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March 8, 2021

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

**Re: 2021 TRIENNIAL INTEGRATED RESOURCE PLAN  
OF ENTERGY NEW ORLEANS, LLC  
Council Docket No. UD-20-02**

Dear Ms. Johnson:

Entergy New Orleans, LLC (“ENO”) respectfully submits its Entergy New Orleans, LLC’s Objections to the Advisors to The City of New Orleans First Set of Requests for Information to Entergy New Orleans, LLC regarding The Council’s 2021 Demand Side Management Portfolio Study in the above referenced docket. As a result of the remote operations of the Council’s office related to Covid-19, ENO submits this filing electronically and will submit the original and requisite number of hard copies once the Council resumes normal operations, or as you direct. ENO requests that you file this submission in accordance with Council regulations as modified for the present circumstances.

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "K. Silas".

Kimberly R. Silas

KRS/amb  
Enclosures

cc: Official Service List via email

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

**IN RE: 2021 TRIENNIAL )  
INTEGRATED RESOURCE PLAN OF ) DOCKET NO. UD-20-02  
ENERGY NEW ORLEANS, LLC )**

**ENERGY NEW ORLEANS, LLC’S OBJECTIONS TO THE  
ADVISORS TO THE CITY OF NEW ORLEANS FIRST SET OF REQUESTS FOR  
INFORMATION TO ENERGY NEW ORLEANS, LLC REGARDING  
THE COUNCIL’S 2021 DEMAND SIDE MANAGEMENT PORTFOLIO STUDY**

Entergy New Orleans, LLC (“ENO” or the “Company”) objects to the Advisors to the City of New Orleans First Set of Request for Information to Entergy New Orleans, LLC Regarding the Council’s 2021 Demand Side Management Portfolio Study (Requests) propounded in the above-captioned proceeding as follows:

**GENERAL OBJECTIONS AND RESERVATION OF RIGHTS**

1. Although ENO has sought to identify all applicable objections, it may become apparent later that additional objections may be appropriate. ENO reserves its rights to make such objections.
2. ENO objects to the “Instructions” to the extent that they purport to impose obligations for responding to the Requests beyond those established by the Louisiana Code of Civil Procedure, the City of New Orleans Home Rule Charter, the City Code, and/or Council Resolution No. R-20-257.
3. ENO objects to the Requests to the extent that they exceed thirty-five in number, including subparts, without leave of the Council, in violation of Louisiana Code of Civil Procedure Article 1457 (A).

4. With respect to documents or information that may be protected by the attorney-client privilege and/or the attorney work product doctrine, if any, that may be responsive to one or more of the requests, ENO objects to providing such material, and reserves its right to make such objections as it deems necessary to protect such documents or information from disclosure.

5. 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, ENO will make such information available to appropriate reviewing representatives who have signed a non-disclosure agreement in this proceeding, pursuant to the terms of the Council's Official Protective Order set forth in Council Resolution R-07-432.

Respectfully submitted:

BY:



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**ATTORNEYS FOR  
ENTERGY NEW ORLEANS, LLC**

**CERTIFICATE OF SERVICE**  
**DOCKET NO. UD-20-02**

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.

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New Orleans, Louisiana, this 8<sup>th</sup> day of March 2021.



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Kimberly R. Silas