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January 23, 2022

VIA Electronic Delivery

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

**Re: *Entergy New Orleans, LLC's 2021 Electric And Gas Formula Rate Plan Filings,
Council Docket No. UD-18-07***

Dear Ms. Johnson:

Enclosed please find the Motion of Entergy New Orleans, LLC (“ENO”) for Delay of Consideration of the Request for Approval of Public Direct Current Fast Charging Station Project and Request to Modify its Electric Rate Schedules (“DCFC Station Request”) filed July 21, 2022. The delay sought pertains to the DCFC Station Request only.

In contrast, ENO requests that the Council act as soon as practical on the January 14, 2022 Request to Modify its Electric Rate Schedules to Expand Access to Electric Vehicle Charging Infrastructure in the City of New Orleans.

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 requisite original and 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.

Should you have any questions regarding the above/attached, please do not hesitate to contact me.

With kindest regards, I am

Sincerely,

A handwritten signature in black ink that reads 'Courtney R. Nicholson'.

Courtney R. Nicholson

Enclosures

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

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

APPLICATION OF ENTERGY NEW)	
ORLEANS, LLC FOR A CHANGE IN)	
ELECTRIC AND GAS RATES)	
PURSUANT TO COUNCIL)	DOCKET NO. UD-18-07
RESOLUTIONS R-15-194 AND R-17-)	
504 AND FOR RELATED RELIEF)	

**MOTION OF ENTERGY NEW ORLEANS, LLC
FOR DELAY OF CONSIDERATION OF THE REQUEST FOR APPROVAL OF
PUBLIC DIRECT CURRENT FAST CHARGING STATION PROJECT
AND REQUEST TO MODIFY ITS ELECTRIC RATE SCHEDULES**

NOW BEFORE THIS COUNCIL, through its undersigned counsel, comes Entergy New Orleans, LLC (“Entergy New Orleans,” “ENO,” or the “Company”) and moves the Council of the City of New Orleans (“Council”) to (1) delay its consideration of the Request for Approval of Public Direct Current Fast Charging Station Project and Request to Modify its Electric Rate Schedules (“DCFC Station Request”) filed July 21, 2022, because of a material change in circumstances as discussed below and (2) expedite approval of its January 14, 2022, Request to Modify its Electric Rate Schedules to Expand Access to Electric Vehicle Charging Infrastructure in the City of New Orleans (“January EVCI Request”).

I.

ENO’s proposed construction of a DCFC station at the Walmart Supercenter on Bullard Avenue in New Orleans East was a material component of the DCFC Station Request. ENO received a letter from Walmart in May 2022 expressing its interest and intent to collaborate on DCFC Electric Vehicle (“EV”) infrastructure deployment at the Bullard Avenue location. That project was designed to meet the eligibility requirements for funding under the Infrastructure and Investment Jobs Act and National Electric Vehicle Infrastructure (“NEVI”) Formula program. In January 2023, however, ENO received additional correspondence from Walmart indicating they

were no longer interested in hosting ENO's EV charging equipment at any of their locations in New Orleans. Therefore, the project at the Bullard Avenue location described in the DCFC Station Request will not go forward.

II.

ENO submits that the Council should delay its consideration of the DCFC Station Request due to this material change in circumstances. ENO is continuing its efforts to expand public access to EV charging infrastructure ("EVCI") in the City of New Orleans and requests an opportunity to rework its DCFC Station Request and to submit an amended DCFC Station Request when, and if, other suitable sites can be identified in the City.

III.

ENO further requests that the Council approve its January EVCI Request as soon as practical. No one has commented on or opposed the January EVCI Request. The January EVCI Request, by itself, will facilitate and encourage the expansion of EVCI and encourage the adoption of EVs with their associated environmental benefits – a goal shared by the Council and ENO.

WHEREFORE, Entergy New Orleans respectfully requests that the Council (1) delay its consideration of ENO's DCFC Station Request until such time as ENO submits an amendment to such request and (2) approve ENO's January EVCI Request as soon as practical.

Respectfully submitted,



BY:

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ATTORNEYS FOR ENTERGY NEW ORLEANS, LLC

CERTIFICATE OF SERVICE

I hereby certify that I have this 23rd day of January, 2023, served the required number of copies of the foregoing pleading upon all other known parties of this proceeding individually and/or through their attorney of record or other duly designated individual, by: electronic mail, facsimile, hand delivery, and/or by depositing same with overnight mail carrier, or the United States Postal Service, postage prepaid.

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