



**Petition to intervene out of time in Docket No. UD-22-03**

July 1, 2022

**By Electronic Mail**

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

RE: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND  
PROCEDURAL SCHEDULE WITH RESPECT TO THE APPLICATION OF  
ENERGY NEW ORLEANS, LLC FOR A BATTERY STORAGE DEMAND RESPONSE PILOT PROGRAM  
DOCKET UD-22-03

Dear Ms. Johnson:

Please find enclosed the Together New Orleans' Petition for Intervention and Inclusion in the service-list in the above-mentioned docket. Please file the attached motion and this letter into the record of the proceeding. We will submit physical copies at your instruction. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention.

Sincerely,

A handwritten signature in black ink, appearing to read "B Bagert, Jr.", written over a horizontal line.

Broderick A Bagert, Jr.  
Organizer  
Together New Orleans



**Before  
the Council of the City of New Orleans**

**In Re: RESOLUTION AND ORDER  
ESTABLISHING A DOCKET AND  
PROCEDURAL SCHEDULE WITH RESPECT  
TO THE APPLICATION OF ENTERGY NEW  
ORLEANS, LLC FOR A BATTERY STORAGE  
DEMAND RESPONSE PILOT PROGRAM**

**DOCKET NO. UD-22-03**

**PETITION OF TOGETHER NEW ORLEANS FOR INTERVENTION OUT OF TIME AND FOR  
INCLUSION ON SERVICE LIST**

Together New Orleans respectfully requests that the Council of the City of New Orleans (“the Council”) grant Together New Orleans the right to intervene in the above captioned proceeding and participate as a party therein.

On June 9, 2022, the full Council for the City of New Orleans issued Resolution R- 22-266, establishing Docket UD-22-03, providing for intervention by interested parties by June 24, 2022.

Together New Orleans is a broad-based coalition of 53 congregations and civic organizations throughout Orleans parish crossing lines of race, religion, neighborhood and political affiliation. We work on issues affecting families and communities, particularly low and moderate income people, including a major focus on grid resilience and disaster response.

In the aftermath of Hurricane Ida, Together New Orleans began developing the “Community Lighthouse Project” – a strategy to create a network of 85 civic, faith and civic organizations across Orleans Parish with solar power and back-up battery capacity to serve as resilience hubs in the aftermath of a power outage. This project was one of 14 nationally to be selected by the Department of Energy to receive technical assistance, was awarded a \$1 million grant from the Greater New Orleans Foundation, the largest disaster-response grant ever awarded by the Foundation, and a \$650,000 grant from Direct Relief; and has support from local, state and federal officials.

Together New Orleans has members served by Entergy New Orleans, LLC. There is no other party representing the interests of Together New Orleans and its members.

Together New Orleans therefore possesses standing to intervene and respectfully seeks intervenor status in order to participate fully in this matter.

Together New Orleans recognizes that this request to intervene is being made outside of the timeline established by Resolution R-22-266 and subsequent rulings by the hearing officer, the Honorable Jeffrey Gulin. However, Together New Orleans requests intervention out of time in the proceeding as the intervention will not prejudice



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any other party or unduly affect the proceeding with respect to the issues presented by this docket. Further, as a late intervenor, Together New Orleans understands that it must accept and participate in this docket in its current posture.

Please note that Together New Orleans is a non-profit organization thus pursuant to Council Resolution R-16-365, we request that all intervenor fees be waived.

Together New Orleans requests placement on the service list of this proceeding, and to be served with all pleadings, notices, orders, and other filings.

All communications and pleadings in this proceeding should be directed to the following persons:

BRODERICK BAGERT – ORGANIZER, TOGETHER NEW ORLEANS  
ABEL THOMPSON – ORGANIZER, TOGETHER NEW ORLEANS  
PIERRE MOSES – TECHNICAL ADVISER, TOGETHER NEW ORLEANS  
CYNTHIA COLEMAN – ADMINISTRATIVE SUPPORT, TOGETHER NEW ORLEANS

Respectfully submitted,

Broderick Bagert  
Organizer, Together New Orleans

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Before  
The Council of the City of New Orleans

In Re: RESOLUTION AND ORDER  
ESTABLISHING A DOCKET AND  
PROCEDURAL SCHEDULE WITH RESPECT  
TO THE APPLICATION OF ENTERGY NEW  
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DOCKET NO. UD-22-03

July 1, 2022

CERTIFICATE OF SERVICE

I do hereby certify that I have, this 1st day of July 2022, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

Abel Thompson  
Organizer  
Together New Orleans

**June 29, 2022**

**UD-22-03: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND  
PROCEDURAL SCHEDULE WITH RESPECT TO THE APPLICATION OF  
ENERGY NEW ORLEANS, LLC FOR A BATTERY STORAGE DEMAND  
RESPONSE PILOT PROGRAM**

**DOCKET UD-22-03**

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