

November 30, 2022

**VIA ELECTRONIC MAIL** (*lwjohnson@nola.gov*)

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

Re: *In Re: Application of Entergy New Orleans, LLC for Certification  
of Costs Related to Hurricane Ida*  
CNO Docket UD-22-05  
Our File No.: 7717-41

Dear Ms. Johnson:

Enclosed please find for electronic filing, Air Products and Chemicals, Inc.'s ("Air Products") Motion for Late Intervention and Inclusion on Service List in the referenced docket. As confirmed with your office today, the requisite original and number of hard copies are not mandatory to formalize this filing in the docket.

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/tp  
Enclosure

cc: Official Service List UD-22-05 (via electronic mail)

**BEFORE THE  
NEW ORLEANS CITY COUNCIL**

**IN RE: APPLICATION OF ENTERGY  
NEW ORLEANS, LLC FOR  
CERTIFICATION OF COSTS  
RELATED TO HURRICANE IDA**

**DOCKET NO. UD-22-05  
November 30, 2022**

**AIR PRODUCTS AND CHEMICALS, INC.  
MOTION FOR LATE INTERVENTION AND INCLUSION ON SERVICE LIST**

This Motion for Late Intervention is filed, through undersigned counsel, by and on behalf of Air Products and Chemicals, Inc. ("Air Products").

1 .

Pursuant to the Initiating Resolution of the City Council of the City of New Orleans (Resolution R-22-483), dated November 3, 2022, that established Docket UD-22-05, Air Products respectfully requests to intervene out of time and for full participation in the *Application of Entergy New Orleans, LLC for Certification of Costs Related to Hurricane Ida* proceeding, as a party therein.

2.

Air Products and its New Orleans operations are one of ENO's largest purchasers of electric power, and accordingly, have a major interest in this docket, will be affected substantially by the outcome thereof, and cannot be adequately represented by any other party.

3.

Air Products recognizes that the intervention deadline for this proceeding was November 23, 2022. However, Air Products agrees to take this proceeding as is. Further,

Air Products submits that given the limited number of days beyond the intervention deadline that this late intervention is being filed, and that Air Products agrees to take the proceeding “as is,” no party would be prejudiced by granting Air Products request for late intervention.

4.

Air Products, upon being granted full Intervenor status, requests that it be added to the Official Service List for this docket, and that all notices, communication, pleadings, briefs, testimony, other filings be served upon the following:

Randy Young  
Gordon Polozola  
KEAN MILLER LLP  
400 Convention Street, Suite 700 (70802)  
Post Office Box 3513  
Baton Rouge, LA 70821-3513  
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Maurice Brubaker  
Brubaker & Associates, Inc.  
16690 Swingly Ridge Road, Suite 140 (63017)  
P.O. Box 412000  
Chesterfield, MO 63141-2000  
[mbrubaker@consultbai.com](mailto:mbrubaker@consultbai.com)

**WHEREFORE**, Air Products and Chemicals, Inc. prays that it be granted Intervenor status and that it be permitted to participate in this proceeding.

RESPECTFULLY SUBMITTED:



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Randy Young (#21958)  
Carrie R. Tournillon (#30093)  
Gordon Polozola (#23900)  
KEAN MILLER LLP  
Post Office Box 3513  
Baton Rouge, LA 70821  
(225) 387-0999  
*Attorneys for Air Products and Chemicals, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading has been served by electronic delivery to the Clerk of Council and all known parties of record on the Official Service List.

New Orleans, Louisiana this 30<sup>th</sup> day of November, 2022.



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Carrie R. Tournillon