

ROEDEL PARSONS BLACHE  
FONTANA PIONTEK & PISANO

A LAW CORPORATION

roedelparsons.com

October 2, 2023

VIA HAND DELIVERY

Lora W. Johnson  
Clerk of Council  
1300 Perdido Street  
1E09  
New Orleans, LA 70112

Re: *2024 Triennial Integrated Resource Plan of Entergy New Orleans, LLC*  
*Docket No: UD-23-01*

Dear Lora:

Enclosed please find the original and two (2) copies of Sewerage and Water Board of New Orleans' Petition for Intervention in the above matter.

Should you have any questions whatsoever, please do not hesitate to contact me.

Very truly yours,



Luke F. Piontek

cc: All Counsel of Record via email

2023 OCT 2 3:19 PM

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

**IN RE: 2024 TRIENNIAL INTEGRATED )  
RESOURCE PLAN OF ENTERGY NEW ) DOCKET NO. UD-23-01  
ORLEANS, LLC )**

**SEWERAGE AND WATER BOARD OF NEW ORLEANS'  
PETITION OF INTERVENTION**

The Sewerage and Water Board of New Orleans (“SWB”), through undersigned counsel, respectfully petitions to intervene as a party in this proceeding pursuant to Secs. 158-236, *et seq.* of the City Code pertaining to intervention in proceedings before the Council of the City of New Orleans (“City Council” or “Council”), and in support thereof states:

1.

SWB is one of the largest ratepayers of Entergy New Orleans, LLC (“ENO”), and, therefore, has a real and substantial interest in this proceeding.

2.

Copies of all correspondence and filings with the Council should be directed to:

Luke F. Piontek  
Roedel, Parsons, Blache, Fontana  
Piontek & Pisano  
8440 Jefferson Highway, Suite 301  
Baton Rouge, LA 70809  
Email: [Lpiontek@roedelparsons.com](mailto:Lpiontek@roedelparsons.com)  
Email: [Jsulzer@roedelparsons.com](mailto:Jsulzer@roedelparsons.com)

3.

The Resolution was heard at the New Orleans Council meeting on June 8, 2023 at adopted as Resolution No. R-23-254, and set a October 2, 2023 deadline to file interventions. Therefore, the filing of this Petition of Intervention is timely.

4.

The outcome of this proceeding involving the City Council's Resolution regarding the 2024 Triennial Integrated Resource Plan of Entergy New Orleans, LLC, will directly affect SWB's business interests in the City of New Orleans.

5.

SWB, therefore, possesses standing to intervene and requests formal intervenor status in this proceeding and that it be allowed the opportunity to file testimony and pleadings, examine witnesses and participate fully in any discovery, hearings, briefings and oral arguments in this matter.

6.

SWB asserts that no other intervenor or party will adequately protect its interests in this docket and that its intervention will not delay the progress of this proceeding.

WHEREFORE, the Sewerage and Water Board of New Orleans prays that it be granted full intervenor status herein; that it be allowed the opportunity to file testimony and pleadings, examine witnesses and participate fully in any discovery, hearings, briefings and oral arguments in this matter; and that it be given notice of any and all proceedings and deadlines in this matter; and for all other relief available to it under the facts and the law.

Respectfully submitted:

**ROEDEL, PARSONS, BLACHE, FONTANA  
PIONTEK & PISANO**

8440 Jefferson Highway, Suite 301

Baton Rouge, LA 70809

Telephone: (225) 929-7033

Facsimile: (225) 928-4925

- and -

1555 Poydras Street, Suite 1700

New Orleans, Louisiana 70112

Telephone: (504) 525-7086

Facsimile: (504) 525-4991

By:  \_\_\_\_\_

Luke F. Piontek (Bar Roll #19979)

*Attorneys for Sewerage and Water Board of  
New Orleans*

**CERTIFICATE**

I hereby certify that on this day a copy of the foregoing the Sewerage and Water Board of New Orleans' Petition of Intervention has been sent to the official service list by email, and/or served by United States mail, postage prepaid, through their representatives, at the following addresses:

<p><b>Lora W. Johnson</b>, <a href="mailto:lwjohnson@nola.gov">lwjohnson@nola.gov</a> Clerk of Council City Hall - Room 1E09 1300 Perdido Street New Orleans, LA 70112 (504) 658-1085 - office (504) 658-1140 - fax <i>Service of Discovery not required</i></p>	<p><b>Hon. Jeffrey S. Gulin</b>, <a href="mailto:judgegulin@gmail.com">judgegulin@gmail.com</a> 3203 Bridle Ridge Lane Lutherville, MD 2109 Tel: (410) 627-5357</p>
<p><b>Erin Spears</b>, <a href="mailto:espears@nola.gov">espears@nola.gov</a> Chief of Staff, Council Utilities Regulatory Office <b>Bobbie Mason</b>, <a href="mailto:bfmason1@nola.gov">bfmason1@nola.gov</a> <b>Christopher Roberts</b>, <a href="mailto:cwroberts@nola.gov">cwroberts@nola.gov</a> <b>Byron Minor</b>, <a href="mailto:Byron.minor@nola.gov">Byron.minor@nola.gov</a> <b>Candace Carmouche</b>, <a href="mailto:Candace.Carmouche@nola.gov">Candace.Carmouche@nola.gov</a> City Hall - Room 6E07 1300 Perdido Street New Orleans, LA 70112</p>	<p><b>Krystal D. Hendon</b>, CM Morrell Chief-of-Staff, <a href="mailto:Krystal.hendon@nola.gov">Krystal.hendon@nola.gov</a> 1300 Perdido St. Rm. 2W50 New Orleans, LA. 70112</p>
<p><b>Andrew Tuozzolo</b>, CM Moreno Chief-of-Staff, <a href="mailto:avtuozzolo@nola.gov">avtuozzolo@nola.gov</a> 1300 Perdido St. Rm. 2W40 New Orleans, LA. 70112</p>	<p><b>Paul Harang</b>, 504-658-1101 / (504) 250-6837, <a href="mailto:Paul.harang@nola.gov">Paul.harang@nola.gov</a> Interim Chief of Staff City Hall - Room 1E06 1300 Perdido Street New Orleans, LA 70112</p>

<p><b>Donesia D. Turner</b>, <a href="mailto:Donesia.Turner@nola.gov">Donesia.Turner@nola.gov</a>  <b>Ashley Spears</b>, <a href="mailto:Ashley.Spears@nola.gov">Ashley.Spears@nola.gov</a>  Law Department  City Hall - 5th Floor  New Orleans, LA 70112  Tel: (504) 658-9800  Fax: (504) 658-9869  <i>Service of Discovery not required</i></p>	<p><b>Norman White</b>, <a href="mailto:Norman.White@nola.gov">Norman.White@nola.gov</a>  Department of Finance  City Hall - Room 3E06  1300 Perdido Street  New Orleans, LA 70112  Tel: (504) 658-1502  Fax: (504) 658-1705</p>
<p><b>Greg Nichols</b>, <a href="mailto:grnichols@nola.gov">grnichols@nola.gov</a>  Deputy Chief Resilience Officer  Office of Resilience &amp; Sustainability  1300 Perdido Street, Suite 8E08  New Orleans, LA 70112  Tel: 504-658-4958  Cell: 504-253-1626</p>	<p><b>Clinton A. Vince</b>, <a href="mailto:clinton.vince@dentons.com">clinton.vince@dentons.com</a>  <b>Presley Reed</b>, <a href="mailto:presley.reedjr@dentons.com">presley.reedjr@dentons.com</a>  <b>Emma F. Hand</b>, <a href="mailto:emma.hand@dentons.com">emma.hand@dentons.com</a>  <b>Dee McGill</b>, <a href="mailto:dee.mcgill@dentons.com">dee.mcgill@dentons.com</a>  Denton Law Firm,  1900 K Street NW  Washington, DC 20006</p>
<p><b>Basile J. Uddo</b> (504) 583-8604 cell, <a href="mailto:buddo@earthlink.net">buddo@earthlink.net</a>  <b>J. A. "Jay Beatmann, Jr.</b> (504) 256-6142 cell, (504) 524-5446 office direct, <a href="mailto:jay.beatmann@dentons.com">jay.beatmann@dentons.com</a>  c/o DENTONS US LLP  650 Poydras Street  Suite 2850  New Orleans, LA 70130</p>	<p><b>Joseph W. Rogers</b>, <a href="mailto:jrogers@legendcgl.com">jrogers@legendcgl.com</a>  <b>Victor M. Prep</b>, <a href="mailto:vprep@legendcgl.com">vprep@legendcgl.com</a>  <b>Byron S. Watson</b>, <a href="mailto:bwatson@legendcgl.com">bwatson@legendcgl.com</a>  Legend Consulting Group  6041 South Syracuse Way, Suite 105  Greenwood Village, CO 80111</p>
<p><b>Courtney R. Nicholson</b> (504) 670-3680, <a href="mailto:cnicho2@entergy.com">cnicho2@entergy.com</a>  Entergy New Orleans, LLC  Vice-President, Regulatory and Public Affairs  <b>Polly Rosemond</b>, <a href="mailto:prosemo@entergy.com">prosemo@entergy.com</a>  <b>Kevin T. Boleware</b>, (504) 670-3673, <a href="mailto:kbolewa@entergy.com">kbolewa@entergy.com</a>  <b>Brittany Dennis</b>, <a href="mailto:bdennil@entergy.com">bdennil@entergy.com</a>  <b>Keith Wood</b>, (504) 670-3633, <a href="mailto:kwood@entergy.com">kwood@entergy.com</a>  <b>Derek Mills</b>, (504) 670-3527, <a href="mailto:dmills3@entergy.com">dmills3@entergy.com</a></p>	<p><b>Ross Thevenot</b>, (504) 670-3556, <a href="mailto:rtheven@entergy.com">rtheven@entergy.com</a>  1600 Perdido Street, L-MAG 505B  New Orleans, LA 70112</p>

<p><b>Vincent Avocato</b>, (281) 297-3508, <a href="mailto:vavocat@entergy.com">vavocat@entergy.com</a>  Entergy New Orleans, LLC  2107 Research Forest Drive, T-LFN-4  The Woodlands, TX 77380</p>	<p><b>Brian L. Guillot</b>, (504) 576-6523, <a href="mailto:bguill1@entergy.com">bguill1@entergy.com</a>  <b>Heather Silbernagel</b>, (504) 576-2806, <a href="mailto:hsilber@entergy.com">hsilber@entergy.com</a>  <b>Leslie M. LaCoste</b> (504) 576-4102, <a href="mailto:llacost@entergy.com">llacost@entergy.com</a>  <b>Lacresha D. Wilkerson</b>, (504) 576-6571, <a href="mailto:lwikel@entergy.com">lwikel@entergy.com</a></p> <p><b>Ed Wicker</b>, (504) 576-3101, <a href="mailto:ewicker@entergy.com">ewicker@entergy.com</a>  <b>Linda Prisuta</b>, (504) 576-4137, <a href="mailto:lprisut@entergy.com">lprisut@entergy.com</a>  Entergy Services, LLC  Mail Unit L-ENT-26E  639 Loyola Avenue  New Orleans, LA 70113</p>
<p><b>Joe Romano, III</b> (504) 576-4764, <a href="mailto:jroman1@entergy.com">jroman1@entergy.com</a>  <b>Tim Rapier</b>, (504) 576-4740, <a href="mailto:trapier@entergy.com">trapier@entergy.com</a>  <b>Farah Webre</b>, (504) 576-6038, <a href="mailto:fwebre@entergy.com">fwebre@entergy.com</a>  Entergy Services, LLC  Mail Unit L-ENT-3K  639 Loyola Avenue  New Orleans, LA 70113</p>	<p><b>Logan A. Burke</b>, <a href="mailto:logan@all4energy.org">logan@all4energy.org</a>  <b>Jesse S. George</b>, <a href="mailto:jesse@all4energy.org">jesse@all4energy.org</a>  <b>Sophie Zaken</b>, <a href="mailto:regulatory@all4energy.org">regulatory@all4energy.org</a>  4505 S. Claiborne Ave.  Tel: (504) 208-9761</p>
<p><b>Simon Mahan</b>, <a href="mailto:simon@southernwind.org">simon@southernwind.org</a>  11610 Pleasant Ridge Rd. Ste 103  Little Rock, AR, 72223  Tel: (337)303-3723</p>	

New Orleans, Louisiana, this 2<sup>ND</sup> day of October, 2023.

  


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**LUKE F. PIONTEK**

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

<b>RESOLUTION DIRECTING ENTERGY NEW )</b>	
<b>ORLEANS, INC. TO INVESTIGATE AND )</b>	<b>DOCKET NO. UD-17-04</b>
<b>REMEDiate ELECTRIC SERVICE )</b>	
<b>DISRUPTIONS AND COMPLAINTS AND TO )</b>	
<b>ESTABLISH MINIMUM ELECTRIC )</b>	
<b>RELIABILITY PERFORMANCE )</b>	
<b>STANDARDS AND FINANCIAL PENALTY )</b>	
<b>MECHANISMS )</b>	

**ORDER**

Upon considering the Petition of Intervention filed by the Sewerage and Water Board of New Orleans on October 2, 2023 in the above-captioned matter,

**IT IS HEREBY ORDERED**, that the Hearing Officer hereby grants the Petition for Intervention filed by the Sewerage and Water Board of New Orleans and the Sewerage and Water Board of New Orleans is hereby granted full intervenor status herein.

Thus done and signed this \_\_\_\_\_ day of October, 2023.

\_\_\_\_\_  
Honorable Jeffrey S. Gulin  
Hearing Officer