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October 10, 2023

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

In Re: 2024 Triennial Integrated Resource Plan of Entergy New Orleans, LLC

CNO Docket UD-23-01 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-23-01 (via electronic mail)

BEFORE THE NEW ORLEANS CITY COUNCIL

IN RE: 2024 TRIENNIAL INTEGRATED RESOURCE PLAN OF ENTERGY NEW

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**DOCKET NO. UD-23-01 October 10, 2023** 

ORLEANS, LLC.

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-23-254), dated June 8, 2023, that established Docket UD-23-01, Air Products respectfully requests to intervene out of time and for full participation in the 2024 Triennial Integrated Resource Plan of Entergy New Orleans, LLC proceeding ("IRP 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 October 2, 2023. 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, no substantive actions have occurred in the IRP Proceeding, 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:

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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:

Randy Young (#21958)

Carrie R. Tournillon (#30093)

Gordon Polozola (#23900)

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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 10th day of October, 2023.

Carrie R. Tournillon

C-R.T