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LATOYA CANTRELL MAYOR

November 7, 2018

SUNNI LEBEOUF CITY ATTORNEY

By Hand

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

Re:

Application of Entergy New Orleans, LLC for a Change in Electric and Gas Rates

Docket No. UD-18-07

Dear Ms. Johnson:

Enclosed please find an original and three copies of the City of New Orleans' Support for and Joinder in Crescent City Power Users' Group's Motion for Extension of Time for Intervenors to File Direct Testimony.

Please file the original and copies and submit along to the Administrative Hearing Officer.

Thank you for your assistance with this matter.

Sincerely yours,

Michael J. Laughlin Assistant City Attorney

Enclosure as indicated

cc (e-copy only): Official Service List

BEFORE THE COUNCIL OF THE CITY OF NEW ORLEANS

REVISED 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)	

CITY OF NEW ORLEANS' SUPPORT FOR AND JOINDER IN CRESCENT CITY POWER USERS' GROUP'S MOTION FOR EXTENSION OF TIME FOR INTERVENORS TO FILE DIRECT TESTIMONY

NOW COMES, Intervenor, the City of New Orleans, through its Department of Finance, through its Director, Norman L. White, and the Mayor's Office of Utilities (the "City"), which supports and joins the Motion for Extension of Time to File Intervenors' Direct Testimony filed by Crescent City Power Users' Group for the following reasons:

1.

Pursuant to the procedural schedule set forth in City Council Resolution No. R-18-434, Intervenors' Direct Testimony is due December 7, 2018.

2.

Entergy New Orleans, LLC's September 21, 2018 filing exceeded 3,300 pages and there are also voluminous discovery responses to be reviewed and analyzed in order for Intervenors to prepare direct testimony.

3.

The City intends to work with experts and Intervenors to present direct testimony in this matter but the time allowed under the Schedule (roughly 60 days) is inadequate and unreasonable

to allow for meaningful preparation and presentation of direct testimony, particularly when gauged by the 52 days (July 31, 2018 – September 21, 2018) it took for the revision and refiling of ENO's Revised Application and which time also effectively collapsed the schedule for Intervenors' Direct Testimony since the City Council is measuring the 12-month regulatory review from the July 31, 2018 inadequate filing.

4.

An extension of time of six (6) weeks over the holiday season or until January 18, 2019 within which to file Intervenors' direct testimony is reasonable and necessary to allow for full and proper review and analysis of the filings herein and preparation of direct testimony.

5.

The City supports and joins Crescent City Power Users' Group's motion to extend the time for Intervenors' direct testimony to be filed to January 18, 2019.

IT IS SO MOVED.

Respectfully submitted,

MICHAEL J. LAUGHLIN, (LSBA #01668)

ASSISTANT CITY ATTORNEY

MARY KATHERINE KAUFMAN, (LSBA #32719)

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Counsel for Intervenor, City of New Orleans, through its Department of Finance, through its Director, Norman L. White, and the Mayor's Office of Utilities

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 7th day of November, 2018, filed the foregoing with the Clerk of the City Council and served same this same date via electronic mail on all on the Official Service List.

Michael J. Laughlin