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August 10, 2016

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

Re: In Re: An Inquiry Into Entergy New Orleans' Utility Operations
Docket No. UD-16-01

Dear Ms. Johnson:

The Alliance for Affordable Energy ("Alliance") hereby submits for your further handling and filing an original and three copies of our objections to Entergy New Orleans' ("ENO") First Set of Requests for Information. Please file an original and two copies into the record in the above referenced matter, and return a date-stamped copy to our courier.

Very truly yours,



Thomas W. Milliner

TWM:dp
Enclosures

BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

IN RE: UTILITY OPERATIONS OF) DOCKET NO. UD.16-01
ENERGY NEW ORLEANS, INC.)

ALLIANCE FOR AFFORDABLE ENERGY'S OBJECTIONS TO ENTERGY NEW ORLEANS'
FIRST SET OF REQUESTS FOR INFORMATION

The Alliance for Affordable Energy ("Alliance") objects as follows to Entergy New Orleans first set of requests for information propounded in the above-captioned proceeding:

I.

GENERAL OBJECTION AND RESERVATION OF RIGHTS

1. Although the Alliance has sought to identify all applicable objections, it may become apparent later that additional objections may be appropriate. The Alliance reserves its rights to make such objections.
2. The Alliance for Affordable Energy objects to the discovery requests submitted by Entergy New Orleans (ENO) generally. This docket, number UD-16-01, is a show cause order issued ENO to show why its actions and omissions over the last two years in regards to, *inter alia*: 1) negotiating for a contract for construction of a combined turbine power plant; 2) seeking the required permits for construction of a CT plant; and 3) proposing a compressed schedule for the start of construction with a timeline of costs, all before the completion of the Council's evaluation of the ENO 2015 IRP Final Report, are not imprudent. Council Resolution R-16-263 (July 14, 2016). None of the Data Requests promulgated by ENO are directed to the issues pertinent to the scope of the issues outlined by Council Resolution R-16-263.

II.

SPECIFIC OBJECTIONS

In addition to the foregoing General Objections, the Alliance has, at this time, identified the following specific objections:

OBJECTIONS TO REQUEST NO. 1-1

The Alliance objects to this discovery question as it is irrelevant and will not lead to the discovery of information useable by ENO in meeting its obligation to show cause for its actions as required by City Council Resolution R-16-263. The Alliance also objects to this request in that it is overly broad, seeks information that is not routinely kept in the normal course of business, and is overly burdensome to attempt to produce. The Alliance further objects to the request for information regarding activities of people who are members of the Alliance but who are not staff, agents, nor representatives of the organization

OBJECTIONS TO REQUEST NO. 1-2

The Alliance objects to this discovery question as it is irrelevant and will not lead to the discovery of information useable by ENO in meeting its obligation to show cause for its actions as required by City Council Resolution R-16-263. The Alliance also objects to this request in that it is overly broad, seeks information that is not routinely kept in the normal course of business, and is overly burdensome to attempt to produce. The Alliance further objects to the request for information regarding activities of people who are members of the Alliance but who are not staff, agents, nor representatives of the organization.

OBJECTIONS TO REQUEST NO 1-3

The Alliance objects to this discovery question as it is irrelevant and will not lead to the discovery of information useable by ENO in meeting its obligation to show cause for its actions as required by City Council Resolution R-16-263. The Alliance further objects to the request for information regarding activities of people who are members of The Alliance but who are not staff, agents, nor representatives of the organization.

OBJECTIONS TO REQUEST NO 1-4

The Alliance objects to this discovery question as it is irrelevant and will not lead to the discovery of information useable by ENO in meeting its obligation to show cause for its actions as required by City Council Resolution R-16-263. The Alliance further objects to the request for information regarding activities of people who are members of the Alliance but who are not staff, agents, nor representatives of the organization.

OBJECTIONS TO REQUEST NO. 1-5

The Alliance objects to this request in that it is overly broad, seeks information that is not routinely kept in the normal course of business, and is overly burdensome to attempt to produce. The Alliance further objects to the request for information regarding activities of people who are members of the Alliance but who are not staff, agents, nor representatives of the organization

OBJECTIONS TO REQUEST NO 1-6

The Alliance objects to this discovery question as it is irrelevant and will not lead to the discovery of information useable by ENO in meeting its obligation to show cause for its actions as required by City Council Resolution R-16-263.

OBJECTIONS TO REQUEST NO 1-7

The Alliance objects to this request in that it purports to directly quote from a transcript that is not in the Alliance's possession. The Alliance objects to this discovery question as it is irrelevant and will not lead to the discovery of information useable by ENO in meeting its obligation to show cause for its actions as required by City Council Resolution R-16-263.

OBJECTIONS TO REQUEST NO 1-8

The Alliance objects to this request in that it purports to directly quote from a transcript that is not in the Alliance's possession. The Alliance objects to this discovery question as it is irrelevant and will not lead to the discovery of information useable by ENO in meeting its obligation to show cause for its actions as required by City Council Resolution R-16-263.

OBJECTION TO REQUEST NO. 1-9

The Alliance objects to this request in that it purports to directly quote from a transcript that is not in the Alliance's possession. The Alliance objects to this discovery question as it is irrelevant and will not lead to the discovery of information useable by ENO in meeting its obligation to show cause for its actions as required by City Council Resolution R-16-263.

OBJECTION TO REQUEST NO. 1-10

The Alliance objects to this request in that it purports to directly quote from a transcript that is not in the Alliance's possession. The Alliance objects to this discovery question as it is irrelevant and will not lead to the discovery of

information useable by ENO in meeting its obligation to show cause for its actions as required by City Council Resolution R-16-263.

OBJECTION TO REQUEST NO. 1-11

The Alliance objects to this discovery question as it is irrelevant and will not lead to the discovery of information useable by ENO in meeting its obligation to show cause for its actions as required by City Council Resolution R-16-263. The Alliance further objects to this request in that it is overly broad and overly burdensome to attempt to produce. The Alliance further objects to this discovery question to the extent that it requests materials which are proprietary information to the Louisiana Health Institute and not within The Alliance's power to disclose.

OBJECTIONS TO REQUEST NO 1-12

The Alliance objects to this discovery question as it is irrelevant and will not lead to the discovery of information useable by ENO in meeting its obligation to show cause for its actions as required by City Council Resolution R-16-263.

OBJECTIONS TO REQUEST NO 1-13

The Alliance objects to this discovery question as it is irrelevant and will not lead to the discovery of information useable by ENO in meeting its obligation to show cause for its actions as required by City Council Resolution R-16-263.

SUBMITTED BY:

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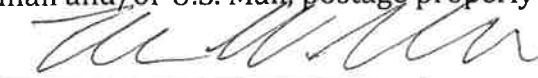
Phone: 504-524-5297

Fax: 504-586-8457

Attorneys for The Alliance for
Affordable Energy

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon "The Official Service List" via electronic mail and/or U.S. Mail, postage properly affixed, this 10th day of August, 2016.



Thomas W. Milliner