

September 12, 2016

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

**Re: Application of Entergy New Orleans, Inc. for Approval to Construct  
New Orleans Power Station and Request for Cost Recovery and Timely Relief,  
Docket No. UD-16-02**

Dear Ms. Johnson:

Pursuant to Council Resolution R-16-332, please find the enclosed the original and three copies of the *Petition to Intervene by the Deep South Center for Environmental Justice, Inc.* in the above-referenced matter. Please file the original and two copies of the petition and this letter into the record in the above-referenced matter, and return a date-stamped copy to our courier.

Thank you for your assistance.

Sincerely,



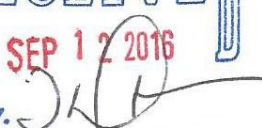
Monique Harden, Attorney

c/o Deep South Center for Environmental Justice, Inc.  
1631 Elysian Fields Avenue, #165  
New Orleans, LA 70118

Enclosure

cc: Director, Council Utilities Regulatory Office

SEP 12 1 47

RECEIVED  
SEP 12 2016  
BY: 

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

**APPLICATION OF ENTERGY NEW )  
ORLEANS, INC. FOR APPROVAL TO )  
CONSTRUCT NEW ORLEANS POWER )  
STATION AND REQUEST FOR COST )  
RECOVERY AND TIMELY RELIEF )**

**DOCKET NO. UD 16-02**

**PETITION TO INTERVENE BY THE  
DEEP SOUTH CENTER FOR ENVIRONMENTAL JUSTICE, INC.**

Pursuant to the Council of the City of New Orleans Resolution R-16-332, the Deep South Center for Environmental Justice, Inc. (“DSCEJ”) respectfully requests that the City Council of New Orleans, Louisiana grant the DSCEJ the right to intervene and participate as a party in the above captioned docket.

The DSCEJ is a non-profit organization incorporated in the State of Louisiana with an office in the City of New Orleans. The DSCEJ works locally and globally as a resource for communities, scientific researchers, and policymakers on issues involving environmental justice.

The DSCEJ serves civic organizations and faith based groups in New Orleans East by finding solutions to environmental issues that adversely affect the health and quality of life of residents. The DSCEJ is committed to conducting research and spearheading advocacy for the purpose of ensuring a healthy and safe environment, equity, and justice for New Orleans East residents.

The DSCEJ requests to intervene in this docket in order to challenge Entergy New Orleans, Inc.’s application to the City Council seeking approval to build a combustion turbine natural gas power plant in New Orleans East, which would adversely impact the health and environment of predominantly African American and Vietnamese American residents. Furthermore, Entergy’s decisions regarding the proposed power plant run counter to local, state, and international action on climate change, fossil fuel reduction, and sustainable communities.

The DSCEJ possesses the standing to intervene, and requests intervenor status in order to fully participate in this docket. The DSCEJ requests to be included on the service list for Docket UD-16-02 and served with all pleadings, notices, orders, and other filings.

All communications regarding Docket UC-16-02 and all documents filed in this docket should be directed to:

Monique Harden, Attorney (LA Bar No. 24118)  
c/o Deep South Center for Environmental Justice, Inc.  
1631 Elysian Fields Ave., #165

New Orleans, LA 70118  
(504) 383-3563  
[mharden@ehumanrights.org](mailto:mharden@ehumanrights.org)

Respectfully submitted on the 12th day of September, 2016 by:

A handwritten signature in cursive script that reads "Monique Harden". The signature is written in black ink and has a long, sweeping horizontal line extending to the right.

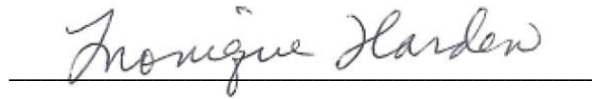
Monique Harden  
c/o Deep South Center for Environmental Justice, Inc.  
1631 Elysian Fields Ave., #165  
New Orleans, LA 70118

**APPLICATION OF ENTERGY NEW ORLEANS, INC. FOR APPROVAL TO  
CONSTRUCT NEW ORLEANS POWER STATION AND REQUEST FOR COST  
RECOVERY AND TIMELY RELIEF**

**DOCKET NO. UD-16-02**

**Certificate of Service**

I certify that I have on this 12<sup>th</sup> day of September 2016 served the required number of copies of the foregoing pleading upon all other known parties of this proceeding by electronic mail.

A handwritten signature in cursive script that reads "Monique Harden". The signature is written in black ink and is positioned above a solid horizontal line.

Monique Harden, Attorney (LA State Bar No. 24118)  
c/o Deep South Center for Environmental Justice, Inc.

**Lora W. Johnson, [lwjohnson@nola.gov](mailto:lwjohnson@nola.gov)**

Clerk of Council  
City Hall - Room 1E09  
1300 Perdido Street  
New Orleans, LA 70112  
(504) 658-1085 - office  
(504) 658-1140 – fax

**Pearlina Thomas, [pthomas@nola.gov](mailto:pthomas@nola.gov)**

Chief of Staff, Council Utilities Regulatory Office  
**W. Thomas Stratton, Jr., [wstrattonjr@nola.gov](mailto:wstrattonjr@nola.gov)**  
Director, Council Utilities Regulatory Office  
City Hall - Room 6E07  
1300 Perdido Street  
New Orleans, LA 70112  
(504) 658-1110 - office  
(504) 658-1117 – fax

**Rebecca Dietz, [rhdietz@nola.gov](mailto:rhdietz@nola.gov)**

City Attorney  
Law Department  
City Hall- 5<sup>th</sup> Floor  
New Orleans, LA 70112  
(504) 658-9800 – office  
(504) 658-9869 – fax

**Norman S. Foster**, [nsfoster@nola.gov](mailto:nsfoster@nola.gov)

Department of Finance  
City Hall - Room 3W06  
1300 Perdido Street  
New Orleans, LA 70112  
(504) 658-1519- office  
(504) 658-1705 – fax

#### **ADMINISTRATIVE HEARING OFFICER**

**Hon. Jeffrey S. Gulin**, [jgulin@verizon.net](mailto:jgulin@verizon.net)

3203 Bridle Ridge Lane  
Lutherville, MD 21093  
(410) 627-5357

#### **NEW ORLEANS CITY COUNCIL CONSULTANTS**

**Clinton A. Vince**, [clinton.vince@dentons.com](mailto:clinton.vince@dentons.com)

**Presley Reed**, [presley.reedjr@dentons.com](mailto:presley.reedjr@dentons.com)

**Emma F. Hand**, [emma.hand@dentons.com](mailto:emma.hand@dentons.com)

DENTONS US LLP  
1301 K Street NW  
Suite 600, East Tower  
Washington, DC 20005  
(202) 408-6400 - office  
(202) 408-6399 - fax

**Basile J. Uddo** (504) 583-8604 cell, [buddo@earthlink.net](mailto:buddo@earthlink.net)

**J. A. “Jay” Beatmann, Jr.** (504) 256-6142 cell, (504) 524-5446 office direct,

[jay.beatmann@dentons.com](mailto:jay.beatmann@dentons.com)

c/o DENTONS US LLP  
650 Poydras Street  
Suite 2850  
New Orleans, LA 70130

**Walter J. Wilkerson**, [wwilkerson@wilkersonplc.com](mailto:wwilkerson@wilkersonplc.com)

**Kelley Bazile**, [kbazile@wilkersonplc.com](mailto:kbazile@wilkersonplc.com)

Wilkerson and Associates, PLC  
650 Poydras Street - Suite 1913  
New Orleans, LA 70130  
(504) 522-4572 - office  
(504) 522-0728 - fax

**Joseph Vumbaco**, [jvumbaco@ergconsulting.com](mailto:jvumbaco@ergconsulting.com)

**Joseph W. Rogers**, [jrogers@ergconsulting.com](mailto:jrogers@ergconsulting.com)

**Victor M. Prep**, [vprep@ergconsulting.com](mailto:vprep@ergconsulting.com)

**Byron S. Watson**, [bwatson@ergconsulting.com](mailto:bwatson@ergconsulting.com)

Legend Consulting Group

8055 East Tufts Ave., Suite 1250

Denver, CO 80237-2835

(303) 843-0351 - office

(303) 843-0529 – fax

**Errol Smith**, [ersmith@btcpas.com](mailto:ersmith@btcpas.com)

Bruno and Tervalon

4298 Elysian Fields Avenue

New Orleans, LA 70122

(504) 284-8733 - office

(504) 284-8296 – fax

## **ENERGY NEW ORLEANS, INC.**

**Gary E. Huntley**, [ghuntley@entergy.com](mailto:ghuntley@entergy.com)

Entergy New Orleans, Inc.

Vice-President, Regulatory Affairs

1600 Perdido Street, L-MAG 505B

New Orleans, LA 70112

(504) 670-3680 - office

(504) 670-3615 - fax

**Seth Cureington**, [scurein@entergy.com](mailto:scurein@entergy.com)

Entergy New Orleans, Inc.

Manager, Resource Planning

1600 Perdido Street, L-MAG 505B

New Orleans, LA 70112

504-670-3602 office

504-670-3615 fax

**Kathryn J. Lichtenberg** (504) 576-2763 office, [klichte@entergy.com](mailto:klichte@entergy.com)

**Tim Cragin** (504) 576-6523 office, [tcragin@entergy.com](mailto:tcragin@entergy.com)

**Brian L. Guillot** (504) 576-2603 office, [bguill1@entergy.com](mailto:bguill1@entergy.com)

**Alyssa Maurice-Anderson** (504) 576-6523 office, [amauric@entergy.com](mailto:amauric@entergy.com)

Entergy Services, Inc.

Mail Unit L-ENT-26E

639 Loyola Avenue

New Orleans, LA 70113

(504) 576-5579 – fax

**Joe Romano, III** (504) 576-4764, [jroman1@entergy.com](mailto:jroman1@entergy.com)  
**Suzanne Fontan** (504) 576-7497, [sfontan@entergy.com](mailto:sfontan@entergy.com)  
**Danielle Burleigh** (504) 576-6185, [dburlei@entergy.com](mailto:dburlei@entergy.com)  
**Therese Perrault** (504-576-6950), [tperrau@entergy.com](mailto:tperrau@entergy.com)

Entergy Services, Inc.  
Mail Unit L-ENT-4C  
639 Loyola Avenue  
New Orleans, LA 70113  
(504)576-6029 – fax

## **ALLIANCE FOR AFFORDABLE ENERGY**

**Casey DeMoss, CEO**, [casey@all4energy.org](mailto:casey@all4energy.org)  
4035 Washington Ave.,  
New Orleans, LA 70125  
(504) 208-9761

**Logan Atkinson Burke**, [logan@all4energy.org](mailto:logan@all4energy.org)  
4035 Washington Ave.,  
New Orleans, LA 70125  
(504) 208-9761- office  
(646) 942-7149 - cell

## **POSIGEN**

**Karla Loeb**, [kloeb@posigen.com](mailto:kloeb@posigen.com)  
2424 Edenborn Ave. Suiet 550  
Metairie, LA 70001  
(504)293-5665

## **AIR PRODUCTS AND CHEMICALS, INC.**

**Ernest L. Edwards Jr**, [ledwards0526@gmail.com](mailto:ledwards0526@gmail.com)  
The Law Offices of Ernest L. Edwards Jr, APLC  
300 Lake Marina Avenue unit 5BE  
New Orleans, LA 70124  
Phone: 504 450-4226

**Mark Zimmerman**, [zimmermr@airproducts.com](mailto:zimmermr@airproducts.com)  
Air Products and Chemicals, Inc.  
7201 Hamilton Boulevard  
Allentown, PA 18195-1501  
610-481-1288 - office  
610-481-2182 – fax

**Maurice Brubaker**, (636) 898-6725, [mbrubaker@consultbai.com](mailto:mbrubaker@consultbai.com)  
Brubaker & Associates, Inc.  
16690 Swingley Ridge Road, Suite 140  
Chesterfield, MO 63017

**James R. Dauphinais**, (636) 898-6725, [jdauphinais@consultbai.com](mailto:jdauphinais@consultbai.com)  
Brubaker & Associates, Inc.  
16690 Swingley Ridge Road, Suite 140  
Chesterfield, MO 63017