



January 19, 2017

**By Hand Delivery and Email**

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

**In Re: APPLICATION OF ENTERGY NEW ORLEANS, INC. FOR APPROVAL TO DEPLOY  
ADVANCED METERING INFRASTRUCTURE, REQUEST FOR COST RECOVERY AND RELATED  
RELIEF (Docket No. UD-16-04)**

Dear Ms. Johnson:

Enclosed please find an original and three copies of the Alliance for Affordable Energy's request for intervention in the above mentioned docket. Please file the attached communication and this letter in the record of the proceeding and return one timestamped copy to our courier, in accordance with normal procedures.

Thank you for your time and attention.

Sincerely,

Logan A. Burke  
New Orleans Policy Director  
Alliance for Affordable Energy

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

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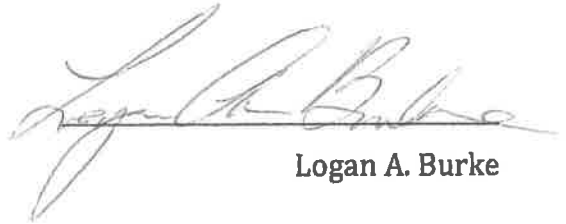
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**Certificate of Service**

I hereby certify that I have this 19th day of January, 2017, served copies of the foregoing pleading upon all other known parties, of this proceeding, as listed below, by U.S. Mail, email, hand delivery, or electronic mail.

A handwritten signature in cursive script, appearing to read "Logan A. Burke", is written over a horizontal line. The signature is positioned to the left of the printed name.

**Logan A. Burke**

**Before**

**The Council of the City of New Orleans**

**In Re: APPLICATION OF ENTERGY NEW  
ORLEANS, INC. FOR APPROVAL TO DEPLOY  
ADVANCED METERING INFRASTRUCTURE,  
REQUEST FOR COST RECOVERY AND  
RELATED RELIEF**

**Docket NO. UD-16-04**

**January 19, 2017**

**The Alliance for Affordable Energy**

**Petition for Intervention and Inclusion on Service List.**

The Alliance for Affordable Energy, ("the Alliance") respectfully requests that the Council of the City Of New Orleans ("the Council") grant the Alliance the right to intervene in the above captioned docket and participate as a party therein.

On January 12, 2016, the full Council for the City of New Orleans issued Resolution R-16-627 setting a procedural schedule for this docket, and setting a period of 30 days from the adoption of the Resolution for parties to file for intervention. This request is being made within the 30 day intervention period and is therefore timely.

The Alliance is a non-profit Louisiana organization that serves as a consumer advocate for the electric ratepayers of Louisiana, with special concern for residential and small commercial customers. The Alliance is dedicated to supporting fair, affordable, environmentally-responsible energy policy for the citizens of New Orleans and Louisiana.

The Alliance is a formal intervenor in Docket UD-08-02, and other dockets concerning Entergy New Orleans infrastructure planning. The Alliance has members served by ENO. There is no other party representing the interests of the Alliance and its members.

The Alliance intends to participate in this proceeding in order to protect the interests of the residential and small commercial Entergy New Orleans, Inc. ("ENO") customers. ENO's application presents a concern that the lengthy proposed timeline for development and deployment of Advanced Metering Infrastructure ("AMI") reduces the benefits customers may enjoy as a result of this deployment. Indeed, full benefits of capacity reduction through ENO's Energy Smart program depend on the installation of AMI. ENO's application outlines customer benefits and savings resulting from the AMI. While other utilities in Louisiana have proven able to deploy larger AMI systems in a shorter time frame, it is unclear why ENO has chosen such a long timeline.

The Alliance's interests in this proceeding include,

- a) ENO's proposed time frame for the deployment of AMI.
- b) Protections for consumers with respect to planned uses of AMI.

c) ENO's proposed project costs.

The Alliance possesses standing to intervene in the aforementioned matter, and respectfully seeks full intervenor status in order to fully participate in this docket. The Alliance requests that it be placed on the service list of this proceeding and be served with all pleadings, notices orders, and other filings.

All communications and pleadings in this docket should be directed to :

Casey DeMoss

Logan Atkinson Burke

Alliance for Affordable Energy

4505 S. Claiborne Ave

(504)208-9761

[casey@all4energy.org](mailto:casey@all4energy.org)

[logan@all4energy.org](mailto:logan@all4energy.org)

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Logan Atkinson Burke".

Logan Atkinson Burke

New Orleans Policy Director

Alliance for Affordable Energy