

August 11, 2017

## **By Hand Delivery**

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

# In Re: 2018 TRIENNIAL INTEGRATED RESOURCE PLAN OF ENTERGY NEW ORLEANS, INC. PENALTY MECHANISMS (Docket No. UD-17-03)

Dear Ms. Johnson:

Please find enclosed an original and three (3) copies of the Alliance for Affordable Energy's Petition for Intervention and Inclusion on Service List 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. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention.

Sincerely,

Logan Burke Executive Director Alliance for Affordable Energy

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4505 S. Claiborne Ave, New Orleans, LA 70125 | Office: 504.208.9761 | www.all4energy.org

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

## IN RE: 2018 TRIENNIAL INTEGRATED RESOURCE PLAN OF ENTERGY NEW ORLEANS, INC.

#### DOCKET UD-17-03

# 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 August 10, 2017, the full Council for the City of New Orleans issued Resolution R-17-430, setting a procedural schedule for this docket, setting a deadline of intervention by October 6, 2017. This request is being made within the 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 equitable, affordable, environmentally-responsible energy policy for the citizens of New Orleans and Louisiana.

The Alliance is a formal intervenor in Council Dockets UD-08-02, UD-17-01 and other dockets concerning Entergy New Orleans, Inc ("ENO") 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.

The Alliance's interests in this proceeding include, but are not limited to:

a) Ensuring New Orleans rate-payers are served with the most cost-effective resources; and

b) Expansion of cost-effective demand-side management programs, including efficiency, demand response, and energy storage; and

c) Increasing access to clean, renewable energy in New Orleans; and

d) Considerations related to improving and sustaining ENO system's reliability and resilience,

including continued modernization of ENO's distribution system; and

e) Efforts to coordinate the council's Resolutions R-17-303, to commit New Orleans to the Paris Climate Agreement, and R-17-428, to dramatically reduce greenhouse gas emissions with resource planning.

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.

Please note the Alliance is a public advocacy non-profit organization, thus pursuant to resolution R-16-365, we request that all intervenor fees be waived.

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

Logan Atkinson Burke logan@all4energy.org Forest Bradley-Wright forest@all4energy.org Sophie Zaken regulatory@all4energy.org

Alliance for Affordable Energy 4505 S. Claiborne Ave (504)208-9761

Respectfully,

ogan A. Burke

Executive Director Alliance for Affordable Energy

# IN RE: 2018 TRIENNIAL INTEGRATED RESOURCE PLAN OF ENTERGY NEW ORLEANS, INC.

# Certificate of Service Docket No. UD-17-03

I hereby certify that I have this 11<sup>th</sup> Day of August, 2017, served the required number of copies of the foregoing correspondence upon all other known parties of this proceeding, by USPS or electronic mail.

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Logan A. Burke Alliance for Affordable Energy