

August 11, 2017

By Hand Delivery and U.S. Mail

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

In Re: RESOLUTION DIRECTING ENTERGY NEW ORLEANS, INC. TO INVESTIGATE AND REMEDIATE ELECTRIC SERVICE DISRUPTIONS AND COMPLAINTS AND TO ESTABLISH MINIMUM ELECTRIC RELIABILITY PERFORMANCE STANDARDS AND FINANCIAL PENALTY MECHANISMS (Docket No. UD-17-04)

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

BEFORE THE COUNCIL OF THE CITY OF NEW ORLEANS

In Re: RESOLUTION DIRECTING ENTERGY NEW ORLEANS, INC. TO INVESTIGATE AND REMEDIATE ELECTRIC SERVICE DISRUPTIONS AND COMPLAINTS AND TO ESTABLISH MINIMUM ELECTRIC RELIABILITY PERFORMANCE STANDARDS AND FINANCIAL PENALTY MECHANISMS

DOCKET UD-17-04

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-17-427, setting a procedural schedule for this docket, and setting a period of 15 days from the adoption of the Resolution for parties to file for intervention. This request is being made within the 15 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 equitable, affordable, environmentally-responsible energy policy for the citizens of New Orleans and Louisiana.

The Alliance is a formal intervenor in Docket UD-17-01 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.

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

a) Causes of outages and vulnerabilities of New Orleans' electricity system (digital/cyber, distribution, transmission, generation); and

b) Expected improvements to ENO's system to reduce outages, harden the system from storms; and

c) ENO's reliability history, including SAIDI and SAIFI metrics.

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 Council 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,

Logan A. Burke

Executive Director Alliance for Affordable Energy

In Re: RESOLUTION DIRECTING ENTERGY NEW ORLEANS, INC. TO INVESTIGATE AND REMEDIATE ELECTRIC SERVICE DISRUPTIONS AND COMPLAINTS AND TO ESTABLISH MINIMUM ELECTRIC RELIABILITY PERFORMANCE STANDARDS AND FINANCIAL PENALTY MECHANISMS

Certificate of Service Docket No. UD-17-04

I hereby certify that I have this 11th 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.

& Bule

Logan A. Burke Alliance for Affordable Energy

Lora W. Johnson, <u>lwjohnson@nola.gov</u> 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

Chief of Staff, Council Utilities Regulatory Office **W. Thomas Stratton, Jr.,** <u>wtstrattonjr@nola.gov</u> 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

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

Norman S. Foster, 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

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

NEW ORLEANS CITY COUNCIL CONSULTANTS

Clinton A. Vince, <u>clinton.vince@dentons.com</u> Presley Reed, <u>presley.reedjr@dentons.com</u> Emma F. Hand, <u>emma.hand@dentons.com</u> 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, <u>buddo@earthlink.net</u> J. A. "Jay" Beatmann, Jr. (504) 256-6142 cell, (504) 524-5446 office direct, jay.beatmann@dentons.com c/o DENTONS US LLP 650 Poydras Street Suite 2850 New Orleans, LA 70130

Walter J. Wilkerson, <u>wwilkerson@wilkersonplc.com</u> Kelley Bazile, 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 Joseph W. Rogers, jrogers@ergconsulting.com Victor M. Prep, vprep@ergconsulting.com Byron S. Watson, 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

Bruno and Tervalon 4298 Elysian Fields Avenue New Orleans, LA 70122 (504) 284-8733 - office (504) 284-8296 - fax

ENTERGY NEW ORLEANS, INC.

Gary E. Huntley, ghuntle@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

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, <u>klichte@entergy.com</u> Tim Cragin (504) 576-6523 office, <u>tcragin@entergy.com</u> Brian L. Guillot (504) 576-2603 office, <u>bguill1@entergy.com</u> Alyssa Maurice-Anderson (504) 576-6523 office, <u>amauric@entergy.com</u> Harry Barton (504)576-2984 office, <u>hbarton@entergy.com</u> Entergy Services, Inc. Mail Unit L-ENT-26E 639 Loyola Avenue New Orleans, LA 70113

Joe Romano, III (504) 576-4764, jroman1@entergy.com Suzanne Fontan (504) 576-7497, <u>sfontan@entergy.com</u> Danielle Burleigh (504) 576-6185, <u>dburlei@entergy.com</u> Therese Perrault (504-576-6950), <u>tperrau@entergy.com</u> Entergy Services, Inc. Mail Unit L-ENT-4C 639 Loyola Avenue New Orleans, LA 70113 (504)576-6029 - fax