

Entergy Services, Inc. 639 Loyola Avenue (70113) P.O. Box 61000 New Orleans. LA 70161-1000 Tel 504 576 2603 Fax 504 576 5579

Brian L. Guillot

Senior Counsel Legal Services - Regulatory bguill L@entergy.com

December 4, 2017

By Hand Delivery

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

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

Dear Ms. Johnson:

Entergy New Orleans, Inc. ("ENO") hereby submits for your further handling and filing an original and three copies of ENO's Objections to the Alliance for Affordable Energy's ("Alliance") Ninth 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.

Should you have any questions regarding the above matter, please don't hesitate to contact me. Thank you for your assistance with this matter.

Sincerely,

Brian L. Guillot

Enclosures

cc: Official Service List (via electronic mail)

LLC = 4 34

BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

SUPPLEMENTAL AND AMENDING)	
APPLICATION OF ENTERGY NEW)	DOCKET NO. UD-16-02
ORLEANS, INC. FOR APPROVAL TO)	
CONSTRUCT NEW ORLEANS POWER)	
STATION AND REQUEST FOR COST)	
RECOVERY AND TIMELY RELIEF)	

ENTERGY NEW ORLEANS, INC.'S OBJECTIONS TO THE ALLIANCE FOR AFFORDABLE ENERGY'S NINTH SET DISCOVERY REQUESTS

Entergy New Orleans, Inc. ("ENO" or the "Company") objects to the entirety of the Alliance for Affordable Energy's ("Alliance") Ninth Set of Requests for Information to ENO (the "Requests") propounded in the above-captioned proceeding on December 1, 2017. The Alliance's Requests were propounded outside of the period allowed to propound written discovery under Council Resolution R-17-426, which establishes that "a discovery period shall extend through 8 days prior to the date of the Evidentiary Hearing," or, in this case, December 7, 2017. The Resolution goes on to state, however, that "discovery requests must be made in time that responses may be received prior to the close of the discovery period" and established a 7-day discovery turn-around deadline. *See* Resolution R-17-426 at pg. 16. Accordingly, the Alliance's Request was not propounded within the period allowed by the Resolution.

Respectfully submitted:

BY:

Timothy S. Cragin, Bar No. 22313
Brian L. Guillot, Bar No. 31759
Alyssa Maurice-Anderson, Bar No. 28388
Harry Barton, Bar No. 29751
639 Loyola Avenue, Mail Unit L-ENT-26 E
New Orleans, Louisiana 70113

Telephone: (504) 576-2603 Facsimile: (504) 576-5579

ATTORNEYS FOR ENTERGY NEW ORLEANS, INC.

CERTIFICATE OF SERVICE CNO Docket No. UD-16-02

I, the undersigned counsel, hereby certify that a copy of the above and foregoing has been served on the persons listed below by facsimile, by hand delivery, by electronic mail, or by depositing a copy of same with the United States Postal Service, postage prepaid, addressed as follows:

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

Rebecca Dietz
Bobbie Mason
City Attorney Office
Law Department
City Hall – 5th Floor
New Orleans, LA 70112

Beverly Gariepy
Department of Finance
City Hall, Room 3E06
1300 Perdido Street
New Orleans, LA 70112

Timothy S. Cragin Brian L. Guillot Alyssa Maurice-Anderson Harry M. Barton Karen Freese Entergy Services, Inc. 639 Loyola Avenue, Mail Unit L-ENT-26E New Orleans, LA 70113

Joseph A. Vumbaco, P.E.
Joseph W. Rogers
Victor M. Prep
Byron S. Watson
Legend Consulting Group Limited
8055 East Tufts Avenue
Suite 1250
Denver, CO 80237-2835

Pearlina Thomas, Chief of Staff W. Thomas Stratton, Jr., Director Council Utilities Regulatory Office City Hall, Room 6E07 1300 Perdido Street New Orleans, LA 70112

Hon. Jeffrey S. Gulin Administrative Hearing Officer 3203 Bridle Ridge Lane Lutherville, MD 21093

David Gavlinski Interim Council Chief of Staff City Hall - Room 1E06 1300 Perdido Street New Orleans, LA 70112

Errol Smith, CPA Bruno and Tervalon 4298 Elysian Fields Avenue New Orleans, LA 70122

Clinton A. Vince Presley R. Reed, Jr. Emma F. Hand Dentons US LLP 1900 K Street NW Washington, DC 20006 Basile J. Uddo, Esq. J. A. "Jay" Beatmann, Jr. c/o Dentons US LLP 650 Poydras Street Suite 2850 New Orleans, LA 70130

Seth Cureington Manager, Resource Planning Entergy New Orleans, Inc. 1600 Perdido Street, Mail Unit L-MAG-505B New Orleans, LA 70112

Monique Harden
Deep South Center for
Environmental Justice, Inc.
3157 Gentilly Blvd, #145
New Orleans, LA 70122

Joseph Romano
Suzanne M. Fontan
Danielle Burleigh
Therese Perrault
Entergy Services, Inc.
639 Loyola Avenue
Mail Unit L-ENT-4C
New Orleans, LA 70113

Benjamin Norwood Beth Galante Posigen 819 Central Avenue Suite 210 Jefferson, LA 70121 Walter J. Wilkerson, Esq. Kelley Bazile Wilkerson and Associates, PLC The Poydras Center, Suite 1913 650 Poydras Street New Orleans, LA 70130

Gary E. Huntley V.P., Regulatory Affairs Entergy New Orleans, Inc. 1600 Perdido Street Mail Unit L-MAG-505A New Orleans, LA 70112

Logan Atkinson Burke Forest Wright Sophie Zaken Alliance for Affordable Energy 4505 S. Claiborne Avenue New Orleans, LA 70125

Ernest L. Edwards, Jr. Law Offices of Ernest L. Edwards, Jr. APLC 300 Lake Marina Avenue Unit 5BE New Orleans, LA 70124

Mark Zimmerman Air Products and Chemicals, Inc. 7201 Hamilton Boulevard Allentown, PA 18195-1501 Maurice Brubaker James Dauphinais Brubaker & Associates, Inc. 16690 Swingley Ridge Road Suite 140 Chesterfield, MO 63017

Jeff Cantin, President Will Feldman Gulf States Renewable Energy 400 Poydras Street, Suite 900 New Orleans, LA 70130

Robert B. Wiygul Waltzer, Wiygul, & Garside, LLC 1011 Iberville Drive Ocean Springs, MS 39564

Susan Stevens Miller Chinyere Osuala Al Luna Alliance for Affordable Energy 350 Louisiana – New Orleans 1625 Massachusetts Avenue NW Suite 702 Washington, DC 20036 Luke Piontek
Judith Sulzer
Gayle T. Kellner
Christian J. Rhodes
Shelley Ann McGlathery
Roedel, Parsons, Koch, Blache,
Balhoff & McCollister
8440 Jefferson Highway
Suite 301
Baton Rouge, LA 70809

Joshua Smith
Sierra Club Environmental Law Program
2101 Webster Street
Suite 1300
Oakland, CA 94612

Michael Brown Waltzer, Wiygul, & Garside, LLC 1000 Behrman Highway Gretna, LA 70056

New Orleans, Louisiana, this 4th day of December, 2017.

Brian L. Guillot