



The Southern Center for Environmental Justice, Inc.

DOING BUSINESS AS THE DEEP SOUTH CENTER FOR ENVIRONMENTAL JUSTICE, INC.

December 6, 2017

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

**Re: 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:

Please find enclosed the original and three copies of the Deep South Center for Environmental Justice, Inc.'s Declaration of Witness Available and List of Witnesses for Cross-Examination with Anticipated Time Lengths for the Evidentiary Hearing. Please file the attached and this letter in the record of the above-referenced docket proceeding.

Sincerely,

Monique Harden, Attorney
Assistant Director of Law & Policy

cc: Official Service List UD-16-02 (via e-mail)

RECEIVED
DEC 06 2017
BY:

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Office Phone: 504-517-2534 Office Fax: 504-372-3473

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

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

DOCKET NO. UD-16-02

**DEEP SOUTH CENTER FOR ENVIRONMENTAL JUSTICE, INC.
DECLARATION OF WITNESS AVAILABLE AND LIST OF WITNESSES FOR
CROSS-EXAMINATION WITH ANTICIPATED TIME LENGTHS FOR THE
EVIDENTIARY HEARING**

The Deep South Center for Environmental Justice, Inc., through undersigned counsel, files this Declaration of Witness Available and List of Witnesses for Cross-Examination with Anticipated Time Lengths for the Evidentiary Hearing in this docket. The evidentiary hearing is scheduled to begin on December 15, 2017.

I. Witness Available for Cross-Examination:

Dr. Beverly Wright, Executive Director of the Deep South Center for Environmental Justice, Inc., is the witness available for the evidentiary hearing.

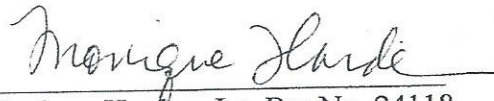
II. Witnesses the Deep South Center for Environmental Justice Intends to Cross-Examine and Anticipated Length of the Cross-Examination:

The Deep South Center for Environmental Justice, Inc. intends to cross-examine the following witnesses during the evidentiary hearing.

| Name of Witness | Offering Party | Anticipated Length of Cross-Examination Required |
|------------------------|-----------------------|---|
| Charles L. Rice, Jr. | ENO | 1 hour |
| Seth E. Cureington | ENO | 45 minutes |
| Charles W. Long | ENO | 30 minutes |
| Jonathan E. Long | ENO | 45 minutes |
| Bliss M. Higgins | ENO | 1 hour |
| Dr. George Losonsky | ENO | 30 minutes |
| Joseph A. Vumbaco | CNO Advisors | 1 hour |

Discovery in this docket is ongoing, and the Deep South Center for Environmental Justice, Inc. will take the depositions of three of the above-listed witnesses for the first time this week, on December 7 - 8, 2017. The Deep South Center for Environmental Justice, Inc. reserves the right to move to amend its schedule, in light of new information that may arise in the course of the depositions.

Respectfully submitted on this 6th day of December, 2017 by:

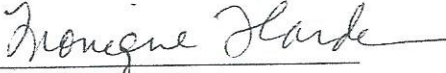


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*Counsel for the Deep South Center for
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CERTIFICATE OF SERVICE

I hereby certify, this 6th day of December, 2017, that a copy of the foregoing has been served upon the following parties in the official service list for this docket maintained by the Council Utilities Regulatory Office via electronic mail and/or U.S. Mail, postage properly affixed.


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