



Waltzer Wiygul Garside
LAW FIRM

December 6, 2017

Via Hand Delivery

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

Re: *Entergy New Orleans, Inc.'s Application for Approval to Construct New Orleans Power Station and Request for Cost Recovery and Timely Relief*
Docket No. UD-16-02

Sierra Club's List of Cross-Examination Witnesses

Dear Ms. Johnson:

Undersigned counsel make this filing on behalf of Sierra Club, an intervenor in this docket. Please find the original and three copies of the enclosed, Sierra Club's List of Cross-Examination Witnesses. Please return one date-stamped copy to our courier for our records and file the remaining original and two copies into the docket in this matter.

A copy of this filing will be served by electronic mail on all parties to the e-mail distribution list for UD-16-02.

Respectfully submitted,

Robert Wiygul, La. Bar No. 17411
Michael Brown, La. Bar No. 35444
Waltzer Wiygul & Garside LLC
1000 Behrman Highway
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Joshua Smith
Staff Attorney

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BY:

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

Counsel for Sierra Club

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

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

DOCKET NO. UD-16-02

SIERRA CLUB'S LIST OF CROSS-EXAMINATION WITNESSES

Sierra Club, through undersigned counsel, files this list of cross-examination witnesses for the evidentiary hearing in this docket that begins on December 15, 2017.

I. Sierra Club Witness Available for Cross-Examination:

Sierra Club will make available Robert M. Fagan for cross-examination on both Mr. Fagan's direct testimony, filed October 16, 2017, and Patrick Luckow's direct testimony, filed on January 6, 2017, which Mr. Fagan has adopted in full.¹

Because of Mr. Fagan's schedule constraints, Sierra Club respectfully asks that Mr. Fagan's cross take place on December 18 or 19, 2017.

II. Witnesses Sierra Club Intends to Cross and Anticipated Length of Cross:

Sierra Club intends to cross-examine the following witnesses during the evidentiary hearing. The times listed below may be affected by the order of cross-examination and the questions asked by other parties.


Name of Witness	Offering Party	Anticipated Length of Cross Required
Charles L. Rice, Jr.	ENO	45 minutes
Seth E. Cureington	ENO	3 hours
Charles W. Long	ENO	2 hours
Jonathan E. Long	ENO	45 minutes
Bliss M. Higgins	ENO	30 minutes

¹ See Robert M. Fagan Direct Testimony at 1:21–2:2, filed October 16, 2017.

Shauna Lovorn-Marriage	ENO	30 minutes
Dr. George Losonsky	ENO	45 minutes
Phillip J. Movish	CNO Advisors	2 hours
Joseph A. Vumbaco	CNO Advisors	30 minutes
Joseph W. Rogers	CNO Advisors	30 minutes
Victor M. Prep	CNO Advisors	30 minutes
Maurice Brubaker	Air Products, Inc.	30 minutes

Discovery in this docket is ongoing, and Sierra Club will take the depositions of four of the above-listed witnesses for the first time this week, on December 6–8. Sierra Club reserves the right to move to amend its schedule, in light of new information that may arise in the course of depositions and discovery.

Respectfully Submitted,




Robert Wiygul, La. Bar No. 17411
Michael Brown, La. Bar No. 35444
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Counsel for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify, this 6th day of December, 2017, that copy of the foregoing has been served upon 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.



Michael L. Brown