

Before the City Council of New Orleans

RE: IN RE: PROPOSED RULEMAKING TO ESTABLISH INTEGRATED RESOURCES PLANNING COMPONENTS AND REPORTING REQUIREMENTS FOR ENTERGY NEW ORLEANS, INC. UD-08-02

Now Comes the Alliance for Affordable Energy

Introduction

We appreciate the Council granting us the opportunity to file these comments and offer forward the following analysis and recommendation for Council action with the aim of further improving the impact of Energy Smart in the coming years. Last April, in Resolution R-17-176, the Council directed Entergy to conduct a minimum of three technical conferences with the purpose of resolving a number of outstanding issues with regard to implementation of Energy Smart Program Years 7-9. Because of delays in Entergy selecting and hiring a new third party administrator (TPA) and the short period of time between Entergy's filing of proposed program implementation plans and the end of the previously funded Energy Smart cycle, numerous important issues were left unresolved even as the next year of program activity commenced. We commend the Council, Entergy, the TPA team and their subcontractors, the Advisors and intervenors for dedicating the substantial time involved in participating in the technical conferences and the purposeful spirit applied to each item of discussion. In particular, it is worth singling out the efforts and contributions of Atticus Doman formerly of CB+I (now Aptim), who consistently and patiently listened to the requests of all parties and unreservedly sought to provide timely and useful information in response to each such request.

Of the nine specified priorities identified by the Council in Resolution R-17-176 as deliverables for the technical conferences, meaningful progress was made on many but not all of the items. Most importantly, agreement was reached on budgets, energy savings targets, and timelines for the duration of this Energy Smart funding cycle, including changes to shorten and prorate Program Year 7, shifting to a typical calendar year schedule, and combining the energy savings requirements for Program Years 7-8. Other important subjects did not receive as much time during the technical conferences and / or were delayed to such an extent that there was not a reasonable possibility of reaching consensus. In these comments we return to some of the subjects that we feel warrant Council action but either received too little time during the technical conference, or for which additional development of the record is needed. We note that not all of the key Council articulated priorities in Resolution R-17-176 were subsequently identified for responsive comments in Resolution R-17-623 that set forth this round of comments, but we note that during discussion at the Dec 13th Utility Committee meeting, Advisor Emma Hand indicated that the comment schedule was intended to allow the opportunity to respond to ideas proposed by other parties. The topics the Alliance addresses in these comments go beyond the four items listed in ordering paragraph 6 of Resolution R-17-623, but the points herein are directly related to the topics raised in ENO's own Sept 29th, 2017 filing and additionally relate to the nine topics the Council directed ENO to address during the

technical conferences and in their subsequent filing. We certainly welcome any further feedback on our remarks but feel it would be unnecessarily restrictive to limit the subjects the Alliance is allowed to respond to only to the four items the Advisors included in the resolution.

Goals for Energy Smart

The New Orleans City Council Should Define Clear Contemporary Goals for Energy Smart

There are many benefits of investments in demand side management, each of which has important implications for the public benefit. Some of these include changes in program design over time to reach deeper savings, more customer segments, and to capture new opportunities as technology and practices evolve over time. There are significant related considerations for budgeting, customer engagement strategies and evaluation, measurement, and verification (EM&V). There are also implications for social impact through market development and the elimination of pollution. And perhaps most importantly, DSM investments have the potential to substantially reduce costs for all customers by offsetting the need for other more expensive energy resource expenditures.

Following seven years of program operations, the Council should consider the development of contemporary goals and expectations to guide key decision making in how to implement, monitor, and improve Energy Smart going forward.

Many of these goals, challenges, and needs associated with DSM are determined by local conditions. For example, New Orleans has prioritized program access for low to moderate income households, has targets to reduce greenhouse gas emission, and is using DSM as an energy resource that competes with traditional generation and infrastructure investments through the IRP. These and many other related concepts are discussed in significant detail in the National Standard Practice Manual (NSPM) for Assessing Cost Effectiveness of Energy Efficiency Resources that was released in May of 2017.¹ The NSPM reflects an increasingly sophisticated and nuanced understanding of DSM that goes beyond the California Standard Practice Manual that has been the default for evaluating cost effectiveness of DSM investments. The NSPM better focuses on development of approaches to match the local goals and needs of jurisdictions like New Orleans. We recommend that the Council become acquainted with the NSPM Resource Value Test and follow its framework to hone in on the priorities and methodologies that are uniquely relevant for our city.

In addition to calculating cost effectiveness, clearly articulated goals from the City Council will inform the development of program budgets, EM&V expenditures and marketing strategies. It will also inform how DSM is utilized as a resource to avoid unnecessary and costly expenditures related to supply resources and grid infrastructure.

¹ National Efficiency Screening Project (NESP), "*National Standard Practice Manual for Assessing Cost Effectiveness of Energy Efficiency Resources*," May 2017.

Without articulating specific goals and expectations that reflect where New Orleans is today, the work of designing, deploying, overseeing, and optimizing DSM will be harder, more expensive, and less effective.

Calendar, Budgets and Savings

The most significant points of discussion and agreement coming out of the technical conferences concern shifting the annual program cycle to match the calendar year, prorating and combining Program Years 7-8, and establishing total budgets, energy saving targets, and timelines. We again wish to commend the Council, Entergy and the TPA for proceeding with Program Year 7 on time without delaying until the following calendar year. Prorating the budgets and targets while combining Program Years 7-8 was a relatively simple and elegant way of shifting to a new calendar year, while also ensuring adequate time for the new program administrator to deploy program offerings and maintain progress towards the Council's 2% DSM goal. Furthermore, we believe that supporting ENO and the TPA in their request for authorization of their originally proposed budget avoided the risk of corners being cut to skim easy to capture savings at the expense of deeper and more persistent savings over time. The Alliance also recognized and appreciated that the TPA is proposing to deliver a higher ratio of program funds to customers in the form of rebates and other offerings, while diminishing the percentage of funds expended for administration and non-incentive costs over time. Combined, these were the most essential issues discussed during the technical conferences and directly relate to maintaining program continuity, customer impact, and providing certainty that New Orleans will be able to capture energy savings consistent with the Council's goals.

Another important area of agreement relates to providing the program administrator with a level of budget flexibility to make reasonable changes and mid-course adjustments based on customer response to program offerings and other on-the-ground insights. We do suggest that such flexibility should not be without some common sense controls and recommend that parties work together over the next few months to address considerations such as:

- What % of budgets can be moved without the need for Council approval
- Not abandoning program activities that are proving difficult without first employing corrective measures
- How to ensure continuity for popular programs that are at risk of running out of money

Where deeper issues are identified, it may be worth considering whether it is acceptable to borrow funds from future program years or whether changes need to be made in the percentage of measure cost paid by the program.

Capacity Targets

The City Council should establish capacity targets as a legislative matter for at least the next two years prior to the end of this Council term. Use the Council's independent Demand Side Management potential study to add further dimension to the goal.

The need for and benefits of capacity targets

Capacity saving targets were one of the specific topics identified by the City Council in Resolution R-17-176 that was to be addressed in the technical conferences held last year. However, the subject was not discussed in any significant measure until the final technical conference and there was clearly little interest or intent by Entergy to present such targets to the Council. Rather, the Company proposed that the subject be deferred until the conclusion of Energy Smart Program Year 9, or the completion of the current Integrated Resource Planning docket. We strongly disagree with this notion, as it leaves years of benefits un-captured, and customers potentially unnecessarily paying for expensive capacity.

Entergy's September 2016 filing stated that no action should be taken on establishing capacity targets until after conclusion and evaluation of Program Year 9. In other words not until 2020 at the earliest, with implementation not likely to take place until 2021 or later. Absolutely no such agreement was reached, nor was it discussed in that way. We do recognize that ENO has concerns. However, that ENO has concerns is not a justification for inaction. What was discussed is that this subject received absolutely inadequate attention because it was put off until the final technical conference, despite being one of the most important issues identified by the Council, the Advisors, and Intervenors.

Energy Smart is increasingly shifting towards more comprehensive energy efficiency programs that expand the range of program offerings, increase the depth and breadth of savings being pursued in each building, expand program offerings to reach all customer segments, and ultimately yield higher net financial savings for all customers. While we have much to be proud of with our Energy Smart program, it is still relatively new, has operated on limited budgets compared to other jurisdictions, and savings to date fall short of the potential. The upside is that New Orleans has substantial savings opportunities to pursue in the years ahead, and it is beyond improbable that we will overshoot the level of available cost effective energy efficiency opportunity for many years. The same applies for capacity savings targets.

While energy efficiency programs like those in Energy Smart produce kWh savings, they also reduce the amount of capacity required to serve loads. However, there are numerous strategies to directly target capacity savings in the form of kW that are distinct from energy efficiency. New Orleans should pursue these capacity savings with the same level of purpose and investment currently focused on energy savings as expressed by the Council's 2% DSM saving goal. The unique benefits of capacity savings relate to the ability to reduce the total demand for power at the times when it matters most - when energy is most expensive and when both distribution and transmission grids are pushed to their maximum capabilities. In addition to kW savings that occur as a byproduct of energy efficiency, capacity savings can be captured through demand response (DR). These capacity savings provide many benefits to customers and the utility including avoiding the need for more expensive supply resources, reducing the demand for energy at the most expensive peak times, and offsetting the need for transmission and distribution investments. By shaving and shifting its peak load, New Orleans can reduce costs while increasing reliability. Typically the design criteria for our utility system is

driven by the times when demand loads are highest, but this level of need only occurs during limited hours of the summer and winter when heating and cooling loads are at their maximum. Therefore, our ability to shave the amount of peak power we require eliminates our need for the most expensive energy resources.

Whether in the Integrated Resource Planning process, related to transmission reliability, or in consideration of Entergy's proposed gas-fired peaking plants, capacity requirements are central to the conversation about how New Orleans meets its energy needs. Despite the enormous potential for cost-effectively reducing capacity requirements, Energy Smart is not currently structured to maximize the benefit of capacity savings through demand side management. As with energy efficiency, the ability to capture capacity savings is far greater when it is defined as a critical priority by the regulator. Absent a set of targets and direction from the Council to proactively capture capacity savings, it is all but certain we will be underutilizing this important resource. The City Council should establish a set of specific and escalating capacity savings targets for Energy Smart comparable to the Council's 2% target for energy savings. Given the attention to reliability concerns for New Orleans that has been raised over the past year, there is an urgent need for the Council to take action to establish capacity saving targets now, particularly those that can be captured through demand response.

Fortunately, New Orleans has at least limited experience with capacity savings through both its energy efficiency programs and demand response pilot programs. Entergy New Orleans has deployed direct load control equipment as well as customer information and behavior programs aimed at saving capacity. While it is peculiar that only one customer is subscribed in New Orleans, the Company also has an interruptible load tariff that can be expanded to enable strategic curtailment of large commercial and industrial loads for both economic or reliability reasons. Recruiting many more such customers represents significant low hanging fruit and would yield significant financial benefit for all customers.

Moreover, the deployment of Advanced Metering Infrastructure, which the Council has approved as of this filing, opens the door for many more demand saving opportunities through time of use rate structures. As with energy efficiency prior to Energy Smart, there is an enormous untapped potential for technologies, programs, and rate designs that can yield savings for customers. Entergy's existing pilot programs can and should be expanded to reach more customers and new programs and should be developed to capture more capacity savings opportunities. Unless the Council decides to act by establishing specific capacity saving targets, this vital resource will continue to be underutilized and result in customers paying far more than they should for the reliable energy service we rely upon.

Learning from the Research and Examples of Others

Substantial work on the potential and benefits of demand response and targeting peak capacity demand was done by FERC in response to the 2007 Energy Policy Act and by consultants at

Navigant on behalf of Advanced Energy Economy (AEE),² each explored the opportunities for substantially and cost-effectively ramping up DR. In FERC's analysis, fully half of the achievable potential for DR nationally is anticipated to come from the residential sector³. AEE's study looked at peak demand reduction benefits in Massachusetts and Illinois, and describe additional market value that stems from goals. Goals send a clear signal to utilities and the market regarding the importance of DR, creating long-term certainty that encourages large-scale investment in DR programs.

New Orleans would not be launching into uncharted waters should the Council elect to apply capacity reduction targets. In 2008, Maryland's legislature implemented the EmPOWER Maryland Energy Efficiency Act, which included targets for utilities to reduce peak demand by 15% by the end of 2015⁴. State utilities were successful in reaching the goal, benefiting all electricity ratepayers⁵. This act started as legislation at the state level and was implemented by the commission, providing a pathway for this Council, serving as both legislative and regulatory body, to move forward with goals.

New Orleans Should Not Delay

Entergy's preference to put off development of capacity targets, in essence postponing the work of devising and implementing a peak capacity reduction strategy, until after Energy Smart Year 9 concludes at the end of 2019, runs contrary to the urgency with which they proclaim action must be taken to mitigate a risk of transmission overloading during peak energy usage times. Not only would the power plants they are seeking be unable to in any way reduce the risk of cascading outages until they are constructed in 2-3 years, but their current strategy for responding to a P6 contingency is forced load shedding. In other words, cutting peak usage in a desperate manner without any of the benefits of DR, which is exactly designed to serve the same purpose.

Recently, MISO requested utilities throughout their southern territory to conserve energy in order to maintain grid reliability, Had a plan been in place to more precisely and purposefully reduce demand during extreme weather events, response to this recent cold weather could have looked much different. The utility has attempted to make the argument that the conservation warning pointed to an immediate need to build a new gas plant, but the same point applies as above, a gas plant could not possibly be on-line for at least 2-3 years.

² Advanced Energy Economy, Peak Demand Reduction Strategy, October 2015, Retrieved at <http://info.aee.net/hubfs/PDF/aee-peak-demand-reduction-strategy.pdf?t=1446657847375>

³ FERC National Assessment and Action Plan on Demand Response. Retrieved from: <https://www.ferc.gov/industries/electric/indus-act/demand-response/dr-potential.asp>

⁴ Maryland emPOWER Act of 2008. House Bill 374. Retrievable at <http://mlis.state.md.us/2008rs/billfile/hb0374.htm>

⁵ EmPOWER Maryland will save customers \$4 Billion on electric bills. Retrievable at <http://aceee.org/press/2017/01/empower-maryland-will-save-customers>

Again, capacity savings from DSM generally, and demand response specifically is perfectly matched to respond to such situations. Entergy has ignored this option in their determination to build another central power station. Investments in demand response are well documented as returning substantial financial benefits to customers, particularly in places that import a majority of their power from the transmission system, as New Orleans does. However, a portion of those benefits are squandered if a utility over-invests in traditional supply resources and is long on power, leading them to either underutilize available DR potential or obligating customers to pay for unneeded supply resources that are by comparison uneconomical.

Entergy has argued that their performance obligations in Energy Smart are for energy savings and express concern about their ability to reach the goals set out by the Council, though notably they have contracted the work of achieving those goals to their third party administrator Aptim, who throughout the technical conferences and in direct conversation consistently indicated confidence in their ability to reach the targets and even has a portion of their compensation tied to their ability to do so.

It would not be unreasonable to overlay a set of capacity saving targets on the existing Energy Smart structure. Moreover, there is a strong public interest case for the Council acting on the opportunity with a clear statement of purpose and expectations, directing the utility, their advisors, intervenors and their newly hired DSM consultant to undertake the work necessary to analyze the potential for capacity savings, formalize a strategy and develop program designs for achieving such goals, and, if appropriate, to allocate program funding for this purpose in addition to those already allocated through Energy Smart to achieve the desired capacity savings impact. Cost effectiveness determination and reliability considerations justify such expenditures.

Despite ENO's proposed delay, it simply is not necessary to wait until the conclusion of the IRP or Energy Smart PY9 to establish capacity targets and initiate implementation. As with the first three years of Energy Smart itself, action by the Council was initiated prior to the completion of the then current IRP cycle. Entergy has suggested that perhaps they should be the ones to propose the what the capacity savings targets would be. This is not in the public's best interest, given the company's own disinclination to proceed, as well as their financial conflict of interest generally and specifically related to their pursuit of authorization to build a gas peaking plant.

We propose immediate Council policy action using their legislative authority to initiate targets for the first two years that can then be increased based on any new information from the DSM study for the same two year period and beyond.

EM&V

The Council should assert clearer expectations and greater oversight of funds and activities related to EM&V, including allocating at least half of the additional authorized EM&V funds (1.125% of the total Energy Smart budget) for use by the Council for these purposes.

There is agreement that the budget for EM&V should be 6.5% rather than 4.25%, however, the KWh and kW metrics are far from the only consideration needing additional attention. Also needed is a focus on operational performance, program bottlenecks, reaching new market segments and a comprehensive evaluation from a forward-looking program evolution perspective. In other words, the rationale for spending more money on EM&V is not justified merely by counting energy savings to date with higher and higher precision, which has diminishing value and fails to effectively inform program design evolution over time. The purpose of a higher expenditure on EM&V is to ensure the development of ever stronger programs that deliver more savings for customers, offset the need for other resources, and build the conditions for deep long-term program success. Summarized, the value in spending more on EM&V is an investment in continuous improvement that yields ever greater savings (essentially a return on investment), not merely recounting the old savings. In the past, all EM&V funds have been controlled and contracted by Entergy. This not only comes at the expense of investing in transparent and proactive work to improve the program in a manner that maximizes future benefit to customers, it presents a significant conflict of interest by allowing the utility to fund and manage the consultant that is supposed to verify utility performance while depriving the Council of the resources designated for the purpose of ensuring oversight of the Council's Energy Smart program. We recommend that at least half of the additional funding dedicated to EM&V be allocated for use by the Council to hire specialized experts to establish and manage a process by which future Energy Smart program and related policy evolution can be planned. We also believe that it is essential that the Council define a set of goals and expectations associated with the future of Energy Smart to guide the EM&V work going forward.

TRM

Significant additional work is needed on the Technical Resource Manual (TRM) before it can be relied upon to determine energy efficiency savings values for Energy Smart or the Integrated Resource Plan.

We believe that development of a technical resource manual is an important step forward for New Orleans. We also support the notion that significant additional work be done beginning with a technical conference scheduled for that purpose. As noted in other sections of these comments, we see an important need for the Council to define a set of goals and expectations associated with Energy Smart going forward to guide the further development of the TRM. This would assist in determining what baseline standards are to be used, will help ensure there is consistency in what factors are included in calculations across all measures, and determine what quality standards for certainty are required. We note that there is an intrinsic relationship between the TRM, the DSM potential study, and the IRP and highly recommend that the independent DSM consultants hired by the Council be given a defined role in supporting the refinement of the TRM. We believe doing so will ultimately improve their potential study analysis and the TRM itself.

Pilot Programs

In the absence of reports from Entergy detailing the results of the pilot programs it is premature to provide the specific comments requested related to this subject.

We would note, however, our concern that management of the Behavioral Energy Efficiency (BEE) program appears to be falling far short of expectations. We do not feel that the program should be allowed to fail without very careful review of what is going on and what corrective steps are needed. We suggest that a formal working group should be convened to identify and respond to issues as they emerge through regular meetings that includes representatives from the utility the BEE vendor, the Advisors, and intervenors.

Discount Rate

We recommend that the Council utilize the discount rate proposed by ENO and the Energy Smart TPA rather than the weighted average cost of capital (WACC) recommended by the Advisors.

The discount rate used in calculating the cost effectiveness of demand side management resources has a profound effect on determining which energy efficiency measures are included in Energy Smart and how much financial benefit is attributed to the energy customers save. It is worth noting that ENO and the Energy Smart TPA proposed a 2% discount rate, which is substantially lower than the WACC discount rate proposed by the Advisors. There are numerous reasons why energy efficiency programs should use a low discount rate, which generally revolve around the very low level of risk to utility money in this context. The first reason this risk is low is that the utility receives contemporaneous cost recovery on a monthly basis for the recovery of their direct expenditures associated with these programs. As a result, there is limited to no risk of shareholder money (equity) compared to other utility expenditures. Second, the majority of cost for energy efficiency improvements is actually paid by customers themselves, with typically only a small fraction of the total cost contributed by the utility, again resulting in very little risk for utility money. Third, energy efficiency investments are far more flexible than major utility expenditures on large assets like central power stations because efficiency program activity can be ramped up or ramped down in response to conditions on the ground, while power plants are large lump sum costs with a far greater scale of risk should they become a stranded asset.

The Energy Smart TPA expressed it in this way:

“The discount rate utilized in the cost effectiveness model represents a value that is consistent with discount rates utilized in several other national programs...For this program, we stressed the Total Resource Cost test (TRC) as it takes the whole system, including rate-payers and the customer’s cost of product, which led our team to the lower discount rate assumption of 2%.”⁶

⁶ ENO / Aptim response to deliverables for 2nd technical conference.

The consequence of changing the discount rate in the way the Advisors recommend is severe. Using the TPA’s projections, over \$23 million dollar of net savings to customers (roughly 30% of the total) is wiped out merely form this accounting change.

CE - 2% Discount Rate			CE - WACC Discount Rate		
TRC Benefits (\$)	TRC Costs (\$)	TRC Ratio	TRC Benefits (\$)	TRC Costs (\$)	TRC Ratio
\$9,489,418	\$6,597,831	1.44	\$6,678,410	\$6,597,832	1.01
\$33,882,817	\$20,202,764	1.68	\$24,292,711	\$20,202,764	1.20
\$4,059,375	\$2,759,902	1.47	\$2,927,178	\$2,759,902	1.06
\$7,481,425	\$3,369,187	2.22	\$4,745,293	\$3,369,187	1.41
\$8,493,708	\$1,897,888	4.48	\$5,192,473	\$1,897,888	2.74
\$69,800	\$61,656	1.13	\$65,152	\$61,656	1.06
\$1,428,689	\$673,140	2.12	\$926,315	\$673,140	1.38
\$4,332,528	\$2,938,928	1.47	\$2,731,192	\$2,938,928	0.93
\$701,225	\$1,390,059	0.50	\$530,890	\$1,390,059	0.38
\$2,770,060	\$1,398,759	1.98	\$1,759,396	\$1,398,759	1.26
\$1,159,892	\$895,496	1.30	\$1,159,892	\$895,496	1.30
\$2,472,038	\$2,015,859	1.23	\$1,935,806	\$2,015,859	0.96
\$76,340,974	\$44,201,470	1.73	\$52,944,709	\$44,201,471	1.20

Source: Aptim workbook for technical conference held July 14, 2017

As referenced in the section regarding the Council defining goals for Energy Smart above, we encourage the City Council to either return to the 2% discount rate proposed by ENO and the TPA, or suggesting working through the National Standard Practice Manual Resource Value Framework to establish a discount rate that appropriately matches the conditions in New Orleans. By contrast, the change proposed by the Advisors greatly overstates the risk and deeply devalues DSM benefits to customers.

Utility Performance Incentives

The Council should leave the utility performance incentive unchanged prior to a thorough process with careful scrutiny of the merits and potential consequences of any such changes.

Careful review and a robust comment process is needed on this matter to ensure appropriate use of ratepayer funds and to avoid unintended consequences. A well-defined proceeding should be undertaken to evaluate this complex issue or it should be taken up in the context of the upcoming rate case, during which the subject of decoupling is to be evaluated in relationship to factors like energy savings through Energy Smart. To be clear, we support fair compensation to the utility related to their work with Energy Smart and believe it is important to work with the financial incentive structure generally to resolve the financial tension that has historically led utilities to resist cost effective efficiency programs that deliver substantial monetary benefits to customers.

We also believe that very careful attention to this subject is required in light of the stance Entergy took regarding lost contributions to fixed costs. Despite consistently recovering all of their fixed cost and exceeding their revenue requirement for many years, ENO intended to recover approximately \$6 million dollars from customers for this purpose in their PY7-9

proposal, which would appear to double charge customers for the same fixed costs. It is important that thorough scrutiny be performed prior to any action that changes the utility performance compensation structure.

Certificate of Service

I hereby certify that I have on this 31st day of January, 2018, served copies of the foregoing pleading upon the Clerk of Council, the Director, Council Utilities Regulatory Office and all known parties to this proceeding by U.S. Mail, email, facsimile and/or hand delivery.

Frost Bradley-Wright

**ENTERGY NEW ORLEANS, INC
IN RE: PROPOSED RULEMAKING TO ESTABLISH INTEGRATED RESOURCES
PLANNING COMPONENTS AND REPORTING REQUIREMENTS FOR
ENTERGY NEW ORLEANS, INC.
UTILITY DOCKET NO. UD-08-02**

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