

March 19, 2018

*Via Electronic Mail*

Katherine Hamilton  
Executive Director  
Advanced Energy Management Alliance  
P.O. Box 65491  
Washington, DC 20035

**Re: Ex parte: In Re: 2018 Triennial Integrated Resource Plan of Entergy  
New Orleans, LLC – CNO Docket No. UD-17-03**

Dear Ms. Hamilton:

I am writing concerning the Advanced Energy Management Alliance's ("AEMA") Petition for Intervention Out of Time and Inclusion (the "Petition") that you served on Entergy New Orleans, LLC ("ENO") and other parties to Docket UD-17-03 on Friday, March 16, 2018. Specifically, I am requesting that you provide information necessary for ENO to assess whether it will make a formal objection to the AEMA's Petition.

Section 158-287 of Chapter 158 of the City Code of Ordinances provides that appearances of any party "shall be subject to a motion to strike upon a showing that the party has no justiciable or administratively cognizable interest in the proceeding." Based on the Petition, ENO is unable to discern whether AEMA actually possesses such an interest in the above captioned Docket.

The Petition states that the AEMA seeks to intervene "in order to advance the interests of third party distributed energy resource providers and the consumers they serve in the Entergy New Orleans, Inc. [SIC] service territory." In order to fully assess the AEMA's standing as an intervenor in this Docket, and the veracity of the above-quoted representation to the Council for the City of New Orleans, ENO will need additional information. Please provide (i) a list of the AEMA's members who provide distributed energy resource services within ENO's service territory, (ii) the dates on which any such members joined the AEMA, (iii) if available to you, copies of the Occupational Licenses issued by the City of New Orleans to those distributed energy resource providers that allow such providers to conduct business in Orleans Parish, (iv) a copy of the AEMA's Orleans Parish Occupational License, (v) a copy of the AEMA's Certificate of Incorporation, or

Ms. Hamilton  
March 19, 2018  
Page 2

any other documents demonstrating the AEMA's existence as a juridical person, and (vi) a list of the ENO customers served by the AEMA members operating in Orleans Parish.

As you may know, Resolution No. R-17-430 requires that objections to untimely interventions be made within 5 days.<sup>1</sup> As such, I ask that you provide the requested information, to the extent you are able to provide it, no later than 5 p.m. on Wednesday, March 21, 2018. Please feel free to call me with any questions or concerns.

Thank you in advance for your prompt attention to this matter.

Sincerely,



Harry M. Barton

HMB/pe

cc: Official Service List (UD-17-03)

---

<sup>1</sup> The provisions of Article 5059 of the Louisiana Code of Civil Procedure, when reviewed in conjunction with R-17-430, indicate that ENO's objection would be due by Friday March 23, 2018.