October 11, 2018

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

Re: Revised Application of Entergy New Orleans, LLC for a Change in Electric and Gas Rates Pursuant to Council Resolutions R-15-194 and R-17-504 and for Related Relief
Council Docket No. UD-18-07

Dear Ms. Johnson:

On behalf of Entergy New Orleans, LLC ("ENO" or the Company), please find enclosed for your further handling an original and three copies of Objections to the Advisors to the Council of the City of New Orleans’ First Set of Data Requests to ENO, which I would appreciate your filing into the record of this proceeding. 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/attached, please do not hesitate to contact me.

With kindest regards, I am

Sincerely,

Alyssa Maurice-Anderson

/ama
Enclosures
cc: Enclosed Service List via email
BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS

REVISED APPLICATION OF
ENTERGY NEW ORLEANS, LLC,
FOR A CHANGE IN ELECTRIC AND
GAS RATES PURSUANT TO COUNCIL
RESOLUTIONS R-15-194 AND R-17-504
AND FOR RELATED RELIEF

Docket No. UD-18-07

ENTERGY NEW ORLEANS, LLC’S OBJECTIONS
TO THE ADVISORS TO THE COUNCIL OF THE CITY OF NEW ORLEANS’
FIRST SET OF DATA REQUESTS TO ENTERGY NEW ORLEANS, LLC

NOW COMES Entergy New Orleans, LLC (“ENO” or the “Company”), through
undersigned counsel, and respectfully asserts the following objections and reservation of rights
to the Advisors to the Council of the City of New Orleans’ First Set of Discovery Requests
propounded to ENO in the above-captioned proceeding:

I.

GENERAL OBJECTION AND RESERVATION OF RIGHTS

1. Although ENO has sought to identify all applicable objections, it may become apparent
later as responses are prepared or as documents are obtained, that additional objections may be
appropriate. ENO reserves its rights to make such objections.

2. ENO objects to definitions and instructions, if any are included, to the extent that they
purport to unilaterally alter the rules of discovery, or purport to modify or supplement the
specific data requests set forth thereafter, or are unduly burdensome.

3. With respect to confidential and/or highly sensitive information, if any, that may be
responsive to one or more of the requests and the production of which is not otherwise
objectionable, ENO will make such information available to appropriate signatories pursuant to
the terms of a Protective Order in this proceeding.
4. With respect to documents or information that may be protected by the attorney-client privilege and/or the attorney work product doctrine, if any, that may be responsive to one or more of the requests, ENO objects to providing such material, and reserves its right to make such objections as it deems necessary to protect such documents or information from disclosure.

5. Neither the failure to object to a request, nor the providing of a response to a request by the Company, should be construed as a waiver of any claim that the Company may have regarding the jurisdiction of the Council of the City of New Orleans over any entities or transactions that are the subject matter of the request.

6. The providing of a response by the Company to a request should not be construed as a waiver of any claim that the Company may have regarding the admissibility of the response in this proceeding or other proceedings, or a waiver of any substantive rights the Company may have.

II.

SPECIFIC OBJECTIONS

At this time, the Company has identified the following specific objection(s):

**OBJECTION TO ADV 1-26:**

The Company objects to this Request as being unduly burdensome and not likely to lead to the discovery of relevant information in that it seeks information, and/or would require the Company to perform analyses, that do(es) not exist and that the Company does not maintain or possess as part of the ordinary course of its business. Subject to these and the foregoing General Objections, the Company states that it will provide a response.
OBJECTION TO ADV 1-27:
The Company objects to this Request as being unduly burdensome and not likely to lead to the
discovery of relevant information in that it seeks information, and/or would require the Company
to perform analyses, that do(es) not exist and that the Company does not maintain or possess as
part of the ordinary course of its business. Subject to these and the foregoing General
Objections, the Company states that it will provide a response.

OBJECTION TO ADV 1-38(ii):
The Company objects to this Request as being unduly burdensome and not likely to lead to the
discovery of relevant information in that it seeks information, and/or would require the Company
to perform analyses, that do(es) not exist and that the Company does not maintain or possess as
part of the ordinary course of its business. Subject to these and the foregoing General
Objections, the Company states that it will provide a response.

OBJECTION TO ADV 1-46:
The Company objects to this request to on the grounds that it is irrelevant and not reasonably
calculated to the discovery of admissible evidence. The Company further objects on the grounds
that the request seeks analysis that has not been performed. As ENO has publicly explained, Mr.
West assumed the role of President and Chief Executive Officer (“CEO”) of ENO on a
temporary basis until a replacement for Mr. Rice has been identified, which is expected to occur
in an expedited timeframe. As such, ENO has not and will not seek to modify its cost of service
for either Period I (historical test year) or Period II (forecasted test year) to account for the fact
that Mr. West receives a higher salary, and the Company will not seek to recover any
incremental costs associated this temporary situation in rates.
OBJECTION TO ADV 1-49:

The Company objects to the form of the question in that the Company disagrees with the predicate of the request which assumes that the Company has not complied with the relevant paragraph of Council Resolution R-17-504. Without waiving the foregoing objections and reservation, the Company will provide a response.

OBJECTION TO ADV 1-50:

The Company objects to the form of the question in that the Company disagrees with the predicate of the request which assumes that the Company has not complied with the relevant paragraph of Council Resolution R-17-504. Without waiving the foregoing objections and reservation, the Company will provide a response.

OBJECTION TO ADV 1-51:

The Company objects to the form of the question in that the Company disagrees with the predicate of the request which assumes that the Company has not complied with the relevant paragraph of Council Resolution R-17-504. Without waiving the foregoing objections and reservation, the Company will provide a response.

OBJECTION TO ADV 1-52:

The Company objects to this request on the grounds that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence. The requested relief set forth in the Company’s revised application and supporting testimony and exhibits reflects that all revenues derived from non-jurisdictional customers have been taken into account as an offset the overall gas revenue requirement. The Company further objects to the request because for the production of customer-specific information. Subject to and without waiving the foregoing objections and reservation, the Company will provide a response.
III.

Consistent with Ordering Paragraph 7 of Council Resolution R-18-434, counsel for the Company is available to discuss the above objections with opposing counsel.

Respectfully submitted,

BY: Alyssa Maurice-Anderson, LSBN 28388
Harry M. Barton, LSBN 29751
Brian L. Guillot, LSBN 31759
ENTERGY SERVICES, INC.
639 Loyola Avenue
Mail Unit L-ENT-26E
New Orleans, Louisiana 70113

Telephone: (504) 576-6523
Facsimile: (504) 576-5579

Stephen T. Perrien, LSBN 22590
TAGGART MORTON, L.L.C.
1100 Poydras Street, Suite 2100
New Orleans, Louisiana 70113
Telephone: (504) 599-8500
Facsimile: (504) 599-8501

John F. Williams, TX Bar No. 21554100
Scott R. Olson, TX Bar No. 24013266
James F. McNally, Jr., TX Bar No. 13815680
DUGGINS WREN MANN & ROMERO, LLP
One American Center
600 Congress Avenue, Suite 1900
Austin, Texas 78701
Telephone: (512) 744-9300
Facsimile: (512) 744-9399

ATTORNEYS FOR ENTERGY NEW ORLEANS, LLC
CERTIFICATE OF SERVICE

I hereby certify that I have this 11th day of October, 2018, served the required number of copies of the foregoing pleading upon all other known parties of this proceeding individually and/or through their attorney of record or other duly designated individual, by: ☑ electronic mail, ☑ facsimile, ☑ hand delivery, and/or by depositing same with ☑ overnight mail carrier, or ☐ the United States Postal Service, postage prepaid.

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

Erin Spears
Bobbie Mason
Connolly Reed
City Hall – Room 6E07
1300 Perdido Street
New Orleans, LA  70112

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

David Gavliniski
Council Chief of Staff
City Hall – Room 1E06
1300 Perdido Street
New Orleans, LA  70112

Suni LeBeouf
Law Department
City Hall – 5th Floor
New Orleans, LA 70112

Norman White
Department of Finance
City Hall – Room 3E06
1300 Perdido Street
New Orleans, LA  70112

Clinton A. Vince
Presley Reed
Emma F. Hand
1900 K Street NW
Washington, DC  20006

Basile J. Uddo
J.A. “Jay” Beatmann, Jr.
c/o Dentons US LLP
650 Poydras Street, Suite 2850
New Orleans, LA  70130

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

Phillip Movish
Victor M. Prep
Joseph W. Rogers
Cortney Crouch
Legend Consulting Group
8055 East Tufts Ave., Suite 1250
Denver, CO  80237-2835