

February 13, 2019

BY HAND DELIVERY

Ms. Lora W. Johnson
Clerk of Council
Council of the City of New Orleans
City Hall, Room IE09
1300 Perdido Street
New Orleans, LA 70112

In Re: *Application of ENO for a Change in Electric and Gas Rates Pursuant to Council Resolutions R-15-194 and R-17-504 and for Related Relief*, CNO Docket UD-18-07

Dear Ms. Johnson:

Enclosed please find an original and three (3) copies of the *Objections of the Utility Advisors for the Council of the City of New Orleans to Entergy New Orleans, LLC's Second Set of Requests for Information* in the above referenced docket, which we are requesting that you file into the record along with this letter in accordance with your normal procedure.

Sincerely,



Jay Beatmann
Counsel

JAB/dpm
Enclosures

cc: Official Service List for UD-18-07

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, the Advisors object to providing such material and reserve their right to make such objections as they deem necessary to protect such documents or information from disclosure.

5. The provision of a response by the Advisors to a Request should not be construed as a waiver of any claim that the Advisors may have regarding the admissibility of the response in this proceeding or other proceedings, or a waiver of any substantive rights that the Advisors may have.

II.

SPECIFIC OBJECTIONS

In addition to the foregoing General Objections, the Advisors have at this time identified the following specific objections:

ENO 2-29: Referencing page 58, lines 5-7 of Mr. Watson's testimony, please provide all Documents in the Advisors' possession showing how the \$2.4 million recovery was determined.

OBJECTION TO ENO 2-29:

The Council's Advisors object to this Request to the extent that it calls for the production of information that is subject to the attorney-client privilege and/or the work product doctrine. The Advisors further object to this Request to the extent that it calls for the production of information that was developed in anticipation of litigation and/or in anticipation of confidential settlement discussions in a separate Council utility docket.

ENO 2-30: Referencing page 58, lines 5-7 of Mr. Watson's testimony, please provide all Documents in the Advisors' possession showing how the Company computed its proposed recovery of the Stranded Plant.

OBJECTION TO ENO 2-30:

The Council's Advisors object to this Request to the extent that it calls for the production of information that is subject to the attorney-client privilege and/or the work product doctrine. The Advisors further object to this Request to the extent that it calls for the production of information that was developed in anticipation of litigation and/or in anticipation of confidential settlement discussions in a separate Council utility docket.

Respectfully submitted,

DENTONS US LLP,



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Attorneys for the Council of the City of New Orleans

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Objections to Entergy New Orleans, LLC's Second Set of Request for Information has been served upon "The Official Service List" via electronic mail and/or U.S. Mail, postage properly affixed, this 13th day of February 2019.



Jerry A. Beatmann, Jr.