

March 29, 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 Entergy New Orleans, LLC for Approval of Renewables Portfolio and Request for Cost Recovery and Related Relief*, CNO Docket No. UD-18-06

Dear Ms. Johnson:

Enclosed please find an original and three (3) copies of the *Unopposed Motion to Extend Dates in Procedural Schedule* in the above referenced docket, which the Advisors to the Council of the City of New Orleans 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-18-06

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

APPLICATION OF ENTERGY NEW)	
ORLEANS, LLC FOR APPROVAL OF)	
RENEWABLES PORTFOLIO AND)	DOCKET NO. UD-18-06
REQUEST FOR COST RECOVERY)	
AND RELATED RELIEF)	

UNOPPOSED MOTION TO EXTEND DATES IN PROCEDURAL SCHEDULE

The Advisors to the Council of the City of New Orleans (“Council”), through undersigned counsel, respectfully submits this Unopposed Motion to Extend Dates in Procedural Schedule in the above-captioned docket, seeking a two-month extension of the procedural schedule in this proceeding to allow parties to continue settlement negotiations. The Advisors believe that substantial progress toward settlement has been made among the parties and that while an Agreement in Principle has not yet been reached, significant potential exists for the parties to be able to reach a settlement and present an Agreement in Principle to the Council for its consideration.

On January 14, 2019, the Hearing Officer issued an Order in this proceeding setting a procedural schedule for settlement discussions among the parties regarding the *Application of Entergy New Orleans, LLC for Approval of Renewables Portfolio and Request for Cost Recovery and Related Relief*. That Order directed the Advisors, no later than April 1, 2019 to file, on behalf of any settling parties, an Agreement in Principle with the Council settling some or all of the issues, and/or (as appropriate) to file a status report with the Council indicating that settlement negotiations have not resulted in an Agreement in Principle resolving all issues in this proceeding, and setting forth the issues regarding which disagreement remains among the parties.

While the parties have not yet entered into an Agreement in Principle, substantial progress has been made with respect to settlement, and the Advisors believe that there is significant potential that the parties will be able to settle this proceeding. ENO's proposed portfolio of resources included three projects, (1) a 20 MW self-build solar project known as the New Orleans Solar Station ("NOSS"); (2) the acquisition of a 50 MW solar electric generation facility in Washington Parish (the "Iris Solar Facility"); and (3) a long-term 20 MW purchase power agreement ("PPA") from a solar plant in St. James Parish ("St. James PPA"). In the Advisors' comments, the Advisors expressed concern that while the St. James PPA appeared to be economic, but the NOSS facility and Iris Solar Facility did not appear to be economic. The Advisors suggested that the parties explore options to reduce the costs of those two facilities through the settlement process. In March 14, 2019, ENO filed a *Supplemental and Amending Application of Entergy New Orleans, LLC for Approval of Renewables Portfolio and Request for Cost Recovery and Related Relief*, indicating that ENO has succeeded in converting its acquisition of the Iris Solar Facility to a long-term PPA from that facility, reducing the cost of the project to ratepayers. The Advisors believe this development is encouraging progress toward settlement of the issues in this case.

With respect to the NOSS facility, the Advisors' understanding is that ENO is conducting internal analyses regarding the project to determine whether there is a viable means of decreasing the costs of the facility. ENO has informed the Advisors that it requires approximately one month to complete its analyses and present the results to the parties in the case for discussion. In order to allow this work to continue and to gain the potential benefit of reduced costs of the NOSS facility for ratepayers, the Advisors now seek a two-month extension of time in this proceeding in order to allow ENO to complete its analyses and for the parties to review the

results and potentially negotiate an Agreement in Principle resolving all issues in the case to submit for the Council’s consideration. Accordingly, the Advisors propose that the schedule be modified as follows:

DEADLINE	CURRENT DATE	PROPOSED DATE
The Advisors shall file, on behalf of any settling parties, an Agreement in Principle with the Council settling some or all of the issues, and/or (as appropriate) shall file a status report with the Council indicating that settlement negotiations have not resulted in an Agreement in Principle resolving all issues in this proceeding, and setting forth the issues regarding which disagreement remains among the parties.	April 1, 2019	Monday, June 3, 2019
To the extent that some or all of the issues in this proceeding are not resolved through an Agreement in Principle, the Intervenors and Advisors shall file any comments and testimony regarding the outstanding issues related to ENO’s 90 MW Renewables Portfolio.	May 17, 2019	Wednesday, July 17, 2019
ENO shall file any reply comments or rebuttal testimony.	June 28, 2019	Wednesday, August 28, 2019
The Advisors shall submit an Advisors Report.	August 1, 2019	Tuesday, Oct. 1, 2019

RESPECTFULLY SUBMITTED:



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon “The Official Service List” via electronic mail and/or U.S. Mail, postage properly affixed, this 29th day of March, 2019.



J. A. “Jay” Beatmann, Jr.

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

**APPLICATION OF ENTERGY NEW
ORLEANS, LLC FOR APPROVAL OF
RENEWABLES PORTFOLIO AND
REQUEST FOR COST RECOVERY
AND RELATED RELIEF**

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DOCKET NO. UD-18-06

ORDER

On _____, 2019, the Advisors to the Council of the City of New Orleans (“Advisors”) filed a Motion to Extend Dates in the Procedural Schedule in the above-captioned proceeding. Considering said unopposed motion, the Advisors’ request is hereby GRANTED. Accordingly, the procedural schedule is reset as follows:

DEADLINE	CURRENT DATE	PROPOSED DATE
The Advisors shall file, on behalf of any settling parties, an Agreement in Principle with the Council settling some or all of the issues, and/or (as appropriate) shall file a status report with the Council indicating that settlement negotiations have not resulted in an Agreement in Principle resolving all issues in this proceeding, and setting forth the issues regarding which disagreement remains among the parties.	April 1, 2019	Monday, June 3, 2019
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ENO shall file any reply comments or rebuttal testimony.	June 28, 2019	Wednesday, August 28, 2019
The Advisors shall submit an Advisors Report.	August 1, 2019	Tuesday, Oct. 1, 2019

This _____ day of April, 2019.

JEFFREY S. GULIN
Hearing Officer