

June 3, 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

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 four (4) copies of the Advisors' *Motion to Extend Dates in Procedural Schedule*, which we are requesting be filed on behalf of the Council's Utility Advisors. Please file the enclosed document and this letter in the record of this proceeding in accordance with your normal procedure.

Sincerely,



J. A. "Jay" Beatmann, Jr.
Counsel

JAB/dpm
Enclosures

cc: Official Service List

**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

MOTION TO EXTEND DATES IN PROCEDURAL SCHEDULE

The Advisors to the Council of the City of New Orleans (“Council”), through undersigned counsel, respectfully submit this Motion to Extend Dates in Procedural Schedule in the above-captioned docket, seeking a brief 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. As of the time of filing and based upon email correspondence and telephone conversations with various parties, it is the Advisors’ understanding that most, if not all of the parties are generally amenable to an extension of time, though differences of opinion exist as to the appropriate length of the extension of time. The Advisors propose a 25-day extension of time to extend the deadline for filing an Agreement In Principle to Friday, June 28, 2019, and a corresponding extension of all subsequent deadlines.

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.

On April 1, in response to an unopposed request for extension of time by the parties, the Hearing Officer issued an Order extending the deadline for the Advisors to file an Agreement in Principle to June 3, 2019. While the parties have not yet entered into an Agreement in Principle, since that time, 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. Since the initial request for an extension of time in this proceeding was granted, ENO has also substantially reduced the cost of the proposed NOSS facility, which is a significant step toward

reaching an Agreement in Principle. ENO submitted its revised cost information regarding the NOSS plant to the Council in its *Second Supplemental Direct Testimony of Seth E. Cureington and Supplemental and Amending Direct Testimony of Jonathan E. Long*, filed with the Council in this proceeding on May 10, 2019.

The parties are currently actively discussing settlement of the case, but have not yet had sufficient time to fully analyze ENO’s May 10 filing and subsequent discovery and finalize terms of an Agreement in Principle. 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.	June 3, 2019	Friday, June 28, 2019
To the extent that some or all of the issues in this proceeding are not resolved through an Agreement in Principle, the Intervenor and Advisors shall file any comments and testimony regarding the outstanding issues related to ENO’s 90 MW Renewables Portfolio.	July 17, 2019	Monday, August 12, 2019
ENO shall file any reply comments or rebuttal testimony.	August 28, 2019	Monday, September 23, 2019
The Advisors shall submit an Advisors Report.	October 1, 2019	Monday, October 28, 2019

Respectfully submitted,



J. A. "Jay" Beatmann, Jr. (#26189)
Dentons US LLP
650 Poydras Street, Suite 2850
New Orleans, LA 70130
Telephone: (504) 524-5446
Facsimile: (504) 568-0331
Email: jay.beatmann@dentons.com

Clinton A. Vince
Emma F. Hand
Presley R. Reed, Jr.
1900 K Street, N.W.
Washington, D.C. 20006
202-408-6400 (Telephone)
202-408-6399 (Facsimile)
clinton.vince@dentons.com
emma.hand@dentons.com
presley.reedjr@dentons.com

Attorneys for the Council of the City of New Orleans

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 3rd day of June, 2019.



J. A. "Jay" Beatmann, Jr.

SERVICE LIST

Lora W. Johnson, lwjohnson@nola.gov

Clerk of Council

City Hall - Room 1E09

1300 Perdido Street

New Orleans, LA 70112

(504) 658-1085 - office

(504) 658-1140 - fax

Service of Discovery not required

Erin Spears, espears@nola.gov

Chief of Staff, Council Utilities Regulatory Office

Bobbie Mason, bfmason1@nola.gov

Connolly A. F. Reed, careed@nola.gov

City Hall - Room 6E07

1300 Perdido Street

New Orleans, LA 70112

(504) 658-1110 - office

(504) 658-1117 - fax

Andrew Tuozzolo, CM Moreno Chief of Staff, avtuozzolo@nola.gov

1300 Perdido St. Rm. 2W40

New Orleans, LA. 70112

David Gavliniski, 504-658-1101, dsgavliniski@nola.gov

Council Chief of Staff

City Hall - Room 1E06

1300 Perdido Street

New Orleans, LA 70112

Sunni LeBeouf, Sunni.LeBeouf@nola.gov

Law Department

City Hall - 5th Floor

New Orleans, LA 70112

(504) 658-9800 - office

(504) 658-9869 - fax

Service of Discovery not required

Norman White, Norman.White@nola.gov

Department of Finance
City Hall - Room 3E06
1300 Perdido Street
New Orleans, LA 70112
(504) 658-1502- office
(504) 658-1705 – fax

ADMINISTRATIVE HEARING OFFICER

Hon. Jeffrey S. Gulin, judgegulin@gmail.com
3203 Bridle Ridge Lane
Lutherville, MD 2109
(410) 627-5357

NEW ORLEANS CITY COUNCIL CONSULTANTS

Clinton A. Vince, clinton.vince@dentons.com
Presley Reed, presley.reedjr@dentons.com
Emma F. Hand, emma.hand@dentons.com
1900 K Street NW
Washington, DC 20006
(202) 408-6400 - office
(202) 408-6399 – fax

Basile J. Uddo (504) 583-8604 cell, buddo@earthlink.net
J. A. “Jay Beatmann, Jr. (504) 256-6142 cell, (504) 524-5446 office direct,
jay.beatmann@dentons.com
c/o DENTONS US LLP
650 Poydras Street
Suite 2850
New Orleans, LA 70130

Joseph W. Rogers, jrogers@legendcgl.com
Victor Prep vprep@legendcgl.com
Legend Consulting Group
6041 South Syracuse Way, Suite 105
Greenwood Village, CO 80111
(303) 843-0351 - office
(303) 843-0529 – fax

Errol Smith, (504) 284-8733, ersmith@btcpas.com
Bruno and Tervalon
4298 Elysian Fields Avenue
New Orleans, LA 70122
(504) 284-8296 – fax

ENTERGY NEW ORLEANS

Brian L. Guillot, 504-670-3680, bguill1@entergy.com

Entergy New Orleans, Inc.

Vice-President, Regulatory Affairs

Polly S. Rosemond, 504-670-3567, prosemo@entergy.com

Derek Mills, 504-670-3527, dmills3@entergy.com

Keith Woods, kwood@entergy.com

Kevin T. Boleware, 504-670-3673, kbolewa@entergy.com

Seth Cureington, 504-670-3602, scurein@entergy.com

1600 Perdido Street, L-MAG 505B

New Orleans, LA 70112

504-670-3615 fax

Tim Cragin (504) 576-6523 office, tcragin@entergy.com

Alyssa Maurice-Anderson (504) 576-6523 office, amauric@entergy.com

Harry Barton (504) 576-2984 office, hbarton@entergy.com

Entergy Services, Inc.

Mail Unit L-ENT-26E

639 Loyola Avenue

New Orleans, LA 70113

(504) 576-5579 - fax

Joe Romano, III (504) 576-4764, jroman1@entergy.com

Suzanne Fontan (504) 576-7497, sfontan@entergy.com

Therese Perrault (504-576-6950), tperrau@entergy.com

Entergy Services, Inc.

Mail Unit L-ENT-4C

639 Loyola Avenue

New Orleans, LA 70113

(504)576-6029 – fax

350 LOUISIANA

Renate Heurich, 504-473-2740, 350louisiana@gmail.com
1407 Napoleon Ave,#C
New Orleans, LA, 70115

Andy Kowalczyk, a.kowalczyk350no@gmail.com
1115 Congress St.
New Orleans, LA 70117

ALLIANCE FOR AFFORDABLE ENERGY

Logan Atkinson Burke, logan@all4energy.org
Sophie Zaken, regulatory@all4energy.org
4505 S. Claiborne Ave.
New Orleans, LA. 70125

AIR PRODUCTS AND CHEMICALS, INC.

Katherine W. King, Katherine.king@keanmiller.com
Randy Young, randy.young@keanmiller.com
400 Convention St. Suite 700
Baton Rouge, LA. 70802
Or
P.O. Box 3513
Baton Rouge, LA 70821-3513

Carrie R. Tournillon, carrie.tournillon@keanmiller.com
900 Poydras St., Suite 3600
New Orleans, LA 70112

Maurice Brubaker, mbrubaker@consultbai.com
16690 Swigly Ridge Rd., Suite 140
Chesterfield, MO 63017
Or
P.O. Box 412000
Chesterfield, MO. 63141-2000