

June 14, 2019

VIA USPS

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

Re: Docket No. UD-18-03 Community and Solar Projects Rulemaking Proceeding

Dr. Ms. Johnson:

Enclosed please find the four (4) copies of the Gulf State Renewable Energy Industry's Late-Filed Petition to Intervene and for Inclusion on Service List, in the above-referenced proceeding. Please file the attached document into the record. If you have any questions or require any additional information, please do not hesitate to contact me. Thank you for your time and attention.

Respectfully Submitted,

Stephen Wright
GSREIA
400 Poydras St, Suite 900
New Orleans, LA 70130
(504) 383-8936

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

DOCKET NO. UD-18-03

In Re: COMMUNITY SOLAR PROJECTS RULEMAKING PROCEEDING

**PETITION FOR LATE INTERVENTION AND FOR INCLUSION
ON SERVICE LIST**

NOW COMES the Gulf States Renewable Energy Industries Association (“GSREIA”) and respectfully request that the Council of the City of New Orleans (“The Council”) grant GSREIA this late-filed request for the right to intervene in the above captioned docket and to participate as a party therein.

I.

GSREIA is a New Orleans-based non-profit trade organization founded in August 2010 whose purpose it is to promote the benefits of renewable energy for the region’s economy and environment while representing the interests of consumers and renewable energy firms throughout Louisiana, Mississippi, and Alabama in matters of policy, regulation, and public relations.

II.

GSREIA's membership works directly with utilities regulated by The Council, including Entergy New Orleans, Inc. (ENO), and serves individual and business customers who are directly affected by energy policies in the city of New Orleans. GSREIA's participation will not disrupt proceedings, cause delay, or prejudice any party. GSREIA intends to fully comply by all procedural schedules issues by the Commission if permitted to intervene.

III.

GSREIA requests late-filed intervention in this proceeding for the following reasons:

IV.

Decisions in this docket will have a material impact on New Orleans' current and future renewable energy capacity, which will directly impact the possibility of renewable energy resources additions. As such GSREIA has substantial and bona fide interest in the subject matter of this docket, which may have substantial impacts on the business and regulatory environment of its members.

V.

GSREIA is an active participant in the Renewable Portfolio Standards docket UD-19-01, whose purpose is the establishing of a regulation that will require Entergy New Orleans to use a certain amount of energy from renewable sources. Therefore, GSREIA asserts

that its interests in the RPS and the present docket are tied to one another and participation in one without the other would unduly limit GSREIA's ability to appropriately represent its positions on matters concerning decision making between generation resource alternatives in New Orleans.

VI.

GSREIA's membership and affiliates represent a wealth of experience and knowledge in the renewable energy field, and offer an informed and useful perspective on this complicated subject. The organization draws on national resources and relationships for guidance on the realistic potential of technologies such as Solar Photovoltaic and Wind Energy to provide a portion of our future energy needs.

VII.

There is no other party representing the interest of GSREIA and its members in matters related to this docket.

VIII.

For these reasons, we ask that GSREIA be granted full rights of procedural due process before The Council in the aforementioned proceedings; and that we be given full and complete standing to participate in any and all meetings as an equal participant in the proceedings; and that all participants in this proceeding be required to serve future testimonies or other correspondence related to this docket to us.

IX.

Please note that as GSREIA is a renewable industry non-profit organization, thus pursuant to resolution R-16-265, we request that all intervenor fees be waived.

X.

All communications and pleadings in this docket should be directed to:

Jeffrey D. Cantin
jcantin@gsreia.org

Stephen Wright
swright@gsreia.org

Gulf States Renewable Energy Industries Association
400 Poydras St, Suite 900
New Orleans, LA 70130
(504) 383-8936

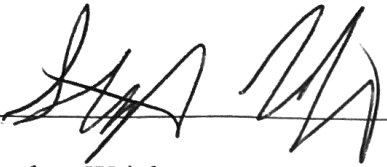
Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Stephen Wright", written in a cursive style.

Stephen Wright
Gulf States Renewable Energy Industries Assn
400 Poydras St, Suite 900
New Orleans, LA 70130

CERTIFICATE OF SERVICE

I hereby certify that I have, this 14th day of June, 2019, served copies of the foregoing
pleading upon all other known parties of this proceeding via electronic mail.

A handwritten signature in black ink, appearing to read 'S. Wright', is written over a horizontal line.

Stephen Wright

Attorney, Gulf States Renewable Energy Industry Alliance