



Entergy Services, LLC  
639 Loyola Avenue (70113)  
P.O. Box 61000  
New Orleans, LA 70161-1000  
Tel 504 576 6571  
Fax 504 576 5579

**Timothy S. Cragin**  
Assistant General Counsel  
Legal Services - Regulatory

April 29, 2020

**Via Electronic Delivery**

Ms. Lora W. Johnson, CMC, LMMC  
Clerk of Council  
City Hall - Room 1E09  
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 for electronic filing ENO’s Motion to Delay Its 2020 Formula Rate Plan Filing for 60 Days, which I would appreciate your filing into the record of this proceeding. As a result of the remote operations of the Council’s office related to COVID-19, ENO submits this filing electronically and will submit the requisite original and number of hard copies once the Council resumes normal operations, or as you direct. ENO requests that you file this submission in accordance with Council regulations as modified for the present circumstances.

Should you have any questions regarding the enclosed filing, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Timothy S. Cragin".

Timothy S. Cragin

Enclosures  
cc: Official Service List via email

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

|  |   |                                     |
|--|---|-------------------------------------|
| <b>APPLICATION OF</b>                    | ) |                                     |
| <b>ENTERGY NEW ORLEANS, LLC FOR</b>      | ) |                                     |
| <b>A CHANGE IN ELECTRIC AND</b>          | ) | <b>DOCKET NO. UD-18-07</b>          |
| <b>GAS RATES PURSUANT TO COUNCIL</b>     | ) | <b>(ENO 2020 Formula Rate Plan)</b> |
| <b>RESOLUTIONS R-15-194 AND R-17-504</b> | ) |                                     |
| <b>AND FOR RELATED RELIEF</b>            | ) |                                     |

**ENTERGY NEW ORLEANS, LLC’S MOTION TO DELAY ITS  
2020 FORMULA RATE PLAN FILING FOR 60 DAYS**

Entergy New Orleans, LLC (“ENO” or the “Company”) respectfully submits this motion seeking to delay its 2020 Formula Rate Plan filing (“2020 FRP Filing”) by 60 days, i.e., extending the current filing deadline of April 30, 2020 to June 29, 2020, for the reasons set forth herein.

Over the past several months, ENO’s regulatory filing team has been preparing ENO’s 2020 FRP Filing in accordance with the formula set forth in the Formula Rate Plan tariff approved by the Council of the City of New Orleans (the “Council”) in conjunction with ENO’s 2018 base rate case (Council Resolution R-19-457). Although the 2020 FRP Filing and accompanying workpapers have been finalized and, if ENO were required by the Council to do so, could be filed on April 30, 2020, as contemplated by the tariff, ENO is requesting a 60-day delay in that filing deadline to allow ENO and the Council to gain a somewhat better understanding of the extent of this coronavirus pandemic and its future effects. ENO understands and is keenly aware that the coronavirus pandemic has placed extraordinary financial, emotional, and in some cases, physical stresses on its customers. ENO, too, has begun to experience certain adverse financial effects associated with the pandemic, including, without limitation, a significant increase in customer arrearages, decreased sales, and the adverse cash flow effects associated with these issues. ENO notes that several regulators throughout the country have authorized delays in rate proceedings

calling for a rate increase as a result of the pandemic. Accordingly, although the FRP tariff calls for an April 30, 2020 filing, given these extraordinary times, ENO respectfully requests that the Council grant a 60-day extension of the 2020 FRP Filing deadline, or until June 29, 2020, to allow the Company and the Council to explore all options with respect to the 2020 FRP filing. At the time of this filing, the Advisors to the Council, the Alliance for Affordable Energy, and Air Products and Chemicals, Inc. have indicated that they do not oppose the extension.

WHEREFORE, for the reasons set forth herein, ENO respectfully requests that the Council grant this motion and extend ENO's FRP Filing deadline from April 30, 2020 to June 29, 2020. ENO requests that the motion be considered at the next meeting of the full Council, currently scheduled for May 7, 2020.

Respectfully submitted,

BY:   
Timothy S. Cragin, LSBN 22313  
Alyssa Maurice-Anderson, LSBN 28388  
Harry M. Barton, LSBN 29751  
ENTERGY SERVICES, LLC  
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

*and*

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 29<sup>th</sup> day of April, 2020, 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  
Council of the City of New Orleans  
City Hall, Room 1E09  
1300 Perdido Street  
New Orleans, LA 70112

Erin Spears, Chief of Staff  
Bobbie Mason  
Christopher Roberts  
Council Utilities Regulatory Office  
City of New Orleans  
City Hall, Room 6E07  
1300 Perdido Street  
New Orleans, LA 70112

Andrew Tuozzolo  
CM Moreno Chief of Staff  
1300 Perdido Street, Rm 2W40  
New Orleans, LA 70112

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

Sunni LeBeouf  
Michael J. Laughlin  
City Attorney Office  
City Hall, Room 5th Floor  
1300 Perdido Street  
New Orleans, LA 70112

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

Jonathan M. Rhodes  
Director of Utilities, Mayor's Office  
City Hall-Room 2E04  
1300 Perdido Street  
New Orleans, LA 70012

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

Clinton A. Vince, Esq.  
Presley R. Reed, Jr., Esq.  
Emma F. Hand, Esq.  
Herminia Gomez  
Dee McGill  
Dentons US LLP  
1900 K Street NW  
Washington, DC 20006

Joseph W. Rogers  
Victor M. Prep  
Byron S. Watson  
Legend Consulting Group  
6041 South Syracuse Way  
Suite 105  
Greenwood Village, CO 80111

Brian L. Guillot  
Vice-President, Regulatory Affairs  
Entergy New Orleans, LLC  
Mail Unit L-MAG-505B  
1600 Perdido Street  
New Orleans, LA 70112

Tim Cragin  
Alyssa Maurice-Anderson  
Harry Barton  
Kimberly R. Silas  
Entergy Services, LLC  
Mail Unit L-ENT-26E  
639 Loyola Avenue  
New Orleans, LA 70113

Joe Romano, III  
Suzanne Fontan  
Therese Perrault  
Entergy Services, LLC  
Mail Unit L-ENT-4C  
639 Loyola Avenue  
New Orleans, LA 70113

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

Polly S. Rosemond  
Seth Cureington  
Keith Woods  
Derek Mills  
Kevin T. Boleware  
Entergy New Orleans, LLC  
1600 Perdido Street  
Mail Unit L-MAG-505B  
New Orleans, LA 70112

Renate Heurich  
1407 Napoleon Ave, #C  
New Orleans, LA 70115

Andy Kowalczyk  
1115 Congress St.  
New Orleans, LA 70117

Logan Atkinson Burke  
Sophie Zaken  
Alliance for Affordable Energy  
4505 S. Claiborne Avenue  
New Orleans, La 70125

Susan Stevens Miller  
Earthjustice  
1625 Massachusetts Ave., NW, Ste. 702  
Washington, DC 20036

Katherine W. King  
Randy Young  
KEAN MILLER LLP  
400 Convention Street, Suite 700 (70802)  
Post Office Box 3513  
Baton Rouge, LA 70821-3513

Carrie R. Tournillon  
KEAN MILLER LLP  
900 Poydras Street, Suite 3600  
New Orleans, LA 70112

John Wolfrom  
720 I Hamilton Blvd.  
Allenton, PA 18195-1501

Maurice Brubaker  
Air Products and Chemicals, Inc.  
16690 Swingly Ridge Road  
Suite 140  
Chesterfield, MO 63017

Myron Katz, PhD  
Building Science Innovators, LLC  
302 Walnut Street  
New Orleans, LA 70118

Michael W. Tift  
710 Carondelet Street  
New Orleans, LA 70118

John H. Chavanne  
111 West Main St., Suite 2B  
P.O. Box 807  
New Roads, LA 70760-8922

Brian A. Ferrara  
Yolanda Y. Grinstead  
Sewerage and Waterboard of New Orleans  
Legal Department  
625 St. Joseph St., Rm 201  
New Orleans, Louisiana 70165

Luke F. Piontek  
Christian J. Rhodes  
Shelley Ann McGlathery  
Roedel, Parsons, Koch, Blache,  
Balhoff & McCollister  
1515 Poydras Street, Suite 2330  
New Orleans, LA 70112

Lane Kollen  
Stephen Baron  
Randy Futral  
Richard Baudino  
Brian Barber  
J. Kenney & Associates  
570 Colonial Park Dr., Suite 305  
Rosewell, GA 30075

Rev. Gregory Manning  
Pat Bryant  
Happy Johnson  
Sylvia McKenzie  
c/o A Community Voice  
2221 St. Claude Avenue  
New Orleans, LA 70117

Grace Morris  
Sierra Club  
4422 Bienville Ave  
New Orleans, LA 70119

Dave Stets  
2101 Selma St.  
New Orleans, La 70122



---

Timothy S. Cragin