



October 13, 2020

**Via Electronic Mail**

Ms. Lora W. Johnson, CMC, LMMC  
Clerk of Council  
Council of the City of New Orleans  
Room 1E09, City Hall  
1300 Perdido Street  
New Orleans, LA 70112  
lwjohnson@nola.gov

**In Re: RESOLUTION AND ORDER ESTABLISHING ADOCKET AND  
OPENING A RULEMAKING PROCEEDING TO ESTABLISH  
RENEWABLE PORTFOLIO STANDARDS  
DOCKET NO. UD-19-01**

Dear Ms. Johnson:

Please find enclosed Energy Future New Orleans's (EFNO) Reply Comments in the above-mentioned docket. Please file the attached communication and this letter in the record of the proceeding. As a result of the remote operations of the Council's office related to COVID-19, EFNO submits this letter electronically and will submit the requisite original and number of hard copies once the Council resumes normal operations, or as you direct. EFNO requests that you file this submission in accordance with Council regulations as modified for the present circumstances. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention,

Sincerely,

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Logan Atkinson Burke  
Executive Director  
Alliance for Affordable Energy  
Energy Future New Orleans

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

**Establishing a Docket and Opening a  
Rulemaking Proceeding to Establish  
Renewable Portfolio Standard**

**Docket No. UD-19-01**

**Energy Future New Orleans Coalition’s Final Reply Comments Pursuant to  
Resolution R-20-104**

**Overview:**

Over the course of the past 18 months various parties engaged in the rulemaking docket established by Resolution R-19-109 have been engaged in a vital process to establish a set of rules that fundamentally change the way the city consumes and generates energy. Shifting the energy supply in the City of New Orleans away from polluting resources in Entergy New Orleans’ (“ENO”) portfolio to zero emission resources is imperative for communities in the region. These communities are affected by air pollution coming from current resources every day. All of us facing the challenges of climate change also face an energy system that lacks fundamental resilience. Although it has been cited in many parties' comments submitted into this docket, it is critical that all global greenhouse gas emissions are brought to zero as quickly as possible and we who are most affected must do our part to limit global temperature warming to 1.5C. The City of New Orleans and the Gulf South have already been affected by an increased frequency of storms at global warming of only 1C. During the current hurricane season, the city has been in the ‘forecast cone’ of six named storms; wildfires burned in California and across the West due to an extended dry season induced by this warming; and savage storms wrecked crops in the Midwest. It is incumbent upon the City of New Orleans, as a firsthand witness to and victim of the effects of climate change, to establish thoughtful and strategic leadership in addressing this threat to the city.

Before addressing Energy Future New Orleans’ (“EFNO”) proposed solution for rules governing a Renewable Portfolio Standard, (“RPS”) that will lead to better outcomes for New Orleans and net zero emissions, we feel the need to address some concerns about the process of rulemaking.

## **Stakeholder Input:**

There have been considerable challenges to working collaboratively at many junctures throughout this proceeding. With the passage of Resolution R-20-104 a new procedural schedule involving stakeholder input was established involving multiple comment periods and two technical meetings. Over the course of these two rapidly paced technical meetings, only limited input and analysis was possible due to time constraints; there was insufficient time to explore collaborative resolution of a host of issues. Compared to other rulemaking proceedings involving clean energy standards, this process fell short in facilitating consensus between stakeholders and providing critical data points for the assessment of strategies. Without a transparent process, there are ambiguities with regards to the success of the strategies proposed. The RPS is about a transformation process that will span decades--it is worth taking the time to get it as right as possible.

## **100% Renewable vs. 100% Clean:**

The assumption by many parties in this docket, preceding the passage of R-20-104, that a 100% renewable energy grid is impossible, is not reflected by many other cities and states with a significantly greater number of ratepayers than the city of New Orleans. The utility Austin Energy, that serves 406,000 customers, has a goal of reaching 100% renewable electricity by 2035, with much of its new capacity additions projected to be from solar energy according to their studies.<sup>1</sup> Los Angeles Department of Water and Power (LADWP) has a goal of 100% renewable electricity by 2045. LADWP serves over 1.5 million customers in the City of Los Angeles<sup>2</sup>, nearly five times the customers of Austin Energy, and over seven times as many customers as Entergy New Orleans.<sup>3</sup> Furthermore, LADWP is executing a study that far exceeds the analysis executed by any of the stakeholders in docket UD-19-01, to examine the feasibility and cost impacts of a 100%

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<sup>1</sup><https://austinenergy.com/wcm/connect/700b2a98-bd65-4e2c-ab2d-aed09a7d1159/ResourcePlanningStudies-Renewable-CarbonFree-Storage.pdf?MOD=AJPERES&CVID=mRGafpZ> (pg 33)

<sup>2</sup>[https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?\\_adf.ctrl-state=w56zrnex\\_4&\\_afLoop=479754450023727](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=w56zrnex_4&_afLoop=479754450023727)

<sup>3</sup> <https://www.entergy-neworleans.com/about-us/>

renewable energy grid for the City of Los Angeles. This study includes an advisory group composed of a diverse group of stakeholders, not unlike that proposed by EFNO's Resilient Renewable Portfolio Standard.<sup>4</sup>

Perhaps the greatest challenge is that presented by ENO, who threatens to bring suit over the passage of a 100% renewable portfolio standard by citing the commerce clause in the U.S. Constitution. This is a clause cited often by utilities that disagree with a renewable portfolio standard, as explained by Clean Energy States Alliance.<sup>5</sup> A 100% renewable energy grid is not a technical impossibility for ENO, rather, the source of the limitation is ENO's desire to use the dormant commerce clause and a well resourced legal staff (paid with customer-paid rates) to reject a 100% renewable portfolio standard. This is the desire of a regulated monopoly utility to not be regulated by the City Council. The result is a renewable and clean portfolio standard policy draft that has been reworked until it has been made palatable to ENO.

### **Entergy New Orleans and Entergy Corporate climate goals:**

It is difficult to read the draft of the Renewable and Clean Portfolio Standard ("RCPS") as anything but a complicated series of regulatory veils that look and sound like sound climate action, and require plenty of administrative resources, but make very little change to New Orleans' energy landscape. Furthermore, the RCPS appears tailor-made to support Entergy New Orleans and Entergy Corporation's goals to maintain the status quo: keep expensive nuclear resources online, use netting and multipliers to hide the continued use of fossil gas plants, and invest ratepayer money into expensive and unproven technologies like Carbon Capture Sequestration and Utilization. Entergy Corporation's recent announcement that it intends to reach 100% *net* zero emissions by 2050 leans on many of the same strategies that are built into the current RCPS draft.

### **Entergy's Comments:**

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<sup>4</sup> [https://www.all4energy.org/uploads/1/0/5/6/105637723/2019\\_07\\_15\\_ud-19-01\\_efno\\_reply\\_rps\\_proposal.pdf](https://www.all4energy.org/uploads/1/0/5/6/105637723/2019_07_15_ud-19-01_efno_reply_rps_proposal.pdf) ; pg 15 at 'Section 15'

<sup>5</sup> <https://www.cesa.org/wp-content/uploads/CEG-Commerce-Clause-paper-031111-Final.pdf>

Throughout this proceeding Entergy’s position has countered the idea of change with proposals that cement the status quo. For example, rather than supporting mandates that would require new renewable generation or additional demand side savings, the utility has pushed for extra credit for programs that would enable their existing gas resources to operate well into the future. Rather than supporting home-grown economic development in New Orleans with distributed resources that benefit local communities, their plan has been to insist that their existing nuclear fleet will solve our emissions problems. At the same time, they fail to acknowledge glaring issues with that nuclear fleet, including cost and reliability, and actual timelines like expected retirement dates and refueling outages. In their comments on September 28, 2020, Entergy asserts 90% nuclear generating capacity availability in 2022<sup>6</sup> even though one of the largest of Entergy’s nuclear resources will be down for a significant refueling that year.<sup>7</sup> Credibility and trustworthiness are the ultimate currency of RPS implementation. The Council and the public are being asked to trust that this utility has New Orleans’ best interests at heart, while the realities EFNO points out are brushed aside. Meanwhile, the plan put forward by both Entergy and the Council’s Advisors matches nearly perfectly with Entergy Corporation’s recently announced pipedream to reach “net” zero by 2050. Entergy has merely outlined an energy future that relies on carbon capture and sequestration--technologies with a history rife with boondoggles exhibiting technological and economic barriers—while we are suggesting a no-regrets pathway shifting to resources that are ready and affordable *right now*. Ironically, Entergy seeks to dismiss these options as reckless and uninformed. The choice is between maintaining a status quo that has worked well for the utility, but not for New Orleans, and starting a fundamental shift in our energy system, for the benefit of all present and future New Orleanians.

Fortunately, and as already documented in Entergy’s 2018 Integrated Resource Plan, the transition to deep efficiency, plus renewable and distributed energy, while leveraging proven existing technology including energy storage, is already the least-cost path. The utility simply does not need to be given multipliers or cost caps to actually achieve affordable pollution-free electricity.

Meanwhile, in a docket intended to develop a policy to transform how our electricity is generated toward renewable resources, this docket has morphed into one that is more supportive of

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<sup>6</sup> Entergy New Orleans Reply Comments Concerning Advisors’ Proposed RCPS, pg 11, table 2

<sup>7</sup> Grand Gulf is scheduled for refueling outage 23 (RF23) in February 2022.

beneficial electrification than renewables. Entergy's concerns about "disincentives" to electrification (pg 3 and 5) belie the reality that the incentive for the utility to pursue beneficial electrification already exists, thanks to a 100 year old business model that encourages higher sales and demand peaks. The RPS shouldn't be turned into a perverse program to pay the utility to do load-building. The goal is to transform the utility's energy mix to use ever-greater proportions of pollution-free energy in order to meet the city's climate goals--ideally while making the City radically more efficient, not less so.

The mechanics of beneficial electrification *with* multipliers as proposed by the utility are the equivalent of giving a bigger shovel to a worker stuck in a hole--it might look like more action, but the problem is only getting worse. Entergy points out its concern that draft language currently disincentivizes electrification, and describes a situation where they may be forced to abandon electrification efforts. An different concern, however, is a situation wherein the utility claims credit for electrification (using Entergy's Illustrative 2022 Base Case, Table 3) for a large customer, reporting 80,000 MWhs. If, as Entergy suggests, these MWhs are allowed as a decrement to the compliance load, even without multipliers, this would enable the utility to continue to source 80,000 MWhs from a coal or gas plant annually and in perpetuity. Further examination of this problem can be found in Appendix A, attached to this document.

If the Council has a goal to reduce carbon emissions from non-Entergy New Orleans pollution there are other regulatory mechanisms to do this. Rather than incentivizing electrification by reducing the utility's compliance load, the Council could incentivize customers to adopt Electric Vehicles using special rates, like low-cost night time rates, as suggested by the Council's Advisors in their report to the Council on Electric Vehicles just this year.<sup>8</sup> Rather than incentivize Entergy to serve the Port of New Orleans with shore power using BE decrements to compliance load, the Council could likewise use rate-design, like a time of use or critical peak pricing. Entergy's concern about beneficial electrification multipliers not providing enough incentive to sell more electricity is upside down. After all, the incentive to sell more electricity is the money made by selling more electricity. The use of beneficial electrification as a "net" to hide behind while continuing to generate fossil fueled electricity is not in the interest of New Orleans, and endangers the Council's goals to transition away from fossil

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<sup>8</sup> April 1, 2020, Council Utility Advisors' Report on Information Gathering in Connection with Regulatory and Related Matters Concerning Electric Vehicles and Electric Vehicle Charging Facilities Pursuant to Resolution No. R-18-537, pg 11-12.

fuels and take demonstrable climate action. EFNO is not debating the substantial emissions reductions benefits from electrification, but based on the perverse incentive to both electrify for greater sales and electrify to enable further fossil fuel use, it isn't appropriate to decrease compliance load or apply multipliers for beneficial electrification.

### **Banking of Compliance Reserves:**

EFNO remains opposed to banking of RECs or other compliance credits. Not only does it further encourage gaming of compliance, as Entergy notes in their recent comments it also raises a question of ratemaking, adding unnecessary complications to accounting.

### **Distributed Energy Resource:**

Entergy's requested language change to the definition of "Distributed Energy Resource" expands the meaning to include their own investments in distributed resources that are in front of the meter. EFNO is not opposed to this.

### **IRP Interactions:**

As stated in prior filings, EFNO's position is that the IRP and the RPS are inextricably linked, and while the RPS should be a mandated policy of the Council that informs the IRP, the IRP should guide the implementation of that mandate.

### **Air Products Comments:**

EFNO provides the following replies to Air Products ("APC") comments of September 28, 2020.

*-Opportunity for stakeholders to review and comment on the triennial RCPS Compliance Plan and annual Compliance Demonstration Report of ENO prior to Council approval and/or acceptance.*

This recommendation is appropriate, as transparency and stakeholder engagement have been foundational recommendations by EFNO. Any filing by the utility the Council is expected to take action on should be followed by an opportunity for review and comment by both intervenors and the public.

*-Determination that the CleanNOLA Fund shall only be used towards meeting the RCPS.*

EFNO does not support the language in APC's recommendation, as we have noted in prior filings, that any CleanNOLA funds should be used specifically for programs that reduce energy burdens for low-income or vulnerable families which *also* hasten the goals of the RCPS, for example

energy efficiency, or distributed renewable resources. We do agree with ACP that the CleanNOLA fund be used exclusively for the purposes of achieving the Council's clean energy mandate.

### **Non-Energy Impacts**

EFNO has consistently recommended that a Renewable Portfolio Standard in New Orleans should be a game changer for New Orleans in more ways than shifting to non-polluting, zero-emissions resources. These worthy goals have been ignored in favor of maintaining a status quo that has not worked for many in the city. We have suggested a transformational policy that an entity like the New Orleans City Council has the authority to approve that has non-energy impacts well beyond the current draft rule. Moreover, this Council has a chance to think differently about what New Orleans can be, and move beyond scarcity thinking to envision a city that is not only mitigating the impacts of greenhouse gas emissions with clean, efficient, renewable resources, but is adapting to the new realities that climate change is wreaking now. When we look to providing resilience in terms of climate risk, we must look to opportunities that provide economic resilience too. Providing least-cost energy options is important in a city with as much income disparity as New Orleans, but the city also must explore opportunities to build wealth and create jobs in the city, wherever possible in zero carbon industries. So-called 'green jobs' are not only the fastest growing job sector but a sector that will only increase in growth as decarbonization efforts ramp up globally. Whether or not it is the stated goal of the resolution, to foster economic growth in renewable energy industries, the City Council should not pass up the opportunity to do so when it can be readily facilitated through a renewable portfolio standard rulemaking. A more locally powered city, that is more resilient, more responsive to the needs of the community, is also more honest about the action needed to keep New Orleans livable.

### **Conclusion:**

The City Council has an important decision to make on how to move forward to implement real climate action in New Orleans. This Council could approve a rule that is tailored to enable continued polluting generation well into the future, or New Orleans can have a clean mandate to transform our energy system to one that works for everyone, reduces pollution to actual zero, that grows our local economy, and that invests in on no-regrets resources now and in the future. We urge the Council to consider what is in the best interest of all New Orleanians.

Respectfully Submitted,

Andy Kowalczyk, 350 New Orleans

Logan Burke, Alliance for Affordable Energy

Brent Newman, Audubon Louisiana

Peter Digre, Chair, Climate Reality Project: New Orleans, LA Chapter

Rev. Gregory T. Manning, Chair, Greater New Orleans Interfaith Climate Coalition

## Appendix A:

### Detailed Explanation of Problems with Entergy's Beneficial Electrification Proposals

While beneficial electrification is a worthy goal, efforts toward BE should not be a decrement to the utility's compliance load, especially not 5, 10, or 20 years after completion. Add Entergy's hypothetical 80,000 MWh to the additional 14,542 MWh for other multipliers projected for 2022<sup>9</sup> and that's 94,542 MWhs of "clean" credit for zero new clean energy. Give the 80,000 MWh a 1.5 multiplier and the amount of credit for no new action is 134,542 MWhs. This exercise highlights the situation the multipliers and credit for beneficial electrification creates: the look of action, with no action. The only action described in the utility's hypothetical compliance charts driven by the draft RCPS is 50 MW of new grid-scale solar (Hypothetical 2). Unfortunately even this hypothetical does not appear to take into account fuel savings from a new 50MW project. As the Entergy suggests, these compliance load subtractions would not "roll off" at any point. If they did, of course, New Orleans would only be in a deeper hole, having wasted valuable time in achieving true transformation of the energy sources on which it relies. The clever accounting of BE credit, whether multiplied or not, allows Entergy to remain a polluting utility, even while claiming "net" emissions reductions. If the intention is to make very few changes while *reporting* a successful transition to clean energy, the current draft is perfectly crafted for this purpose. One is reminded of the claims of the nuclear industry about costs, and Entergy's claims of available future capacity.

The use of BE to reduce compliance creates a concerning possibility as more and more of end-users that are not electrified become grid-connected in the interest of both cost savings and pollution reduction, both of which are worthy goals. A hypothetical example where BE deductions (as suggested by Entergy) to compliance loads causes concern would be the electrification of cars in New Orleans, thus increasing ENO's total load, yet decreasing the compliance load. This is not actually a path to transition to clean or renewable energy. Instead it is a path to sell more electricity and hide pollution behind the "net." If just 1,000 internal combustion engine cars in New Orleans transitioned to EV, and each of those used 3.24 MWh annually,<sup>10</sup> the result is 3,240 MWh of annual load that could forever be

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<sup>9</sup> September 28, 2020, Entergy New Orleans Comments, pg 13

<sup>10</sup> US Department of energy hypothetical suggests 3.8MWh annual load. For conservative calculations we used 3.24 MWh annually.

<https://www.energy.gov/sites/prod/files/2019/12/f69/GITT%20ISATT%20EVs%20at%20Scale%20Grid%20S>

subtracted from Entergy's requirements to supply pollution-free electricity, long past the day when electric transportation becomes the norm.

Furthermore, Sewerage and Water Board, industrial customers, city transit, and fleets all represent opportunities to reduce compliance requirements, even if these transitions are already underway and would happen without a RCPS. Some other examples include:

- Shore power: 20% of Port of Orleans berths: 96,000 mwh<sup>11, 12</sup>
- 100 Bus fleet: 9,360 mwh<sup>13, 14</sup>
- Individual cars: 231,517 mwh
- SWB: 70,000 mwh<sup>15</sup>

If each of these opportunities manifest by 2040, Entergy's compliance load would be reduced by nearly 7% just for receiving credit for BE measures. Stated another way, in 2040 with conservative estimates of electrification, 406,877 MWh could still be generated with fossil fuels because of beneficial electrification. Add the allowed 10% RECs that year *and* 1.5 multiplier for the BE, and Entergy could still be generating around 1,215,000 MWh with fossil fuels in 2040. While it is true that the emissions from those fossil fueled plants are likely less than the emissions from diesel bus or ship engines, or Sewerage and Water Board's old steam generation, the fact is, incentivizing beneficial electrification in this way only extends the fossil fueled status quo, and it only gets worse the more ENO is encouraged to electrify. By 2050, if 75% of light duty vehicles in the city are electrified and 50% of port berths use shore power, the number could go up to 618,736 MWh from fossil fuels, just from decrements related to beneficial electrification. Based on the current draft with Entergy's suggested edits to preserve credit for BE, these MWh would remain a decrement to the utility's

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ummary%20Report%20FINAL%20Nov2019.pdf

<sup>11</sup> March 2017, U.S. Environmental Protection Agency, Shore Poer Technology Assessment at U.S. Ports. <https://www.epa.gov/sites/production/files/2017-05/documents/420r17004-2017-update.pdf>

<sup>12</sup> Port of Orleans has 40 berths. This calculation assumes 12,000 MWh for a single 16 MW shore power connection for 1 berth.

<sup>13</sup> 100 city buses, each using 260kwh daily, 360 days a year. As of 2019, New Orleans has 132 large buses and 57 smaller buses.

<sup>14</sup> April 2020. Federal Transit Administration, Zero Emission Bus Evaluation Results. <https://www.transit.dot.gov/sites/fta.dot.gov/files/2020-05/FTA-Report-No.-0163.pdf>

<sup>15</sup> March 2020, Master Power Plan, Sewerage and Water Board, prepared by Jacobs, page 3-4. 70.1 GWh only includes baseload energy needs. Sewerage and Water Board peak is known to top 50-60 MW, so this number is very conservative.

compliance load every year into the future, allowing the utility to continue to generate power using fossil fuels well beyond 2050, and the greater share of other electrification that is added the more the allowed fossil fuel generation. EFNO is not stating an opposition to beneficial electrification here, but we do oppose the use of electrification as an argument against transitioning to cleaner resources. Entergy is asking to not only be forgiven for continuing to depend on fossil gas, but to be rewarded for it.

**In Re: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND OPENING A  
RULEMAKING PROCEEDING TO ESTABLISH RENEWABLE PORTFOLIO  
STANDARDS. DOCKET UD-19-01**

I hereby certify that I have on this 13th day of October 2020, served the required number of copies of the foregoing correspondence upon all other known parties of this proceeding, by USPS or electronic mail.



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Logan Atkinson Burke  
Executive Director  
Alliance for Affordable Energy  
Energy Future New Orleans

**November 5, 2019**

**RULEMAKING PROCEEDING TO ESTABLISH RENEWABLE PORTFOLIO  
STANDARDS**

**DOCKET UD-19-01**

**Lora W. Johnson, [lwjohnson@nola.gov](mailto: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](mailto:espears@nola.gov)**

Chief of Staff, Council Utilities Regulatory Office

**Bobbie Mason, [bfmason1@nola.gov](mailto:bfmason1@nola.gov)**

**Christopher Roberts, [cwroberts@nola.gov](mailto:cwroberts@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](mailto:avtuozzolo@nola.gov)**

1300 Perdido St. Rm. 2W40  
New Orleans, LA. 70112

**David Gavlinski**, [504-658-1101, dsgavlinski@nola.gov](mailto:dsgavlinski@nola.gov)  
Council Chief of Staff  
City Hall - Room 1E06  
1300 Perdido Street  
New Orleans, LA 70112

**Sunni LeBeouf**, [Sunni.LeBeouf@nola.gov](mailto: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](mailto: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

**Jonathan M. Rhodes**, [Jonathan.Rhodes@nola.gov](mailto:Jonathan.Rhodes@nola.gov)  
Director of Utilities, Mayor's Office  
City Hall – Room 2E04  
1300 Perdido Street  
New Orleans, LA 70112  
(504) 658-4928 - Office

#### **ADMINISTRATIVE HEARING OFFICER**

**Hon. Jeffrey S. Gulin**, [judgegulin@gmail.com](mailto: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](mailto:clinton.vince@dentons.com)  
**Presley Reed**, [presley.reedjr@dentons.com](mailto:presley.reedjr@dentons.com)

**Emma F. Hand**, [emma.hand@dentons.com](mailto:emma.hand@dentons.com)  
**Herminia Gomez**, [herminia.gomez@dentons.com](mailto:herminia.gomez@dentons.com)  
**Dee McGill**, [dee.mcgill@dentons.com](mailto:dee.mcgill@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](mailto:buddo@earthlink.net)  
**J. A. “Jay Beatmann, Jr.** (504) 256-6142 cell, (504) 524-5446 office direct,  
[jay.beatmann@dentons.com](mailto:jay.beatmann@dentons.com)

c/o DENTONS US LLP  
650 Poydras Street  
Suite 2850  
New Orleans, LA 70130

**Joseph W. Rogers**, [jrogers@legendcgl.com](mailto:jrogers@legendcgl.com)  
**Victor M. Prep**, [vprep@legendcgl.com](mailto:vprep@legendcgl.com)  
**Byron S. Watson**, [bwatson@legendcgl.com](mailto:bwatson@legendcgl.com)  
**Cortney Crouch**, [ccrouch@legendcgl.com](mailto:ccrouch@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](mailto:ersmith@btcpas.com)  
Bruno and Tervalon  
4298 Elysian Fields Avenue  
New Orleans, LA 70122  
(504) 284-8296 – fax

## **ENTERGY NEW ORLEANS, LLC**

**Brian L. Guillot**, 504-670-3680, [bguill1@entergy.com](mailto:bguill1@entergy.com)  
Entergy New Orleans, LLC  
Vice-President, Regulatory Affairs  
**Polly S. Rosemond**, 504-670-3567, [prosemo@entergy.com](mailto:prosemo@entergy.com)  
**Derek Mills**, 504-670-3527, [dmills3@entergy.com](mailto:dmills3@entergy.com)  
**Keith Wood**, [kwood@entergy.com](mailto:kwood@entergy.com)  
**Seth Cureington**, 504-670-3602, [scurein@entergy.com](mailto:scurein@entergy.com)

**Kevin T. Boleware**, 504-670-3673, [kbolewa@entergy.com](mailto:kbolewa@entergy.com)  
1600 Perdido Street, L-MAG 505B  
New Orleans, LA 70112  
504-670-3615 fax

**Tim Cragin** (504) 576-6571, [tcragin@entergy.com](mailto:tcragin@entergy.com)  
**Alyssa Maurice-Anderson** (504) 576-6523, [amauric@entergy.com](mailto:amauric@entergy.com)  
**Harry Barton** (504) 576-2984, [hbarton@entergy.com](mailto:hbarton@entergy.com)  
Entergy Services, LLC  
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](mailto:jroman1@entergy.com)  
**Suzanne Fontan** (504) 576-7497, [sfontan@entergy.com](mailto:sfontan@entergy.com)  
**Therese Perrault** (504) 576-6950, [tperrau@entergy.com](mailto:tperrau@entergy.com)  
Entergy Services, LLC  
Mail Unit L-ENT-4C  
639 Loyola Avenue  
New Orleans, LA 70113  
(504)576-6029 – fax

#### **ALLIANCE FOR AFFORDABLE ENERGY**

**Logan Atkinson Burke**, [logan@all4energy.org](mailto:logan@all4energy.org)  
**Sophie Zaken**, [regulatory@all4energy.org](mailto:regulatory@all4energy.org)  
4505 S. Claiborne Ave.  
New Orleans, LA. 70125

#### **350 NEW ORLEANS**

**Renate Heurich**, 504-473-2740, [renate@350neworleans.org](mailto:renate@350neworleans.org)  
1407 Napoleon Ave,#C  
New Orleans, LA, 70115

**Andy Kowalczyk**, [a.kowalczyk350no@gmail.com](mailto:a.kowalczyk350no@gmail.com)  
1115 Congress St.  
New Orleans, LA 70117

**Benjamin Quimby**, 978-505-7649, [ben@350neworleans.org](mailto:ben@350neworleans.org)  
1621 S. Rampart St.  
New Orleans, LA 70113

**Marion Freistadt**, 504-352-2142, [marionfreistadt@yahoo.com](mailto:marionfreistadt@yahoo.com)  
1539 Adams St.  
New Orleans, LA 70118

## **CENTER FOR CLIMATE AND ENERGY SOLUTIONS**

**Marty Niland**, [Press@c2es.org](mailto:Press@c2es.org)  
**Bob Perciasepe**, 703-516-4146  
3100 Clarendon Blvd, Suite 800  
Arlington, VA 22201

## **GULF STATES RENEWABLE ENERGY INDUSTRIES ASSOCIATION**

**Stephen Wright**, 318-663-3810, [swright@gsreia.org](mailto:swright@gsreia.org)  
522 Marilyn Dr.  
Mandeville, LA 70448

**Jeff Cantin**, 877-785-2664, [jcantin@gsreia.org](mailto:jcantin@gsreia.org)  
2803 St. Philip St.  
New Orleans, LA 70119

## **NATIONAL AUDUBON SOCIETY**

**Karen J. Profita**, 225-768-0820, [kprofita@audubon.org](mailto:kprofita@audubon.org)  
**Gary Moody**, [gmoody@audubon.org](mailto:gmoody@audubon.org)  
5615 Corporate Blvd., Suite 600B  
Baton Rouge, La. 70808

## **SOUTHERN RENEWABLE ENERGY ASSOCIATION**

**Simon Mahan**, 337-303-3723, [simon@southernwind.org](mailto:simon@southernwind.org)  
5120 Chessie Circle  
Haltom City, Texas 76137

## **AIR PRODUCTS AND CHEMICALS, INC.**

**Katherine W. King**, [Katherine.king@keanmiller.ocm](mailto:Katherine.king@keanmiller.ocm)  
**Randy Young**, [randy.young@kean](mailto:randy.young@kean) miller.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](mailto:carrie.tournillon@keanmiller.com)  
900 Poydras St., Suite 3600  
New Orleans, LA 70112

**Maurice Brubaker**, [mbrubaker@consultbai.com](mailto:mbrubaker@consultbai.com)  
16690 Swigly Ridge Rd., Suite 140  
Chesterfield, MO 63017  
Or  
P.O. Box 412000  
Chesterfield, MO. 63141-2000

## **NEW ORLEANS CHAMBER**

**G. Ben Johnson**, (504) 799-4260, [bjohnson@neworleanschamber.org](mailto:bjohnson@neworleanschamber.org)  
1515 Poydras Street, Suite 1010  
New Orleans, La. 70112

## **SIERRA CLUB**

**Grace Morris**, 973-997-7121 [Grace.Morris@sierraclub.org](mailto:Grace.Morris@sierraclub.org)  
4422 Bienville Ave  
New Orleans, LA 70119

**Dave Stets**, 804-222-4420, [Davidmstets@gmail.com](mailto:Davidmstets@gmail.com)  
2101 Selma St.  
New Orleans, LA 70122

**Joshua Smith**, [joshua.smith@sierraclub.org](mailto:joshua.smith@sierraclub.org)  
**Lauren Hogrewe**, [lauren.hogrewe@sierraclub.org](mailto:lauren.hogrewe@sierraclub.org)  
2101 Webster Street, Suite 1300  
Oakland, California 94612-3011  
(415) 977-5660

## **POSIGEN SOLAR**

**Elizabeth Galante**, 504-293-4819, [bgalante@posigen.com](mailto:bgalante@posigen.com)  
**Ben Norwood**, 504-293-4819, [bnorwood@posigen.com](mailto:bnorwood@posigen.com)  
819 Central Avenue, Suite 201

Jefferson, La. 70121

**VOTE SOLAR**

**Thadeus B. Culley**, 504-616-0181, [thad@votesolar.org](mailto:thad@votesolar.org)  
1911 Ephesus Church Road  
Chapel Hill, North Carolina 27517

**DEEP SOUTH**

**Monique Harden**, 504-510-2943, [moniqueh@dscej.org](mailto:moniqueh@dscej.org)  
3157 Gentilly Boulevard, #145  
New Orleans, La. 70122