

February 19, 2021

BY ELECTRONIC 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: 2021 Triennial Integrated Resource Plan Of Entergy New Orleans, LLC,
CNO Docket No. UD-20-02

Dear Ms. Johnson:

Enclosed please find the *Advisors' Motion to Extend Procedural Deadline* in the above referenced docket, which we are requesting be filed into the record along with this letter. As a result of the remote operations of the Clerk of Council's office related to COVID-19, the Advisors submit this filing electronically and will submit the requisite original and number of hard copies once the Council resumes normal operations, or as you direct. Please file this submission in accordance with Council regulations as modified for the present circumstances.

Sincerely,



Jay Beatmann
Counsel

JAB/dpm
Attachment

cc: Official Service List for UD--20-02

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

**IN RE: 2021 TRIENNIAL
INTEGRATED RESOURCE PLAN OF
ENTERGY NEW ORLEANS, LLC**

)
)
)
)

DOCKET NO. UD-20-02

ADVISORS' MOTION TO EXTEND PROCEDURAL DEADLINE

Now come the Advisors to the Council of the City of New Orleans ("Advisors"), who, through undersigned counsel, respectfully move the Council to extend the deadline for the 2021 IRP Report in this proceeding from January 24, 2022 to March 25, 2022.

For the reasons explained in the memorandum of support of this motion, which is attached hereto and made a part hereof, the Advisors request that the procedural schedule in the proceeding be modified as set forth above.

WHEREFORE, the Advisors to the Council of the City of New Orleans pray that their Motion to Extend Procedural Deadline be granted and the procedural schedule in the proceeding be adjusted as described above.

RESPECTFULLY SUBMITTED:



J. A. "Jay" Beatmann, Jr. (#26189)
Basile J. Uddo (#10174)
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

Advisors to 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 19th day of February, 2021.



J. A. "Jay" Beatmann, Jr.

OFFICIAL SERVICE LIST

**IN RE: 2021 TRIENNIAL INTEGRATED RESOURCE PLAN
OF ENTERGY NEW ORLEANS, LLC**

DOCKET NO. UD-20-02

Lora W. Johnson, lwjohnson@nola.gov

Clerk of Council
City Hall - Room 1E09
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-1085
Fax: (504) 658-1140

Service of Discovery not required

Erin Spears, espears@nola.gov

Chief of Staff, Council Utilities Regulatory Office

Bobbie Mason, bfmason1@nola.gov

Christopher Roberts, cwroberts@nola.gov

City Hall - Room 6E07
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-1110
Fax: (504) 658-1117

Andrew Tuozzolo, CM Moreno Chief of Staff, avtuozzolo@nola.gov
1300 Perdido St. Rm. 2W40
New Orleans, LA. 70112

Paul Harang, 504-658-1101 / (504) 250-6837, Paul.harang@nola.gov
Interim 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
Tel: (504) 658-9800
Fax: (504) 658-9869

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
Tel: (504) 658-1502
Fax: (504) 658-1705

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

ADMINISTRATIVE HEARING OFFICER

Hon. Maria Auzenne, maria@auzennelaw.com
1615 Poydras Street, Suite 900
New Orleans, Louisiana 70112
Tel: 504-566-7999
Fax: 504-569-0087

CITY COUNCIL CONSULTANTS and SUPPORT STAFF

Clinton A. Vince, clinton.vince@dentons.com
Presley Reed, presley.reedjr@dentons.com
Emma F. Hand, emma.hand@dentons.com
Adriana Velez-Leon, adriana.velez-leon@dentons.com
Dee McGill, dee.mcgill@dentons.com

Denton Law Firm,
1900 K Street NW
Washington, DC 20006
Tel: (202) 408-6400
Fax: (202) 408-6399

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 M. Prep, vprep@legendcgl.com
Byron S. Watson, bwatson@legendcgl.com
Legend Consulting Group
6041 South Syracuse Way, Suite 105
Greenwood Village, CO 80111
Tel: (303) 843-0351
Fax: (303) 843-0529

CITY COUNCIL’S INDEPENDENT DSM CONSULTANT

Jeffrey Huber, jeffrey.huber@gdsassociates.com
Rich Hasselman, rich.hasselmann@gdsassociates.com
Richard Spellman, dick.spellman@gdsassociates.com
Warren Hirons, warren.hirons@gdsassociates.com
GDS Associates, Inc.
1850 Parkway, Suite 800
Marietta, GA 30067
Tel: (770) 425-8100 (Main)
Fax: (866) 611-3791

Casey DeMoss, caseyleedemoss@gmail.com
Independent Consultant
248 Cherokee Street, Suite 30
New Orleans, Louisiana 70118

Tel: (504) 982-0468
(GDS Associates, Inc. Team Member)

Manish Mardia, mmardia@msmmeng.com
President, MSMM Engineering, LLC
4640 South Carrollton Avenue
New Orleans, Louisiana 70119
Tel: (504) 559-1897
(GDS Associates, Inc. Team Member)

Corinne Villavaso, corinne@tvglplanning.com
President, The Villavaso Group, LLC
7111 Lake Barrington Drive
New Orleans, Louisiana 70128
Tel: (504) 905-2892
(GDS Associates, Inc. Team Member)

ENERGY NEW ORLEANS, LLC

Becky Knox (504) 670-3680, rharskh@entergy.com
Entergy New Orleans, LLC
Vice-President, Regulatory Affairs
Alyssa Maurice-Anderson, (504) 670-3567, amauric@entergy.com
Entergy New Orleans, LLC
Director, Regulatory Operations
Derek Mills, (504) 670-3527, dmills3@entergy.com
Keith Wood, (504) 670-3633, kwood@entergy.com
Seth Cureington, (504) 670-3602, scurein@entergy.com
Kevin T. Boleware, (504) 670-3673, 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
Brian L. Guillot, (504) 567-6523, bguill1@entergy.com
Courtney R. Nicholson, (504) 576-4102, cnicho2@entergy.com
Kimberly Silas, (504) 576-4122, ksilas@entergy.com
Entergy Services, LLC
Mail Unit L-ENT-26E
639 Loyola Avenue
New Orleans, LA 70113
Fax: 504-576-5579

Joe Romano, III (504) 576-4764, jroman1@entergy.com
Tim Rapier, (504) 576-4740, trapier@entergy.com
Entergy Services, LLC

Mail Unit L-ENT-4C
639 Loyola Avenue
New Orleans, LA 70113
Fax: (504) 576-6029

INTERVENORS

ALLIANCE FOR AFFORDABLE ENERGY

Logan Atkinson Burke, Logan@all4energy.org
Sophie Zaken, Regulatory@all4energy.org
4505 S. Claiborne Ave.
New Orleans, LA. 70125
Tel: (504) 208-9761

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
Tel: (225) 387-0999
Fax: (225) 388-9133

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

SOUTHERN RENEWABLE ENERGY ASSOCIATION (“SREA”)

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

SUSTAINABLE ENERGY ECONOMY SOLUTIONS

Andy Kowalczyk, andy@senergysolutions.org

819 Saint Roch Avenue
New Orleans, Louisiana 70117
Tel: (415) 676-1047

350 NEW ORLEANS

Pooja Prazid, p.prazid@gmail.com
Benjamin Quimby, benjaminquimby1@gmail.com
Clare Giesen, claregiesen@gmail.com
Marion Freistadt, marionfreistadt@gmail.com
Vickie Boothe, boothevickiel@gmail.com

1632 8th Street
New Orleans, Louisiana 70115
Tel: (916) 952-9955

NATIONAL AUDUBON SOCIETY

Brent Newman, Brent.newman@audubon.org

Senior Policy Director
3801 Canal Street, Suite 400
New Orleans, Louisiana 70119
Tel: (303) 681-8420

GULF STATES RENEWABLE ENERGY INDUSTRIES ASSOCIATION

Stephen Wright, 318-663-3810, swright@gsreia.org

695 Kiskatom Lane
Mandeville, Louisiana 70471

Jeff Cantin, 877-785-2664, jcantin@gsreia.org

2803 St. Philip St.
New Orleans, LA 70119

INTERESTED PARTIES

Joshua Smith, Joshua.smith@sierraclub.org

Staff Attorney
Sierra Club Environmental Law Program
2101 Webster Street, Suite 1300
Oakland, California 94612
Tel: (415) 977-5560 (Office)
Tel: (503) 484-7194 (Cell)

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

**IN RE: 2021 TRIENNIAL
INTEGRATED RESOURCE PLAN OF
ENTERGY NEW ORLEANS, LLC**

)
)
)
)

DOCKET NO. UD-20-02

**MEMORANDUM IN SUPPORT OF ADVISORS' MOTION TO EXTEND
PROCEDURAL DEADLINE**

In Resolution No. R-20-257, issued August 20, 2020, the Council set forth the procedural schedule governing the 2021 Entergy New Orleans, LLC (“ENO”) Integrated Resource Plan (“IRP”) Proceeding. In that Resolution, the Council determined that it would not utilize a consultant that reports to the Council to perform an independent DSM Potential Study for the 2021 IRP Proceeding. However, subsequently, in Motion M-20-269, the Council determined that it would hire such a consultant and in Motion M-21-34, authorized the President of the Council to contract with GDS Associates, Inc. (“GDS”) for such a DSM Potential Study.

Due to the time necessary to complete the Council’s RFP and selection process, GDS was not able to commence work until February 1, 2021, and will not be able to complete the approximately 4-6 month process necessary to produce a DSM Potential Study by the current March 1, 2021 deadline set forth in Resolution No. R-20-257. The Advisors have worked with GDS and the Council Utilities Regulatory Office (“CURO”) to make adjustments to the procedural schedule to allow sufficient time for GDS to develop the Council’s DSM Potential Study while still concluding the proceeding as near as reasonably possible to the original conclusion date and permitting sufficient time after the conclusion of the IRP Process for the Council to review and act upon the Energy Smart Implementation Plan for Program Years 13-15 (2023-2025) no later than December 31, 2022.

The Advisors are concurrently submitting a motion to change all remaining procedural schedule deadlines for consideration by the Hearing Officer, however in Resolution R-20-257 the Council specifically reserved to itself the ability to change the deadline for the 2021 IRP Report. The Advisors, therefore, are separately filing this motion to the Council regarding the 2021 IRP Report deadline. In order to accommodate the changes needed to the schedule to allow GDS sufficient time to complete the Council's DSM Potential Study, the Advisors request that the Council extend the deadline for the 2021 IRP Report from January 24, 2022, to March 25, 2022.

The Advisors believe that the above-proposed changes to the procedural schedule would best accommodate the needed time for the DSM Potential Study while preserving reasonable timeframes for the remaining procedural deadlines in the procedural schedule. For these reasons, the Advisors request that their proposed changes to the procedural schedule in this proceeding be adopted.

RESPECTFULLY SUBMITTED:



J. A. "Jay" Beatmann, Jr. (#26189)
Basile J. Uddo (#10174)
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

Advisors to 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 19th day of February, 2021.



J. A. "Jay" Beatmann, Jr.

OFFICIAL SERVICE LIST

**IN RE: 2021 TRIENNIAL INTEGRATED RESOURCE PLAN
OF ENTERGY NEW ORLEANS, LLC**

DOCKET NO. UD-20-02

Lora W. Johnson, lwjohnson@nola.gov
Clerk of Council
City Hall - Room 1E09
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-1085
Fax: (504) 658-1140
Service of Discovery not required

Erin Spears, espears@nola.gov
Chief of Staff, Council Utilities Regulatory Office
Bobbie Mason, bfmason1@nola.gov
Christopher Roberts, cwroberts@nola.gov
City Hall - Room 6E07
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-1110
Fax: (504) 658-1117

Andrew Tuozzolo, CM Moreno Chief of Staff, avtuozzolo@nola.gov
1300 Perdido St. Rm. 2W40
New Orleans, LA. 70112

Paul Harang, 504-658-1101 / (504) 250-6837, Paul.harang@nola.gov
Interim 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
Tel: (504) 658-9800
Fax: (504) 658-9869

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
Tel: (504) 658-1502
Fax: (504) 658-1705

Jonathan M. Rhodes, Jonathan.Rhodes@nola.gov

Director of Utilities, Mayor's Office
City Hall – Room 2E04
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-4928 - Office

ADMINISTRATIVE HEARING OFFICER

Hon. Maria Auzenne, maria@auzennelaw.com

1615 Poydras Street, Suite 900
New Orleans, Louisiana 70112
Tel: 504-566-7999
Fax: 504-569-0087

CITY COUNCIL CONSULTANTS and SUPPORT STAFF

Clinton A. Vince, clinton.vince@dentons.com

Presley Reed, presley.reedjr@dentons.com

Emma F. Hand, emma.hand@dentons.com

Adriana Velez-Leon, adriana.velez-leon@dentons.com

Dee McGill, dee.mcgill@dentons.com

Denton Law Firm,
1900 K Street NW
Washington, DC 20006
Tel: (202) 408-6400
Fax: (202) 408-6399

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 M. Prep, vprep@legendcgl.com

Byron S. Watson, bwatson@legendcgl.com

Legend Consulting Group
6041 South Syracuse Way, Suite 105
Greenwood Village, CO 80111
Tel: (303) 843-0351
Fax: (303) 843-0529

CITY COUNCIL'S INDEPENDENT DSM CONSULTANT

Jeffrey Huber, jeffrey.huber@gdsassociates.com

Rich Hasselman, rich.hasselmann@gdsassociates.com

Richard Spellman, dick.spellman@gdsassociates.com

Warren Hirons, warren.hirons@gdsassociates.com

GDS Associates, Inc.
1850 Parkway, Suite 800
Marietta, GA 30067
Tel: (770) 425-8100 (Main)
Fax: (866) 611-3791

Casey DeMoss, caseyleedemoss@gmail.com

Independent Consultant
248 Cherokee Street, Suite 30
New Orleans, Louisiana 70118
Tel: (504) 982-0468
(GDS Associates, Inc. Team Member)

Manish Mardia, mmardia@msmmeng.com

President, MSMM Engineering, LLC

4640 South Carrollton Avenue
New Orleans, Louisiana 70119
Tel: (504) 559-1897
(GDS Associates, Inc. Team Member)

Corinne Villavaso, corinne@tvgplanning.com
President, The Villavaso Group, LLC
7111 Lake Barrington Drive
New Orleans, Louisiana 70128
Tel: (504) 905-2892
(GDS Associates, Inc. Team Member)

ENTERGY NEW ORLEANS, LLC

Becky Knox (504) 670-3680, rharshk@entergy.com
Entergy New Orleans, LLC
Vice-President, Regulatory Affairs
Alyssa Maurice-Anderson, (504) 670-3567, amauric@entergy.com
Entergy New Orleans, LLC
Director, Regulatory Operations
Derek Mills, (504) 670-3527, dmills3@entergy.com
Keith Wood, (504) 670-3633, kwood@entergy.com
Seth Cureington, (504) 670-3602, scurein@entergy.com
Kevin T. Boleware, (504) 670-3673, 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
Brian L. Guillot, (504) 567-6523, bguill1@entergy.com
Courtney R. Nicholson, (504) 576-4102, cnicho2@entergy.com
Kimberly Silas, (504) 576-4122, ksilas@entergy.com
Entergy Services, LLC
Mail Unit L-ENT-26E
639 Loyola Avenue
New Orleans, LA 70113
Fax: 504-576-5579

Joe Romano, III (504) 576-4764, jroman1@entergy.com
Tim Rapier, (504) 576-4740, trapier@entergy.com
Entergy Services, LLC
Mail Unit L-ENT-4C
639 Loyola Avenue
New Orleans, LA 70113
Fax: (504) 576-6029

INTERVENORS

ALLIANCE FOR AFFORDABLE ENERGY

Logan Atkinson Burke, Logan@all4energy.org

Sophie Zaken, Regulatory@all4energy.org

4505 S. Claiborne Ave.

New Orleans, LA. 70125

Tel: (504) 208-9761

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

Tel: (225) 387-0999

Fax: (225) 388-9133

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

SOUTHERN RENEWABLE ENERGY ASSOCIATION (“SREA”)

Simon Mahan, simon@southernwind.org

5120 Chessie Circle

Haltom City, Texas 76137

Tel: (337) 303-3723

SUSTAINABLE ENERGY ECONOMY SOLUTIONS

Andy Kowalczyk, andy@senergysolutions.org

819 Saint Roch Avenue

New Orleans, Louisiana 70117

Tel: (415) 676-1047

350 NEW ORLEANS

Pooja Prazid, p.prazid@gmail.com
Benjamin Quimby, benjaminquimby1@gmail.com
Clare Giesen, claregiesen@gmail.com
Marion Freistadt, marionfreistadt@gmail.com
Vickie Boothe, boothevickiel@gmail.com
1632 8th Street
New Orleans, Louisiana 70115
Tel: (916) 952-9955

NATIONAL AUDUBON SOCIETY

Brent Newman, Brent.newman@audubon.org
Senior Policy Director
3801 Canal Street, Suite 400
New Orleans, Louisiana 70119
Tel: (303) 681-8420

GULF STATES RENEWABLE ENERGY INDUSTRIES ASSOCIATION

Stephen Wright, 318-663-3810, swright@gsreia.org
695 Kiskatom Lane
Mandeville, Louisiana 70471

Jeff Cantin, 877-785-2664, jcantin@gsreia.org
2803 St. Philip St.
New Orleans, LA 70119

INTERESTED PARTIES

Joshua Smith, Joshua.smith@sierraclub.org
Staff Attorney
Sierra Club Environmental Law Program
2101 Webster Street, Suite 1300
Oakland, California 94612
Tel: (415) 977-5560 (Office)
Tel: (503) 484-7194 (Cell)