

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

June 30, 2021

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:

Please find enclosed for your further handling Entergy New Orleans, LLC's Motion to Delay Its 2021 Formula Rate Plan Filing Until July 19, 2021. 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.

Thank you for your assistance with this matter.

Sincerely,

Timothy S. Cragi

 $TSC \ rdm$

Enclosures

cc: Official Service List (UD-18-07 via electronic mail)

BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

)

)

)

)

)

)

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

DOCKET NO. UD-18-07 (ENO 2021 Formula Rate Plan)

ENTERGY NEW ORLEANS, LLC'S MOTION TO DELAY ITS 2021 FORMULA RATE PLAN FILING UNTIL JULY 19, 2021

Entergy New Orleans, LLC ("ENO" or the "Company") respectfully submits this motion seeking to delay its 2021 Formula Rate Plan filing ("2021 FRP Filing") until July 19, 2021, *i.e.*, extending the current filing deadline of June 30, 2021 to July 19, 2021, for the reasons set forth herein. The following parties were contacted prior to this filing and have authorized counsel for ENO to represent that they have no objection to the requested extension: Alliance for Affordable Energy; Air Products and Chemicals, Inc.; the Sewerage & Water Board of New Orleans; the City of New Orleans; and the Advisors to the Council of the City of New Orleans (the "Council").

Over the past several months, ENO's regulatory filing team has been preparing ENO's 2021 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 2021 FRP Filing and accompanying workpapers are near final and, if ENO were required by the Council to do so, could be finalized and filed on June 30, 2021, as contemplated by the tariff, due to recent management changes at ENO, the Company respectfully requests that the Council grant ENO a short delay to July 19, 2021, to allow further internal review of the filing as well as additional time to consider options for streamlining the FRP negotiation process. If the delay is granted, the current procedural

schedule would still allow for the 75-day review period allotted to parties and a 25-day post-review period for resolving disputed issues. Thus, ENO's current implementation in the first billing cycle in November would remain unaffected.

WHEREFORE, for the reasons set forth herein, ENO respectfully requests that the Council grant this motion and extend ENO's 2021 FRP Filing deadline from June 30, 2021 to July 19, 2021. ENO requests that the motion be considered at the next available meeting of the full Council.

Respectfully submitted,

BY: limoths

Timothy S. Cragin, ISBN 22313 Brian L. Guillot, LSBN 31759 ENTERGY SERVICES, LLC 639 Loyola Avenue Mail Unit L-ENT-26E New Orleans, Louisiana 70113 Telephone: (504) 576-6523 Facsimile: (504) 576-5579

and

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

ATTORNEYS FOR ENTERGY NEW ORLEANS, LLC

CERTIFICATE OF SERVICE

I hereby certify that I have this 30th day of June, 2021, 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: \square electronic mail, \square facsimile, \square hand delivery, and/or by depositing same with \square overnight mail carrier, or \square 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

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

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

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

Paul Harang Interim Council Chief of Staff New Orleans City Council City Hall, Room 1E06 1300 Perdido Street New Orleans, LA 70112

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

Hon. Jeffrey S. Gulin 3203 Bridle Ridge Lane Lutherville, MD 21093 Clinton A. Vince, Esq. Presley R. Reed, Jr., Esq. Emma F. Hand, Esq. Adriana Velez-Leon 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

Kevin T. Boleware Marketa Piernas Jessica Williams Entergy New Orleans, LLC 1600 Perdido Street Mail Unit L-MAG-505B New Orleans, LA 70112

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

Andy Kowalczyk 1115 Congress St. New Orleans, LA 70117

Susan Stevens Miller Earthjustice 1625 Massachusetts Ave., NW, Ste. 702 Washington, DC 20036 Basile J. Uddo J.A. "Jay" Beatmann, Jr. c/o Dentons US LLP 650 Poydras Street, Suite 2850 New Orleans, LA 70130

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

Timothy Cragin Brian Guillot Courtney Nicholson Entergy Services, LLC Mail Unit L-ENT-26E 639 Loyola Avenue New Orleans, LA 70113

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

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

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

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

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

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

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

Grace Morris Sierra Club 4422 Bienville Ave New Orleans, LA 70119 John Wolfrom 720 I Hamilton Blvd. Allenton, PA 18195-1501

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

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

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

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

Dave Stets 2101 Selma St. New Orleans, La 70122