

**BEFORE THE
NEW ORLEANS CITY COUNCIL**

**IN RE: APPLICATION OF ENTERGY
NEW ORLEANS FOR CERTIFICATION
OF COSTS RELATED TO HURRICANE
ZETA.**

**DOCKET NO. UD-21-02
September 2, 2021**

**AIR PRODUCTS AND CHEMICALS, INC.
MOTION FOR INTERVENTION AND INCLUSION ON SERVICE LIST**

This Motion for Intervention is filed, through undersigned counsel, by and on behalf of Air Products and Chemicals, Inc. ("Air Products").

1 .

Pursuant to the Initiating Resolution of the City Council of the City of New Orleans (Resolution R-21-296), dated August 5, 2021, that established Docket UD-21-02, Air Products respectfully requests intervention for full participation in the Application of Entergy New Orleans, LLC for Certification of Costs Related to Hurricane Zeta, as a party therein.

2.

Air Products and its New Orleans operations are one of ENO's largest purchasers of electric power, and accordingly, have a major interest in this docket, will be affected substantially by the outcome thereof, and cannot be adequately represented by any other party.

3.

Air Products, upon being granted full Intervenor status, requests that it be added to the Official Service List for this docket, and that all notices, communication, pleadings, briefs, testimony, other filings be served upon the following:

Randy Young
KEAN MILLER LLP
400 Convention Street, Suite 700 (70802)
Post Office Box 3513
Baton Rouge, LA 70821-3513
Tel: (225) 387-0999
Fax: (225) 388-9133
katherine.king@keanmiller.com
randy.young@keanmiller.com

Carrie R. Tournillon
KEAN MILLER LLP
900 Poydras Street, Suite 3600
New Orleans, LA 70112
carrie.tournillon@keanmiller.com

Maurice Brubaker
Brubaker & Associates, Inc.
16690 Swingly Ridge Road, Suite 140 (63017)
P.O. Box 412000
Chesterfield, MO 63141-2000
mbrubaker@consultbai.com

WHEREFORE, Air Products and Chemicals, Inc. prays that it be granted Intervenor status and that it be permitted to participate in this proceeding.

RESPECTFULLY SUBMITTED:



Randy Young (#21958)
Carrie R. Tournillon (#30093)
KEAN MILLER LLP
Post Office Box 3513
Baton Rouge, LA 70821
(225) 387-0999
Attorneys for Air Products and Chemicals, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served by hand delivery to the Clerk of Council with a copy to the Director, Council Utilities Regulatory Office, and upon all known parties of record via electronic mail.

New Orleans, Louisiana this 2nd day of September, 2021.



Carrie R. Tournillon