



Petition to intervene in Docket No. UD-18-03

February 2, 2023

By Electronic Mail

Ms. Lora Johnson, CMC Clerk of Council Room 1E09, City Hall 1300 Perdido Street New Orleans, LA 70112

In Re: RESOLUTION AND ORDER ESTABLISHING A COMMENT PERIOD TO AMEND THE COMMUNITY SOLAR RULES RESOLUTION NO. R-22-370

Dear Ms. Johnson:

Please find enclosed the Together New Orleans' Petition for Intervention and Inclusion in the service-list in the above-mentioned docket. Please file the attached motion and this letter into the record of the proceeding. We will submit physical copies at your instruction. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention.

Sincerely,

Broderick A Bagert, Jr. Organizer Together New Orleans



Before the Council of the City of New Orleans

IN RE: RESOLUTION AND ORDER ESTABLISHING A COMMENT PERIOD TO AMEND THE COMMUNITY SOLAR RULES DOCKET NO. UD-18-03

PETITION OF TOGETHER NEW ORLEANS FOR INTERVENTION OUT OF TIME AND FOR INCLUSION ON SERVICE LIST

Together New Orleans respectfully requests that the Council of the City of New Orleans ("the Council") grant Together New Orleans the right to intervene in the above captioned proceeding and participate as a party therein.

On August 18, 2022, the full Council for the City of New Orleans issued Resolution R-22-370, establishing Docket UD-21-03, providing for intervention by interested parties by December 8, 2022.

Together New Orleans is a broad-based coalition of 54 congregations and civic organizations throughout Orleans parish crossing lines of race, religion, neighborhood and political affiliation. We work on issues affecting families and communities, particularly low and moderate income people, including a major focus on grid resilience and disaster response.

Through the Community Lighthouse project, we have members and partners interested in community solar as a project we hope to facilitate.

Together New Orleans has members served by Entergy New Orleans, LLC. There is no other party representing the interests of Together New Orleans and its members.

Together New Orleans therefore possesses standing to intervene and respectfully seeks intervenor status in order to participate fully in this matter.

Together New Orleans recognizes that this request to intervene is being made outside of the timeline established by Resolution R-22-370 and subsequent rulings by the hearing officer, the Honorable Jeffrey Gulin. However, Together New Orleans requests intervention out of time in the proceeding as the intervention will not prejudice any other party or unduly affect the proceeding with respect to the issues presented by this docket. Further, as a late intervenor, Together New Orleans understands that it must accept and participate in this docket in its current posture.

Please note that Together New Orleans is a non-profit organization thus pursuant to Council Resolution R-16-365, we request that all intervenor fees be waived.

Together New Orleans requests placement on the service list of this proceeding, and to be served with all pleadings, notices, orders, and other filings.



All communications and pleadings in this proceeding should be directed to:

BRODERICK BAGERT, (225) 803-5876, <u>bagertir@gmail.com</u>

ALAINA DILAURA, (225)933-4871, <u>alaina@togethernola.org</u> PIERRE MOSES, (504) 669-8552, <u>pmoses@127energy.com</u> ABEL THOMPSON, (225) 978-1667, <u>abel@togethernola.org</u> ERIN HANSEN, (603) 667-0254, <u>erin@togetherla.org</u>

Respectfully submitted,

Broderick Bagert

Organizer Together New Orleans