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November 7, 2018

VIA HAND DELIVERY

Lora W. Johnson  
Clerk of Council  
1300 Perdido Street  
1E09  
New Orleans, LA 70112

Re: *Council of the City of New Orleans Docket No.: UD-18-07*  
*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*

Dear Lora:

Enclosed please find original and two (2) copies of Crescent City Power Users' Group's Motion for Extension to File Direct Testimony.

Should you have any questions whatsoever, please do not hesitate to contact me.

Very truly yours,



Shannon Bell, Legal Assistant to  
Luke F. Piontek, Christian J. Rhodes &  
Shelley Ann McGlathery

Enclosure

cc: All Counsel of Record via email

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BY: 

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

**REVISED APPLICATION OF ENTERGY )  
NEW ORLEANS, LLC FOR A CHANGE )  
IN ELECTRIC AND GAS RATES ) DOCKET NO. UD-18-07  
PURSUANT TO COUNCIL RESOLUTIONS )  
R-15-194 AND R-17-504 AND )  
FOR RELATED RELIEF )**

**CRESCENT CITY POWER USERS' GROUP'S  
MOTION FOR EXTENSION OF TIME TO FILE  
DIRECT TESTIMONY**

NOW COMES, Crescent City Power Users' Group ("CCPUG"), through undersigned counsel, which respectfully moves for an extension of time within which to file direct testimony pursuant to Sec. 158-238 of the City Code pertaining to extensions of time in proceedings before the Council of the City of New Orleans ("City Council" or "Council") and Resolution No. R-18-434, and in support thereof states:

1.

CCPUG is an unincorporated association comprised of large ratepayers of Entergy New Orleans, Inc. ("ENO").

2.

CCPUG intervened in this proceeding on October 30, 2018. No objection to CCPUG's intervention has yet been filed. Consequently, CCPUG's intervention should be deemed granted, pursuant to Resolution No. R-18-434, if no objection is filed on or before the close of business on November 6, 2018.

3.

The outcome of this proceeding regarding ENO's application for approval of a change in electric and gas rates will directly affect the business and economic interests of CCPUG in the City of New Orleans. The notice of filing of ENO's application was included in the Council's Resolution No. R-18-434, adopted on October 4, 2018.

4.

According to the procedural schedule set forth in the City Council's Resolution No. R-18-434, intervenors' direct testimony in this proceeding is due December 7, 2018. The deadline for intervenors' direct testimony, therefore, is roughly 60 days from notice of the initiation of this proceeding. As such, the time within which to conduct discovery and fully and properly prepare direct testimony is woefully inadequate considering the application and supporting testimony in this matter exceeds 3,300 pages in length. 5.

5.

CCPUG has retained expert consultants to assist it with discovery and to prepare testimony in this matter. CCPUG's consultants require significantly more time than December 7, 2018 to engage in discovery, analyze the discovery of other parties, and prepare their direct testimony. CCPUG, therefore, respectfully requests an extension of time within which to file its direct testimony in this matter. The extension, if granted, should extend to all intervenors.

6.

After consulting with its experts, CCPUG believes that it can prepare and file its direct testimony on or before January 18, 2019 in this proceeding. As such, the extension

requested by CCPUG would constitute a six-week extension which will encompass the holiday season.

7.

The Advisors' direct testimony is due on February 1, 2019, therefore, extending the deadline for intervenors' direct testimony to January 18, 2019 will provide the Advisors two (2) weeks to review and conduct discovery on intervenors' direct testimony. Considering that the Advisors' primary objective is to analyze ENO's application and supporting testimony, two (2) weeks should be sufficient to address intervenors' direct testimony.

WHEREFORE, Crescent City Power Users' Group prays that its Motion for Extension of Time to File Direct Testimony be granted and that it and the other intervenors in this matter be granted an extension of time from December 7, 2018 to January 18, 2019 within which to file direct testimony, and for all other relief available to it under the facts and the law.

[Remainder of page intentionally left blank.]

Respectfully submitted:

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By:  \_\_\_\_\_

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*Counsel for Crescent City Power Users' Group*

**CERTIFICATE**

I hereby certify that on this day a copy of the foregoing Crescent City Power Users' Group's Motion for Extension of Time to File Direct Testimony has been sent to the official service list by email, and/or served by United States mail, postage prepaid, through their representatives, at the following addresses:

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New Orleans, Louisiana, this 6<sup>th</sup> day of November, 2018.



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**LUKE F. PIONTEK**

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

<b>REVISED APPLICATION OF ENTERGY</b>	)	
<b>NEW ORLEANS, LLC FOR A CHANGE</b>	)	
<b>IN ELECTRIC AND GAS RATES</b>	)	<b>DOCKET NO. UD-18-07</b>
<b>PURSUANT TO COUNCIL RESOLUTIONS</b>	)	
<b>R-15-194 AND R-17-504 AND</b>	)	
<b>FOR RELATED RELIEF</b>	)	

**ORDER**

Upon considering the Motion for Extension to File Direct Testimony filed by Crescent City Power Users' Group on November \_\_\_\_\_, 2018 in the above-captioned matter,

**IT IS HEREBY ORDERED**, that the Hearing Officer hereby grants the Motion for Extension to File Direct Testimony filed by Crescent City Power Users' Group and the deadline within which intervenors must file direct testimony is hereby extended to January 18, 2019.

Thus done and signed this \_\_\_\_\_ day of November, 2018.

\_\_\_\_\_  
Honorable Jeffrey S. Gulin  
Hearing Officer