

"RE-BUILDING THE CITY'S WATER SYSTEMS FOR THE 21ST CENTURY"

Sewerage & Water Board of NEW ORLEANS

625 ST. JOSEPH STREET
NEW ORLEANS, LA 70165 • 504-529-2837 OR 52-WATER

November 2, 2018

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

Re: UD-18-07

Dear Ms. Johnson:

Please find enclosed the Motion of Intervention in UD-18-07, Entergy Application for a Change in Electric and Gas Rates, filed on behalf of the Sewerage and Water Board of New Orleans.

Yours truly,

ASSISTANT SPECIAL COUNSEL

BAF:mkt Enc.

n:\entergy\ud-18-07\181102ltr.transmotion_intervention.docx

BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

COUNCIL OF THE CITY OF NEW ORLEANS

DOCKET NO. UD-18-07

<u>Docket No. UD-18-07</u> – 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

MOTION OF INTERVENTION

NOW COMES, through undersigned counsel, the Sewerage and Water Board of New Orleans (herein "Board") for the purpose of intervening in the above captioned proceeding.

1.

The Board is a party interested in the above captioned docket inasmuch as it is Entergy New Orleans, LLC's ("ENO") largest "gas" customer and one of its largest "electric" customers and its interests cannot be represented or protected adequately by other parties hereto, and this intervention will not prejudice any other party.

2.

This intervention is timely as it is filed within 30 days from the October 4, 2018 adoption of Resolution R-18-434 which established a procedural schedule for this docket.

3.

The Board is a ratepayer of ENO and, as such, has a real and substantial interest in the above captioned proceeding. The Board wishes to participate in this docket as an intervenor in order to ensure that its interests are fully protected, and therefore requests full intervenor status.

4.

The Board intervention will not delay the progress of this proceeding.

The Board asks that it be granted intervenor status and be allowed the opportunity to fully participate in this proceeding pursuant to the procedural schedule adopted in Resolution R-18-434.

6.

The Board requests that notices, correspondence, and other communications concerning this Motion for Intervention be directed to the following persons:

John H. Chavanne c/o Chavanne Enterprises 111 West Main St., Suite 2B P.O. Box 807 New Roads, LA 70760-8922 Telephone: 225-638-8922 Fax: 225-638-8933

jchav@bellsouth.net

Brian A. Ferrara, Assistant Special Counsel Yolanda Y. Grinstead, Special Counsel Sewerage and Water Board of New Orleans Legal Department 625 St. Joseph St., Room 201 New Orleans, LA 70165 Telephone: 504-585-2154 bferrara@swbno.org

WHEREFORE, the Sewerage and Water Board of New Orleans requests that it be granted full intervenor status with the right to fully participate in the above captioned docket, accept its Motion of Intervention and grant the Board prior notice of any and all hearings and proceedings which may be set in this matter.

ygrinstead@swbno.org

Respectfully submitted,

BRIAN A. FERRARA

ASSISTANT SPECIAL COUNSEL

SEWERAGE AND WATER BOARD OF NEW ORLEANS

CERTIFICATE OF SERVICE

I hereby certify that I have this 2 hd day of November 2018 served the required number of copies of the foregoing pleading upon all other known parties of this proceeding, via email at the email addresses indicated below:

Lora W. Johnson, Iwjohnson@nola.gov Clerk of Council City Hall - Room 1E09 1300 Perdido Street New Orleans, LA 70112

Erin Spears, espears@nola.gov
Chief of Staff, Council Utilities Regulatory Office
Bobbie Mason, bfinason1@nola.gov
Connolly A. F. Reed, careed@nola.gov
City Hall - Room 6E07
1300 Perdido Street
New Orleans, LA 70112

David Gavlinski, 504-658-1101, <u>dsgavlinski@nola.gov</u> Council Chief of Staff City Hall - Room 1E06 1300 Perdido Street New Orleans, LA 70112

Sunni LeBeouf, Sunni LeBeouf@nola.gov
Michael J. Laughlin, mjlaughlin@nola.gov
Mary Katherine Kauffman, mkkaugman@nola.gov
Law Department
City Hall - 5th Floor
New Orleans, LA 70112

Norman White, Norman White anola.gov Department of Finance City Hall - Room 3E06 1300 Perdido Street New Orleans, LA 70112

ADMINISTRATIVE HEARING OFFICER

Hon. Jeffrey S. Gulin, judgegulin@gmail.com 3203 Bridle Ridge Lane Lutherville, MD 2109

NEW ORLEANS CITY COUNCIL CONSULTANTS

Clinton A. Vince, <u>clinton.vince@dentons.com</u>
Presley Reed, <u>presley.reedjr@dentons.com</u>
Emma F. Hand, <u>emma.hand@dentons.com</u>
1900 K Street NW
Washington, DC 20006

Basile J. Uddo, buddo@earthlink.net

J. A. "Jay Beatmann, Jr. jay.beatmann@dentons.com c/o DENTONS US LLP 650 Poydras Street Suite 2850 New Orleans, LA 70130

Philip J. Movish, pmovish@ergconsulting.com
Joseph W. Rogers, jrogers@ergconsulting.com
Victor M. Prep, vprep@ergconsulting.com
Byron S. Watson, bwatson@erconsulting.com
Legend Consulting Group
8055 East Tufts Ave., Suite 1250
Denver, CO 80237-2835

Errol Smith, ersmith@btcpas.com
Bruno and Tervalon
4298 Elysian Fields Avenue
New Orleans, LA 70122

ENTERGY NEW ORLEANS

Gary E. Huntley, ghuntle@entergy.com
Entergy New Orleans, Inc.
Vice-President, Regulatory Affairs
Polly S. Rosemond, prosemo@entergy.com
Derek Mills, dmills3@entergy.com
Keith Woods, kwood@entergy.com
Seth Cureington, scurein@entergy.com
1600 Perdido Street, L-MAG 505B
New Orleans, LA 70112

Tim Cragin, teragin@entergy.com
Brian L. Guillot, bguill(@entergy.com
Alyssa Maurice-Anderson, amauric@entergy.com
Harry Barton, hbarton@entergy.com
Entergy Services, Inc.

Mail Unit L-ENT-26E 639 Loyola Avenue New Orleans, LA 70113

Joe Romano, III, <u>iroman1@entergy.com</u>
Suzanne Fontan, <u>sfontan@entergy.com</u>
Therese Perrault, <u>tperrau@entergy.com</u>
Entergy Services, Inc.
Mail Unit L-ENT-4C
639 Loyola Avenue
New Orleans, LA 70113

ALLIANCE FOR AFFORDABLE ENERGY

Logan Atkinson Burke, logan@all4energy.org Sophie Zaken, regulatory@all4energy.org 4505 S. Claiborne Ave. New Orleans, LA 70125

AIR PRODUCTS AND CHEMICALS, INC.

Katherine W. King, Katherine.king@keanmiller.com
Randy Young, randy.young@kean miller.com
400 Convention St. Suite 700
Baton Rouge, LA. 70802
Or
P.O. Box 3513
Baton Rouge, LA 70821-3513

Carrie R. Tournillon, <u>carrie.tournillon@keanmiller.com</u> 900 Poydras St., Suite 3600 New Orleans, LA 70112

Mark Zimmerman, zimmermr@airporducts.com 720 I Hamilton Blvd. Allentown, PA. 18195-1501

Maurice Brubaker, mbrubaker@consultbai.com 16690 Swigly Ridge Rd., Suite 140 Chesterfield, MO 63017 Or P.O. Box 412000 Chesterfield, MO. 63141-2000

> BRIAN A. FERRARA, ASSISTANT SPECIAL COUNSEL SEWERAGE AND WATER BOARD OF NEW ORLEANS

BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

COUNCIL OF THE CITY OF NEW ORLEANS

DOCKET NO. UD-18-07

<u>Docket No. UD-18-07</u> – 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

ORDER

Upon considering the Motion for Intervention filed by Sewerage and Water Board of New Orleans on November 2, 2018 in the above captioned matter:

IT IS HEREBY ORDERED that the Hearing Officer hereby grants the Motion for Intervention filed by Sewerage and Water Board of New Orleans and Sewerage and Water Board of New Orleans is hereby granted full intervenor status herein.

Thus done and signed this _____ day of November 2018.

Honorable Jeffrey S. Gulin Hearing Officer

n:\entergy\ud-18-07\181101motion_intervention.docx