



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

September 14, 2020

Via Electronic Delivery

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

Re: ENO 2020 FRP Filing, *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:

On behalf of Entergy New Orleans, LLC (“ENO” or the Company), please find attached for electronic filing, ENO’s Motion to Delay Its 2020 Formula Rate Plan Filing Deadline to Allow for an Additional 14 Days to File an Agreement in Principle, which I would appreciate your filing into the record of this proceeding. 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 or the Council otherwise directs. ENO requests that you file this submission in accordance with Council regulations as modified for the present circumstances.

Should you have any questions regarding the enclosed filing, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Timothy S. Cragin".

Timothy S. Cragin

Enclosures

cc: Official Service List via email

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

APPLICATION OF ENTERGY NEW)	
ORLEANS, LLC FOR A CHANGE IN)	
ELECTRIC AND GAS RATES)	DOCKET NO. UD-18-07
PURSUANT TO COUNCIL)	(ENO 2020 Formula Rate Plan)
RESOLUTIONS R-15-194 AND R-17-)	
504 AND FOR RELATED RELIEF)	

**ENTERGY NEW ORLEANS, LLC’S MOTION TO DELAY ITS
2020 FORMULA RATE PLAN FILING DEADLINE
TO ALLOW FOR AN ADDITIONAL 14 DAYS
TO FILE AN AGREEMENT IN PRINCIPLE**

Entergy New Orleans, LLC (“ENO” or the “Company”) respectfully submits this motion seeking to delay its 2020 Formula Rate Plan filing (“2020 FRP Filing”) deadline an additional 14 days, i.e., from September 14, 2020 to September 28, 2020, for the reasons set forth herein. ENO, the Council Advisors, the Crescent City Power Users Group (“CCPUG”), Air Products & Chemicals, Inc. (“Air Products”) and the Alliance for Affordable Energy (the “Alliance”), in recognition of the effects of the COVID-19 pandemic, have reached conceptual agreement or non-opposition to a settlement that will allow ENO to delay its first filing under the 3-year FRP until June 30, 2021, based on a 2020 Test Year. ENO is seeking this fourteen-day delay to allow it to get an Agreement in Principle signed by the parties to the agreement and filed with the Council for its consideration at the Council’s earliest convenience.

WHEREFORE, for the reasons set forth herein, ENO respectfully requests that the Council grant this motion and extend ENO’s FRP Filing deadline from September 14, 2020 to September 28, 2020. ENO requests that the motion be considered at the next meeting of the full Council, currently scheduled for September 17, 2020, or as soon thereafter as practicable.

Respectfully submitted,



Timothy S. Cragin, LSBN 22313
Harry M. Barton, LSBN 29751
ENERGY SERVICES, LLC
639 Loyola Avenue
Mail Unit L-ENT-26E
New Orleans, Louisiana 70113
Telephone: (504) 576-6523
Facsimile: (504) 576-5579

**ATTORNEYS FOR
ENERGY NEW ORLEANS, LLC**

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

CERTIFICATE OF SERVICE

I hereby certify that I have this 14th day of September, 2020, 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: electronic mail, facsimile, hand delivery, and/or by depositing same with overnight mail carrier, or 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

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

Andrew Tuozzolo
CM Moreno Chief of Staff
1300 Perdido Street, Rm 2W40
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

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

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

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

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

Basile J. Uddo
J.A. “Jay” Beatmann, Jr.
c/o Dentons US LLP
650 Poydras Street, Suite 2850
New Orleans, LA 70130

Joseph W. Rogers
Victor M. Prep
Byron S. Watson
Legend Consulting Group
6041 South Syracuse Way
Suite 105
Greenwood Village, CO 80111

Errol Smith
Bruno and Tervalon
4298 Elysian Fields Avenue
New Orleans, LA 70122

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

Alyssa Maurice-Anderson
Seth Cureington
Keith Woods
Derek Mills
Kevin T. Boleware
Entergy New Orleans, LLC
1600 Perdido Street
Mail Unit L-MAG-505B
New Orleans, LA 70112

Tim Cragin
Courtney Nicholson
Kimberly Silas
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

Joe Romano, III
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

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

Susan Stevens Miller
Earthjustice
1625 Massachusetts Ave., NW, Ste. 702
Washington, DC 20036

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

John Wolfrom
720 I Hamilton Blvd.
Allenton, PA 18195-1501

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

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

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

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

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


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

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

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

Grace Morris
Sierra Club
4422 Bienville Ave
New Orleans, LA 70119

Dave Stets
2101 Selma St.
New Orleans, La 70122



Timothy S. Cragin