



*By Electronic Mail*  
*(Bfmason1@nola.gov)*

Ms. Bobbie Mason  
Clerk of Council  
Room 1E09, City Hall  
1300 Perdido Street  
New Orleans, LA 70112

September 30, 2022

**RESOLUTION AND ORDER ESTABLISHING RULEMAKING TO CONSIDER  
SAVINGS TARGETS AND PROGRAM DESIGN FOR ENERGY EFFICIENCY,  
CONSERVATION, DEMAND RESPONSE AND OTHER DEMAND-SIDE  
MANAGEMENT PROGRAMS AS WELL AS CUSTOMER-OWNED DISTRIBUTED  
ENERGY RESOURCES AND BATTERY STORAGE FOR THE  
CITY OF NEW ORLEANS (DOCKET NO. UD-22-04)**

Dear Ms. Mason:

Please find the enclosed Petition of Sierra Club for Intervention and Inclusion on Service List under the above-mentioned docket. Please file the attached intervention and this letter in the record of the proceeding. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Elena Saxonhouse".

Elena Saxonhouse  
Managing Attorney  
Sierra Club

**Before  
The Council of the City of New Orleans**

**RESOLUTION AND ORDER ESTABLISHING  
RULEMAKING TO CONSIDER SAVINGS TARGETS  
AND PROGRAM DESIGN FOR ENERGY EFFICIENCY,  
CONSERVATION, DEMAND RESPONSE AND OTHER  
DEMAND-SIDE MANAGEMENT PROGRAMS  
AS WELL AS CUSTOMER-OWNED DISTRIBUTED  
ENERGY RESOURCES AND BATTERY STORAGE  
FOR THE CITY OF NEW ORLEANS**

**DOCKET NO. UD-22-04**

**Sept 30, 2022**

**PETITION OF SIERRA CLUB FOR INTERVENTION  
AND INCLUSION ON SERVICE LIST**

Sierra Club respectfully requests that the Council of the City of New Orleans (“the Council”) grant it the right to intervene in the above-captioned proceeding and participate as a party therein.

On September 15, 2022, the Council adopted Resolution R-22-413, establishing docket UD-22-04, providing for intervention by interested parties by October 1, 2022

Sierra Club is a non-profit corporation organized under California law, with more than 630,000 members nationwide, and more than 3,000 members residing in Louisiana, dedicated to the protection of public health and the environment. One of Sierra Club’s priority national conservation campaigns involves promoting cost-effective clean energy alternatives and energy efficiency measures as a means to reducing or eliminating reliance on expensive fossil-fuel energy generation sources that emit high levels of harmful greenhouse gases and other pollutants.

Sierra Club is a formal intervenor in other dockets considering electric and gas infrastructure owned by Entergy New Orleans, LLC (“ENO”).

Sierra Club has members served by ENO. Sierra Club and its members have a substantial interest in the provision of reliable, affordable, clean, and efficient energy in the City of New Orleans. Sierra Club is uniquely situated to represent the interests of its members in this proceeding as a result of its expertise and experience in energy policy and law, renewable energy generation, energy efficiency, and energy affordability. Sierra Club also has experience in working with utilities to design energy efficiency programs for low-income customers to help address energy affordability issues. There is no other party representing the interests of Sierra Club and its members.

Sierra Club therefore possesses standing to intervene, and respectfully seeks intervenor status in order to fully participate in this matter. Sierra Club requests that it be placed on the service list of this proceeding and be served with all pleadings, notices, orders, and other filings.

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

All communications and pleadings in this proceeding should be directed to the following (electronic communication preferred):

Elena Saxonhouse  
Sierra Club  
Environmental Law Program  
2101 Webster Street, Suite 1300  
Oakland, CA 94612  
elena.saxonhouse@sierraclub.org

Sharonda Williams-Tack  
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50 F Street, NW  
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sharonda.williams-tack@sierraclub.org

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Elena Saxonhouse', written in a cursive style.

Elena Saxonhouse  
Managing Attorney  
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*(Pro Hac Vice Application Forthcoming)*

**Before  
The Council of the City of New Orleans**

**RESOLUTION AND ORDER ESTABLISHING  
RULEMAKING TO CONSIDER SAVINGS TARGETS  
AND PROGRAM DESIGN FOR ENERGY EFFICIENCY,  
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FOR THE CITY OF NEW ORLEANS**

**DOCKET NO. UD-22-04**

**Sept 30, 2022**

**CERTIFICATE OF SERVICE**

I do hereby certify that I have, this 30th day of September 2022, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



Elena Saxonhouse  
Managing Attorney  
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Service of Discovery not required

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