



March 29, 2023

By Electronic Mail

Clerk of Council
Room 1E09, City Hall
1300 Perdido St.
New Orleans, LA 70112

IN RE: 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

Dear Ms. Johnson,

Attached please find the Reply Comments of the Alliance for Affordable Energy and the National Audubon Society to the Advisors Report in the above matter. Please file the attached document and this letter in the record of the proceeding. We will file physical copies at your instruction. If you have any questions, please do not hesitate to contact me.

Thank you for your assistance with this matter.

Sincerely,

Susan Stevens Miller
Senior Staff Attorney
Earthjustice

Cc: Official Service List for Docket UD-22-04

WASHINGTON, DC OFFICE 1001 G Street, NW, STE. 1000, WASHINGTON, DC 20001

T: 202.667.4500 F: 202.667.2356 DCOFFICE@EARTHJUSTICE.ORG WWW.EARTHJUSTICE.ORG

BEFORE THE COUNCIL OF THE CITY OF NEW ORLEANS

**IN RE: 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)**

DOCKET NO. UD-22-04

**JOINT REPLY COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY AND
THE NATIONAL AUDUBON SOCIETY ON ADVISORS' PROPOSED REVISIONS**

Date: March 29, 2023

Susan Stevens Miller
Senior Attorney
Earthjustice
1001 G Street, N.W., Ste 1000
Washington, D.C. 20001
(443) 534-6401
smiller@earthjustice.org

Chinyere Osuala
Senior Attorney
Earthjustice
48 Wall St., 15th, Fl.
New York, NY 10005
(202) 797-5258
cosuala@earthjustice.org

*Counsel for the Alliance for Affordable
Energy*

TABLE OF CONTENTS

I. BACKGROUND	1
II. COMMENTS	2
A. The Joint Parties' Recommendation to Have 15% of Portfolio Savings Attributable to Income Qualified Participation Should Only Come From IQ Programs Not Market Rate Programs.	2
B. Demand Side Management Working Group.....	4
(i) The Demand Side Management Working Group should be organized around achieving Energy Justice in New Orleans.	4
C. Benefit Cost Analysis	7
D. 2% Savings Target Should Be Maintained	9
E. Demand Savings Target.....	10
III. CONCLUSION	11

BEFORE THE COUNCIL OF THE CITY OF NEW ORLEANS

**IN RE: 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)**

DOCKET NO. UD-22-04

**REPLY COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY AND THE
AUDUBON SOCIETY ON ADVISORS’ PROPOSED REVISIONS**

I. BACKGROUND

On September 15, 2022, the Council of the City of New Orleans (“Council”) issued Resolution No. R-22-413 regarding considerations related to setting goals for Energy Smart programs beginning in Program Year (“PY”) 16. In the Resolution, the Council establishes “Docket No. UD-22-04 to consider modification of the Energy Smart energy efficiency and conservation program as well as potential Council policy with respect to [demand-side management (“DSM”)] and customer-owned [distributed energy resources] and energy storage.”¹ On October 31st, 2022, the parties filed comments proposing changes to the Energy Smart Program. After a technical conference held on December 8th, 2022, Parties filed

¹ Resolution No. R-22-413, 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, at 4 (Sept. 15, 2022) (“Resolution No. R-22-413”), <https://council.nola.gov/council/media/Assets/Committees/Climate/R-22-413-Rulemaking-Docket.pdf>.

responsive comments on January 12th. On March 1st, the Advisors filed a report on the Parties' proposed changes and additional guidance. The Advisors agreed with many of the changes that the stakeholders put forward for the Energy Smart program, however they requested more detailed explanations on the method of these changes. The Advisors reiterated this in the March 20th Technical Conference. The Alliance for Affordable Energy ("AAE" or "the Alliance") and the National Audubon Society ("Audubon") (collectively "Joint Parties") provide these comments in response to the Advisors' Report. These comments and recommendations do not represent the entirety of the modifications and expansions of Energy Smart that the Joint Parties support, and we anticipate offering further recommendations and support for additional measures after considering the filings submitted by other stakeholders.

II. COMMENTS

A. The Joint Parties' Recommendation to Have 15% of Portfolio Savings Attributable to Income Qualified Participation Should Only Come From IQ Programs Not Market Rate Programs.

In its comments submitted on October 31, 2022, AAE recommended the Council establish a subgoal to ensure that "at least 15% of total portfolio savings²...result from the participation of [Income-Qualified ("IQ")] households in program offerings that are specifically designed to serve the needs of the IQ community, such as the IQ Weatherization program."³ This recommendation was made because IQ households "having the greatest need for energy bill

² AAE, Comments of the Alliance for Affordable Energy, at 13 (October 31, 2022) ("Comments of AAE"); *see also*, Advisors' Report Regarding Parties' Proposed Changes and Additional Guidance, at 9 (Mar. 01, 2023) ("Advisors' Report") (The Advisors' Report notes that Entergy New Orleans ("ENO") claims "the actual amount of savings associated with income qualified participants is much closer to, if not already above, the 15% of residential savings that the AAE proposes" however this mischaracterizes AAE's recommendation, which is that 15% of total portfolio—not residential—savings should be obtained from IQ-specific programs.).

³ Comments of the AAE at 10 (emphasis added).

relief that could be provided in the form of energy savings, receive an even smaller share of the residential savings—just over 8% on average from PY13 to PY15, despite making up 35% of the households served by ENO.”⁴ However, as noted in the Advisors’ Report, ENO argues that “other programs, such as Retail Solutions, Multifamily Solutions and the Behavioral Program contain savings associated with income qualified participants, although the tables in the Implementation Plan do not show those savings separately. ENO argues that determining whether participants in other non-income qualified-specific programs are in fact income-qualified customers is not feasible at the time of their participation, particularly when a customer goes into a retail location or online marketplace and purchases a product that has been marked down in price using Energy Smart incentives.”⁵

As cited above, the Alliance proposed the 15% metric apply to “program offerings that are specifically designed to serve the needs of the IQ community.”⁶ With this understanding, the issue of attributing some portion of participation in market-rate programs to IQ customers is moot—AAE did not recommend that the metric would apply to IQ participation in all programs. AAE agrees that attempting to reliably determine the level of IQ participation in programs that are not specifically designed to serve their needs could be challenging, time-consuming, expensive, and unreliable and does not recommend that as a means of determining whether IQ households are being served equitably. AAE’s position is that IQ households and communities will be better served by programs that are designed with their unique needs in mind, and that should be the priority the subgoal stresses by establishing a threshold savings requirement.

⁴ Comments of AAE at 7.

⁵ Advisors’ Report at 9 (footnote omitted).

⁶ Comments of AAE at 10 (emphasis added).

AAE's original recommendation notwithstanding, a reasonable compromise to address ENO's concerns could be to assume that a small portion of IQ households do participate in market-rate programs without attempting to precisely determine what that portion is. AAE suggests that it might be reasonable to assume that as much as 1%–2% of portfolio savings could be attributed to IQ participation in market rate programs. Such an assumption would then result in a much easier to verify subgoal which would require ENO to achieve, say, 13% or 14% of portfolio savings through program offerings that are specifically designed to serve the needs of the IQ community.

B. Demand Side Management Working Group

(i) The Demand Side Management Working Group should be organized around achieving Energy Justice in New Orleans.

All of the parties to the proceeding support the formation and operation of a DSM Working Group in order to generate recommendations that would make the Council's processes for approving energy efficiency programs more consensus-based and efficient. At the same time, the parties and the Advisors also expressed general support for more effective design and implementation of energy efficiency programs that serve low-wealth and disadvantaged customers.

In order to ensure that the DSM Working Group achieves its potential, it should be commissioned by the Council with a clear mission. That mission should have two primary objectives: (1) maintaining the affordability, and improving the service quality/reliability, of electricity for citizens of New Orleans; and (2) expanding access to clean distributed energy resources through increased efficiency of energy use.

The DSM Working Group should be organized around achieving, maintaining, and enhancing energy justice in New Orleans. Only with a focus on energy justice can the Council

ensure that the electric service rates that will ultimately pay for energy efficiency program costs are just and reasonable, and that the flow of benefits are as well.

The core tenets of energy justice⁷ are: (1) Recognition Justice, which “focuses on identifying and advocating for communities that are ignored or misrepresented in energy decisions,” asking “*who* is recognized by decisions and in decision-making processes”; (2) Procedural Justice, which “focuses on ensuring equitable decision-making processes across the energy system” and “*how* energy decisions are made”; (3) Distributional Justice, which focuses on where and when, and on whom the costs and benefits of energy actions and systems are allocated, assigned, or allowed to occur, essentially addressing the issue of “*what is going where?*”; and (4) Restorative (or Structural) Justice, which asks *why* things are the way they are in order to identify “long-term solutions that address root causes” of energy injustice.

The Council should direct the DSM Working Group to strive to ensure that all Energy customers in New Orleans enjoy rights to energy justice in participation in energy efficiency programs along each of the dimensions cited, while recognizing that action will be required at multiple levels. As pointed out by Professor Diana Hernández of Columbia University, in advocating for energy justice rights to (1) healthy and sustainable energy production; (2) best available energy infrastructure; (3) affordable energy; and (4) uninterrupted energy service:

At the individual level, the “ethical consumption” of energy would reduce the demand for intense energy production and, in turn, the burden borne in energy sacrifice zones. Energy conservation methods would also reduce energy expenditures, therefore diminishing the prevalence of energy insecurity. At the macro level, the creation and enforcement of regulations that mandate ambitious energy efficiency and higher energy performance standards, the development and scalability of renewable sources of energy,

⁷ See generally, Matthew Grimley, *Energy & Equity in Minnesota’s Twin Cities Briefs – Energy Justice*, University of Minnesota (2021), <https://drive.google.com/file/d/1CPFFp4hzDldd37u0r0tVBQ7tWTqoASV4/view>.

as well as differentiated rates and subsidies for the neediest households would raise accountability on the part of manufacturers, utility companies, and the purveyors of low-income housing. These measures are crucial if energy is to be acknowledged as a basic human right with special attention to minimizing sacrifice of vulnerable groups along the energy continuum.⁸

The Council should establish foundational operating guidelines for the DSM Working Group, while allowing additional details to be worked out by the group once it convenes. We propose that the Council specify that the DSM Working Group meet at least quarterly, with additional meetings scheduled as needed to ensure satisfactory completion of deliverables. We further propose that the Council authorize hiring an independent facilitator with specific DSM subject matter expertise to convene, guide, facilitate, and ensure the DSM Working Group completes its deliverables, as set by the Council and by the DSM Working Group itself. Finally, we propose that the Council direct the DSM Working Group to complete specific deliverables related (though not limited) to the following topics:

- Establishment of new savings targets to complement the 2% annual savings goal. Possible examples may include an escalating demand savings goal, DSM attributable carbon reductions, cumulative energy savings, energy burden reduction, etc.;
- Modifications to the utility performance incentive mechanism;
- Changes to the discount rate;

⁸ Diana Hernández, *Sacrifice Along the Energy Continuum: A Call for Energy Justice*, 8 *Env't Just.* 151, 154–155 (2015), https://www.researchgate.net/publication/281719307_Sacrifice_Along_the_Energy_Continuum_A_Call_for_Energy_Justice.

- Strategies for expanding the impact of Energy Smart through leveraging external sources of funding (including but not limited to new federal funding for efficiency and electrification);
- Near term opportunities to achieve higher savings through modification or addition of Energy Smart programs, measures, and delivery channels;
- Development of a scope of work for a deeper, more comprehensive, far-sighted, and solutions-oriented analysis of Energy Smart. In general, such an analysis would identify opportunities and barriers for increasing overall Energy Smart savings, would thoroughly examine national models and comparative benchmarking, and consider other policies and practices that could support sustained high levels of DSM savings in New Orleans over the long term.⁹

Within one year of a Council’s resolution in the present proceeding, each of these deliverables should be submitted to the Council for regulatory consideration and action ahead of the next three-year Energy Smart program cycle.

C. Benefit Cost Analysis

Benefit-Cost Analysis (“BCA”) is an essential foundation for energy efficiency program design, implementation, and evaluation. The Advisors recommend that the cost-effectiveness methodology for energy efficiency programs be reevaluated, and that the work take advantage of guidance in the National Standard Practice Manual (“NSPM”) to also address non-energy benefits. Unfortunately, the Advisors rely on out-of-date NSPM guidance and did not recognize

⁹ This aim of this analysis is complementary but distinct from existing Evaluation, Measurement, and Verification (“EM&V”) and DSM Potential Studies, which give limited attention to methods for overcoming constraints on savings, and do not provide a comprehensive roadmap of strategic choices to ensure Energy Smart continues to achieve sustained high level DSM savings.

the work that has been done on Distribution Equity Analysis to inform BCAs for energy efficiency and other distributed energy resources.

The DSM Working Group should be informed and guided by the results of transparent and comprehensive assessment of the costs and benefits of energy efficiency measures and programs. Fortunately, the decades of work invested in sound BCA processes has yielded a consensus among leading practitioners as to the elements of best BCA practices. That consensus is documented in the NSPM—the National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources, published in August of 2020.¹⁰ Best practices across jurisdictions countenance the undertaking of BCAs under a common analytical framework that can also incorporate New Orleans- and Entergy-specific facts and circumstances. The development of a framework and the investigation of the costs and benefits of customer-sited generation should be conducted with experienced, independent expert support as appropriate.

The newer NSPM is a comprehensive document that includes guiding principles, recommended process steps, impact category lists, definitions, and specific guidance on a wide range of issues associated with developing a BCA framework and conducting cost effectiveness analysis. It would be wise for the DSM Working Group to take advantage of the comprehensive and integrated nature of its recommendations. The entire NSPM guidance document is 300 pages in length, including several appendices. For an overview of specific guidance including guiding principles, the standard five-step process, and impacts to be considered, including utility system,

¹⁰ See generally, Tim Woolf et al., *National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources*, National Energy Screening Project (Aug. 2020), <https://www.nationalenergyscreeningproject.org/national-standard-practice-manual/> (While the NSPM-DER was published recently, it reflects best practices articulated in a prior NSPM for efficiency resources and generally recognized in the industry. Mr. Rábago, who is consulting with Audubon in this matter, was a co-author of the manual.).

customer, and societal impacts, please see the NSPM Summary published by the National Energy Screening Project.¹¹ The National Energy Screening Project, which published the NSPM, is also developing a complementary tool to perform Distribution Equity Analysis and to support distributional energy justice.

A BCA framework will allow integration of the Council’s policy priorities, including energy justice, reducing energy burden, stimulating economic development, and other impacts. As such, the BCA framework will make unnecessary the bypassing of cost-effectiveness evaluations in order to serve low-wealth and disadvantaged customers, as suggested by the Advisors.

The Joint Parties recommend that the Council take advantage of the updated and expanded capabilities for BCA set out in the updated NSPM. In particular, the Council should commission the creation of a separate and parallel working group charged with developing a New Orleans BCA Framework and Test. This New Orleans-specific framework and test should then be used by the DSM Working Group, CURO, ENO, and others to provide consistent program design and evaluation across all energy resource programs and initiatives.

D. 2% Savings Target Should Be Maintained

The Joint Parties reiterate support for the Council’s 2% energy savings goal. Furthermore, the target should remain in place after the savings target is achieved in 2024 or 2025, not only as guidance to the utility for Integrated Resource Planning modeling purposes, but as a baseline goal. An energy savings target in New Orleans should not be allowed to passively sunset. On the

¹¹ National Energy Screening Project, *National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources – Summary* (Aug. 2020), https://www.nationalenergyscreeningproject.org/wp-content/uploads/2020/08/NSPM-Summary_08-24-2020.pdf.

contrary, we urge the Council to confirm that once the 2% target is reached it should remain the floor, not the ceiling, until the Council takes action otherwise. This certainty is important for maintaining expectations about the significance of energy savings in New Orleans, in concert with new federal and state legislation. The assurance of a clear rule is also vital to maintain momentum for trade allies who are developing the necessary workforce to make our city more efficient. While, as the Advisor's Report points out,¹² the impacts of various drivers outside the Council's policy may impact a goal in future program years, the setting of a goal reduces ambiguity between program cycles, ambiguity which has raised problems across the life of the Council's program for trade allies and implementers.

E. Demand Savings Target

The Joint Parties agree with the Advisors' guidance that the Council move forward with a demand savings target of 3% for the current Program Cycle.¹³ Even without rate-design programs to induce demand reductions, the utility has previously piloted demand management programs that can successfully reach this low-threshold goal in the short term. There is no reason to delay if savings can be achieved in the near term, particularly where there is consensus among the parties that meeting a target is possible. We agree with the Advisors that a more significant kW savings goal may be approved by the Council for future program cycles, but as with energy savings, having a policy in place offers assurances for trade allies, customers, and the utility. As discussed in prior filings, the Joint Parties support demand savings goals with incremental increases along the way.

¹² Advisors' Report at 7.

¹³ Advisors' Report at 8.

III. CONCLUSION

In conclusion, the Joint Parties appreciate the opportunity to respond to the Advisors' Report Regarding Parties' Proposed Changes and Additional Guidance and welcome the opportunity to answer any further concerns about the Parties' proposed changes.

Respectfully,

Date: March 29, 2023

Susan Stevens Miller
Senior Attorney
Earthjustice
1001 G Street, N.W., Ste 1000
Washington, D.C. 20001
(443) 534-6401
smiller@earthjustice.org

Chinyere Osuala
Senior Attorney
Earthjustice
48 Wall St., 15th, Fl.
New York, NY 10005
(202) 797-5258
cosuala@earthjustice.org

***Counsel for the Alliance for Affordable
Energy***

**IN RE: 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**

I, Angelica Navarro, hereby certify that I have this 29th day of March, 2023, served copies of the foregoing on all known parties on the Official Service List for Docket No. UD-22-04 by electronic mail.



Angelica Navarro
Litigation Assistant, Clean Energy Program
Earthjustice

Official Service List: DOCKET UD-22-04

Lora W. Johnson, lwjohnson@nola.gov

Clerk of Council

City Hall - Room 1E09

1300 Perdido Street

New Orleans, LA 70112

Tel: (504) 658-1085

Fax: (504) 658-1140

Service of Discovery not required

Erin Spears, espears@nola.gov

Chief of Staff, Council Utilities Regulatory Office

Bobbie Mason, bfmason1@nola.gov

Christopher Roberts, cwroberts@nola.gov

Jessica Hendricks, Jessica.Hendricks@nola.gov

City Hall - Room 6E07

1300 Perdido Street

New Orleans, LA 70112

Tel: (504) 658-1110

Fax: (504) 658-1117

Keith Lampkin, CM Morrell Chief-of-Staff, Kdlampkin@nola.gov

1300 Perdido St. Rm. 2W50

New Orleans, LA. 70112

Andrew Tuozzolo, CM Moreno Chief-of-Staff, avtuozzolo@nola.gov
1300 Perdido St. Rm. 2W40
New Orleans, LA. 70112

Paul Harang, 504-658-1101 / (504) 250-6837, Paul.harang@nola.gov
Interim Chief of Staff
City Hall - Room 1E06
1300 Perdido Street
New Orleans, LA 70112

Donesia D. Turner, Donesia.Turner@nola.gov
Ashley Spears, Ashley.Spears@nola.gov
Law Department
City Hall - 5th Floor
New Orleans, LA 70112
Tel: (504) 658-9800
Fax: (504) 658-9869
Service of Discovery not required

Norman White, Norman.White@nola.gov
Department of Finance
City Hall - Room 3E06
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-1502
Fax: (504) 658-1705

Tara Richard, Tgrichard@nola.gov
Mayor's Office
City Hall – Room 2E04
1300 Perdido Street
New Orleans, LA 70112

ADMINISTRATIVE HEARING OFFICER

Hon. Jeffrey S. Gulin, judgegulin@gmail.com
3203 Bridle Ridge Lane
Lutherville, MD 2109
Tel: (410) 627-5357

CITY COUNCIL CONSULTANTS and SUPPORT STAFF

Clinton A. Vince, clinton.vince@dentons.com
Presley Reed, presley.reedjr@dentons.com

Emma F. Hand, emma.hand@dentons.com
Adriana Velez-Leon, adriana.velez-leon@dentons.com
Dee McGill, dee.mcgill@dentons.com
Denton Law Firm,
1900 K Street NW
Washington, DC 20006
Tel: (202) 408-6400
Fax: (202) 408-6399

Basile J. Uddo, (504) 583-8604 cell, buddo@earthlink.net
J. A. "Jay Beatmann, Jr. (504) 256-6142 cell, (504) 524-5446 office direct,
jay.beatmann@dentons.com
c/o DENTONS US LLP
650 Poydras Street
Suite 2850
New Orleans, LA 70130

Joseph W. Rogers, jrogers@legendcgl.com
Victor M. Prep, vprep@legendcgl.com
Byron S. Watson, bwatson@legendcgl.com
Legend Consulting Group
6041 South Syracuse Way, Suite 105
Greenwood Village, CO 80111
Tel: (303) 843-0351
Fax: (303) 843-0529

ENERGY NEW ORLEANS, LLC

Courtney R. Nicholson, (504) 670-3680, cnicho2@entergy.com
Entergy New Orleans, LLC
Vice-President, Regulatory and Public Affairs
Barbara Casey, (504) 670-3567, bcasey@entergy.com
Entergy New Orleans, LLC
Director, Regulatory Affairs
Polly Rosemond, prosemo@entergy.com
Kevin T. Boleware, (504) 670-3673, kbolewa@entergy.com
Brittany Dennis, bdennil@entergy.com
Keith Wood, (504) 670-3633, kwood@entergy.com
Derek Mills, (504) 670-3527, dmills3@entergy.com
Ross Thevenot, (504) 670-3556, rtheven@entergy.com
1600 Perdido Street, L-MAG 505B
New Orleans, LA 70112

Vincent Avocato, (281) 297-3508, vavocat@entergy.com
Entergy New Orleans, LLC
2107 Research Forest Drive, T-LFN-4

The Woodlands, TX 77380

Brian L. Guillot, (504) 576-6523, bguill1@entergy.com

Leslie M. LaCoste (504) 576-4102, llacost@entergy.com

Entergy Services, LLC

Mail Unit L-ENT-26E

639 Loyola Avenue

New Orleans, LA 70113

Fax: 504-576-5579

Joe Romano, III (504) 576-4764, jroman1@entergy.com

Tim Rapier, (504) 576-4740, trapier@entergy.com

Farah Webre, fwebre@entergy.com

Lacresha D. Wilkerson, (504) 576-6571, lwilke1@entergy.com

Linda Prisuta, (504) 576-4137, lprisut@entergy.com

Ed Wicker, (504) 576-3101, ewicker@entergy.com

Entergy Services, LLC

Mail Unit L-ENT-4C

639 Loyola Avenue

New Orleans, LA 70113

Fax: (504) 576-6029

W. Raley Alford, III, (504) 523-1580, wra@stanleyreuter.com

Stanley, Reuter, Ross, Thornton, & Alford, LLC

O/B/O Entergy New Orleans, LLC

909 Poydras Street, Suite 2500

New Orleans, Louisiana 70112

Fax: (504) 524-0069

INTERVENORS

National Audubon Society

Brent Newman, 303-681-8420, Brent.newman@audubon.org

Senior Policy Director

3801 Canal Street, Suite 400

New Orleans, LA 70119

Nicholas Dixon, 225-315-3026, Nicholas.dixon@audubon.org

Outreach Associate

3801 Canal Street, Suite 400

New Orleans, LA 70119

Karl Rabago, karl@rabagoenergy.com

Rabago Energy

Alliance for Affordable Energy

Logan A. Burke, logan@all4energy.org

Jesse S. George, jesse@all4energy.org

Sophie Zaken, regulatory@all4energy.org

Susan Stevens Miller, Earth Justice, smiller@earthjustice.org

Chinyere A. Osuala, Earth Justice, cosuala@earthjustice.org

Jim Grevatt, Energy Futures Group, jgrevatt@energyfuturesgroup.com

4505 S. Claiborne Ave

New Orleans, Louisiana 70125

Tel: (504) 208-9761

Sierra Club

Elena Saxonhouse, elena.saxonhouse@sierraclub.org

Environmental Law Program

2101 Webster Street, Suite 1300

Oakland, CA 94612

Tel: (415) 265-2943