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September 7, 2022

**Via Electronic Mail**

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

**Re: Rulemaking Proceeding to Establish Rules for Community Solar Projects  
CNO Docket No. UD-18-03**

Dear Ms. Johnson:

Entergy New Orleans, LLC (“ENO”) respectfully submits its Motion to Extend Deadline to File Comments in the above-referenced docket. 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 original and requisite number of hard copies once the Council resumes normal operations, or as you direct. ENO requests that you file this submission in accordance with Council regulations as modified for the present circumstances.

If you have any questions or concerns about this request, please contact me at your convenience.

Sincerely,

A handwritten signature in blue ink that reads 'Leslie LaCoste'.

Leslie M. LaCoste

LML/kl1  
Enc.

cc: Official Service List by Electronic Mail

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

|                                   |   |                            |
|-----------------------------------|---|----------------------------|
| <b><i>IN RE: A RULEMAKING</i></b> | ) |                            |
| <b>PROCEEDING TO ESTABLISH</b>    | ) |                            |
| <b>RULES FOR COMMUNITY SOLAR</b>  | ) | <b>DOCKET NO. UD-18-03</b> |
| <b>PROJECTS</b>                   | ) |                            |

**ENTERGY NEW ORLEANS, LLC’S MOTION TO EXTEND  
DEADLINE TO FILE COMMENTS**

Entergy New Orleans, LLC (“ENO” or the “Company”) submits this motion seeking to extend the September 19, 2022 deadline in the Council’s resolution for submitting comments on Madison Energy Investments’ (“MEI”) Motion to Amend the Community Solar Rules (“Motion to Amend”). ENO requests that the comment deadline be moved to a date 30 days following a 60-day period for discovery.

The Council’s resolution set September 19, 2022, as the deadline for parties to submit comments on MEI’s Motion to Amend. ENO and the Advisors timely issued data requests to MEI to explore the basis, if any, for MEI’s request to change the Council’s community solar rules. With regard to ENO’s first set of data requests, the Hearing Officer determined in a decision issued September 2, 2022, that MEI has 30 days from service to provide responses, or September 14, 2022 – which is only 5 days before the September 19, 2022 comment deadline. ENO also issued a second set of data requests to MEI, and, using the same logic, MEI’s responses will be due on September 29, 2022 – 10 days *after* the comment deadline. As for the Advisors’ first set of data requests, again using the same logic, MEI’s responses will be due on October 3, 2022 – 2 weeks *after* the comment deadline. As a result, the current September 19, 2022 deadline for comments

is not workable given that all information necessary to fully evaluate and comment on MEI's Motion to Amend will not be available until after September 19.

Under the resolution, the Hearing Officer has the "authority to change or amend procedural dates" for "good cause shown." There is good cause for the Hearing Officer to modify the September 19, 2022 comment deadline. Considering the outstanding data requests to MEI, the current deadline does not allow sufficient time for discovery regarding MEI's Motion to Amend. Before comments are submitted on MEI's Motion to Amend, it is important that MEI provides full and complete responses to all data requests, that parties have adequate time to review the information provided, submit additional requests to MEI as may be appropriate, and formulate their comments based on the information received. To that end, ENO suggests that a 60-day period (until November 7, 2022) should be sufficient time for discovery, and then the parties can prepare comments to file within a 30-day period (December 7, 2022).

For all these reasons, ENO respectfully requests that the Hearing Officer move the comment deadline to a date 30 days following a 60-day period for discovery.

Respectfully submitted,

By:   
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**ATTORNEYS FOR  
ENERGY NEW ORLEANS, LLC**

**CERTIFICATE OF SERVICE**

**Docket No. UD-18-03**

I hereby certify that I have this 7<sup>th</sup> day of September, 2022, 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.

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