

Re: Docket No. UD-24-02 June 1, 2026 via electronic mail

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

Motion for a time extension to respond to CNO's Fourth Set of Requests for Information in UD-24-02

Dear Ms. Collier,

Together New Orleans respectfully submits a **motion for an extension of time until this Friday, June 5, 2026** to respond to CNO's Fourth Set of Requests for Information in docket **UD-24-02** pertaining to the City's Distributed Energy Resource Program.

Please do not hesitate to reach out with any questions related to this filing.

Sincerely,



Broderick Bagert
Together New Orleans

BEFORE THE COUNCIL OF THE CITY OF NEW ORLEANS - DOCKET NO. UD-24-02

IN RE: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND PROCEDURAL SCHEDULE TO ENHANCE DISTRIBUTED ENERGY RESOURCE PROGRAMS

MOTION OF TOGETHER NEW ORLEANS FOR EXTENSION OF TIME TO RESPOND TO ADVISORS' FOURTH SET OF DATA REQUESTS

Together New Orleans ("TNO") respectfully moves for a short extension of time to respond to the Advisors' Fourth Set of Data Requests in the above-captioned docket. In support of this Motion, TNO states as follows:

1. TNO received the Advisors' Fourth Set of Data Requests concerning issues related to the proposed Distributed Energy Resource Program.
2. TNO has been working diligently to prepare complete and accurate responses. The requests seek detailed information and analysis across multiple subjects, including information requiring review of prior filings, supporting workpapers, public program materials, and cost assumptions used in TNO's prior submissions.
3. TNO needs a modest amount of additional time to finalize its responses, ensure internal review, and provide answers that are accurate, useful to the Advisors, and consistent with the record in this docket.
4. TNO does not seek this extension for purposes of delay. The requested extension is intended to promote a more complete and orderly record and to avoid the need for unnecessary supplementation or correction.
5. TNO respectfully requests that the deadline for its responses to the Advisors' Fourth Set of Data Requests be extended until **Friday, June 5, 2026**.
6. TNO does not believe the requested extension will prejudice any party or materially affect the procedural posture of this docket. To the contrary, allowing a short extension will assist the Advisors, the Council, and the parties by supporting more complete responses on issues central to the Council's consideration of the program.

WHEREFORE, Together New Orleans respectfully requests that the Hearing Officer grant this Motion and extend TNO's deadline to respond to the Advisors' Fourth Set of Data Requests until **Friday, June 5, 2026**, and grant such other relief as may be appropriate.

Respectfully submitted,



Broderick Bagert, Jr.
Together New Orleans

CERTIFICATE OF SERVICE

I hereby certify that on this May 31, 2026, a copy of the foregoing Motion of Together New Orleans for Extension of Time to Respond to Advisors' Fourth Set of Data Requests was served upon the official service list in Docket No. UD-24-02 by electronic mail.

A handwritten signature in black ink, consisting of the letters 'B' and 'B' followed by a horizontal line, representing Broderick Bagert.

Broderick Bagert
Together New Orleans