



Jay Beatmann  
Counsel  
jay.beatmann@dentons.com  
D +1 504 524 5446

Dentons US LLP  
650 Poydras Street  
Suite 2850  
New Orleans, LA 70130-6132  
United States

大成 Salans FMC SNR Denton McKenna Long  
dentons.com

December 1, 2017

**BY HAND DELIVERY**

Ms. Lora Johnson  
Clerk of Council  
Council of the City of New Orleans  
City Hall, Room IE09  
1300 Perdido Street  
New Orleans, LA 70112

*Re: Application of Entergy New Orleans, Inc. for Approval to Construct New Orleans Power Station and Request for Cost Recovery and Timely Relief, Docket No. UD-16-02*

Dear Ms. Johnson:

Enclosed please find an original and four (4) copies of the *Joint Statement of Issues*, which we are requesting be filed into the record of this proceeding as well along with this letter in accordance with your normal procedure.

Sincerely,



Jay Beatmann  
Counsel

JAB/dpm  
Enclosure

cc: Official Service List for UD-16-02

BEFORE THE  
COUNCIL OF THE CITY OF NEW ORLEANS

*IN RE:* APPLICATION OF ENTERGY NEW )  
ORLEANS, INC. FOR APPROVAL TO )  
CONSTRUCT NEW ORLEANS POWER ) DOCKET NO. UD-16-02  
STATION AND REQUEST FOR COST )  
RECOVERY AND TIMELY RELIEF )

JOINT STATEMENT OF ISSUES

NOW COME, through undersigned counsel, Entergy New Orleans, Inc. (“ENO” or the “Company”), the Advisors to the Council of the City of New Orleans, Alliance for Affordable Energy, Sierra Club, Deep South Center for Environmental Justice, 350 Louisiana – New Orleans, Air Products and Chemicals, who together submit this Joint Statement of Issues pursuant to Council Resolution R-17-426:

Uncontested Issues

None. At least one party has expressed opposition to every issue in the case.

Contested Issues

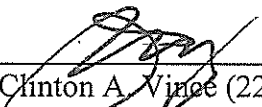
- I. Whether ENO's analysis of need is sufficient to justify an investment
  - A. Whether ENO has demonstrated a capacity need
  - B. Whether ENO has demonstrated a reliability need
- II. Whether either of ENO's choices of technology(ies) is in the public interest
  - A. Whether ENO's selection of a CT unit is in the public interest
  - B. Whether ENO's selection of a RICE unit is in the public interest
  - C. Whether ENO appropriately considered a full range of options to meet the identified need
- III. Whether ENO's selection of the Michoud site is reasonable

IV. Whether ENO's proposed costs, cost recovery mechanism and Monitoring Plan are just and reasonable and should be approved by the Council

It is hereby agreed that all parties to this proceeding that have submitted pre-filed written testimony, which has not been excluded by a motion to strike, shall be permitted to advance any and all arguments that were properly set forth in their respective testimony and/or have a foundation in law. All such arguments shall, however, be included in the designated section of their post-hearing brief in a manner consistent with the four (4) contested issues identified above. These four (4) issues are not intended to be used as an attempt to prevent any party from making any argument that was properly set forth in written testimony submitted in this docket or in responding to any issues raised or arguments made in ENO's rebuttal testimony.

Nothing in this agreement shall constitute a waiver of the right of any party to appeal a ruling to strike or limit testimony in this proceeding.

Respectfully Submitted,

  
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Clinton A. Vince (223594)  
Presley R. Reed, Jr. (42065)  
Emma F. Hand (476001)  
J. A. "Jay" Beatmann, Jr. (LSBA #26189)  
DENTONS, US LLP  
650 Poydras Street, Suite 2850  
New Orleans, LA 70130  
Office: 504-524-5446  
Cell: 504-256-6142  
Email: [jay.beatmann@dentons.com](mailto:jay.beatmann@dentons.com)

and

Walter J. Wilkerson (#13473)  
WILKERSON & ASSOCIATES, PLC  
650 Poydras Street, Suite 1913  
New Orleans, LA 70130  
Telephone: (504) 522-4572  
Facsimile: (504) 522-0728  
Email: [wwilkerson@wilkersonplc.com](mailto:wwilkerson@wilkersonplc.com)  
*Advisors to the City Council of New Orleans*

Brian L. Guillot, Senior Counsel  
639 Loyola Ave.  
New Orleans, La 70113  
Direct: 504.576.2603  
Fax: 504.576.5579  
[bguill1@entergy.com](mailto:bguill1@entergy.com)  
*Counsel for Entergy Services, Inc.*

Susan Stevens Miller, (202) 667-4500  
[smiller@earthjustice.org](mailto:smiller@earthjustice.org)  
Chinyere Osuala, (202) 667-4500  
[cosuala@earthjustice.org](mailto:cosuala@earthjustice.org)  
Al Luna, (202) 667-4500  
[aluna@earthjustice.org](mailto:aluna@earthjustice.org)  
1625 Massachusetts Ave., NW Ste 702  
Washington D.C. 20036  
*Counsel for the Alliance for Affordable Energy and  
350 Louisiana - New Orleans*

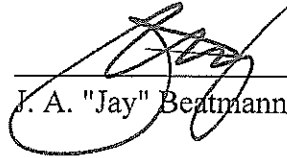
Monique Harden  
Louisiana State Bar No. 24118  
Deep South Center for Environmental Justice, Inc.  
1631 Elysian Fields Avenue, #165  
New Orleans, LA 70118  
(504) 517-2534  
[moniquecovharden@gmail.com](mailto:moniquecovharden@gmail.com)  
*Counsel for Deep South Center for Environmental  
Justice, Inc.*

Ernest L. Edwards Jr,  
The Law Offices of Ernest L. Edwards Jr, APLC  
300 Lake Marina Avenue unit 5BE  
New Orleans, LA 70124  
Phone: 504 450-4226  
[ledwards0526@gmail.com](mailto:ledwards0526@gmail.com)  
*Counsel for Air Products and Chemicals, Inc.*

Michael Brown, Esq. (35444)  
Waltzer, Wiygul & Garside, LLC  
1000 Behrman Hwy  
Gretna, LA 70056  
*Counsel for Sierra Club*

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon "The Official Service List" via electronic mail and/or U.S. Mail, postage properly affixed, this 1st day of December, 2017.



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J. A. "Jay" Beatmann, Jr.