

ROEDEL PARSONS KOCH
BLACHE BALHOFF & MCCOLLISTER
A LAW CORPORATION

Writer's E-mail sbell@roedelparsons.com
Writer's Fax No. (504) 525-4991

October 30, 2018

VIA HAND DELIVERY

Lora W. Johnson
Clerk of Council
1300 Perdido Street
IE09
New Orleans, LA 70112

Re: *Council of the City of New Orleans Docket No.: UD-18-07*
Revised Application of Entergy New Orleans, LLC for a Change in Electric and Gas Rates
Pursuant to Council Resolutions R-15-194 and R-17-504 and for Related Relief

Dear Lora:

Enclosed please find original and three (3) copies of Crescent City Power Users' Group's Motion for Intervention.

Should you have any questions whatsoever, please do not hesitate to contact me.

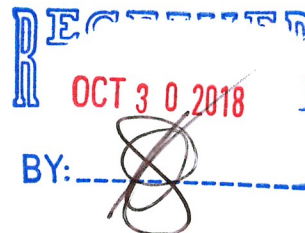
Very truly yours,

Shannon Bell

Shannon Bell, Legal Assistant to
Luke F. Piontek, Christian J. Rhodes &
Shelley Ann McGlathery

Enclosure

cc: All Counsel of Record via email



OCT 30 2018

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

**REVISED APPLICATION OF ENTERGY)
NEW ORLEANS, LLC FOR A CHANGE)
IN ELECTRIC AND GAS RATES) DOCKET NO. UD-18-07
PURSUANT TO COUNCIL RESOLUTIONS)
R-15-194 AND R-17-504 AND)
FOR RELATED RELIEF)**

**CRESCENT CITY POWER USERS' GROUP'S
MOTION FOR INTERVENTION**

NOW COMES, Crescent City Power Users' Group ("CCPUG"), through undersigned counsel, which respectfully moves to intervene as a party in this proceeding pursuant to Secs. 158-236, *et seq.* of the City Code pertaining to intervention in proceedings before the Council of the City of New Orleans ("City Council" or "Council"), and to be included on the service list, and in support thereof states:

1.

CCPUG is an unincorporated association comprised of large ratepayers of Entergy New Orleans, Inc. ("ENO"), and, therefore, has a real and substantial interest in this proceeding.

2.

Copies of all correspondence and filings with the Council should be directed to:

Luke F. Piontek
Christian J. Rhodes
Shelley Ann McGlathery
Roedel, Parsons, Koch, Blache,
Balhoff & McCollister
1515 Poydras Street, Suite 2330
New Orleans, LA 70112
Email: Lpiontek@roedelparsons.com
Email: Jsulzer@roedelparsons.com

3.

The notice of publication of this proceeding was included in the City Council's Resolution No. R-18-434, dated October 4, 2018, and set a 30-day intervention period. Therefore, the filing of this Motion for Intervention is timely.

4.

The outcome of this proceeding regarding ENO's application for approval of a change in electric and gas rates will directly affect the business and economic interests of CCPUG in the City of New Orleans.

5.

As an unincorporated association, CCPUG may, in its name, institute, defend, intervene, or participate in a judicial, administrative, or other governmental proceeding or in an arbitration, mediation, or any other form of alternative dispute resolution. La. R.S. 12:507(A). CCPUG, therefore, possesses standing to intervene and requests formal intervenor status in this proceeding and that it be allowed the opportunity to file testimony and pleadings, examine witnesses and participate fully in any discovery, hearings, briefings and oral arguments in this matter.

6.

CCPUG asserts that no other intervenor or party will adequately protect its interests in this docket and that its intervention will not delay the progress of this proceeding.

WHEREFORE, Crescent City Power Users' Group prays that it be granted full intervenor status herein; that it be allowed the opportunity to file testimony and pleadings, examine witnesses and participate fully in any discovery, hearings, briefings

and oral arguments in this matter; that it be included on the service list of this matter; and that it be given notice of any and all proceedings and deadlines in this matter; and for all other relief available to it under the facts and the law.

Respectfully submitted:

**ROEDEL, PARSONS, KOCH, BLACHE,
BALHOFF & McCOLLISTER**

8440 Jefferson Highway, Suite 301

Baton Rouge, LA 70809

Telephone: (225) 929-7033

Facsimile: (225) 928-4925

- and -

1515 Poydras Street, Suite 2330

New Orleans, Louisiana 70112

Telephone: (504) 525-7086

Facsimile: (504) 525-4991

By: _____



Luke F. Piontek (Bar Roll #19979)

J. Kenton Parsons (Bar Roll # 10377)

Christian J. Rhodes (Bar Roll # 31935)

Shelley Ann McGlathery (Bar Roll # 32585)

George W. Hardy, IV (Bar Roll # 38012)

CERTIFICATE

I hereby certify that on this day a copy of the foregoing Crescent City Power Users' Group's Motion for Intervention has been sent to the official service list by email, and/or served by United States mail, postage prepaid, through their representatives, at the following addresses:

Lora W. Johnson
lwjohnson@nola.gov
Clerk of Council
City Hall- Room 1E09
1300 Perdido Street
New Orleans, LA 70112

Norman White,
Norman.White@nola.gov
Department of Finance
City Hall - Room 3E06
1300 Perdido Street
New Orleans, LA 70112

Erin Spears, espears@nola.gov
Chief of Staff, Council Utilities
Regulatory Office
Bobbie Mason, bfmason1@nola.gov
Connolly A. F. Reed, careed@nola.gov
City Hall - Room 6E07
1300 Perdido Street
New Orleans, LA 70112

Hon. Jeffrey S. Gulin,
judgegulin@gmail.com
3203 Bridle Ridge Lane
Lutherville, MD 2109

David Gavlinski, 504-658-1101,
dsgavlinski@nola.gov
Council Chief of Staff
City Hall - Room 1E06
1300 Perdido Street
New Orleans, LA 70112

Basile J. Uddo
J.A. "Jay" Beatmann, Jr.
c/o DENTONS US, LLP
650 Poydras Street
Suite 2850
New Orleans, LA 70130
buddo@earthlink.net
jay.beatmann@dentons.com

Sunni LeBeouf,
Sunni.LeBeouf@nola.gov
Michael J. Laughlin,
mjlaughlin@nola.gov
Mary Katherine Kauffman,
mkkaugman@nola.gov
Law Department
City Hall - 5th Floor
New Orleans, LA 70112

Clinton A. Vince,
clinton.vince@dentons.com
Presley Reed,
presley.reedjr@dentons.com
Emma F. Hand,
emma.hand@dentons.com
1900 K Street NW
Washington, DC 20006

Philip J. Movish,
pmovish@ergconsulting.com
Joseph W. Rogers,
jrogers@ergconsulting.com
Victor M. Prep,
vprep@ergconsulting.com
Byron S. Watson,
bwatson@erconsulting.com
Legend Consulting Group
8055 East Tufts Ave., Suite 1250
Denver, CO 80237-2835

Errol Smith, (504) 284-8733,
ersmith@btcpas.com
Bruno and Tervalon
4298 Elysian Fields Avenue
New Orleans, LA 70122

Gary H. Huntley
Entergy New Orleans, Inc.
Manager, Regulatory Affairs
1600 Perdido Street, L-MAG 505B
New Orleans, LA 70112
guntle@entergy.com

Polly S. Rosemond
Entergy New Orleans, Inc.
Manager, Regulatory Affairs
1600 Perdido Street, L-MAG 505B
New Orleans, LA 70112
prosemo@entergy.com

Tim Cragin
Brian L. Guillot
Alyssa Maurice-Anderson
Entergy Services, Inc.
Mail Unit L-ENT-26E
639 Loyola Avenue
New Orleans, LA 70113
tcraigin@entergy.com
bguill@entergy.com
amauric@entergy.com

Joe Romano, III
Suzanne Fontan
Therese Perrault
Entergy Services, Inc.
Mail Unit L-ENT-4C
639 Loyola Avenue
New Orleans, LA 70113
jromani@entergy.com
sfontan@entergy.com
tperrau@entergy.com

Logan Atkinson Burke,
logan@all4energy.org
Sophie Zaken,
regulatory@all4energy.org
4505 S. Claiborne Ave.
New Orleans, LA. 70125

Katherine W. King,
Katherine.king@keanmiller.com
Randy Young,
randy.young@keanmiller.com
400 Convention St. Suite 700
Baton Rouge, LA. 70802

Carrie R. Tournillon,
carrie.tournillon@keanmiller.com
900 Poydras St., Suite 3600
New Orleans, LA 70112

Mark Zimmerman,
zimmermr@airproducts.com
720 I Hamilton Blvd.
Allentown, PA. 18195-1501
610-481-1288

Maurice Brubaker,
mbrubaker@consultbai.com
16690 Swigly Ridge Rd., Suite 140
Chesterfield, MO 63017

New Orleans, Louisiana, this 30th day of October, 2018.



LUKE F. PIONTEK

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

REVISED APPLICATION OF ENTERGY)	
NEW ORLEANS, LLC FOR A CHANGE)	
IN ELECTRIC AND GAS RATES)	DOCKET NO. UD-18-07
PURSUANT TO COUNCIL RESOLUTIONS)	
R-15-194 AND R-17-504 AND)	
FOR RELATED RELIEF)	

ORDER

Upon considering the Motion for Intervention filed by Crescent City Power Users' Group on October __, 2018 in the above-captioned matter,

IT IS HEREBY ORDERED, that the Hearing Officer hereby grants the Motion for Intervention filed by Crescent City Power Users' Group and Crescent City Power Users' Group is hereby granted full intervenor status herein.

Thus done and signed this _____ day of October, 2018.

Honorable Jeffrey S. Gulin
Hearing Officer