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February 11, 2019

**VIA HAND DELIVERY**

Lora W. Johnson  
Clerk of Council  
1300 Perdido Street  
1E09  
New Orleans, LA 70112

Re: *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 Relief: UD-18-07*

Dear Lora:

Enclosed please find original and three (3) Copies of **Crescent City Power Users Group's Objections to Discovery Propounded by Entergy New Orleans, LLC** on behalf of Crescent City Power Users' Group.

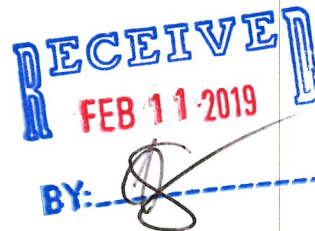
Should you have any questions whatsoever, please do not hesitate to contact me.

Very truly yours,



Ashanti Person, Assistant to  
Luke F. Piontek & Christian J. Rhodes

Enclosure  
cc: All Counsel of Record via email



FEB 11 2019

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

**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**

**DOCKET NO. UD-18-07**

**CRESCENT CITY POWER USERS GROUP'S  
OBJECTIONS TO DISCOVERY PROPOUNDED BY  
ENTERGY NEW ORLEANS, LLC.**

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**NOW COMES** Crescent City Power Users Group (“CCPUG”) with the following objections to Entergy New Orleans LLC's ("ENO") First Set of Requests for Information (“Requests”) submitted to CCPUG in the above captioned proceeding:

**I.**

**GENERAL OBJECTIONS AND RESERVATION OF RIGHTS**

1. Although CCPUG has sought to identify all applicable objections, it may later become apparent as responses are prepared or as documents are obtained that additional objections are appropriate. CCPUG reserves its right to make such objections.
2. CCPUG objects to the definitions and instructions supplied by ENO to the extent that they unilaterally purport to alter the rules of discovery, or purport to modify or supplement the specific Requests set forth thereafter, or are unduly burdensome.
3. With respect to documents or information that may be protected by the attorney-client privilege and/or the attorney work product doctrine, if any, that may be responsive to one or more of the Requests, CCPUG objects to providing such material and reserves its right to make such objections as it deems necessary to protect such documents or information from disclosure.
4. The provision of a response by CCPUG to a Request should not be construed as a waiver of any claim that CCPUG may have regarding the admissibility of the response in this proceeding or other proceedings, or a waiver of any substantive rights that CCPUG may have.

## II.

### SPECIFIC OBJECTIONS

In addition to the foregoing General Objections, CCPUG has at this time identified the following specific objections:

#### **ENO Request 1-3:**

Please provide all cost of service models (e.g., ENO External Model provided to the parties), bill calculations, rate calculations, or other analyses, including electronic versions with all cell formulae intact, prepared by the CCP in conjunction with their review of the Company's Application that were not included with the CCP's filed testimony.

#### **Objection to ENO Request 1-3:**

CCPUG objects to this request to the extent that it seeks documents or data that are properly classified as attorney work-product and are therefore beyond the scope of discovery. CCPUG further objects to the request as any such documents or data would be protected by attorney-client privilege.

Respectfully submitted:

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

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Baton Rouge, LA 70809  
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- and -

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New Orleans, Louisiana 70112  
Telephone: (504) 525-7086  
Facsimile: (504) 525-4991

/s/ LUKE F. PIONTEK

Luke F. Piontek (Bar Roll #19979)  
J. Kenton Parsons (Bar Roll # 10377)  
Christian J. Rhodes (Bar Roll # 31935)  
George W. Hardy, IV (Bar Roll # 38012)

*Counsel for Crescent City Power Users' Group*

**CERTIFICATE**

I hereby certify that on this day a copy of the foregoing Crescent City Power Users' Group's First Set of Data Requests to Council Advisors has been served upon "The Official Service List" via electronic mail and/or U.S. Mail, postage properly affixed, this 11<sup>th</sup> day of February, 2019.

/s/ LUKE F. PIONTEK

**LUKE F. PIONTEK**