



November 10, 2020

By Electronic Mail

Clerk of Council
Room 1E09, City Hall
1300 Perdido Street
New Orleans, LA 70112

Re: 2021 Triennial Integrated Resource Plan of Entergy New Orleans, Inc. – Docket No. UD-20-02

Dear Ms. Johnson,

Enclosed please find an original and three copies of the intervention out of time of National Audubon Society in the above matter. Please file the attached intervention and this letter for the record of this proceeding and return one time stamped copy in the enclosed self-addressed envelope.

Thank you for your assistance in this matter.

Sincerely,

Brent Newman
Senior Policy Director
Arkansas, Louisiana, and Mississippi Regional Office
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3801 Canal Street, Suite 400
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Brent.newman@audubon.org

Cc: Known parties Docket UD-20-02

Before

The Council of the City of New Orleans

**In Re: 2021 TRIENNIAL INTEGRATED
RESOURCE PLAN OF ENTERGY
NEW ORLEANS, INC. DOCKET NO.
UD-20-02**

**DOCKET UD-20-02
NOVEMBER 10, 2020**

NATIONAL AUDUBON SOCIETY

PETITION TO INTERVENE OUT OF TIME AND FOR INCLUSION ON SERVICE LIST

National Audubon Society, through the auspices of their regional office covering Arkansas, Louisiana, and Mississippi, respectfully requests that the Council of the City of New Orleans (“the Council”) grant National Audubon Society the right to intervene in the above captioned proceeding and participate as a party therein.

On August 20th, 2020, the full Council for the City of New Orleans issued Resolution R-20-257, establishing Docket UD-20-02, providing for intervention by interested parties by November 2, 2020.

Audubon Delta is the regional office of the National Audubon Society, encompassing the states of Arkansas, Louisiana, and Mississippi. The regional office combines the former state office of Audubon Louisiana with two other state offices. The National Audubon Society protects birds and the places they need, today and tomorrow, throughout the Americas using science, advocacy, education, and on-the-ground conservation.

Under the auspices of Audubon Louisiana, the National Audubon Society is a formal intervenor in other dockets considering electric and gas infrastructure owned by Entergy New Orleans, LLC (“ENO”), including previous dockets relating to the Renewable and Clean Portfolio Standard.

The National Audubon Society has members served by ENO. There is no other party representing the interests of the National Audubon Society and its members.

National Audubon Society therefore possesses standing to intervene, and respectfully seeks intervenor status in order to fully participate in this matter.

National Audubon Society recognizes that this request to intervene is being made outside of the timeline established by Resolution R-20-257. However, National Audubon Society requests intervention out of time in the proceeding as the intervention will not prejudice any other party or unduly affect the proceeding with respect to the issues presented by this docket. The IRP process contemplated in this proceeding has not yet begun. Further, as a late intervenor, National Audubon Society understands that it must accept and participate in this docket in its current posture.

Please note that National Audubon Society is a non-profit organization thus pursuant to Council Resolution R-16-365, we request that all intervenor fees be waived.

National Audubon Society requests placement on the service list of this proceeding, and to be served with all pleadings, notices, orders, and other filings.

All communications and pleadings in this proceeding should be directed to:

Brent Newman
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Brent.newman@audubon.org

Respectfully submitted,



Brent Newman
Senior Policy Director
National Audubon Society
Arkansas, Louisiana, and Mississippi Regional Office

**Re: 2021 TRIENNIAL INTEGRATED RESOURCE PLAN OF ENTERGY NEW
ORLEANS, INC.
DOCKET NO. UD-20-02**

I hereby certify that I have this day of 11th day of November, 2020, served the required number of copies of the foregoing correspondence upon all other known parties of this proceeding, by USPS or electronic mail.



Brent Newman
Audubon Delta

Lora W. Johnson, lwjohnson@nola.gov

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