

December 7, 2021

Via Electronic Mail

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

In re: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND
PROCEDURAL SCHEDULE WITH RESPECT TO SYSTEM RESILIENCY
AND STORM HARDENING
DOCKET NO. UD-21-03

Dear Ms. Johnson:

Please find enclosed the Greater New Orleans Interfaith Climate Coalition's (GNOICC) Petition for Intervention and Inclusion on the service-list in the above-mentioned docket. Please file the attached communication and this letter in the record of the proceeding. As a result of the remote operations of the Council's office related to COVID-19, GNOICC submits this letter electronically and will submit the requisite original and number of hard copies once the Council resumes normal operations, or as you direct. GNOICC requests that you file this submission in accordance with Council regulations as modified for the present circumstances. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention,

Sincerely,

A handwritten signature in black ink that reads "Jonathan Sebastian Leo, for". The signature is written in a cursive style with a large, sweeping initial "J".

Pastor Gregory Manning

Founder and President, Board of Directors

Greater New Orleans Climate Coalition, Inc.

(by Jonathan Sebastian Leo, Member, Board of Directors)

Before

The Council of the City of New Orleans

In re: RESOLUTION AND ORDER

DOCKET NO. UD-21-03

ESTABLISHING A DOCKET AND

PROCEDURAL SCHEDULE WITH RESPECT TO

SYSTEM RESILIENCY AND STORM HARDENING

DECEMBER 7, 2021

**PETITION OF THE GREATER NEW ORLEANS INTERFAITH CLIMATE COALITION FOR
INTERVENTION AND INCLUSION ON SERVICE LIST**

Petitioner the Greater New Orleans Interfaith Climate Coalition, Inc. (“GNOICC”) respectfully requests that the Council of the City of New Orleans (“the Council”) grant GNOICC the right to intervene in the above-captioned proceeding and to participate as a party therein.

On October 27, 2021, the Council issued Resolution R-21-401, establishing Docket UD-21-03, providing for intervention by interested parties by November 29, 2021. In October, 2021, GNOICC began the formal, legal process of moving from the status of an unincorporated association of interfaith advocates for climate justice to a Louisiana non-profit corporation. On advice of counsel, GNOICC waited until receipt of confirmation of its non-profit corporate status before preparing this petition for intervention. GNOICC received notice of its successful incorporation on December 2, 2021 and, as expeditiously as possible thereafter, completed preparation of this petition which it now submits to you for filing.

Based on the above-described circumstances, GNOICC respectfully asserts that its failure to file this petition for intervention by the November 29, 2021 deadline was neither the result of “inexcusable neglect, indifference, or lack of diligence” (New Orleans City Code section 158-238 (b)) nor has resulted in any prejudice to the interests of or inconvenience to any of the parties or other intervenors to this proceeding.

GNOICC is a non-profit Louisiana corporation whose interfaith climate justice mission is anchored in the recognition that the physical and economic health of minority, indigenous, and low-income communities are disproportionately harmed and their individual and collective resilience compromised by their exposure to industrial pollutants and the ravages of the increasingly frequent and more intense hurricanes and other extreme weather events referenced by the Council in the preamble to its Resolution No. R-21-401. GNOICC seeks to ensure that the interests of those communities are articulated and protected in this proceeding, that the infrastructure resilience and storm hardening plan that ultimately emerges from this proceeding, including ENO's cost recovery methods and amount, incorporates the lessons learned from previous similar efforts, and that such plan does not disproportionately impact ENO's most vulnerable ratepayers and the City's most vulnerable residents.

The majority of the members of GNOICC's Board of Directors and Steering Committee are served by ENO. There is no other party or intervenor representing the interests of GNOICC in this proceeding.

Please note that GNOICC is a non-profit, interfaith climate justice organization and, on that basis and pursuant to Council Resolution R-16-365, GNOICC requests that all intervenor fees be waived.

GNOICC respectfully asserts that it has standing to intervene in this proceeding and seeks intervenor status to fully participate herein. GNOICC requests that it be placed on the service list for this proceeding and be served with all pleadings, notices, orders, and other filings associated with this proceeding.

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

Pastor Gregory Manning
President, Board of Directors of GNOICC
2021 S. Dupre Street
New Orleans, LA 70125
913-940-5713
gmanning1973@yahoo.com

and

Jonathan Sebastian Leo
Member, Board of Directors, GNOICC
10942 Neale Fraser Drive
Baton Rouge, LA 70810
423-763-8808
jonathan.s.leo@gmail.com

Respectfully submitted,

Jonathan Sebastian Leo, for

Pastor Gregory Manning

Founder and President of Board of Directors

Greater New Orleans Interfaith Climate Coalition

(by Jonathan Sebastian Leo, Member, Board of Directors)

Jonathan Sebastian Leo

Before

The Council of the City of New Orleans

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CERTIFICATE OF SERVICE

I do hereby certify that I have, this 7th day of December 2021, served the required number of copies of the foregoing correspondence upon all other known parties to and intervenors in this proceeding by electronic mail.



Jonathan Sebastian Leo
Member, Board of Directors
Greater New Orleans Interfaith Climate Coalition