

Gulf States Renewable Energy Industries Association

April 25, 2018

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

Re: UD-19-01

Dear Ms. Johnson:

Please find enclosed the Motion of Intervention in UD-19-01, ESTABLISHING A DOCKET AND OPENING A RULEMAKING PROCEEDING TO ESTABLISH RENEWABLE PORTFOLIO STANDARDS, filed on behalf of the Gulf States Renewable Energy Industry Alliance.

Best Regards

STEPHEN P. Wright

GSREIA

BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

COUNCIL OF THE CITY OF NEW ORLEANS

DOCKET NO. UD-19-01

Docket No. UD-19-01 - ESTABLISHING A DOCKET AND OPENING A RULEMAKING PROCEEDING TO ESTABLISH RENEWABLE PORTFOLIO STANDARDS

MOTION OF INTERVENTION

NOW COMES, through undersigned counsel, the Gulf States Renewable Energy Industries Association (herein "GSREIA") for the purpose of intervening in the above captioned proceeding.

1.

The Board is a party interested in the above captioned docket inasmuch as it is an energy efficiency policy advocate with members located in the City of New Orleans and its interests cannot be represented or protected adequately by other parties hereto, and this intervention will not prejudice any other party.

2.

his intervention is timely has it is filed before the posted deadline of May 1st, 2019 as outlined in the adoption of Resolution R-19-109, which established a procedural schedule for this docket.

3.

GSREIA members are ratepayers of ENO and are vendors of the types of renewable energy services typically included in a renewable energy portfolio, as such, have a real and substantial interest in the above captioned proceeding. GSREIA wishes to participate in this docket as an intervenor in order to ensure that its interests

are fully protected, and there requests full intervenor status.

4.

GSREIA intervention will not delay the progress of this proceeding.

5.

GSREIA asks that it be granted intervenor status and be allowed the opportunity to fully participate in this proceeding pursuant to the procedural schedule adopted in Resolution R-19-109.

6.

GSREIA requests that notices, correspondence, and other communications concerning this Motion for Intervention be directed to the following persons:

Stephen Wright
c/o GSRIEA
552 Marilyn Drive
Mandeville, LA 70448
Telephone: 318-663-3810

swright@gsreia.org

Jeff Cantin, GSREIA Board Chair c/o Solar Alternatives 2803 Saint Philip Street New Orleans, LA 70119 Telephone: 877-785-2664

jcantin@gsriea.org

WHEREFORE, GSREIA requests that it be granted full intervenor status with the right to fully participate in the above captioned docket, accept its Motion of Intervention and grant GSREIA prior notice of any and all hearings and proceedings which may be set in this matter.

Respectfully submitted,

Stephen P. Wright

GSREIA

CERTIFICATE OF SERVICE

I hereby certify that I have this _____ of April 2019 served the required number of copies of the foregoing pleading upon all other known parties of this pleasing, via email at the email addresses indicated below:

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

Erin Spears, espears@nola.gov
Chief of Staff, Council Utilities Regulatory Office
Bobbie Mason, bfinason1@nola.gov
Connolly A. F. Reed, careed@nola.gov
City Hall - Room 6E07
1300 Perdido Street
New Orleans, LA 70112

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

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

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

ADMINISTRATIVE HEARING OFFICER

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

NEW ORLEANS CITY COUNCIL CONSULTANTS

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

Basile J. Uddo, buddo@earthlink.net

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

Philip J. Movish, pmovish@ergconsulting.com
Joseph W. Rogers, irogers@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, ersmith@btcpas.com Bruno and Tervalon 4298 Elysian Fields Avenue New Orleans, LA 70122

ENTERGY NEW ORLEANS

Gary E. Huntley, ghuntle@entergy.com
Entergy New Orleans, Inc.
Vice-President, Regulatory Affairs
Polly S. Rosemond, prosemo@entergy.com
Derek Mills, dmills3@entergy.com
Keith Woods, kwood@entergy.com
Seth Cureington, scurein@entergy.com
1600 Perdido Street, L-MAG 505B
New Orleans, LA 70112

Tim Cragin, teragin@entergy.com
Brian L. Guillot, bguill1@entergy.com
Alyssa Maurice-Anderson, amauric@entergy.com
Harry Barton, hbarton@entergy.com
Entergy Services, Inc.
Mail Unit L-ENT-26E
639 Loyola Avenue

Joe Romano, III, <u>iroman l@entergy.com</u>
Suzanne Fontan, <u>sfontan@entergy.com</u>
Therese Perrault, <u>tperrau@entergy.com</u>
Entergy Services, Inc.
Mail Unit L-ENT-4C
639 Loyola Avenue

New Orleans, LA 70113

New Orleans, LA 70113

ALLIANCE FOR AFFORDABLE ENERGY

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

Stephen Wright, GSREIA

BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

COUNCIL OF THE CITY OF NEW ORLEANS

DOCKET NO. UD-19-01

Docket No. UD-19-01 - ESTABLISHING A DOCKET AND OPENING A RULEMAKING PROCEEDING TO ESTABLISH RENEWABLE PORTFOLIO STANDARDS

ORDER

Upon considering the Motion for Intervention filed by GSREIA on April 29, 2019 in the above captioned matter:

IT IS HEREBY ORDERED that the Hearing Officer hereby grants the Motion for
Intervention filed by GSREIA is hereby granted full intervenor status herein.
Thus done and signed this of 2019.
Honorable Jeffrey S. Gulin

Hearing Officer