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CIVIL
DISTRICT COURT

List of Exhibits

- Exhibit 18..... May 7, 2018, Investigation Request Letter
- Exhibit 19..... May 14, 2018, Rehearing Request

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CIVIL
DISTRICT COURT

Exhibit 18

May 7, 2018, Investigation Request Letter



LOYOLA
UNIVERSITY
NEW ORLEANS

COLLEGE OF LAW

Stuart H. Smith Law Clinic and Center for Social Justice

May 7, 2018

Louisiana Attorney General Jeff Landry
PO Box 94005
Baton Rouge, LA 70804

Louisiana Ethics Administration Program
PO Box 4368
Baton Rouge, Louisiana 70821

Orleans Parish District Attorney Leon A. Cannizzaro, Jr.
619 South White Street
New Orleans, LA 70119

New Orleans City Council
1300 Perdido Street
New Orleans, LA 70112

Re: Request for Investigation into Legality of Paid Actors at City Council Public Meetings

Dear Public Officials:

This letter is a complaint and request for an investigation into possible legal and ethical violations arising from the hiring of professional actors to take up seats and speak from scripts as though they were concerned citizens at two public meetings convened by the New Orleans City Council on October 16, 2017 and February 21, 2018.

Over the last few months, disturbing details have emerged indicating that professional actors, some of whom reside outside of New Orleans and Louisiana, were paid to attend and participate in public meetings convened by the New Orleans City Council relating to the proposal by Entergy New Orleans, Inc. to build a gas plant in New Orleans East.¹ Some of these details are provided in a pending Open Meetings Law enforcement action filed on April 18, 2018, in Civil District Court for the Parish of Orleans, Case No. 18-3843. *See Attachment 1, Petition to Enforce the Louisiana Open Meetings Law, for Declaratory Judgment, Injunction, Attorneys'*

¹ Specifically, the New Orleans City Council public meetings concern the Application of Entergy New Orleans, Inc. for Approval to Construct New Orleans Power Station and Request for Cost Recovery and Timely Relief, Docket No. UD-16-02.

Fees and Costs, and Memorandum in Support (“OML Petition”) at p. 8 note 11, p. 23 note 78, and Exhibits 4 and 5. Other information has been published since then. See Attachment 2, Michael Isaac Stein, *Actors were paid to support Entergy’s power plant at New Orleans City Council meetings*, The Lens (May 4, 2018), <https://thelensnola.org/2018/05/04/actors-were-paid-to-support-entergys-power-plant-at-new-orleans-city-council-meetings/> (“The Lens article”).

As a whole, there is substantial evidence indicating that people or organizations recruited, trained, and paid cash to numerous actors to arrive early, take up seats and speak from scripts at two public meetings by the New Orleans City Council in order to influence the decision by the Council on whether or not to approve a proposed gas plant by Entergy New Orleans, Inc., and to prevent other members of the public from participating in the meeting. We understand that these actors were asked to sign non-disclosure agreements (“NDAs”) to prevent the fact of their participation from becoming public. See Attachment 3, *FB Messenger comms re paid actors for CNO public mtgs*. See also Attachment 2, The Lens article. These secret actions to influence government, if true, appear to contravene the law and are unethical.

Therefore, we write to ask you and your staff to investigate whether laws and ethical rules were violated as a result of hiring professional actors to take up seats and speak from scripts in an attempt to sway a decision by the New Orleans City Council. Furthermore, we request that your investigation include a search for the individual(s) responsible for hiring and compensating the professional actors and whether such individual(s) may have violated laws and ethical rules.

This request is filed by undersigned counsel on behalf of the Deep South Center for Environmental Justice, VAYLA New Orleans, Justice and Beyond, 350 New Orleans, and Sierra Club.

Evidence of Recruitment and Payment of Actors

There are at least four sources of evidence supporting this request for an investigation.

First, one professional actor admitted to being paid for his participation in one of the Council’s public meetings in a news interview with WWL-TV Channel 4.² Actor Andrew Wiseman, who appeared in the HBO series *Treme*, told WWL Channel 4 that he was paid \$120 in cash to attend a City Council meeting concerning Entergy’s proposed gas plant. Mr. Wiseman said that he was told to “‘Just sit down, wear a t-shirt, don’t talk, don’t open your mouth.’”³ Mr. Wiseman “heard about the gig through one of his acting buddies” and said that they “weren’t told what they were going to be doing before they walked in the council meeting.”⁴

Second, an affidavit submitted in the Open Meetings Law enforcement action shows three professional actors who participated in one of the Council’s public meetings and their online

² See Kristin Pierce, *City Council could face lawsuit following public hearing on Entergy plant*, WWL-TV (Mar. 7, 2018), <http://www.wwltv.com/article/news/local/city-council-could-face-lawsuitfollowing-public-hearing-on-entergy-plant/526747370>.

³ *Id.*

⁴ *Id.*

acting profiles.⁵ Based on the WWL-TV Channel 4 report and his impression that some of the comments given by Entergy supporters at an October 17, 2017 public hearing concerning the proposed gas plant appeared scripted, attorney Michael L. Brown reviewed the video recording of the hearing to determine if any of the commenters speaking in favor of the plant were actors.⁶ Mr. Brown's internet search indicated that at least three of the commenters were professional actors.⁷

Third, The Lens article reported that "[a]t least four of the people in orange shirts were professional actors. One actor said he recognized 10 to 15 others who work in the local film industry. They were paid \$60 each time they wore the orange shirts to meetings in October and February. Some got \$200 for a 'speaking role'"⁸ The Lens article provides troubling details into how this scheme worked and its intent.

Finally, we attach a series of screenshots showing Facebook Messenger communications regarding the acting job between what appears to be a recruiter and a prospective actor. These communications, which are also largely included in The Lens article, indicate, among other things, that:

- Participating actors had to sign non-disclosure agreements or NDAs;
- An actor was told, "We need people to sit through part of a city council meeting to decide on building an additional turbine onto the local power plant The council already supports it, this is mostly just to show them that the citizens don't have a problem with it. Free pizza and a round of drinks after it's over, at which point pay will be dispersed in cash";
- Speaking roles were available;
- An actor was repeatedly instructed to "Tell nobody you're being paid" and later told "Do not mention NDAs or anything to anyone, and if someone approaches you with questions or attempts to talk to you, send them to one of us";
- After participating in the Council's public meeting on October 16, 2017, an actor was told that "There's another project coming up on 2/21, 9am call time in New Orleans, \$60 for non speaking extras to sit in an auditorium" and "The meeting will take place at 601 Poydras St New Orleans, LA 70130 Payout location will be given out closer to the event";
- Regarding the February 21, 2018 City Council public meeting, an actor was informed that the "Pay site will be about 2 blocks from the meeting spot," that "You'll be headed inside before the crowd members so you can get signed in and everything," and that "You'll get 200 cash";
- An actor received talking points supporting Entergy's plant to incorporate in a "1-3 minute speech," including:

⁵ OML Petition at Exh. 4 (Affidavit of Michael L. Brown).

⁶ *Id.* at ¶ 14.

⁷ *Id.* at ¶ 16.

⁸ The Lens article.

- “We’ve had public meetings for two years now and talking this power station to death. The objections are far outweighed by the benefits.”
- “Entergy has been more than fair opening this process for public input.”
- “Let me thank the city council for giving the public ample opportunity to voice opinions on the power station.”

Possible Violations of Law

We are not saying that any of the paid actors violated any laws. Indeed, the actors may have thought they were participating in a simulation or movie of a city council meeting. We are saying that those who dreamed up these schemes, those who recruited actors to attend these public meetings, those who told the actors what to say, those who organized these productions, those who paid for these actors to sit in and speak out at these public meetings, and those who have attempted to keep these schemes secret, appear to have violated the law.

The Louisiana Constitution guarantees every citizen the right to observe the deliberations of public bodies. Article XII, Section 3. The Louisiana Open Meetings Law, Revised Statute 42:12, is designed to ensure state integrity and to increase the public’s trust and awareness of its governing officials. La. R.S. 42:12(A) states, “It is essential to the maintenance of a democratic society that public business be performed in an open and public manner and that the citizens be advised of and aware of the performance of public officials and the deliberations and decisions that go into the making of public policy. Toward this end, the provisions of this Chapter shall be construed liberally.”

It appears that in at least two public meetings convened by the New Orleans City Council, professional actors were directed to wear orange t-shirts with a printed message in support of Entergy’s gas plant and present public comments as though they were concerned citizens in support of the proposed Entergy gas plant. In each of those public meetings, real concerned citizens were denied access into the meeting room where they could observe and/or make comments for the purported reason that there were no seats available. The real concerned citizens either waited for as much as several hours to be allowed in the meeting room or left in frustration after considerable time spent waiting.

Secretly paying professional actors to attend a public meeting and pretend to support a cause and consequently preventing members of the public from observing or participating in public meetings are actions that egregiously contravene the Louisiana Constitution and the Open Meetings Law. Moreover, a full investigation of these actions may reveal that other laws, as well as ethical rules, were violated. We request that all possible violations of the law be fully investigated.

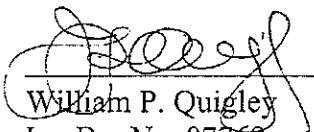
Fact Questions to Investigate

We ask that the following fact questions be formally investigated, by the use of subpoena, if necessary, so that the complete facts of this scheme be made public.

1. Who organized, recruited, directed, and paid cash to actors to attend and speak at public meetings of the New Orleans City Council?
2. Who compensated the people who organized, recruited, directed, and paid cash to actors to attend and speak out at public meetings of the New Orleans City Council?
3. Who drafted the nondisclosure agreements that try to keep the cash payments to actors secret?
4. How many actors were paid to attend and speak out at the City Council public meetings and how much was each person paid?

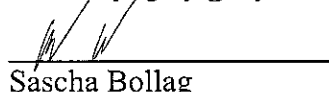
Thank you for your attention to this important matter. Please do not hesitate to contact us if you have any questions or concerns, or need additional information.

Sincerely,



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La. Bar No. 07769

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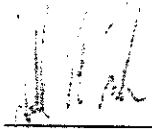
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Counsel for VAYLA New Orleans, Justice and Beyond, 350 New Orleans, and Sierra Club

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Exhibit 19

May 14, 2018, Rehearing Request

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May 14, 2018

Via Hand Delivery

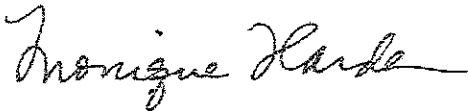
Ms. Lora W. Johnson
Clerk of Council
City Hall - Room 1E09
1300 Perdido Street
New Orleans, LA 70112

Dear Ms. Johnson:

Enclosed are the original and three copies of this letter and the accompanying letter to Councilmembers, *Request that the Council of the City of New Orleans Order Rehearing on the Council's Own Motion of Council Resolution 18-65.*

Please return one date-stamped copy of the enclosed documents to our courier for our records.

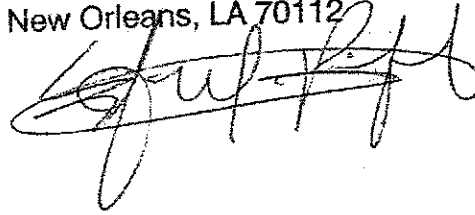
Sincerely,



Monique Harden, Attorney
Assistant Director of Law and Policy

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Clerk of Council
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May 14, 2018

To: Members of the Council of the City of New Orleans
Mr. Jason R. Williams, Councilmember-at-Large
Ms. Helena Moreno, Councilmember-at-Large
Mr. Joseph I. Giarrusso, District "A" Councilmember
Mr. Jay Banks, District "B" Councilmember
Ms. Kristen Gisleson Palmer, District "C" Councilmember
Mr. Jared C. Brossett, District "D" Councilmember
Ms. Cyndi Nguyen, District "E" Councilmember

Re: Request that the Council of the City of New Orleans Order Rehearing on the
Council's Own Motion of Council Resolution 18-65
Application of Entergy New Orleans, Inc. for Approval to Construct New Orleans Power
Station and Request for Cost Recovery and Timely Relief, Docket No. UD-16-02

Dear City Councilmembers:

The Deep South Center for Environmental Justice, VAYLA New Orleans, Justice and Beyond, 350 New Orleans, Sierra Club, and the Alliance for Affordable Energy respectfully request that the Council of the City of New Orleans ("City Council") exercise its authority pursuant to the New Orleans City Code § 158-485 to order rehearing on the City Council's own

motion of Council Resolution 18-65. Recent revelations about the compromised public process and false record of public opinion concerning this Resolution necessitate rehearing.

In Resolution 18-65, the majority of the City Council voted to approve Entergy New Orleans, Inc.'s ("Entergy") application to construct a 128 megawatt peaking gas plant in New Orleans East. As discussed below, disturbing evidence has come to light that demonstrates that Entergy's subcontractor paid numerous actors to feign support for the proposed gas plant by attending two public City Council meetings and providing public comments on Entergy's proposal. As a result of this and other actions, New Orleans residents were deprived of their constitutional and statutory rights to attend the meetings and provide public comments.¹ The illicit actions of Entergy's subcontractor also created "substantial errors of procedure" and otherwise "so affected the record as to render it impracticable to determine the case justly and fairly upon the record." New Orleans City Code § 158-485. Accordingly, the City Council should, on its own motion, suspend the operation of Council Resolution 18-65 and set the matter for rehearing.

We agree with Councilmembers Jason Williams and Helena Moreno that "the City Council owes a fiduciary obligation to the citizens of New Orleans."² Thus, we urge the City Council to suspend the operation of Resolution 18-65 given the disturbing evidence that this resolution is based on a proceeding in which New Orleans residents were deprived of their rights

¹ The Louisiana Constitution provides that "[n]o person shall be denied the right to observe the deliberations of public bodies and examine public documents, except in cases established by law." Louisiana Const. Art. XII, Sec. 3. The Open Meetings Law, La. R.S. 42:12 *et seq.*, ensures the rights of persons to observe and participate in the deliberations of public bodies. *Wagner v. Beauregard Par. Police Jury*, 525 So. 2d 166, 168 (La. Ct. App. 1988).

² Caresse Jackman, *New Orleans City Council Members respond to Entergy's investigation into paid actors*, WWL-TV News (May 10, 2018), <https://www.wwltv.com/article/news/local/new-orleans-city-council-members-respond-to-entergys-investigation-into-paid-actors/289-551113178>.

due, in part, to the intentional actions of entities that conspired to prevent residents from actively participating in the public meetings.

Evidence of Recruitment and Payment of Actors

As provided in the May 7, 2018 letter, on behalf of several organizations, to the City Council as well as state and parish officials requesting an investigation, troubling details have emerged in the last few months indicating that professional actors were paid cash to pose as concerned residents of New Orleans attending and providing comments in support of Entergy's proposed gas plant at public meetings convened by the City Council.³ This letter urged the City Council, as well as state and parish officials, to launch an investigation into the potential legal and ethical violations associated with recruiting and paying actors to feign support for the Entergy gas plant at City Council public meetings, thereby depriving residents of their rights to observe those public hearings and provide comment.

Following the letter, Entergy revealed on May 10th that one of its own subcontractors, Crowds on Demand, recruited, trained, and paid cash to numerous individuals to take up seats and speak from scripts at two public meetings conducted by the City Council.⁴ Entergy admitted

³ See Letter to Public Officials, *Request for Investigation into Legality of Paid Actors at City Council Public Meetings* (May 7, 2018). The letter is incorporated by reference in this request. See also Michael Isaac Stein, *Actors were paid to support Entergy's power plant at New Orleans City Council meetings*, *The Lens* (May 4, 2018), <https://thelensnola.org/2018/05/04/actors-were-paid-to-support-entergys-power-plant-at-new-orleans-city-council-meetings/> ("The Lens article"); Kristin Pierce, *City Council could face lawsuit following public hearing on Entergy plant*, WWL-TV (Mar. 7, 2018), <http://www.wwltv.com/article/news/local/city-council-could-face-lawsuit-following-public-hearing-on-entergy-plant/526747370>.

⁴ See Entergy, *Report of Investigation New Orleans Power Station Advocacy*, (May 10, 2018), p. 3, <http://www.entergy.com/NOPS/NOPSInvestigationReport.pdf> ("Entergy Report") ("We now know, as a result of our investigation, that Crowds on Demand did in fact compensate most, if not all, of the other individuals it recruited to appear at the [October 16, 2017] meeting [H]owever, we now know that Crowds on Demand also recruited and compensated people to attend this [February 21, 2018] meeting.").

that its initial statement to the public, claiming that the Company only asked people it has relationships with to participate in the City Council public meetings, was not accurate given its contractual relationship with the Hawthorn Group and the actions of Crowds on Demand.⁵ Entergy also revealed that Crowds on Demand was hired by Entergy contractor, the Hawthorn Group.⁶ The Hawthorn Group is known for the tactic of creating sham support for utility companies' projects in order to sway governmental decisions.⁷ Entergy does not explain its reason for contracting with the Hawthorn Group in light of its controversial history related to deceiving government officials and the public. Entergy also does not explain how its employees ended up wearing the same orange pro-gas plant t-shirts as the paid actors and presented comments similar to those made by the paid actors during the City Council public meetings. In sum, Entergy's report raises more questions than it answers. The need for a full investigation, as requested in the May 7, 2018 letter to the City Council and state and parish officials, remains.

Entergy contracted with firms that prevented New Orleans residents from exercising their constitutional and statutory right to participate in the City Council public meetings. Entergy and the firms' clear purpose was to sway the City Council to approve a proposed gas plant by

⁵ While Entergy states that it had no knowledge of Crowds on Demand's activities, Entergy concedes that it bears "ultimate responsibility for the actions of those purporting to act on our behalf." Entergy Report, p. 2.

⁶ Entergy Report, p. 1.

⁷ See Matt Kasper, *Hawthorn Group, PR firm behind paid actors scandal in New Orleans, has long record of being paid by utilities to lie to the public*, EnergyandPolicy.org (May 10, 2018) <http://www.energyandpolicy.org/hawthorn-group-pr-firm-paid-actors-new-orleans-entergy/>; Michael Stein and Charles Maldonado, *Entergy acknowledges astroturfing campaign for power plant, but says it didn't know about it*, *The Lens* (May 10, 2018), <https://thelensnola.org/2018/05/10/entergy-says-a-public-relations-firm-hired-people-to-speak-on-behalf-of-its-new-power-plant/>.

Entergy and to silence public opposition.⁸ As a result, and as Councilmember Jason Williams recognizes, the process has been “compromised.”⁹

Violations of Law

The actions described above are not merely regrettable, they are illegal and unethical. The Louisiana Constitution guarantees all persons the right to observe the deliberations of public bodies, Article XII, Section 3. The Open Meetings Law is designed to ensure integrity and to increase the public’s trust and awareness of its governing officials. Moreover, the Open Meetings Law expressly provides for public participation through the public comment process. Thus, the Louisiana Legislature has determined that the input public bodies receive from their constituencies is an indispensable part of all decisions these public bodies make.

The evidence gathered so far demonstrates that in at least two public meetings convened by the City Council, Crowds on Demand, an Entergy subcontractor, directed professional actors to wear orange t-shirts with a printed message in support of Entergy’s gas plant and present public comments as though they were concerned residents supporting the proposed plant. In each of those public meetings, real concerned residents were denied access into the meeting rooms where they could observe and/or make comments for the purported reason that no seats were available. The real concerned residents either waited for as much as several hours to be allowed in the meeting rooms or left in frustration after considerable time spent waiting.

⁸ *Id.*

⁹ Jessica Williams, *Did Entergy pay actors, ‘compromise’ plant process? New Orleans council to investigate*, The New Orleans Advocate (May 8, 2018), http://www.theadvocate.com/new_orleans/news/article_d22a990e-530f-11e8-9be9-2b956736d5b4.html.

There has been much discussion in the media about the legality of the tactic known as “astroturfing.” Astroturfing generally refers to paying people to pose as grassroots supporters for a given action or cause. But to be clear, what happened at the City Council meetings goes beyond astroturfing and thus does not turn on the legality of astroturfing in general. This is not a case where people were paid to enlarge the size of a crowd or join a protest, for example. Here, Entergy’s subcontractor paid actors to arrive early to public meetings convened by the City Council;¹⁰ to take up seats for the entire duration of the meetings (despite calls for people who had already provided public comment to give up their seats so others could be afforded an opportunity to provide comment);¹¹ and, in some cases, to help create a false public record by providing public comment, posing as concerned residents. Indeed, from the period beginning with the October 16, 2017 City Council public meeting through the City Council’s majority vote to approve the Entergy gas plant application on March 8, 2018, numerous media outlets published news reports with photographs of apparently paid actors wearing the ubiquitous orange pro-gas plant t-shirts. The presence of these paid actors potentially and significantly misrepresented and overstated public support for the gas plant. The intention and result of these actions was not only to misrepresent public support, but to deprive New Orleans residents of their constitutional right to observe the deliberations of public bodies and their statutory right to observe and comment.

¹⁰ See, e.g., The Lens article (one of the hired actors told The Lens that the actors were instructed to arrive early).

¹¹ *Id.* (As one of the hired actors described, “They said, you guys have to be there first thing because as soon as they open the door, we want you guys in there so if there are any protesters we got that whole room filled.”).

The evidence demonstrates that Entergy's subcontractor Crowds on Demand, planned, participated, and took actions in two public meetings that violated the Louisiana Constitution and the Open Meetings Law, resulting in irreparable injury to New Orleans residents who attended or attempted to attend the meetings, by excluding them from participation in the meetings and denying them the right to offer comments on a matter of interest to the public.

Authority of the City Council to Order Rehearing

The City Council has the authority to grant a rehearing of an order on its own motion where the City Council "concludes that substantial errors of procedure or the exclusion of evidence or any other substantial factors have so affected the record as to render it impracticable to determine the case justly and fairly upon the record."¹² The setting of a matter for rehearing shall suspend the operation of the rule or order in question unless otherwise provided by the City Council.¹³

In light of Entergy's admissions, the City Council should find that the actions taken on behalf of Entergy by its contractor and subcontractor prevented New Orleans residents from attending the public meetings and commenting on the Entergy gas plant and, therefore, constitutes a substantial factor affecting the record. The City Council should further find that these actions also created "substantial errors of procedure" to such an extent that it is impracticable to determine in a just and fair manner whether the Entergy gas proposal should be

¹² New Orleans City Code § 158-485.

¹³ *Id.*

approved. As Councilmember Jason Williams stated, “the harmful impact of this nefarious practice is unfortunate, unappreciated and repulsive to true democratic deliberative process.”¹⁴

It is essential to our democracy that the City Council rigorously investigate, determine, and act upon the facts in this matter. Councilmember Williams has called the process “compromised.”¹⁵ We agree and respectfully request that the City Council act on its own motion to grant rehearing, and suspend Council Resolution 18-65 until this matter is fully investigated and the City Council has had the opportunity to act on the investigation’s findings.

An Independent Investigation Is Necessary

We strongly recommend the City Council retain special counsel to lead an investigation into the use of paid actors at the City Council public meetings. We suggest that the scope of this investigation include, at a minimum, finding answers to the following questions:

- 1) Why did Entergy hire the Hawthorn Group?
- 2) What is the total amount of money that Entergy has paid to the Hawthorn Group?
- 3) Was any portion of the payment made by Entergy to the Hawthorn Group and its subcontractor Crowds on Demand collected from New Orleans ratepayers?
- 4) How long has Entergy retained the services of the Hawthorn Group?
- 5) What tasks have been performed by the Hawthorn Group on behalf of Entergy?
- 6) What is the total amount of money that Entergy paid to its subcontractor, Crowds on Demand?

¹⁴ Jessica Williams, *Did Entergy pay actors, ‘compromise’ plant process? New Orleans council to investigate*, The New Orleans Advocate (May 8, 2018) http://www.theadvocate.com/new_orleans/news/article_d22a990e-530f-11e8-9be9-2b956736d5b4.html.

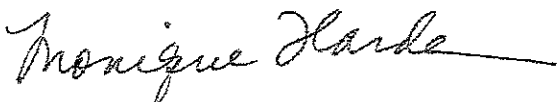
¹⁵ *Id.*

- 7) Has Crowds on Demand worked for Entergy prior to the October 2017 City Council public meeting?
- 8) Does Entergy's action to enter a contract with the Hawthorn Group to identify and recruit supporters of the proposed Entergy gas plant, which resulted in the paying of individuals to create sham support for Entergy's gas plant application in City Council public meetings, violate the franchise agreement between the City of New Orleans/City Council and Entergy?
- 9) Does Entergy's action to enter a contract with the Hawthorn Group to identify and recruit supporters of the proposed Entergy gas plant, which resulted in the paying of individuals to create sham support for Entergy's gas plant application in City Council public meetings, violate any of the legal obligations that Entergy has as a regulated utility monopoly?
- 10) Did any of the Council's utility advisors on the staff of the Dentons law firm and/or Legends Consulting Group have knowledge of any action to recruit, hire, and pay actors to feign support for the proposed Entergy gas plant prior to either the City Council meeting on October 16, 2017 or the City Council meeting on February 21, 2018?
- 11) Did any elected member of the City Council, whose term of office included the period between October 16, 2017 and March 8, 2018, or staff employed by the City Council during that time, have knowledge of any action to recruit, hire, and pay actors to feign support for the proposed Entergy gas plant prior to either the City Council meeting on October 16, 2017 or the City Council meeting on February 21, 2018?

12) Who drafted, reviewed, and/or approved the nondisclosure agreement in an effort to keep the cash payments to actors secret?

While an independent investigation is essential to determine ultimate responsibility and culpability, there is no doubt that the public process has been corrupted and that substantial errors of procedure have occurred. As a result, the City Council should suspend Resolution 18-65, on its own motion, and rehear the matter based on the information gathered to date, including Entergy's report.

Respectfully,



Monique Harden
Counsel for Deep South Center for Environmental Justice

William P. Quigley
Jill Tauber
Susan Stevens Miller
Sascha Bollag
Counsel for VAYLA New Orleans, Justice and Beyond, 350 New Orleans, the Alliance for Affordable Energy, and Sierra Club

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