

CC: MW

2019 APR -2 PM 1:38

LA PUBLIC SERVICE  
COMMISSION

**BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION**

**LOUISIANA PUBLIC SERVICE  
COMMISSION, ex parte**

**DOCKET NO. R-35135**

**In Re: RULEMAKING PURSUANT TO THE  
GENERAL ORDER DATED MARCH 7, 2019  
IN DOCKET NO. R-34948 TO DEVELOP  
RULES UNDER WHICH THIRD-PARTY  
AGGREGATORS OF RETAIL CUSTOMERS  
SEEKING AUTHORITY TO OPERATE  
WILL BE ALLOWED TO DO BUSINESS  
WITHIN THE LPSC'S JURISDICTION**

**LAFAYETTE UTILITIES SYSTEM  
NOTICE OF INTERVENTION AND INCLUSION ON SERVICE LIST**

Lafayette Utilities System ("LUS"), submits this Notice of Intervention and Inclusion on Service List pursuant to Rule 10 of the Rules of Practice and Procedure of the Louisiana Public Service Commission ("LPSC" or "Commission"), as follows:

1.

This rulemaking proceeding was initiated pursuant to the LPSC's General Order, Section 4 and 5, issued on March 7, 2019 in Docket No. R-34948. Notice of this proceeding was published in the LPSC's Official Bulletin Number 1188, dated March 8, 2019. Interventions are due on or before April 2, 2018.

2.

LUS is a municipal utility serving more than 67,000 retail electric service customers in the City of Lafayette and certain areas of the Parish of Lafayette, Louisiana. LUS is a Load Serving Entity, Transmission Owner and Generation Owner in MISO. LUS is electrically interconnected with Entergy Louisiana, LLC ("Entergy") and Cleco Power LLC ("Cleco"), and a

By Hand

party to longstanding interconnection agreements with Cleco and Entergy. Thus, LUS has an actual interest in this proceeding, and no other party to this proceeding is suited to adequately represent LUS's interests.

3.

Rule 10 of the LPSC Rules of Practice and Procedures provides that any party actually in interest may appear in any proceeding before the LPSC.

4.

No other party to this proceeding is suited to adequately represent LUS's interests. Accordingly, LUS seeks to intervene and participate in this docket as a full party intervenor.

5.

This intervention will not prejudice any other party or unduly delay the proceedings with respect to the examination of the issues presented by this proceeding.

6.

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

Katherine W. King  
Randy Young  
KEAN MILLER LLP  
Post Office Box 3513  
Baton Rouge, LA 70821  
Tel: (225) 387-0999  
Fax: (225) 388-9133  
E-Mail: [katherine.king@keanmiller.com](mailto:katherine.king@keanmiller.com)  
[randy.young@keanmiller.com](mailto:randy.young@keanmiller.com)

and

Carrie R. Tournillon  
KEAN MILLER LLP  
909 Poydras Street, Suite 3600  
New Orleans, Louisiana 70112  
Tel: (504) 585-3056  
Fax: (504) 585-3051  
E-mail: [carrie.tournillon@keanmiller.com](mailto:carrie.tournillon@keanmiller.com)

**WHEREFORE**, LUS hereby respectfully requests that this motion be granted and LUS be granted Intervenor status, with the right to fully participate in this proceeding. Further, LUS requests that it be placed on the official service list and served with all pleadings, notices, orders, and other filings.

RESPECTFULLY SUBMITTED:



Katherine W. King, #7396  
J. Randy Young, #21958  
Carrie R. Tournillon #30093  
KEAN MILLER LLP  
400 Convention Street, Suite 700  
Post Office Box 3513  
Baton Rouge, LA (70821-3513)  
Tel: (225) 387-0999  
*Attorneys for Lafayette Utilities System*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of Lafayette Utilities System Notice of Intervention and Inclusion on Service List has been served by electronic mail and/or by U.S. mail, postage prepaid, on all parties on the Official Service List.

New Orleans, Louisiana this 2<sup>nd</sup> day of April, 2019.



Carrie R. Tournillon