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2016 MAR 28 AM 10: 58

LA PUBLIC SERVICE
COMMISSION

March 24, 2016

VIA OVERNIGHT MAIL

Ms. Terri Lemoine Bordelon
Records and Recording Division
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North Fifth Street
Baton Rouge, Louisiana 70802

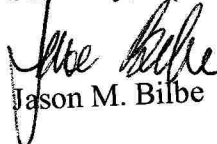
Re: Proposed Modification to the Commission's Market-Based Mechanism Rules
(LPSC Docket No. R-34003)

Dear Ms. Bordelon:

On behalf of Entergy Louisiana, LLC ("ELL"), please find enclosed the original and three copies of ELL's Petition for Intervention in the above-captioned docket. Please retain the original and two copies for your files and return a date-stamped copy to me in the enclosed, self-addressed envelope.

If you have any questions, please do not hesitate to call me. Thank you for your courtesy and assistance with this matter.

Sincerely,


Jason M. Bilbe

JMB/ttm
Enclosures

cc: Official Service List (via Electronic and U.S. mail)

UPS

BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION 2016 MAR 28 AM 10: 58

LA PUBLIC SERVICE
COMMISSION

***IN RE: PROPOSED MODIFICATION TO)
THE COMMISSION'S MARKET-BASED)
MECHANISM RULES)***

DOCKET NO. R-34003

PETITION FOR INTERVENTION

NOW BEFORE THIS COMMISSION, through undersigned counsel, comes Entergy Louisiana, LLC (“ELL” or the “Company”), who pursuant to Rule 10 of the Louisiana Public Service Commission’s (“LPSC” or the “Commission”) Rules of Practice and Procedure (“Rules”), respectfully submits this Petition for Intervention (“Petition”) with respect to the above-captioned proceeding. In support of this Petition, the Company represents the following:

I.

This rulemaking docket addresses a possible modification to the Commission’s Market-Based Mechanism (“MBM”) rules found in the General Order dated October 29, 2008 (Docket No. R-26172, Subdocket C). The proposed modification would alter a criterion under which generating capacity investments or contracts would require the formal use of a market-based mechanism. The notice of publication appeared in the Commission’s Official Bulletin No. 1110 dated March 11, 2016. Pursuant to Rule 19 of the LPSC Rules, interventions must be filed within 25 days of the date of the Commission’s Official Bulletin, or by April 5, 2016. This intervention is therefore timely.

II.

Pursuant to Rule 10 of the LPSC’s Rules, “[a]ny party actually in interest may appear in any proceeding before the” LPSC.

III.

The Company is a regulated utility that was organized for the purposes, among others, of developing, manufacturing, generating, transmitting, distributing, and selling electricity for power, lighting, heating and other such uses. ELL conducts business in fifty-eight (58) of the sixty-four (64) parishes in the State of Louisiana.

IV.

The Company has been actively involved in the various MBM dockets at the Commission. Thus, the Company has substantial interests in the outcome of this proceeding. The Company's interests in this proceeding cannot be represented or protected adequately by any other parties.

V.

The Company requests that notices, correspondence, and other communications concerning this Petition for Intervention be directed to the following persons:

Mark D. Kleehammer
4809 Jefferson Highway
Mail Unit L-JEF-357
Jefferson, Louisiana 70121
Telephone: (504) 840-2528
Facsimile: (504) 840-2681
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Karen H. Freese
Jason M. Bilbe
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jbilbe@entergy.com

The Company further requests that the foregoing individuals be placed on the Official Service List for this proceeding and respectfully requests that the Commission permit the designation of more than one person to be placed on the Official Service List.

WHEREFORE, the Company prays that this Petition for Intervention be granted and that ELL be made a party to this proceeding with a right to participate fully in said proceeding, to

receive notices and copies of all filings, discovery, and other pleadings, to present evidence and witnesses, to cross-examine witnesses, and for all general and equitable relief that the law and the nature of the case may permit.

Respectfully submitted,

By: 

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Karen H. Freese, La. Bar No. 19616
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**ATTORNEYS FOR
ENERGY LOUISIANA, LLC**

CERTIFICATE OF SERVICE
LPSC Docket No. R-34003

I, the undersigned counsel, hereby certify that a copy of the above and foregoing has been served on the persons listed below by facsimile, by hand delivery, by electronic mail, or by depositing a copy of same with the United States Postal Service, postage prepaid, addressed as follows:

Melanie Verzwuyvelt
LPSC Staff Attorney
Louisiana Public Service Commission
P.O. Box 91154
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Brandon Frey
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Louisiana Public Service Commission
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Donnie Marks
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Louisiana Public Service Commission
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P. O. BOX 3513
Baton Rouge, LA 70821

New Orleans, Louisiana, this 24th day of March, 2016.



Jason M. Bilbe