

LAW OFFICE OF  
DANIEL L. AVANT  
701 West Beltline Road  
Cedar Hill, Texas 75104  
972-291-2581

July 16, 2014

*Via Facsimile (225) 342-2831*

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

Re: Potential Business Combination of Entergy Louisiana, LLC and Entergy  
Gulf States Louisiana, L.L.C. (LSPC Docket No. U-33244)

Dear Ms. Bordelon:

On behalf of IBEW, Local 2286, enclosed is an original and three copies of a Notice of Late Intervention. I have this date faxed the filing. In accordance with the rules, please file the Notice of Late Intervention and return a date stamped copy to me in the enclosed, self-addressed envelope. If you have any question, please feel free to call me and thank you for your courtesy and assistance with this matter. I have enclosed my check in the amount of \$25.00 for the fax filing fee.

Sincerely,

  
Daniel L. Avant

Enclosures

cc: Official Service list  
Clinton Trahan  
George Crawford

BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION

ENTERGY GULF STATES LOUISIANA,	)	
L.L.C., AND ENTERGY LOUISIANA, LLC,	)	
<i>EX PARTE, IN RE: POTENTIAL BUSINESS</i>	)	DOCKET NO. U-33244
COMBINATION OF ENTERGY LOUISIANA,	)	
LLC AND ENTERGY GULF STATES	)	
LOUISIANA, L.L.C.		

INTERNATIONAL BROTHERHOOD OF  
ELECTRICAL WORKERS, LOCAL UNION 2286  
NOTICE OF LATE INTERVENTION AND INCLUSION ON SERVICE LIST

The International Brotherhood of Electrical Workers, Local Union 2286 ("IBEW, Local 2286"), pursuant to Rule 10 of the Louisiana Public Service Commission ("LPSC") Rules of Practice and Procedures, hereby intervenes in the captioned proceeding upon suggesting as follows:

1.

IBEW, Local 2286 is the exclusive collective bargaining agent for approximately 540 employees of Entergy Gulf States Louisiana, L.L.C. (EGSL) employees.

2.

IBEW, Local 2286 has collective bargaining agreements with EGSL employees at Entergy Gulf States Louisiana Fossil, Entergy Gulf States Louisiana T&D, Entergy Operations, Inc. - Planners and Entergy Operations, Inc.

3.

EGSL and Entergy Louisiana, LLC ("ELL") has stated in its June 4, 2014 "Evaluation of the Potential Business Combination of Entergy Louisiana, LLC and Entergy Gulf States Louisiana, L.L.C. that:

"With regard to bargaining unit employees, ELP will assume any collective bargaining agreements ("CBAs") in effect at the time of the Transaction to which EGSL is a party, and ELP will honor any bargaining obligations that might exist for EGSL bargaining unit employees who become employees of the combined company. Therefore, during the terms of the applicable CBAs, the rights, compensation, benefits, and obligations pertaining to bargaining unit employees who become ELP employees will be determined by their

applicable CBAs, as well as any other applicable collective bargaining obligations. By recognizing the unions and assuming the CBAs, ELP will maintain the terms and conditions of employment for the affected bargaining unit employees."

4.

IBEW, Local 2286 is currently in negotiations with Entergy Gulf States Louisiana Fossil for a new collective bargaining agreement. IBEW, Local 2286 anticipates entering into negotiations with Entergy Gulf States Louisiana T&D in September, 2014 as the current CBA expires October 11, 2014.

5.

IBEW, Local 2286 has an interest in ensuring that if the proposed business combination of Entergy Louisiana, LLC and Entergy Gulf States Louisiana, L.L.C. is approved by the Public Service Commission that the new proposed entity, ELP, does, in fact, assume all then existing collective bargaining agreements with IBEW, Local 2286 and honor all bargaining obligations with the EGSL bargaining unit employees represented by IBEW, Local 2286.

6.

IBEW, Local 2286 is thus an interested party and should be permitted to intervene in the above entitled and numbered proceeding in order to protect the EGSL employees it represents.

7.

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

8.

No other party to this proceeding is in a position to properly and adequately represent IBEW, Local Union 2286's interest. Accordingly, IBEW, Local 2286 seeks to intervene and participate in this docket as a full party intervenor.

9.

This intervention will not prejudice any other party or unduly delay the proceedings.

10.

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

Daniel L. Avant  
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701 Beltline Road  
Cedar Hill, Texas 75104  
Telephone: (972) 291-2581  
Email: [davant@afllclaw.com](mailto:davant@afllclaw.com)

**WHEREFORE**, IBEW, Local 2286 prays that it be granted leave to file this late intervention in the above entitled and numbered proceeding, that it be granted intervenor status as an interested party and further requests that it be placed on the LPSC official service docket.

RESPECTFULLY SUBMITTED



DANIEL L. AVANT  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of IBEW, Local 2286's Notice of Intervention and Inclusion on Service

List has been served by electronic mail and/or by U.S. mail, postage prepaid, as follows:

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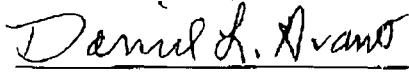
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Gordon D. Polozola  
NRG Energy, Inc.  
General Counsel - South Central Region  
112 Telly Street  
New Road, Louisiana 70760

Cedar Hill, Texas, this 16<sup>th</sup> day of July, 2014

A handwritten signature in cursive script, reading "Daniel L. Avant", written over a horizontal line.

Daniel L. Avant