EXHIBIT A

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF LOUISIANA

In re	*	
ENTERGY NEW ORLEANS, INC.,	*	Bankruptcy Number 05-17697
DEBTOR.	*	

* * * * * * * * * * * * * **

Rule 30(b)(6) deposition of ENTERGY NEW ORLEANS, INC., through their designated representative, THEODORE H. BUNTING, JR., 1340 Echelon Parkway, Jackson, Mississippi 39213, taken at the law offices of Jones, Walker, Waechter, Pointevent, Carriere & Denegre, LLP, located at 201 St. Charles Avenue, 51st Floor, New Orleans, Louisiana 70170, commencing at 9:10 a.m. on Monday, the 25th day of September, 2006.

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(Document entitled "NOTICE OF DEPOSITION OF ENTERGY NEW ORLEANS, INC.")

EXHIBIT NO. 2 11
(Document entitled "NOTICE OF DEPOSITION AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS OF ENTERGY NEW ORLEANS, INC. BY FINANCIAL GUARANTY INSURANCE COMPANY")

EXHIBIT NO. 3 44
(BINDER ENTITLED "6/21/06 MEETING")

EXHIBIT NO. 4 45
(Document entitled "Community Development Block Grant (CDBG) Application for Utility Restoration and Infrastructure Rebuilding")

EXHIBIT NO. 5 62
(Document entitled "THIRD MOTION FOR AN ORDER EXTENDING THE TIME PERIODS WITHIN WHICH THE DEBTOR HAS THE EXCLUSIVE RIGHT TO FILE A PLAN OF REORGANIZATION AND SOLICIT ACCEPTANCES THEREFORE")

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EXHIBIT NO. 8 100
(Document entitled "Attachment A")

EXHIBIT NO. 9 100
(Letter to Andy Kopplin, Louisiana Recovery Authority from the council for the City of New Orleans)

EXHIBIT NO. 10 106
(Document entitled "Entergy New Orleans' Request for Community Development Block Grant, Presented to Louisiana Recovery Authority Infrastructure Committee")

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right.
A. All right. Again, I'm not certain. I mean, I see some of the claim descriptions as loan labor, and if any of that labor had been part and parcel to restoration, then it's possible it could have been.
Q. But presumably most of this was pre-Katrina?
A. Again, I don't know specifically without looking at the actual detail behind the claim itself.
Q. If you could look at the section called CDBG Application Status Report, and attached right after 913 there is an enclosure that doesn't seem to have Bates numbers.
A. Uh-huh (indicating affirmatively).
Q. If you look at page 10.
A. It's numbered 10?
Q. Yeah. It's numbered 10 on the right.
A. Uh-huh (indicating affirmatively).
Q. It says, "CDBG funding will directly offset cost that would otherwise be

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recovered from ENO's customers"?
A. Uh-huh (indicating affirmatively).
Q. Do you know what is meant by directly offset cost there?
A. Well, since I didn't produce it, no. So I don't know what the implication is as it stands relative to this document.
Q. Do you know who produced this particular document, who prepared it?
A. No, I don't.
Q. Do you have any idea what it was used for?
A. Other than as is contained in this report, I'm not certain.
Q. Okay. On 744 --
A. Which section?
Q. Rate Filing Status Report.
A. Okay.
Q. Section Roman XIII.
A. Uh-huh (indicating affirmatively).
Q. First of all, are you familiar with this rate filing status report?
A. I mean it appears to be part of

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an application that was filed before the city council.
Q. And the Section XIII makes reference to the potential for future hurricane damage?
A. Yeah. I mean, it says, "Given the frequent hurricane activity experience in the Gulf Coast region over the last several years and the predictions for the future, ENO must take into consideration the very real possibility that another major storm could hit the City of New Orleans in the summer or fall of 2006.
Q. Is the storm reserve -- or the proposed storm reserve rider the way in which ENO is dealing with the potential for future storms?
A. That's its option today is to build up that reserve through collection of rates through customers.
Q. What other options might it have or --
A. I'm not aware of any that it would have. Well, I mean, the Stafford Act is what my counsel says here.

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Q. I know it's in here. I just need to find it. There's a section I believe in here on insurance. 910. The tab does say "Insurance Update."
A. Right.
Q. What is the current projected insurance recovery for ENO?
A. I believe it's 240 to $250 million.
Q. And when is that money expected to be recovered?
A. Our current forecast of receipts has most of those monies being recovered in 2009, a significant portion of them in 2009.
Q. And what needs -- why is it taking so long to recover the money?
A. I don't know. I'm probably not the person to respond in terms of the timing. I mean, obviously insurance companies don't want to pay, that's just the natural process, and obviously, you know, they're going to make the payouts of that. I won't say it's difficult, but it will be a protracted process. Part of it is in the primary layer you -- there's actually -- you're actually exceeding

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the total aggregate coverage which obviously gives the party that's providing the coverage a situation where they want to ensure that they're not going to pay more than what's necessary.
Q. What's -- Go ahead.
A. So that's going to protract it. You have primary and secondary layers of coverage, and which would tend to complicate it as well.
Q. How much is it going to cost or is there a projection of what it's going to cost ENO in legal fees to recover that insurance?
A. I have not seen one.
Q. You have not.
What law firms are handling the recovery of that insurance to the extent it's being handled by outside counsel for ENO?
A. I'm not sure.
Q. Is the recovery being handled by counsel for the Entergy affiliates as a group?
A. I'm sorry. Ask it again.
Q. I'm trying to figure out whether ENO has its own counsel dealing with the

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coverage recovery, which would be a direct expense, or whether the expense would be borne through counsel serving the Entergy affiliates as a group on the coverage issues?
A. Yeah. I mean, I'm not certain, but I -- I mean I think you would have to assume that from an efficiency prospective it would make sense that it's dealing with the coverage in totality because it is an Entergy corp -- it's an Entergy corporation policy in terms of -- you know, in terms of how it's structured.
Q. Well, the projections as to ENO's operations on a go-forward basis, financial projections, do they contain a cost factor for what it's going to cost to recover this insurance?
A. We -- I mean we have an O&M line in those projections, yes, and budgets built up to those O&M lines, but I can't tell you if there's a -- I can go to a specific line item that lays out what that amount is.
Q. Are you confident that whatever that O&M number would be would be sufficient to pay for this type of recovery effort?

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A. Well, I mean, I'm confident that our legal fees are a part of our budget buildup, and, you know, it would be the individual who has responsibility for budgeting those things would obviously, you know, play a role in that.
Q. Who is that?
A. The legal department.
Q. And who specifically would you go to as the leader on giving you that number?
A. They have a budget coordinator within their particular department.
Q. And who is he or she?
A. I can't think of her name, sir, today.
Q. Okay. So what sort of money is ENO going to need to get out of bankruptcy, what sort of cash is it going to need to have?
A. I'm not sure.
MR. VANCE:
Object to the form of the question.
Answer it if you can.
THE WITNESS:
I don't know if I can answer

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that. I mean, that's a fairly open-ended question. What they're going to need is going to be a function of a number of different things.
EXAMINATION BY MR. DABNEY:
Q. What's it going to be a function of? What checks do you anticipate possibly are likely being written at the time ENO exits bankruptcy?
A. Again, that --
MR. VANCE:
I'm going to the object to the form of the question. Are you asking about payments to creditors or are you asking about the receipts of money to the debtor?
MR. DABNEY:
I'm asking about the outflow of money to creditors and other expenses.
MR. VANCE:
If you can answer that.
THE WITNESS:
Again, I don't know if I can. That's a function of exactly how do you come out. Do you come out under a full

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