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November 16, 2005

Via Facsimile No. 582.8583 and United States Mail

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Ewell E. Eagan, Jr., Esq.
Gordon, Arata, McCollam, Duplantis & Eagan, LLP
201 St. Charles Ave., Suite 4000
New Orleans, LA 70170

Re: *In Re: Entergy New Orleans, Inc.*,
United States Bankruptcy Court,
Eastern District of Louisiana,
Bankruptcy Case No. 05-17697 "B"

Dear Counsel:

Based upon the deposition testimony of the various Entergy representatives over the past several days, it is apparent that Entergy New Orleans, Inc., and Entergy Corporation (collectively "Entergy") have not produced all documents and records in their possession responsive to The Bank of New York's pending discovery. While we do not believe Entergy has intentionally failed or refused to respond fully, it is imperative that we receive all documents and records responsive to the discovery. Accordingly, we kindly request that Entergy conduct a complete search of its records and produce all responsive documents, including, but not limited to, the following:

1. Any cost estimates, including, but not limited to, those prepared by Scheurich and/or Bunting;

2. Any T&D planning reports;

EXHIBIT
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3. Any reports, inventories, and/or maps prepared by Paul Olivier;

4. Any reports, inventories, and/or maps prepared by Jim Raleigh;

5. Any reports, inventories, and/or maps prepared by Perry Dufrene;

6. Any reports, data, inventories, spreadsheets, etc., prepared by Al King;

7. Any reports, data, inventories, spreadsheets, etc., prepared by Donna Doucet;

8. Any and all reports prepared by or for, and any written and/or electronic communication to or from, PricewaterhouseCoopers;

9. Any and all reports prepared by or for, and any written and/or electronic communication to or from, Black & Veatch, R. G. Rudden Associates, Inc.;

10. Any and all reports prepared by or for, and any written and/or electronic communication to or from, P-PIC, L.L.C.;

11. Any and all reports prepared by or for, and any written and/or electronic communication to or from, McGriff, Seibels, and Williams, Inc.;

12. Any Proofs of Loss;

13. Any reports, data, inventories, spreadsheets, etc. prepared by the Fossil Operations Group;

14. Any reports, data, inventories, spreadsheets, etc. prepared by Mike Bakewell and/or Etienne Senac;

15. Any reports, data, inventories, spreadsheets, etc. prepared by John Zemanek;

16. Any reports, data, inventories, spreadsheets, etc. prepared by Ed Melendresas;

17. Any reports, data, inventories, spreadsheets, etc. prepared by Randy Helmick;

18. Any minutes and notes relative to the weekly, Friday telephone conference calls between Mike Wilson, representatives of McGriff, Seibels & Williams, Inc., and/or others;

19. Any Loss Estimate Reports;

20. Any project codes lists;

21. Any engagement letter to and/or from PricewaterhouseCoopers;

22. Any and all reports, data, inventories, spreadsheets, etc., prepared by Ann Kulakowski;

23. Any and all reports, data, inventories, spreadsheets, etc., prepared by Barret Green;

24. Any and all reports, data, inventories, spreadsheets, etc., prepared by any loss control engineers;

25. Any Katrina cost estimates;

26. The Original Damage Report;

27. ENOI's Cost Reimbursement File;

28. Excel spreadsheet that entails the damage report to the substations as of 9/16/05;

29. Any and all reports prepared by or for, and any written and/or electronic communication to or from, Baker & O'Brien;

30. Any and all reports prepared by or for, and any written and/or electronic communication to or from, Fluor;

31. Any and all reports prepared by or for, and any written and/or electronic communication to or from, Bateman & Chapman;

32. Any and all reports prepared by or for, and any written and/or electronic communication to or from, Robertson & Co.;

33. Any and all reports prepared by or for, and any written and/or electronic communication to or from, Mattson, Driscoll & D'Amico;

34. Any and all reports prepared by or for, and any written and/or electronic communication to or from, OMSL - Service Company;

35. Any and all reports prepared by or for, and any written and/or electronic communication to or from, Oil Insurance Ltd.;

36. Any and all reports prepared by or for, and any written and/or electronic communication to or from, AIG;

37. Any summary of line damage;

38. Any reports prepared by Earl Vedros;

39. Any reports prepared by Sherry Mahoney;

40. Any facilities cost estimates;

41. Any cost estimation models;

42. Any written and/or electronic communication to or from Simon Cox;

43. Any written and/or electronic communication to or from Agnew Higgins;

44. Any gas restoration reports;

45. The weekly periodic reports which preceded, and which were replaced by, the Executive Summary Storm Reports;

46. Any reports, spreadsheets, etc., generated by, or from, the AM/FM System;

47. The Storm Plan;

48. Any Department of Energy reports;

49. Any map, drawing, etc., of ENOI's current or reconfigured system;

50. Any documents and records, including, but not limited to, written and/or electronic communication, to or from the City of New Orleans relating and/or pertaining to the restoration of electric and gas services to ENOI's customers, future rates for such services, and ENOI's franchise to supply such services in the future;

51. Any regulatory responses provided to the City of New Orleans;

52. Any feeder maps;

53. Any daily transmission reports;

54. Any reports, maps, drawings, etc., depicting the currently energized distribution substations.

We also kindly request that you provide a copy of the handout(s) submitted to the New Orleans City Council today and any reports, documents, data, etc., from which said handout(s) were created.

Please contact me should you have any questions or comments.

Thanking you for your prompt attention to this matter, I remain

Very truly yours,

HELLER, DRAPER, HAYDEN, PATRICK & HORN, L.L.C.

Drew R. Ballina

DRB/jlm

3034.18224.133893

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November 17, 2005

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Re: *In Re: Entergy New Orleans, Inc.*,
United States Bankruptcy Court, Eastern District of Louisiana,
Bankruptcy Case No. 05-17697 "B"

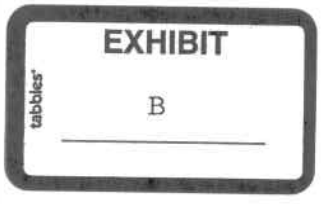
Gentlemen:

Pursuant to your request at the deposition of Theo Bunting yesterday, please consider this our written request for the following documents, responsive to our documents requests and referenced by Mr. Bunting in his deposition:

(i) any and all maps that show the areas that ENOI believes would be able to receive services after the restoration costs of $260-325M are incurred;
(ii) any and all documents which contain the assumptions for the financial projections in Bates numbered docs Entergy 004149-004156;
(iii) any and all updates of the financial projections in Bates numbered docs Entergy 004149-004156; and
(iv) any and all "planning scenarios" for ENOI.

Mr. Bunting also was unable to answer certain questions regarding the financial projections in Bates numbered docs Entergy 004149-004156 and advised that he would provide an answer to Pat. Pat, can you please make sure that Mr. Bunting provides a response to the following:

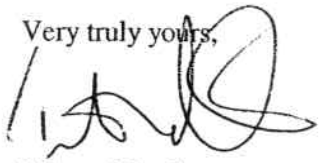
(i) why the "Purchased Power" referenced on Entergy 004153 increases dramatically from 2006 to 2007.
(ii) why "Utility Plant" referenced on Entergy 004154 decreases from 2007 to 2008; and
(iii) why "Other regulatory assets" referenced on Entergy 004154 increases dramatically from 2007 to 2008.



As we advised on break from the depositions, we have no problem with providing you a written request for specific documents referenced in the depositions by the witnesses, however, please note that our agreement should not be considered in anyway as a release by the Trustee of your obligations under the Federal Rules of Civil Procedure, applicable to these proceedings under the Federal Rules of Bankruptcy Procedure, to fully respond to the written discovery previously propounded upon each of your clients.

Thanking you in advance for your prompt response to our requests. With kindest regards, I am

Very truly yours,



Tristan Manthey

TM/rh
cc: H. Slate Dabney, Esq.
Loretta Lundberg, Esq.
William H. Patrick, III, Esq.
Douglas S. Draper, Esq.
Drew R. Ballina, Esq.