



Louisiana - New Orleans
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March 6, 2017
By Hand Delivery and Email

Ms. Lora W. Johnson, CMC
Clerk of Council
Room 1E09, City Hall
1300 Perdido St.
New Orleans, La 70112

IN RE: RESOLUTION REGARDING PROPOSED RULEMAKING TO ESTABLISH INTEGRATED
RESOURCE PLANNING COMPONENTS AND REPORTING REQUIREMENTS FOR ENTERGY
NEW ORLEANS, INC. (DOCKET NO. UD-17-01)

Dear Ms. Johnson,

Enclosed please find an original and three copies of 350 Louisiana - New Orleans' request for *Out of Time Proposed Amendments for 350 Louisiana - New Orleans* in the above mentioned docket.

Please file the attached communication and this letter in the record of the proceeding and return one time-stamped copy to our courier, in accordance with normal procedures.

Thank you for your time and attention,

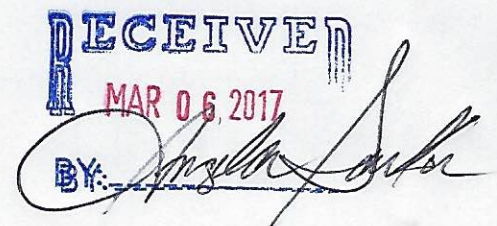
Sincerely,

A handwritten signature in black ink that reads 'Renate Heurich'.

Renate Heurich

Co-founder

350 Louisiana - New Orleans



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Before

The Council of the City of New Orleans

IN RE: RESOLUTION REGARDING PROPOSED RULEMAKING TO ESTABLISH INTEGRATED RESOURCE PLANNING COMPONENTS AND REPORTING REQUIREMENTS FOR ENTERGY NEW ORLEANS, INC.

(DOCKET NO. UD-17-01)

OUT OF TIME PROPOSED AMENDMENTS TO THE COUNCIL'S INTEGRATED RESOURCE PLANNING REQUIREMENTS BY 350 LOUISIANA - NEW ORLEANS

350 Louisiana - New Orleans ("350 LA") respectfully requests that the City Council of New Orleans, Louisiana grants its Proposed Amendments Out of Time in above mentioned docket. 350 LA was not included in this docket's service list until March 1st and did not receive any of the communications exchanged by other intervenors until that day.

350 LA is a volunteer led local organization whose purpose is to connect our region to the international climate change movement led by 350.org. Our mission is to lend support to initiatives in New Orleans to raise consciousness and promote sound policy around climate change, which poses unprecedented threats to our lives. Rising seas, hotter temperatures, and stronger storms make our community especially vulnerable. 69% of New Orleans residents are worried about climate change, according to a 2016 study by Yale University, which yields insights even on a community level (see exhibit A).

Between April 2015 and December 2016, 350 LA collected more than 1,200 signatures on a petition asking the New Orleans City Council to mandate that Entergy New Orleans ("ENO") meet at least 20% of energy needs with renewable sources by 2020 (see attached). We submitted these signatures to the New Orleans Utility Committee on December 19, 2016.

The citizens of New Orleans widely support policies encouraging renewable sources of energy. We encountered overwhelming support whenever we were out in the community collecting petition signatures. The above mentioned Yale study supports this observation: 73% of New Orleans residents support requiring utilities to produce 20% of electricity from renewable sources. In addition, 78% want to see CO2 regulated as a pollutant; 79% want to see strict CO2 limits on existing coal-fired power plants.¹

A large number of states have implemented Renewable Portfolio Standards ("RPS")² as a means of gradually transitioning from a fossil fuel-based economy (see exhibit B). An RPS of 20% by 2020 is in line with goals set by other states and would be absolutely within reach,

¹ <http://climatecommunication.yale.edu/visualizations-data/>

² <http://www.ncsl.org/research/energy/renewable-portfolio-standards.aspx>

considering our region's potential for solar energy and opportunities for wind power purchase agreements through the Midcontinent Independent System Operator ("MISO"). There are more than 7,000 rooftop solar installations in New Orleans, underlining how much our residents are embracing clean affordable renewable energy.

350 LA is therefore recommending the inclusion of a Renewable Portfolio Standard of 20% by the year 2020 in the 2018 Integrated Resource Plan ("IRP") for the City of New Orleans.

However, solar access remains disproportionately concentrated in middle class and affluent households with incomes of \$40- 90,000/ year. Low income households are less likely to own their own roof and have less access to loans and financing for solar purchase. 40% of US households earn less than \$40,000/year, but they account for less than 5% of all solar installations³ (see exhibit C). Regulations favoring community solar programs would expand this option to many more residents.

350 LA is asking the City Council of New Orleans to establish regulatory tools to allow residents to participate in community solar projects. These should not only include utility-managed community solar, but also third party-controlled community solar projects. Utility- as well as third party-managed community solar projects should include a minimum of 20% of low income households in their customer base. Options for third party models might include local businesses, industry, non-profit organizations, local government, schools etc. Businesses would take advantage of the lower cost of solar installation on a utility scale, enhance their image by financing community solar and inviting residents to participate, and receive a decent return on their investment.

New Orleans is among the 10 top cities likely to see big increases in power outage risks due to extreme weather events.⁴ Large-scale solar projects with battery back-up, strategically located on critical infrastructure and public buildings (water treatment plant, emergency shelters, hospitals, fire stations, police stations, schools etc.), would make our city much more resilient in the case of natural disasters. "The traditional solution to deal with outages has been facility-based backup power in the form of diesel generators. But these are designed to run only during emergencies and are therefore prone to fail when called upon. Furthermore, once on-site fuel supplies are exhausted, diesel generators are dependent on fuel deliveries that may not be possible during a disaster. And, because they sit idle most of the time, they represent sunk costs with little ability to generate revenue."⁵ Hurricane Katrina revealed how devastating it is to lose power supply to critical infrastructure, disproportionately affecting our low income residents and vulnerable populations. But even absent any hurricanes we are experiencing water boil advisories far too often. "Clean distributed generation systems, such as solar+storage, as well as other systems like combined heat-and-power (CHP) systems and fuel cells... can provide on-going benefits such as continuous power, energy cost savings,

³ <http://cesa.org/assets/2017-Files/STEP-webinar-slides-1.10.2017.pdf>

⁴ <http://www.cleaneogroup.org/wp-content/uploads/Resilient-Cities.pdf>

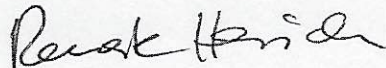
⁵ <http://www.cleaneogroup.org/wp-content/uploads/Resilient-Cities.pdf>

and lower emissions, as well as provide emergency power to cover local critical loads when the grid goes down.”⁶

We are asking the City Council to include a Resilient Power Plan in the rule making procedures of the 2018 IRP, combining solar power generation with back-up storage at critical infrastructure locations.

We thank you in advance for your careful consideration.

Respectfully Submitted,



Renate Heurich

Co-founder

350 Louisiana - New Orleans

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⁶ <http://www.cleane.org/wp-content/uploads/Resilient-Cities.pdf>



350Louisiana.org

DATE _____

PETITION TO THE UTILITIES COMMISSION OF THE NEW ORLEANS CITY COUNCIL

We urge the Commission, through the Integrated Resource Plan, to mandate that Entergy New Orleans (ENO) obtain at least 20% of energy needs from renewable sources by 2020. We also request that ENO factor in external costs of burning fossil fuels in their cost projections for providing energy to ratepayers.

It is unwise on the part of ENO to rely solely on natural gas, other fossil fuels, and nuclear to produce our energy. Rising gas prices translate to higher energy bills, and burning fossil fuels causes climate change, which destroys our way of life in Louisiana. New Orleans needs a diverse, renewable energy portfolio to guarantee clean, reliable and affordable energy for years to come. We demand a transition to a clean energy economy.

	NAME	ADDRESS	PHONE	EMAIL
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Certificate of Service

I hereby certify that I have this 6th day of March, 2017, served copies of the foregoing pleading upon all over known parties, of this proceeding, as listed below, by U.S. Mail, hand delivery, or electronic mail.

A handwritten signature in black ink, appearing to read "Renate Heurich". The signature is written in a cursive style with a large initial 'R'.

Renate Heurich

March 1, 2017

UD-17- 01

**In Re: RULEMAKING TO ESTABLISH INTEGRATED RESOURCE PLANNING
COMPONENTS AND REPORTING REQUIREMENTS FOR ENTERGY NEW
ORLEANS, INC.**

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