



October 14, 2022

By Electronic Mail

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

IN RE: 2021 TRIENNIAL INTEGRATED RESOURCE PLAN OF ENTERGY NEW ORLEANS, LLC and APPLICATION OF ENTERGY NEW ORLEANS, LLC FOR APPROVAL OF THE IMPLEMENTATION PLAN FOR PROGRAM YEARS 13 THROUGH 15 OF THE ENERGY SMART PLAN (Docket Nos. UD-20-02 and UD-08-02)

Dear Ms. Johnson,

Please find enclosed the comments of the Alliance for Affordable Energy in the above-mentioned docket. Please file the attached communication and this letter in the record of the proceeding. We will file physical copies at your instruction. If you have any questions, please do not hesitate to contact me.

Thank you for your assistance with this matter.

Sincerely,

Logan Burke
Executive Director
Alliance for Affordable Energy

**BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS**

**IN RE: 2021 TRIENNIAL
INTEGRATED RESOURCE PLAN
OF ENERGENCY NEW ORLEANS, LLC**

**DOCKET Nos. UD-20-02 and
UD-08-02**

**REQUEST TO SUBMIT COMMENTS OUT OF TIME, AND COMMENTS FOR
THE ALLIANCE FOR AFFORDABLE ENERGY**

The Alliance for Affordable Energy (“the Alliance”) respectfully requests to that the Alliance be granted leave to submit these comments regarding Resolution R-22-412, heard by the New Orleans City Council (“the Council”) on September 18, 2022, as part of Docket Nos. UD-20-02 and UD-08-02 out of time. This request to file these comments out of time is due to staff oversight regarding the timing of the initial filing deadline, September 30, 2022 and the deadline for reply comments, due this day, October 14, 2022.

In Resolution R-22-412 The Council requested input on specific questions, including whether the full three year implementation plan should be approved, what programs should include autoenrollment, and whether some programs should be changed. Below, we provide our comments on Energy’s Implementation Plan.

I. The Council should approve three years of goals and budgets

The history of the Energy Smart program is full of extensions, last-minute decision-making, and almost always delays in program implementation for the beginning of a new three year program cycle. This has typically been due to IRP procedural changes. Unfortunately, this has led to uncertainty in the energy efficiency marketplace, with customers, contractors, and administrators alike frustrated or unsure about planning, staffing, and implementation every three years. The good news is that the Council is currently considering, in Docket No. UD-22-04, shifting DSM planning of all types for the Energy Smart program such that the regular IRP cycle does not stymie progress. And in the short term, this is an opportunity to begin implementation on time, with certainty

for the next three years of goals and budgets, but only if the Council acts soon. The Alliance is aware that planning and implementation of some of Energy Smart projects go well beyond a 12 month cycle, and that building a local market for efficiency contractors and workers is an important part of ensuring there are qualified contractors available to do the work.

The Alliance encourages the Council to approve a PY 13 implementation plan as soon as possible, along with direction for energy and demand goals and budget as the baseline policy for all three program years (13,14, and 15), but with some flexibility to allow for outcomes of UD-22-04 to inform PY 14 and 15. This would mean programs could move forward beginning in January 2023 with no lag, there could be market certainty for planning and contracting, and stakeholders would have an opportunity to address some of the questions in UD-22-04 to apply to the next two program years. Certainly, if the Council desires, it has the authority to approve a three year implementation plan now, and direct changes along the way, however a Council action that acknowledges other on going dockets, and allows and even expects flexibility now will make necessary changes less challenging in the coming two years.

II. Income Qualified Programming Should Reach More Households

Based on prior program year reports, the Income Qualified Weatherization (“IQW”) Program has been successful and in high demand. In fact an apparent adjustment in programming raised last year’s savings over 183% of the kwh goal. Even so, qualified customers in Orleans Parish far outstrip the availability of the program. It is encouraging to see that the proposed plan for the IQW program starts the energy savings at nearly same level as achieved last year. We encourage the Council to consider implementing an auto-enrollment plan for customers who fall in any of the following categories: 1)in arrears 2) participate in the Low Income Home Energy Assistance Program 3) have been disconnected for inability to pay in the prior 12 months.

On the other hand in PY 12, the Appliance Recycling and Replacement program had very low realized savings (5% of goal) as compared with budget spent (61% of budget), and has disappointing benefit/cost ratios. Energy’s implementation plan refers to

providing a refrigerator replacement option for income qualified customers. The Alliance recommends the majority of this program be geared to income qualified participants. In addition, directing the refrigerator replacement program to Multi-Family households could help attract the harder to reach renter population.

III. School Kit, Education and Community Outreach Should be Local

The Alliance is disappointed to see such a significant change in the Education program. Energy Wise Alliance, which has been providing the in-school programming for at least 5 years, is a New Orleans based non-profit organization with roots developed in the local education community, and has more than reached their goals, even in while managing program years impacted by Covid-19. It is unclear why a large national company was selected to deliver a program that has been successful with local educators. We urge the Council and Entergy to consider the impact this change has on local opportunities to weave community engagement and energy literacy together.

IV. A Peak Time Rebate Program Should be Expanded

The Residential Peak Time Rebate Pilot is only proposed to draw 4% of eligible participants or 1,931 in the first year. Entergy's prior Peak Time Rebate Pilot¹, launched as part of a DOE effort in 2011 was widely successful for the two years it ran, with 96% of participants saying they would continue the program on a permanent basis. Based on its prior approval rating and high benefit/cost metrics, this program should encourage greater participation. The Alliance notes that the benefit/cost metrics described in the implementation plan are likely underestimated in a high-gas and high-energy market costs scenario like those experienced to-date in 2022.

V. Conclusion

The Alliance respectfully provides these comments and urges the Council to take action quickly to ensure the Energy Smart program is well positioned to continue to provide

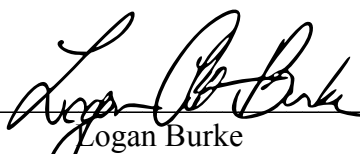
¹ March 26, 2014. New Orleans Peak-Time Rebate a Strong Draw for Low-Income Customers. Greentech Media [retrieved from: <https://www.greentechmedia.com/articles/read/New-Orleans-Peak-Time-Rebate-Really-Appeals-to-Low-Income-Customers>]

energy savings to all New Orleans customers in 2023, but is also prepared for adjustments in response to other on-going dockets and demand side programs, including UD-22-04 and leveraging of federal dollars now available for energy efficiency, electrification, demand reduction, and distributed energy resources.

**IN RE: 2021 TRIENNIAL INTEGRATED RESOURCE PLAN
OF ENTERGY NEW ORLEANS, LLC**

Certificate of Service Dockets UD-20-02 and UD-08-02

I hereby certify that I have, on this 14th day of October 2022, served the foregoing correspondence upon all other known parties of this proceeding by USPS or electronic mail.



Logan Burke
Executive Director
Alliance for Affordable Energy

Lora W. Johnson, lwjohnson@nola.gov

Clerk of Council
City Hall - Room 1E09
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-1085
Fax: (504) 658-1140

Service of Discovery not required

Erin Spears, espears@nola.gov

Chief of Staff, Council Utilities Regulatory Office

Bobbie Mason, bfmason1@nola.gov

Christopher Roberts, cwroberts@nola.gov

Jessica Hendricks, Jessica.Hendricks@nola.gov

City Hall - Room 6E07
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-1110

Fax: (504) 658-1117

Keith Lampkin, CM Morrell Chief-of-Staff, Kdlampkin@nola.gov
1300 Perdido St. Rm. 2W50
New Orleans, LA. 70112

Andrew Tuozzolo, CM Moreno Chief-of-Staff, avtuozzolo@nola.gov
1300 Perdido St. Rm. 2W40
New Orleans, LA. 70112

Paul Harang, 504-658-1101 / (504) 250-6837, Paul.harang@nola.gov
Interim Chief of Staff
City Hall - Room 1E06
1300 Perdido Street
New Orleans, LA 70112

Donesia D. Turner, Donesia.Turner@nola.gov
Ashley Spears, Ashley.Spears@nola.gov
Law Department
City Hall - 5th Floor
New Orleans, LA 70112
Tel: (504) 658-9800
Fax: (504) 658-9869
Service of Discovery not required

Norman White, Norman.White@nola.gov
Department of Finance
City Hall - Room 3E06
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-1502
Fax: (504) 658-1705

Tara Richard, Tgrichard@nola.gov
Mayor's Office
City Hall – Room 2E04
1300 Perdido Street
New Orleans, LA 70112

ADMINISTRATIVE HEARING OFFICER

Hon. Maria Auzenne, maria@auzennelaw.com
1615 Poydras Street, Suite 900
New Orleans, Louisiana 70112
Tel: 504-566-7999
Fax: 504-569-0087

CITY COUNCIL CONSULTANTS and SUPPORT STAFF

Clinton A. Vince, clinton.vince@dentons.com

Presley Reed, presley.reedjr@dentons.com
Emma F. Hand, emma.hand@dentons.com
Adriana Velez-Leon, adriana.velez-leon@dentons.com
Dee McGill, dee.mcgill@dentons.com

Denton Law Firm,
1900 K Street NW
Washington, DC 20006
Tel: (202) 408-6400
Fax: (202) 408-6399

Basile J. Uddo (504) 583-8604 cell, buddo@earthlink.net
J. A. “Jay Beatmann, Jr. (504) 256-6142 cell, (504) 524-5446 office direct,
jay.beatmann@dentons.com
c/o DENTONS US LLP
650 Poydras Street
Suite 2850
New Orleans, LA 70130

Joseph W. Rogers, jrogers@legendcgl.com
Victor M. Prep, vprep@legendcgl.com
Byron S. Watson, bwatson@legendcgl.com

Legend Consulting Group
6041 South Syracuse Way, Suite 105
Greenwood Village, CO 80111
Tel: (303) 843-0351
Fax: (303) 843-0529

CITY COUNCIL’S INDEPENDENT DSM CONSULTANT

Jeffrey Huber, jeffrey.huber@gdsassociates.com
Rich Hasselman, rich.hasselman@gdsassociates.com
Richard Spellman, dick.spellman@gdsassociates.com
Warren Hirons, warren.hirons@gdsassociates.com

GDS Associates, Inc.
1850 Parkway, Suite 800
Marietta, GA 30067
Tel: (770) 425-8100 (Main)
Fax: (866) 611-3791

Casey DeMoss, caseyleedemoss@gmail.com

Independent Consultant
248 Cherokee Street, Suite 30
New Orleans, Louisiana 70118
Tel: (504) 982-0468
(GDS Associates, Inc. Team Member)

Manish Mardia, mmardia@msmmeng.com
President, MSMM Engineering, LLC
[4640 South Carrollton Avenue](#)
[New Orleans, Louisiana 70119](#)

[Tel: \(504\) 559-1897](tel:5045591897)

(GDS Associates, Inc. Team Member)

Corinne Villavaso, corinne@tvglplanning.com

President, The Villavaso Group, LLC

7111 Lake Barrington Drive

New Orleans, Louisiana 70128

Tel: (504) 905-2892

(GDS Associates, Inc. Team Member)

ENERGY NEW ORLEANS, LLC

Courtney R. Nicholson (504) 670-3680, cnicho2@entergy.com

Entergy New Orleans, LLC

Vice-President, Regulatory and Public Affairs

Barbara Casey, (504) 670-3567, bcasey@entergy.com

Entergy New Orleans, LLC

Director, Regulatory Affairs

Polly Rosemond, prosemo@entergy.com

Kevin T. Boleware, (504) 670-3673, kbolewa@entergy.com

Brittany Dennis, bdennil@entergy.com

Keith Wood, (504) 670-3633, kwood@entergy.com

Derek Mills, (504) 670-3527, dmills3@entergy.com

Ross Thevenot, (504) 670-3556, rtheven@entergy.com

1600 Perdido Street, L-MAG 505B

New Orleans, LA 70112

Vincent Avocato, (281) 297-3508, vavocat@entergy.com

Entergy New Orleans, LLC

2107 Research Forest Drive, T-LFN-4

The Woodlands, TX 77380

Brian L. Guillot, (504) 576-6523, bguill1@entergy.com

Leslie M. LaCoste (504) 576-4102, llacost@entergy.com

Entergy Services, LLC

Mail Unit L-ENT-26E

639 Loyola Avenue

New Orleans, LA 70113

Fax: 504-576-5579

Joe Romano, III (504) 576-4764, jroman1@entergy.com

Tim Rapier, (504) 576-4740, trapier@entergy.com

Farah Webre, fwebre@entergy.com

Lacresha D. Wilkerson, (504) 576-6571, lwilke1@entergy.com

Linda Prisuta, (504) 576-4137, lprisut@entergy.com

Ed Wicker, (504) 576-3101, ewicker@entergy.com

Entergy Services, LLC

Mail Unit L-ENT-4C

639 Loyola Avenue
New Orleans, LA 70113
Fax: (504) 576-6029

INTERVENORS

ALLIANCE FOR AFFORDABLE ENERGY

Logan Atkinson Burke, Logan@all4energy.org
Sophie Zaken, Regulatory@all4energy.org
Jesse George, Jesse@all4energy.org
4505 S. Claiborne Ave.
New Orleans, LA. 70125
Tel: (504) 208-9761

AIR PRODUCTS AND CHEMICALS, INC.

Katherine W. King, Katherine.king@keanmiller.com
Randy Young, randy.young@keanmiller.com
400 Convention St. Suite 700
Baton Rouge, LA. 70802
Or
P.O. Box 3513
Baton Rouge, LA 70821-3513
Tel: (225) 387-0999
Fax: (225) 388-9133

Carrie R. Tournillon, carrie.tournillon@keanmiller.com
900 Poydras St., Suite 3600
New Orleans, LA 70112

Maurice Brubaker, mbrubaker@consultbai.com
16690 Swigly Ridge Rd., Suite 140
Chesterfield, MO 63017
Or
P.O. Box 412000
Chesterfield, MO. 63141-2000

SOUTHERN RENEWABLE ENERGY ASSOCIATION (“SREA”)

Simon Mahan, simon@southernwind.org
5120 Chessie Circle
Haltom City, Texas 76137
Tel: (337) 303-3723

SUSTAINABLE ENERGY ECONOMY SOLUTIONS

Andy Kowalczyk, andy@senergysolutions.org
819 Saint Roch Avenue

New Orleans, Louisiana 70117
Tel: (415) 676-1047

350 NEW ORLEANS

Pooja Prazid, p.prazid@gmail.com
Benjamin Quimby, benjaminquimby1@gmail.com
Clare Giesen, claregiesen@gmail.com
Marion Freistadt, marionfreistadt@yahoo.com
Vickie Boothe, boothevickiel@gmail.com
1632 8th Street
New Orleans, Louisiana 70115
Tel: (916) 952-9955

NATIONAL AUDUBON SOCIETY

Brent Newman, Brent.newman@audubon.org
Senior Policy Director
3801 Canal Street, Suite 400
New Orleans, Louisiana 70119
Tel: (303) 681-8420

Karl R. Rabago, karl@rabagoenergy.com
Rabago Energy, LLC
2025 E. 24th Avenue
Denver, Colorado 80205
Tel: (512) 968-7543

GULF STATES RENEWABLE ENERGY INDUSTRIES ASSOCIATION

Stephen Wright, 318-663-3810, swright@gsreia.org
695 Kiskatom Lane
Mandeville, Louisiana 70471

Jeff Cantin, 877-785-2664, jcantin@gsreia.org
2803 St. Philip St.
New Orleans, LA 70119

INTERESTED PARTIES

Joshua Smith, Joshua.smith@sierraclub.org
Staff Attorney
Sierra Club Environmental Law Program
2101 Webster Street, Suite 1300
Oakland, California 94612
Tel: (415) 977-5560 (Office)
Tel: (503) 484-7194 (Cell)

R. Foster Duncan, rfosterduncan@gmail.com

Tel: (646) 872-5930