



*By Electronic Mail*  
(Bfmason1@nola.gov)

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

April 17, 2023

**RESOLUTION AND ORDER ESTABLISHING RULEMAKING TO CONSIDER SAVINGS TARGET AND PROGRAM DESIGN FOR ENERGY EFFICIENCY, CONSERVATION, DEMAND RESPONSE AND OTHER DEMAND-SIDE MANAGEMENT PROGRAMS AS WELL AS CUSTOMER-OWNED DISTRIBUTED ENERGY RESOURCES AND BATTERY STORAGE FOR THE CITY OF NEW ORLEANS (DOCKET NO. UD-22-04)**

Dear Ms. Johnson:

Please find enclosed the **Reply Comments of Sierra Club Regarding Comments on the Advisors' Report** in the above-mentioned docket. Please file the attached comments and this letter in the record of the proceeding. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elena Saxonhouse".

Elena Saxonhouse  
Managing Attorney  
Sierra Club

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

**IN RE: RESOLUTION AND ORDER  
ESTABLISHING RULEMAKING TO  
CONSIDER SAVINGS TARGET AND  
PROGRAM DESIGN FOR ENERGY  
EFFICIENCY, CONSERVATION, DEMAND  
RESPONSE, AND OTHER DEMAND-SIDE  
MANAGEMENT PROGRAMS AS WELL AS  
CUSTOMER-OWNED DISTRIBUTED  
ENERGY RESOURCES AND BATTERY  
STORAGE**

**DOCKET NO. UD-22-04**

**REPLY COMMENTS OF SIERRA CLUB  
REGARDING COMMENTS ON THE ADVISORS' REPORT**

Sierra Club submits the following comments in response to comments on the Advisors' report.

**I. The City Council's Final Order Should Include Specific Deliverables and Timelines for a DSM Working Group, As Recommended in Prior Comments**

The comments submitted on March 29, 2023 in response to the Advisors' Report reflect agreement between intervenors and Entergy New Orleans (ENO) on a number of general issues that would be appropriate for further discussion and action by a new demand-side working group. However, ENO does not provide the same level of detail as to recommended next steps for the Council as the other commenters. Sierra Club urges the Council to refer to the recommendations in Sierra Club's and AAE/Audubon's three prior sets of comments for specific deliverables and timelines when crafting the Council's final order.

As the Advisors have noted,<sup>1</sup> it is crucial that the creation of any demand-side management working group include such detailed deliverables and timelines if it is to achieve the goals of the Council and the parties for the Energy Smart program. This caution is borne out by the experience of the Arkansas "Parties Working Collaborative" workgroup ("PWC").<sup>2</sup> Although the PWC has made progress on some important energy efficiency topics, Sierra Club staff reports that the PWC has not had a meeting on low-income energy efficiency in nearly a year, as other issues have been prioritized instead. As a result, little progress has been made on

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<sup>1</sup> Advisors' Report at 14.

<sup>2</sup> Sierra Club staff have been participating in the workgroup and provided their feedback for these comments.

that issue. The Council should ensure it orders a timeline and deliverables that will address the key issues for income-qualified program design identified in this docket. The Council should also define a working group structure and size that allows for frequent meetings of subgroups as needed to address urgent issues in a timely way.

For ease of reference, the table below lists the pages of prior comments where Sierra Club comments addressed each issue supported by all of the parties in more detail.

Issue	Sierra Club Comments (pp.)		
	Oct. 31	Jan. 12	Mar. 29
DSM Working Group	19, 39	1-8, 17	
Geographic Targeting and Neighborhood-Based Delivery	2-20, 38	8-13, 16	3-4
Automatic Enrollment			4
Health & Safety Deferrals	23-35	4-5	4-7
Data Collection and Reporting	29-30, 40	7	7-9
Funding Partnerships	31-37, 40	7-8, 13-15	9-12

Sierra Club also made other recommendations that ENO did not explicitly state agreement with, but which Council should still consider, such as expanded heat pump offerings, improvements to the multi-family program, and other energy efficiency best practices described in prior comments.

**II. The City Council Should Take Immediate Action on Certain Issues, Rather Than Deferring Action to a Workgroup**

As discussed in Sierra Club’s initial comments on the Advisors’ Report, the Council has an opportunity to require near-term action and improvements to the Energy Smart program without disrupting the implementation of program or waiting for the development and discussion of a demand-side management working group. These include steps towards tracking and eliminating health and safety deferrals, targeting resources toward the most burdened parts of the city, and others. Please refer to the pages referenced in the table above in Sierra Club’ January 12 and March 29 comments for specific near-term action items on each issue that need not wait for a workgroup’s input.

**III. The Recommended Geographic Targeting and Neighborhood Delivery Program Must be More than a Marketing Strategy**

Repeatedly in this docket, ENO has referred to the proposed geographic targeting program as a marketing initiative, stating for example that “the Company looks forward to working with stakeholders to identify geographic areas within which to target marketing efforts,” and that a “neighborhood-based delivery initiative pilot would allow the opportunity to gauge how

successful this type of marketing strategy could be.”<sup>3</sup> While marketing would be one element, Sierra Club reiterates its prior comments that a geographic targeting program should seek to provide enhanced service to the targeted areas, including features like automatic eligibility for whole-home audits, an emphasis on providing all building envelope measures needed for a target number of homes, and avoiding health and safety deferrals by leveraging multiple funding sources. While strategies to increase awareness about the Energy Smart program among income-qualified populations are important, participation will increase further when customers see and hear about neighbors receiving quality improvements that increase their home comfort and reduce their energy bills. If the Council agrees with intervenors’ recommendations for a geographic targeting program to relieve energy burden and heat island impacts, the Council should clarify in its final order that it intends ENO to implement a program that includes each of these elements, not just a shift in marketing.

Sierra Club also reiterates that the geographic targeting/neighborhood delivery program need not be characterized as a “pilot,”<sup>4</sup> as ENO is already providing an income-qualified weatherization program. The program would be aimed at targeting resources already dedicated for that service towards measurable outcomes in specific neighborhoods.

Sierra Club appreciates the Council’s attention to these important issues and looks forward to participating in future opportunities for input.

Respectfully submitted,



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<sup>3</sup> ENO Comments on Advisors’ Report, at 4.

<sup>4</sup> *Id.*

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**DOCKET NO. UD-22-04**

**CERTIFICATE OF SERVICE**

I do hereby certify that I have, this 17<sup>th</sup> day of April 2023, served the **Reply Comments of Sierra Club Regarding Comments on the Advisors' Report** upon all other known parties of this proceeding and to the attached Service List by electronic mail.



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