



**Keith D. Wood**

Director, Resource Planning & Market Operations  
Entergy New Orleans, LLC  
504-670-3633 | kwood@entergy.com  
1600 Perdido Street, New Orleans, LA 70112

May 1, 2023

**VIA ELECTRONIC DELIVERY**

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

Re: Rulemaking Proceeding to Establish Renewable Portfolio Standards  
Council Docket No. UD-19-01

Dear Ms. Johnson:

Entergy New Orleans, LLC (“ENO”) respectfully submits its Renewable and Clean Portfolio Standard (“RCPS”) Compliance Demonstration Report for the 2022 compliance year. This filing is being electronically submitted and the original and requisite number of hard copies once the Council resumes normal operations, or as you direct. ENO requests that you file this submission in accordance with Council regulations as modified for the present circumstances.

Should you have any questions regarding this filing, please contact my office at (504) 670-3633. Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Keith D. Wood'.

Keith D. Wood

KDW/bkd

Enclosures

cc: Official Service List (*via email*)

**ENTERGY NEW ORLEANS, LLC  
RCPS COMPLIANCE DEMONSTRATION REPORT COVERING 2022**

**1. BACKGROUND**

***a. Requirement for a Retrospective RCPS Compliance Demonstration Report***

Under Section 4.f of the Renewable and Clean Portfolio Standard (“RCPS”) rules (“the Rules”) adopted by the Council of the City of New Orleans (“Council”) in Resolution R-21-182 on May 20, 2021, Entergy New Orleans, LLC (“ENO”) is required to submit a retrospective Compliance Demonstration Report for the 2022 compliance year by May 1, 2023. This report describes and demonstrates ENO’s compliance with the RCPS in 2022 and satisfies the informational requirements of Section 4.f.

**2. 2022 RCPS COMPLIANCE REQUIREMENT**

Section 3.a.1 of the RCPS rules specifies that for 2022, ENO must meet “64% of Retail Compliance Load ... with a combination of Tier 1, 2 and 3 resources ... with not more than 25% compliance through RECs purchased without the associated energy.” Per Section 4.a of the RCPS rules, “Retail Compliance Load is the reported annual MWh sales for each compliance year, increased by the cumulative MWh savings of DSM programs installed after January 1, 2021.”

**Table 1: 2022 Retail Compliance Load and RCPS Requirement**

	<b>2022</b>
<b>Retail Sales MWh</b>	5,705,256
<b>DSM Post-1/21 MWh</b>	95,614
<b>Retail Compliance Load</b>	5,800,870
<b>RCPS Requirement (64% of Retail Compliance Load)</b>	3,712,557

As shown in the above table, ENO’s retail compliance load is 5,800,870 MWh. Retail sales of electricity increased by over 6% from 2021 and exceeded the forecast filed in the Initial RCPS Compliance Plan by 4%. ENO’s compliance requirement increased accordingly. The 2022 RCPS requirement is 3,712,557 RCPS Compliance Credits, which can include both Clean Energy Credits (“CECs”) and Renewable Energy Credits (“RECs”).

**3. 2022 RCPS COMPLIANCE CREDITS**

***a. Clean Energy and Renewable Energy Credits***

Based on the verified output, demand-side reductions, or calculated impact of beneficial electrification, ENO applies the following credits towards 2022 RCPS compliance:

**Table 2: 2022 RCPS Compliance Credits**

Resource Name	Type	2022 MWh	Tier	RCPS Multiplier or CEC/MWh Rate <sup>1</sup>	2022 Compliance Credits
Grand Gulf	Nuclear	1,527,671	2	1.00	1,527,671
River Bend	Nuclear	861,137	2	1.00	861,137
ANO Unit 2	Nuclear	241,961	2	1.00	241,961
ANO Unit 1	Nuclear	153,919	2	1.00	153,919
Waterford Unit 3	Nuclear	144,606	2	1.00	144,606
Energy Efficiency <sup>2</sup> (implemented after 1/2021)	EE	95,614	1	1.25	119,517
New Orleans Solar Station	Solar	37,125	1	1.25	46,406
Vidalia <sup>3</sup>	Hydro	15,833	2	1.00	15,833
Iris Solar	Solar	9,594	2	1.00	9,594
Commercial Rooftop Solar	Solar	5,786	1	1.25	7,232
Paterson Solar	Solar	167	1	1.25	208
Public EV Chargers <sup>4</sup>	EVCI	4	3	1.88	7
<b>Sub-total:</b>					<b>3,128,087</b>
2020/2021 ENO RECs <sup>5</sup>	REC	44,098	2	1.00	44,098
Purchased RECs <sup>6</sup>	REC	600,000	2	1.00	600,000
<b>Total Compliance Credits</b>					<b>3,772,185</b>
<b>Total RCPS Requirement:</b>					<b>3,712,557</b>
Compliance Credits beyond RCPS Requirement (to be Placed in Compliance Reserve)	REC	59,628	2	1.00	59,628

<sup>1</sup> For Tier 3 Qualified Measures, the figure in this column represents the measure-specific Council-approved CEC per MWh conversion rate.

<sup>2</sup> Energy Efficiency MWh reflect total MWh of reductions delivered in 2022 from measures installed after January 1, 2021. This figure will differ from the annualized figures in which Energy Smart Plan Year targets are denominated for two reasons: 1) measures installed in 2022 will provide only a portion of their expected annualized reductions in 2022 and 2) the efficacy of measures installed in 2021 is assumed to degrade in subsequent years.

<sup>3</sup> Because it is more than 15 years old, the Vidalia hydroelectric facility is not eligible for Green-e certification. Therefore, its output cannot create certificates that qualify for the definition of “Renewable Energy Credit” under Section 2 of the RCPS. As a result, ENO accounts for the energy received from the Vidalia hydroelectric facility as a Zero Carbon Emissions Resource and recognizes its entitlement to the output of Vidalia through CECs.

<sup>4</sup> Provides credit for 2022 electric vehicle charging MWh at 14 operational public ENO Level 2 EV chargers, 12 of which became operational in December 2022.

<sup>5</sup> 44,098 RECs from ENO Green-E registered solar resources were created in 2020 or 2021 and were retired in April 2023. These RECs meet the definition in Section 2 of the Rules and meet the requirements for use for compliance in 2022 in Section 4.h of the Rules. The use of these RECs avoids the need to purchase additional RECs from the market and reduces the cost to customers of RCPS compliance.

<sup>6</sup> All purchased RECs were from Green-E registered wind resources located in ERCOT, as permitted under the Rules.

Resources in ENO’s portfolio provided 3,128,087 CECs from their 2022 operations. Output from Tier 1 resources – Energy Efficiency and solar resources – receive a 1.25 multiplier in the table above. Annual output from some ENO resources was lower than projected due to nuclear outages and hurricane-related delays in construction of the Iris and St. James solar facilities.

No RECs that are retired on behalf of ENO’s Green Select program can be counted toward RCPS compliance. ENO retired 979 MWh of RECs created in Q3-Q4 2021 to meet the requirements of its 2022 Green Select program. All of these RECs are excluded from Table 2.

To ensure compliance with the RCPS, ENO will utilize an additional 44,098 owned RECs and a substantial portion of the 600,000 purchased RECs that are tracked in ENO’s North American Renewables (“NAR”) registry account. Per the definition in Section 2 of the RCPS for all additional RECs, “(1) they were generated from a Renewable Energy Resource in MISO, the Electric Reliability Council of Texas, or elsewhere that are deliverable into the MISO region; (2) they are Green-e certified at the time of their creation and are subsequently tracked with M-RETS or an equivalent; and (3) they are retired against the compliance requirements in the compliance year in which they were utilized for compliance.” ENO will place 50,034 purchased RECs and 9,594 RECs generated by the Iris Solar facility – a total of 59,628 RECs of 2022 vintage – in the Compliance Reserve.

No other entity can claim credit for the environmental attributes associated with any resource output or credits included in the table above. Any RECs, alternative energy credits, or other attributional certificates created from these resources have been retired.

#### **4. ENO HAS COMPLIED WITH RCPS PROVISIONS**

##### ***a. Alternative Compliance Payment***

As stated in Section 5.a, “In the event that the Utility is unable to comply with the RCPS standard using reasonable measures for the applicable calendar year, the Utility shall make an Alternative Compliance Payment (‘ACP’) into a CleanNOLA Fund established by the Council.”

Per Council Resolution R-22-145, the ACP for 2022 was set at \$8.45 per megawatt-hour. As shown previously in Tables 1 and 2, ENO was able to comply with the RCPS standard through existing resources and purchased RECs, and therefore did not need to utilize the ACP in 2022. The costs of all purchased RECs were below \$8.45/REC; therefore, compliance through REC purchases had lower costs than compliance through the ACP.

##### ***b. RCPS Customer Protection Cost Cap***

Section 6 of the RCPS rules establishes a Customer Protection Cost Cap “that the Utility shall not exceed to acquire RCPS Compliance Credits. The Customer Protection Cost Cap in any RCPS plan year is one percent (1%) of plan year total utility retail sales revenues, beginning in

2022.” Section 4.d of the RCPS rules describes the calculation of RCPS compliance costs that are subject to this Cost Cap as follows:

- 1) The RCPS Cost of Compliance is calculated as all incremental costs prudently incurred by the Utility in complying with RCPS Section 3, including, but not limited to, the incremental costs of new resources for compliance, the Incremental DSM costs, and other costs related to RCPS compliance. The cost of RECs as allowed through the Banking and Compliance Reserve provision that are applied in the compliance year shall be included in the RCPS Cost of Compliance for that year. The cost of RECs acquired for the Banking and Compliance Reserve provision but not applied in that year shall be treated as working capital and shall not be included in the RCPS Compliance Cost for the compliance year.
- 2) Incremental costs are the total electric utility revenue requirements associated with the Utility’s operations in compliance with the RCPS, less the total electric utility revenue requirements associated with the optimized resource portfolio that may have been in place absent the requirements of the RCPS. The Utility’s most recently filed Integrated Resource Plan shall inform the calculation of incremental costs as to the optimized resource portfolio that may have been in place absent the requirements of the RCPS.

ENO’s 2022 utility retail sales revenues were ~\$714 million. As a result, the Customer Protection Cost Cap is \$7.14 million. All resources in ENO’s existing resource portfolio would be included in the optimized resource portfolio that may have been in place absent the requirements of the RCPS; therefore, there are no incremental costs associated with those resources. Market REC purchases, however, would not have been made in the absence of RCPS requirements; therefore, their costs are included in the determination of incremental costs.

Table 3 illustrates that the Customer Protection Cost Cap was not exceeded in 2022.

**Table 3: 2022 RCPS Incremental Costs**

<b>Source</b>	<b>Compliance Credits Provided</b>	<b>Average Incremental Cost</b>	<b>Incremental Cost (\$000)</b>
Existing Generation Portfolio	2,998,969	N/A	N/A
Energy Efficiency	119,517	N/A	N/A
EV Charging Infrastructure	7	N/A	N/A
2020/2021 Vintage RECs	44,098	N/A	N/A
Purchased RECs	549,966	\$2.80 / REC	\$1,540
<b>Total</b>	<b>3,712,557</b>		<b>\$1,540</b>

**c. Limitation on Use of Purchased RECs**

As stated in Section 3.a.1, in 2022, “not more than 25% compliance [shall be] through RECs purchased without the associated energy.” As shown in the following table, 14.8% of compliance was achieved through RECs purchased without the associated energy.

**Table 4: Limit on Purchased RECs**

	<b>2022</b>
Compliance Credits Required	3,712,557
Purchased RECs Used for 2022 Compliance	549,966
Percent of Compliance Achieved Via Purchased RECs	14.8%

**d. Compliance Reserve**

Section 4.h of the RCPS rules describes the Banking and Compliance Reserve Provision as follows:

The utility may use RECs produced and Green-e certified in one compliance year for compliance in either of the two subsequent compliance years, subject to a review of the accounting for the banking and compliance reserve, and provided that the utility was in compliance for the compliance year in which the RECs were created. In addition, the utility shall demonstrate to the satisfaction of the Council that such Compliance Credits:

- 1) were in excess of the Compliance Credits needed for compliance in the compliance year in which they were generated;
- 2) do not exceed the REC limitation specified in Section 3 for compliance with the RCPS in the year they were used for compliance and retired; and
- 3) have not otherwise been, nor will be, sold, retired, claimed or represented as part of clean energy output or sales, or used to satisfy obligations in other jurisdictions.

This is the first year in which ENO is subject to RCPS requirements; therefore, the Compliance Reserve has no starting balance. In order to build a small compliance reserve, to hedge against potential future market increases to REC costs, and to ensure it purchased enough RECs to ensure 2022 compliance as it finalized its 2022 resource output figures, retail sales, and other parameters, ENO acquired Compliance Credits that ultimately exceeded its final RCPS requirement by 59,628 RECs. This amount was well within the 5% contingency for REC purchases approved in Resolution R-22-145. Per the Rules, these RECs are eligible for use towards RCPS compliance in 2023 or 2024.

Per Section 4.d.1 of the RCPS, the \$140,096 cost associated with the 50,034 purchased RECs (\$2.80/REC) placed in the Compliance Reserve will be treated as working capital and recovered from customers in the year they are utilized for RCPS compliance. Should ENO retire

any of these RECs on behalf of Green Select customers in the future, it will remove these RECs from the Compliance Reserve.

**Table 5: Compliance Reserve Detail**

	<b>RECs</b>	<b>Costs (Treated as Working Capital)</b>	
2022 Compliance Reserve Starting Balance	0	0	
Withdrawals from Compliance Reserve	0	0	
RECs Deposited into Compliance Reserve from ENO Resources	9,594	0	
Purchased RECs Deposited into Compliance Reserve	50,034	\$140,096	
2023 Compliance Reserve Starting Balance	59,628	\$140,096	
RECs in Reserve by Vintage:	2022	59,628	\$140,096

## **5. OTHER RCPS REPORT REQUIREMENTS**

### ***a. Energy portfolio report***

Section 4.f.3 of the RCPS requires ENO to include "an energy portfolio report for the preceding compliance year which shall identify the MWh hours produced by each supply and demand-side resource comprising the utility's total resource portfolio. RECs purchased and utilized by the utility and their associated MWh, including RECs that can be associated with net metering, and incremental MWh associated with DSM and other eligible resources should also be included in the energy portfolio report. For each resource in the portfolio, the utility shall identify the resource name, MWh, fuel type, the average per MWh energy-related cost associated with that resource, and the average per MWh energy related revenue received from MISO for that resource."

ENO received 8,155,181 MWh in 2022 from its entitlement of generation from ENO's wholly-owned, partially-owned, and contracted resources and from ENO's purchases of energy. The total electricity that ENO generates or purchases exceeds ENO's total load because it includes electricity that serves energy sales to the MISO market. These wholesale sales benefit ENO customers. When ENO resources are dispatched by MISO to generate power in excess of ENO customer needs, these resources receive MISO energy revenues in excess of their costs; this margin is then credited to ENO customers.

The table below summarizes the energy-related costs for each resource; that is, the average variable costs that would be avoided if the resource did not generate that megawatt-hour of energy. Also shown is the average MISO energy price at the unit's location when the resource is generating. When the resource is needed to meet ENO load, ENO customers pay the variable cost

of the resource. When the resource’s output is in excess of ENO load, ENO customers are credited with the difference between the MISO energy price and the variable cost.

**Table 6: 2022 Energy Portfolio Report**

<b>Resource Name</b>	<b>Fuel Type</b>	<b>MWh</b>	<b>Fuel and O&amp;M Cost (\$/MWh)<sup>7</sup></b>	<b>Average MISO Energy Price (\$/MWh)<sup>8</sup></b>
Union Unit 1	Gas	3,110,281	51.10	61.91
Grand Gulf	Nuclear	1,527,671	TBD <sup>9</sup>	58.75
River Bend	Nuclear	861,137	27.40	60.67
Ninemile Unit 6	Gas	811,814	50.50	63.10
MISO Purchases	Purchase	547,773	64.55	N/A
New Orleans Power Station	Gas	367,917	80.62	83.35
Arkansas Nuclear One Unit 2	Nuclear	241,961	22.80	58.75
Arkansas Nuclear One Unit 1	Nuclear	153,919	22.80	53.84
Waterford Unit 3	Nuclear	144,606	30.50	56.52
Occidental Power – Taft	Gas	59,222	N/A	64.29
Ninemile Unit 5	Gas	48,546	80.19	72.79
White Bluff Unit 1	Coal	42,121	39.09	63.06
White Bluff Unit 2	Coal	40,734	39.09	65.31
New Orleans Solar Station	Solar	37,125	0.00	72.27
Ninemile Unit 4	Gas	36,046	80.19	68.25
Acadia Unit 2	Gas	31,844	59.42	67.91
Independence Unit 1	Coal	26,086	35.81	63.43
Vidalia	Hydro	15,833	N/A	58.36
Perryville Unit 1	Gas	11,858	53.65	61.33
Little Gypsy Unit 2	Gas	9,662	98.19	83.50

<sup>7</sup> “Fuel and O&M Cost” refers to costs reported on Entergy FERC Form 1s associated with production expenses, including fuel. Some portion of O&M costs reported here may be fixed costs that would not vary with the output of the plant. For non-Entergy-owned resources whose output is acquired through a Power Purchase Agreement, costs are not known. All solar facilities are assumed to have variable costs of \$0/MWh. Cost and production values for certain units of the same plant were reported as aggregate values on the FERC Form 1s.

<sup>8</sup> This is calculated as the output-weighted average of the MISO Day Ahead Locational Marginal Price at the generator’s pricing node, or at an equivalent nearby price point, and does not include any MISO uplift payments or other credits.

<sup>9</sup> System Energy Resources, Inc. (SERI) requested and was granted an extension of time from April 18, 2023 until May 18, 2023 to file its 2022 FERC Form 1.



<b>Resource Name</b>	<b>Fuel Type</b>	<b>MWh</b>	<b>Fuel and O&amp;M Cost (\$/MWh)<sup>7</sup></b>	<b>Average MISO Energy Price (\$/MWh)<sup>8</sup></b>
Iris	Solar	9,594	0.00	54.30
Waterford Unit 2	Gas	6,674	116.24 <sup>10</sup>	86.46
Commercial Rooftop Solar	Solar	5,786	0.00	72.68
Little Gypsy Unit 3	Gas	5,742	98.19	56.35
Perryville Unit 2	Gas	678	53.65	101.56
Paterson	Solar	167	0.00	72.68
Waterford Unit 4	Oil	161	116.24 <sup>11</sup>	89.52
Montauk	Biomass	141	N/A	68.51
Sterlington Unit 7	Gas	81	245.64	113.31
Energy Efficiency, Installed after 1/1/21	Demand	95,614	N/A	N/A
<b>Supply-Side Resources Total:</b>		<b>8,155,181</b>		
<b>Demand-Side Resources:</b>		<b>95,614</b>		
<b>Purchased RECs Retired for 2022 RCPS Compliance:</b>		<b>549,966</b>		

***b. Carbon emissions report***

Section 4.f.3 of the RCPS requires this report to include a “carbon emissions report that details the carbon emissions resulting from the production of the electricity used by the Utility to serve its Retail Compliance Load, whether or not each generator is owned by the Utility.”

To help its customers measure progress towards their climate goals, Entergy has developed an emissions accounting system that tracks emissions incurred to meet ENO customer demand on an hourly basis. Resources with the lowest hourly variable operating costs are assigned to ENO customers first, while higher cost resources are more likely to be dispatched by MISO to meet non-ENO demand. This system is independently audited subject to protocols developed by the Center for Resource Solutions, a leading environmental Non-Governmental Organization. Table 7 below summarizes the results of this system for 2022, including the emissions and megawatt-hours from each resource associated with meeting ENO customer demand. It should be noted that the megawatt-hours listed from each resource will differ from the energy portfolio report in Table 6, above, because not all generation in the energy portfolio was necessary to meet ENO demand.

<sup>10</sup> The value here was reported in Entergy Louisiana, LLC’s FERC Form 1 as costs and production for Waterford Units 1 and 2.

<sup>11</sup> No value was reported in Entergy Louisiana, LLC’s FERC Form 1 for Waterford Unit 4. It is assumed to be the same as Waterford Unit 2.

**Table 7: Carbon Emissions Report**

<b>Resource</b>	<b>Type</b>	<b>Estimated MWh Serving ENO Customer Load</b>	<b>Average CO<sub>2</sub> Rate (lbs/MWh)</b>	<b>CO<sub>2</sub> Tons</b>
Grand Gulf	Nuclear	1,527,295	0	0
River Bend	Nuclear	860,925	0	0
Arkansas Nuclear One Unit 2	Nuclear	241,901	0	0
Arkansas Nuclear One Unit 1	Nuclear	153,882	0	0
Waterford Unit 3	Nuclear	144,570	0	0
New Orleans Solar Station	Solar	37,116	0	0
Iris	Solar	9,594	0	0
Commercial Rooftop Solar	Solar	5,785	0	0
Paterson	Solar	167	0	0
Vidalia	Hydro	15,829	0	0
Montauk	Biomass	141	0	0
Union Unit 1	Gas	1,550,781	861	667,837
Ninemile Unit 6	Gas	404,769	830	168,022
New Orleans Power Station	Gas	183,443	1,083	99,323
Occidental Power – Taft	Gas	29,528	809	11,945
Ninemile Unit 5	Gas	24,205	1,218	14,737
Ninemile Unit 4	Gas	17,973	1,255	11,278
Acadia Unit 2	Gas	15,878	875	6,950
Perryville Unit 1	Gas	5,912	828	2,449
Little Gypsy Unit 2	Gas	4,818	1,459	3,514
Waterford Unit 2	Gas	3,327	1,289	2,145
Little Gypsy Unit 3	Gas	2,863	1,246	1,784
Perryville Unit 2	Gas	338	1,306	221
Sterlington Unit 7	Gas	41	1,553	31
Waterford Unit 4	Oil	80	2,169	87
White Bluff Unit 1	Coal	21,002	2,388	25,076
White Bluff Unit 2	Coal	20,310	2,352	23,888
Independence Unit 1	Coal	13,006	2,421	15,742
MISO Purchases	Purchase	547,773	1,360	372,566
<b>Resources Used to Meet ENO Customer Load</b>		5,843,248	489	1,427,594
<b>Net Additional RECs Retired for 2022 Load</b>		540,372 <sup>12</sup>	Offset at (489)	(132,021) <sup>13</sup>
<b>Portfolio Carbon Emissions, Adjusted for RECs</b>		5,843,248	444	1,295,573

<sup>12</sup> As discussed in Sections 3 and 4, above, ENO retired 549,966 purchased RECs for 2022 compliance. It also placed the 9,594 RECs from Iris shown in the table into the RCPS Compliance Reserve for use towards future years' RCPS requirements. 540,372 is the net of these two figures.

<sup>13</sup> Per accounting protocols discussed and developed with the Center for Resource Solutions, additional unbundled RECs are credited against the emissions used to meet customer load by applying the ENO average CO<sub>2</sub> rate to each net additional REC. This permits the carbon-free attribute of a REC to replace the average carbon emissions of ENO's resources.

*c. Draft Bill Insert*

See Appendix A for a draft bill insert to be included in customer bills per Section 4.f.5 with an easy-to-understand explanation of the Utility's compliance status for Council review and approval.

**6. COST RECOVERY**

Section 6.a.1 of the Rules provides that “the Utility shall be allowed the opportunity to recover prudently incurred costs in complying with a mandated renewable and clean portfolio standard.” The RCPS contemplates customer cost impacts through its inclusion of a Customer Protection Cost Cap. However, it does not specify the precise mechanism by which ENO would recover costs of RCPS compliance from its customers.

For some potential measures, such as a future new solar resource, costs would be included in base rates. For other measures, such as the purchase of RECs undertaken for 2022 compliance, several pathways for cost recovery are possible. These include recovery through the Fuel Adjustment Clause (“FAC”) rider, the Environmental Adjustment Clause (“EAC”) rider (assuming modification to accommodate costs associated with purchased RECs), or a new rider.

In order to mitigate the impact of the REC purchases, ENO proposes to recover the costs of RECs retired for 2022 compliance (\$1.54 million) in the FAC over/under recovery balance, subject to further guidance by the Council.

**7. 2023 RCPS ACTIVITIES**

In its *Compliance Plan Covering Compliance Years 2023-2025*, approved by the Council in Resolution No. R-22-525, ENO projected that it will generate Compliance Credits in 2023 that will exceed its compliance requirement of 66% of Retail Compliance Load. In Resolution R-22-525, the Council approved ENO’s plan to purchase unbundled RECs as needed to achieve RCPS compliance. ENO will continue to monitor its resource output and retail sales throughout the year and purchase RECs, if needed, to ensure RCPS compliance.

**8. CONCLUSION**

ENO requests the following: 1) that the Council review this Compliance Demonstration Report Covering Compliance Year 2022; 2) determine ENO achieved the RCPS target for 2022 and remained within the Customer Protection Cost Cap; and 3) approve ENO’s proposal to recover the costs associated with 2022 compliance as described in Section 6.

## APPENDIX A

### Sample Bill Insert

In May 2021, the New Orleans City Council adopted a Renewable and Clean Portfolio Standard (“RCPS”) with the goal of achieving net zero carbon emission electricity by 2040, among the most aggressive standards in the country. In 2022, the first year of the RCPS, Entergy New Orleans (“ENO”) was required to meet an interim goal of 64% zero carbon emission electricity.

ENO uses a variety of zero emissions electricity sources located in Louisiana or neighboring states to meet these requirements such as:

- nuclear energy
- solar power
- hydroelectric power
- energy efficiency measures from ENO’s Energy Smart program, which allow ENO customers to reduce their electricity consumption
- electric vehicle charging infrastructure, which replaces street-level gasoline emissions with cleaner electricity
- purchases of renewable energy certificates, which support renewable energy in the region

Each megawatt-hour supplied by these resources is recognized with one credit under the Council’s policy, and resources located within Orleans Parish receive additional credits.

ENO has met its RCPS compliance requirements for 2022 with the following resources:

<b>Electricity Source</b>	<b>Credits</b>	<b>% of Credits</b>	<b>Portion of 64% Goal for 2022</b>
Nuclear	2,929,290	78.9%	50.5%
Energy Efficiency	119,517	3.2%	2.1%
Solar	97,944	2.6%	1.7%
Hydroelectric	15,833	0.4%	0.3%
Public Electric Vehicle Charging	7	0.0%	0.0%
Additional Renewable Energy Certificates	549,966	14.8%	9.5%
<b>Total</b>	<b>3,712,557</b>	<b>100%</b>	<b>64%</b>

ENO’s costs to comply with the RCPS in 2022 were \$1.54 million, which would result in an estimated bill effect of approximately \$0.28 cents for a Residential customer using 1,000 kWh of electricity.

Further information on the RCPS and ENO’s compliance in 2022 can be found at: URL

## **CERTIFICATE OF SERVICE**

### **Docket No. UD-19-01**

I hereby certify that I have served the required number of copies of the foregoing report upon all other known parties of this proceeding, by the following: electronic mail, facsimile, overnight mail, hand delivery, and/or United States Postal Service, postage prepaid.

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

Erin Spears, Chief of Staff  
Bobbie Mason  
Christopher Roberts  
Byron Minor  
Council Utilities Regulatory Office  
City Hall, Room 6E07  
1300 Perdido Street  
New Orleans, LA 70112

Krystal D. Hendon  
Chief-of-Staff to CM Morrell  
City Hall – 2W50  
1300 Perdido Street  
New Orleans, LA 70112

Andrew Tuozzolo  
Chief-of-Staff to CM Moreno  
City Hall – 2W40  
1300 Perdido Street  
New Orleans, LA 70112

Paul Harang  
Interim Chief of Staff  
City Hall – Room 1E06  
1300 Perdido Street  
New Orleans, LA 70112

Donesia D. Turner  
Ashley Spears  
City Attorney Office  
City Hall – 5th Floor  
1300 Perdido Street  
New Orleans, LA 70112

Greg Nichols  
Deputy Chief Resilience Officer  
Office of Resilience & Sustainability  
1300 Perdido Street, Ste 8E08  
New Orleans, LA 70112

Clinton A. Vince, Esq.  
Presley R. Reed, Jr., Esq.  
Emma F. Hand, Esq.  
Adriana Velez-Leon  
Dee McGill  
Dentons US LLP  
1900 K Street NW  
Washington, DC 20006

Norman White  
Department of Finance  
City Hall – Room 3E06  
1300 Perdido Street  
New Orleans, LA 70112

Joseph W. Rogers  
Victor M. Prep  
Byron S. Watson  
Cortney Crouch  
Legend Consulting Group  
6041 South Syracuse Way, Suite 105  
Greenwood Village, CO 80111

Honorable Jeffrey S. Gulin  
3203 Bridle Ridge Lane  
Lutherville, MD 21093

Basile J. Uddo, Esq.  
J.A. "Jay" Beatmann, Jr.  
c/o Dentons US LLP  
650 Poydras Street, Suite 2850  
New Orleans, LA 70130-6132

Courtney R. Nicholson  
Kevin T. Boleware  
Brittany Dennis  
Keith Wood  
Derek Mills  
Ross Thevenot  
Entergy New Orleans, LLC  
Mail Unit L-MAG-505B  
1600 Perdido Street  
New Orleans, LA 70112

Andy Kowalczyk  
1115 Congress Street  
New Orleans, LA 70117

Logan Atkinson Burke  
Sophie Zaken  
Jesse George  
Alliance for Affordable Energy  
4505 S. Claiborne Avenue  
New Orleans, LA 70125

Benjamin Quimby  
1621 S. Rampart Street  
New Orleans, LA 70113

Vincent Avocato  
Entergy New Orleans, LLC  
2107 Research Forest Drive, T-LFN-4  
The Woodlands, TX 77380

Joseph J. Romano, III  
Tim Rapier  
Farah Webre  
Entergy Services, LLC  
Mail Unit L-ENT-3K  
639 Loyola Avenue  
New Orleans, LA 70113

Brian L. Guillot  
Leslie M. LaCoste  
Lacresha Wilkerson  
Ed Wicker  
Linda Prisuta  
Entergy Services, LLC  
Mail Unit L-ENT-26E  
639 Loyola Avenue  
New Orleans, LA 70113

Marion Freistadt  
1539 Adams Street  
New Orleans, LA 70118

Stephen Wright  
Gulf States Renewable Energy Industries  
Association  
552 Marilyn Drive  
Mandeville, LA 70448

Karen J. Profita  
Gary Moody  
National Audubon Society  
5615 Corporate Boulevard, Suite 600B  
Baton Rouge, LA 70808

Marty Niland  
Bob Perciasepe  
Center for Climate and Energy Solutions  
3100 Clarendon Boulevard, Suite 800  
Arlington, VA 22201

Jeff Cantin  
Gulf States Renewable Energy Industries  
Association  
2803 St. Philip Street  
New Orleans, LA 70119

Simon Mahan  
Southern Renewable Energy Association  
5120 Chessie Circle  
Haltom City, TX 76137

Carrie Tournillon  
Kean Miller LLP  
900 Poydras Street, Suite 3600  
New Orleans, LA 70112

G. Ben Johnson  
New Orleans Chamber  
1515 Poydras Street, Suite 1010  
New Orleans, LA 70112

Dave Stets  
Sierra Club  
2101 Selma Street  
New Orleans, LA 70122

Monique Harden  
Deep South Center for Environmental  
Justice  
3157 Gentilly Boulevard, #145  
New Orleans, LA 70122

Katherine W. King  
Randy Young  
Kean Miller LLP  
400 Convention Street, Suite 700  
Baton Rouge, LA 70802

Maurice Brubaker  
Brubaker & Associates, Inc.  
16690 Swigly Ridge Road, Suite 140  
Chesterfield, MO 63017

Grace Morris  
Sierra Club  
4422 Bienville Avenue  
New Orleans, LA 70119

Joshua Smith  
Sierra Club  
2101 Webster Street, Suite 1300  
Oakland, CA 94612-3011

Tyler Fitch  
Vote Solar  
1911 Ephesus Church Road  
Chapel Hill, NC 27517

Elizabeth Galante  
Ben Norwood  
Posigen Solar  
819 Central Avenue, Suite 201  
Jefferson, LA 70121

New Orleans, Louisiana, this 1<sup>st</sup> day of May, 2023.



---

Keith D. Wood