



November 17, 2023

Via Electronic Mail

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

In Re: ESTABLISHING A SMART CITIES INITIATIVE FOR THE CITY OF NEW ORLEANS,
ELECTRIC VEHICLES CHARGING, AND RELATED REGULATORY ISSUES (Docket No.
UD-18-01)

Dear Ms. Johnson:

Please find the enclosed Preliminary 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 submit physical copies at your instruction. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention.

Sincerely,

Jesse S. George
New Orleans Policy Director
Alliance for Affordable Energy

**Before
The Council of the City of New Orleans**

**In Re: ESTABLISHING A SMART CITIES
INITIATIVE FOR THE CITY OF NEW ORLEANS,
ELECTRIC VEHICLES CHARGING, AND
RELATED REGULATORY ISSUES**

DOCKET NO. UD-18-01

NOVEMBER 17, 2023

PRELIMINARY COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY

I. INTRODUCTION

On September 7, 2023, the New Orleans City Council (“the Council”) adopted Resolution R-23-396 under the instant docket to establish procedural deadlines around continuing efforts to encourage the development of electric vehicle (“EV”) charging infrastructure and EV adoption in the City of New Orleans. Per the procedural schedule, on October 9, 2023, Entergy New Orleans, LLC (“ENO”) filed a report on the status of its infrastructure, investments, and incentives around EVs. Subsequently, on November 8, 2023, the parties held the first of two technical conferences required by the procedural schedule. The Alliance for Affordable Energy (“Alliance”) now submits the following preliminary comments:

II. THE COUNCIL SHOULD FOCUS EV INFRASTRUCTURE INVESTMENT AND INCENTIVES AROUND PUBLIC TRANSIT AND CITY FLEETS

One of the primary concerns of EV drivers identified at the first technical conference is “range anxiety”, or the uncertainty of knowing whether one’s destination will have sufficient charging infrastructure to allow charging for a return trip. As EV adoption expands along with the geographic footprint of charging infrastructure, it will be important for the Council to adopt regulations and policies to encourage maximal investment in electrifying and expanding public transit as the most efficient use of these resources. The Alliance is supportive, for instance, of

Entergy's vehicle-to-grid pilot with First Student charter schools, and would urge the Council and ENO to expand these efforts to the wider school system and to the Regional Transit Authority ("RTA"). The Council should work with RTA to leverage as much federal funding as possible to electrify and expand the public bus fleet. Furthermore, while the current administration elected this year to invest \$50 million dollars into inefficient cars and SUVs for Orleans Parish public fleets, despite the Council's Clean Fleet Ordinance, the Alliance remains supportive of the Ordinance, and encourages the Council and Entergy to consider how to support the implementation of the law.

III. THE COUNCIL SHOULD REQUIRE CLEAR ACCOUNTING FROM ENO REGARDING EV INCENTIVES AND INTERCONNECTION COSTS

Another issue that the Alliance identified at the first technical conference that should be clarified is the cost structure around ENO's eTech incentives for construction of EV charging infrastructure. It is not immediately clear how these rebates are financed, and the Council should require a thorough accounting. In the Alliance's view, these programs enable higher end sales for ENO and have not been approved by the Council for recovery by ratepayer funds, and thus should not be funded with ratepayer dollars.

Additionally, the costs of interconnection, including make-ready investments like transformers, for private host sites of EV charging infrastructure are unclear. ENO responded at the first technical conference by saying that "costs vary by site", but the Council should require more detail in the amount and calculation of these costs, and how they are allocated.

IV. THE ALLIANCE SUPPORTS ENO'S SUGGESTION OF AN IDLE FEE TO ENCOURAGE EFFICIENT USE OF EV CHARGING INFRASTRUCTURE

In order to discourage drivers from remaining at EV charging stations past the point of full charge, ENO has proposed an “idle fee” that would be assessed through the same application used to pay for charging. Users would receive a warning when their vehicle is at full charge and would have a set amount of time to move their vehicle before being assessed an additional charge for idling. The Alliance is supportive of this idea as the most direct way to address the issue, conditioned on the fee being set at a reasonable level and also on the existence of a cap that would limit the maximum penalty.

V. CONCLUSION

The Alliance thanks the Council for this opportunity to offer these preliminary comments. We look forward to the next technical conference under this docket, and for the opportunity to offer additional comments in the future.

Submitted respectfully,



Jesse S. George
New Orleans Policy Director
Alliance for Affordable Energy

**Before
The Council of the City of New Orleans**

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CERTIFICATE OF SERVICE

I do hereby certify that I have, this 17th day of November 2023, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



Jesse S. George
Alliance for Affordable Energy

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