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November 17, 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: CNO Docket No. UD-18-01 & UD-18-02 Smart Cities, Grid Modernization,
Electric Vehicles**

Dear Ms. Johnson:

Attached please find Entergy New Orleans, LLC's ("ENO") Preliminary Comments for filing in the above-referenced docket. ENO makes this filing in compliance with the requirements of Resolution No. R-23-396, issued on September 7, 2023, by the Council of the City of New Orleans.

If you have any questions, please do not hesitate to call me. Thank you for your courtesy and assistance with this matter.

Sincerely,

A handwritten signature in black ink that reads 'Kevin T. Boleware'.

Kevin T. Boleware

Enclosures

cc: Official Service List (*via electronic mail*)

BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS

IN RE: RESOLUTION AND ORDER)	
PROVIDING GUIDANCE AND)	
ESTABLISHING PROCEDURAL)	
DEADLINES WITH RESPECT TO)	
CONTINUED EFFORTS TO)	UD-18-01
ENCOURAGE DEVELOPMENT OF)	
ELECTRIC VEHICLE CHARGING)	
INFRASTRUCTURE AND ELECTRIC)	
VEHICLE ADOPTION)	
)	
and)	
)	
IN RE: RESOLUTION AND ORDER)	
OPENING A DOCKET REGARDING)	UD-18-02
ELECTRIC VEHICLE CHARGING AND)	
RELATED REGULATORY ISSUES)	

**PRELIMINARY COMMENTS OF ENTERGY NEW ORLEANS, LLC IN RESPONSE
TO RESOLUTION NO. R-23-396 WITH RESPECT TO CONTINUED EFFORTS
TO ENCOURAGE DEVELOPMENT OF ELECTRIC VEHICLE CHARGING
INFRASTRUCTURE AND ELECTRIC VEHICLE ADOPTION**

NOW BEFORE THIS COUNCIL, through its undersigned counsel, comes Entergy New Orleans, LLC (“Entergy New Orleans,” “ENO,” or the “Company”) and represents as follows:

ENO, in compliance with the requirements of Resolution No. R-23-396, issued on September 7, 2023 (“Resolution”), by the Council of the City of New Orleans (“Council”), hereby submits preliminary comments in response to topics discussed at the technical conference convened by the Council Utility Regulatory Office (“CURO”) on November 8, 2023 (“Technical Conference”), as participated in by ENO, Dentons and Legend Consulting Group Limited (together “Advisors”), the Office of Resilience and Sustainability for the City of New Orleans, and other Stakeholders.

I. Community Education and Communication Efforts

For the past few years, ENO has been working diligently to educate customers on the concepts designed by ENO to expand access to EV charging infrastructure in the City of New Orleans (“City”). ENO has engaged in customer outreach and education, hosting activities and events, building local and national stakeholder partnerships, and participating in organizations whose mission it is to proliferate EV adoption. Additional information on community education and communication efforts can be found in Appendix A.

Customer Outreach and Education

ENO uses daily interactions with customers to learn how ENO can support their transportation electrification needs, to educate them on ENO EV specific incentives and riders, and to inform them on various available federal grant programs.

Further, using proactive direct outreach through customer account managers and sales team members, ENO has developed a systematic campaign to share information and education with large fleet customers, car dealerships, apartment complex management, and other customers likely to need support through their transportation electrification efforts. That campaign discusses with the customers the potential and timing to electrify their fleets and to install charging infrastructure; it opens communication lines to gain an understanding of the customers’ interests and needs in transportation electrification and infrastructure installations; and it provides consulting and education on all of the ENO specific incentives, rates, and riders that support EV adoption, as well as the different types of federal funding opportunities available to customers. To support the outreach campaigns, ENO provided training to its customer services team members on EV basics to aid in the discussions with customers as well as developed scripts for the Entergy call center to

provide information and connect customers with company resources when inquiring about EV offerings.

In December 2023, ENO plans to kick off another proactive outreach approach to support the ride share drivers and rental car companies in our community. This customer-centric effort will provide education on the availability and location of the ENO level-2 public chargers, the ENO Bring Your Own Charger Pilot (“BYOC”) Program, and eTech incentives.

Finally, ENO rolled out a social media information initiative for eTech incentives through Facebook and LinkedIn, and the Company offers a robust website to educate on electrification opportunities and to provide a user-friendly calculator to show a customer the potential costs and potential savings from adopting electric transportation. Whether a customer is looking to electrify vehicles for personal use or for business use, the website will provide an electrification road map with step-by-step information empowerment and cost estimates.

EV Community Events

Annually since 2021, ENO has organized local Ride and Drive experiences by hosting events around New Orleans, including National Drive Electric Week¹ and Drive Electric Earth Day² events. For these experiences ENO partners with community organizations like the Southeast Louisiana Clean Fuels Partnership to showcase vehicles for event participants to drive and to learn firsthand about electric vehicles, helping to dispel misinformation in the hopes of increasing New Orleans adoption rates.

On December 1, 2022, Entergy New Orleans hosted an Electric School Bus Summit inviting Orleans Parish School Board and the local school bus transportation providers to begin

¹ <https://www.energynewsroom.com/news/new-orleans-drive-electric-week-kick-off-event-at-loyola-university/>.

² <https://driveelectricearthday.org/event?eventid=3645>.

discussions and education efforts on school bus electrification opportunities. Through this open forum, ENO provided critical information regarding charger infrastructure installation processes, available Environmental Protection Agency grants, as well as available ENO incentives, rates, and riders that can help facilitate future school bus electrification projects for the Orleans Parish school bus providers and the students.

Stakeholder Partnerships

ENO has been working to develop enhanced relationships with local installers to help ease the process of EV charger infrastructure installation for our customers. These efforts have focused on educating installers and providing information on the available incentives, rates, and riders ENO has available for EV charging infrastructure that installers can pass along to their customers. ENO is also actively meeting with national public charging providers to develop strategic partnerships in order to work together to increase DC Fast Charger (“DCFC”) availability in and around Orleans Parish. These partnerships will provide a path for two-way information sharing with national public charging providers and will open up communication that will aid in planning for additional capacity at DCFC installation locations.

Industry Organizations

ENO is an active member of Southeast Louisiana Clean Fuels Partnership, which works with vehicle fleets, fuel providers, community leaders, and other stakeholders to save energy and promote the use of domestic fuels and advanced vehicle technologies in transportation.³ ENO participated in the Partnership’s quarterly EV Readiness Roundtable on November 2, 2023, where it presented on the available eTech EV charging incentives from ENO. ENO is also a supporting

³ <https://cleanfuelpartnership.weebly.com/>.

member of Louisiana Clean Fuels,⁴ with Scott Barrios, Entergy Electric Mobility Solutions Manager, serving as Board President of the organization. As a member, ENO representatives participate in forums, summits, conferences, and meetings with other members and the public to disseminate alternative fuel expertise and education, state and federal policy updates, and project development assistance.

II. eTech

In response to questions at the technical meeting regarding the incentives available through eTech to ENO customers, Table 1, below, provides the total annual eTech incentives paid for EV chargers over the last three years for both commercial and residential customers. Customers are eligible for eTech incentives for EV chargers after providing ENO with evidence of the EV charger installation.

Table 1

Annual eTech Incentives for EV Chargers	
<i>Commercial</i>	
2020	\$2,000
2021	\$250
2022	\$2,500
2023 (as of 6/30/23)	\$11,000
<i>Residential</i>	
2020	\$9,896
2021	\$19,500
2022	\$20,327
2023 (as of 6/30/23)	\$22,500

As discussed, ENO has increased the incentive amounts available to individual customers in an effort to spur further development of charging infrastructure in New Orleans, particularly DC fast chargers. The overall eTech budgets for 2024 have been increased to support these additional

⁴ <https://louisianacleanfuels.org/index.php>.

incentives, with up to \$250,000 planned for commercial customers and up to \$44,000 for residential customers.

In addition to residential and commercial eTech incentives for EV chargers, ENO also provides a specific commercial incentive of \$2,500 per port for Level 2 EV chargers installed in a disadvantaged community for use at a workplace, a multi-unit dwelling, and public charging. To be considered for the “Level 2 in Disadvantaged Community” incentive, the EV charger site location must be identified as a disadvantaged community in the⁵ used in the Justice40 Initiative.⁶

III. The City of New Orleans Permitting Process

ENO acknowledges the discussion at the technical conference regarding the opportunity for the City to improve and streamline the EV charger installation permitting process. As requested, Appendix B details ENO’s experience throughout the permitting process and provides a proposal to streamline the process. Additionally, ENO is interested to learn about the City’s transportation electrification strategic planning and the Charging and Fueling Infrastructure (“CFI”) Grant Program application. ENO is prepared to work with the City and the Office of Resilience and Sustainability to discuss ENO’s potential role in supporting the transportation electrification strategic plan and the installation of more public charging for Orleans Parish, including assistance in site selection, extension of service planning, and the availability of applicable rates, riders, and incentives.

IV. ENO Level-2 Public Charging Usage by Location

In response to the request for usage data detailed by charger, ENO will assess the available data and develop an annual reporting framework to be included each year in the public Distributed

⁵ <https://screeningtool.geoplatform.gov/en/#3/33.47/-97.5>.

⁶ <https://www.whitehouse.gov/environmentaljustice/justice40/>.

Energy Resource Report compliance filing required by Resolution R-21-153.⁷ ENO plans to make the 2022 Distributed Energy Resource Report compliance filing by December 31, 2023.

V. Make Ready Offerings

As discussed during the technical meeting, ENO can support commercial customers with the EV charger make-ready installation process through three different options. First, ENO offers an Extension of Electric Service Policy⁸ that is available to all customers for the provision of permanent electric service. ENO will extend overhead lines and/or add other overhead facilities without cost to the customer if the extension and/or additions do not exceed three hundred (300) feet and if the extension and/or additions, or combinations of extension and/or additions, will cost no more than four (4) times the customer's estimated minimum annual revenue, excluding adjustments. The second option for customers installing make-ready infrastructure is the Electric Vehicle Charging Infrastructure Rider ("EVCI-2").⁹ EVCI-2 provides the option for ENO to install only the make-ready infrastructure for non-residential site hosts. More specifically, the tariff allows a non-residential customer (*e.g.*, retail store, school, hospital, multi-family housing) to choose for ENO to install, own, and maintain the make-ready infrastructure. The costs incurred by ENO for the make-ready equipment, installation, and any ongoing operations and maintenance ("O&M") will be added to each EVCI-2 Rider customer's monthly ENO electric bill as a fixed

⁷ Docket No. UD-20-01, Streamlining Entergy New Orleans Reporting Requirements, Pursuant to Council Resolution R-21-153.

⁸ See https://cdn.entergyneworleans.com/userfiles/content/price/tariffs/enol_elec_eoes.pdf?_gl=1*jwnqw4*_gcl_au*NDkwNTk2ODQwLjE2OTk5OTQxNTM.*_ga*ODc5Nzg0NTkuMTY5OTk5NDE1Mw.*_ga_8YKL3FLBBC*MTY5OTk5NDE1My4xLjAuMTY5OTk5NDE1OS41NC4wLjA.*_ga_H0JW6TJK3Y*MTY5OTk5NDE1My4xLjAuMTY5OTk5NDE1OS4wLjAuMA..&_ga=2.112310022.381373869.1699994153-87978459.1699994153.

⁹ See https://cdn.entergyneworleans.com/userfiles/content/price/tariffs/enol_elec_evci.pdf?_gl=1*ob984l*_gcl_au*NDkwNTk2ODQwLjE2OTk5OTQxNTM.*_ga*ODc5Nzg0NTkuMTY5OTk5NDE1Mw.*_ga_8YKL3FLBBC*MTY5OTk5NDE1My4xLjAuMTY5OTk5NDE1OS41NC4wLjA.*_ga_H0JW6TJK3Y*MTY5OTk5NDE1My4xLjAuMTY5OTk5NDE1OS4wLjAuMA..&_ga=2.151099323.381373869.1699994153-87978459.1699994153.

payment.¹⁰ Finally, a customer can utilize the eTech incentives for Residential (\$150 per circuit) and Commercial (\$200 per circuit) Level-2, Pre-Wire construction make-ready infrastructure installation, as shown in Appendix A.

VI. Conclusion

ENO appreciates the opportunity to submit these comments and will review those submitted by other parties. The Company looks forward to continuing this process with the parties, the Advisors, the Council, and other stakeholders.

Respectfully submitted,



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Attorneys for Entergy New Orleans, LLC

¹⁰ The customer may also choose to have ENO install, own, and maintain an EV charger under rider EVCI-2 and receive a monthly charge on its electric bill.

CERTIFICATE OF SERVICE
Docket No. UD-18-01 & UD-18-02

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.

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New Orleans, Louisiana, this 17th day of November 2023.



Lacresha D. Wilkerson



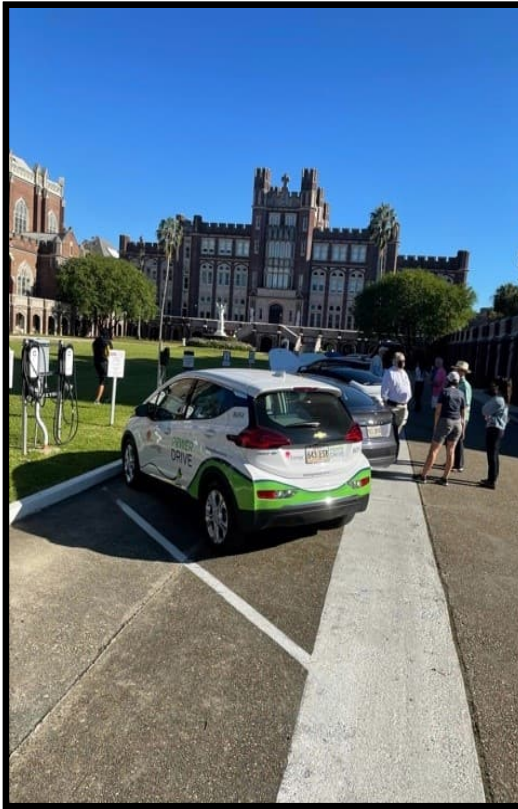
Entergy New Orleans, LLC

Appendix A

EV Event Photos and Example Marketing Material



National Drive Electric Week 2022(Left) and 2019(Right)



Drive Electric Earth Day 2022(Left) and Louisiana Clean Fuels Summit 2023(Right)



www.emobility.entergy.com (screenshots)

entergy Calculate savings

Ready. Set. Charge!

Whether you're looking to electrify vehicles for your home or business, we've got what you need.

Calculate savings

ELECTRIC VEHICLE BENEFITS

Operational savings

Select vehicle type
Passenger Car

Save up to
\$1,334
Every year

Miles per gallon
26

Gas price (gallon)
\$3.04

in fuel and maintenance costs by switching from a gas-powered vehicle to its EV equivalent.

STEP-BY-STEP Electrification roadmap

Residential Business

Step 1
Get your first charger
To get started, you can reach us at 1-800-ENTERGY to receive charger recommendations and guidelines. We will provide you with all the necessary information to help you make an informed decision.

Step 2
Install at your home

Step 3
Connect to the grid

Apply for rebate up to \$250

CHARGING MAP

Where can I charge my vehicle?

Chargers nearby
Discover the best charging options in your area

70124

Search

- Delgado Community Coll...**
615 City Park Ave
0.32 miles away
- ENTERGY NO LVL2 LV H...**
777 Harrison Ave EVC
1.05 miles away
- ENTERGY NO LVL2 CTY ...**
10 Friedrich's Ave EVC
1.11 miles away

Example EV marketing collateral



Have an EV charger project in mind?

eMobility Solutions 

Entergy has developed turnkey EV charging solutions for commercial installation

Entergy now partners with its customers to install and maintain EV chargers. Whether you're a property developer trying to include EV chargers in your project, a business owner trying to make charging available at the workplace and/or for your customers, or a fleet manager pursuing the benefits of electric fleet operations, Entergy can partner with you to select, install and maintain EV charging equipment to meet your needs.

Our experts will assist you in designing the optimal charging layout and number of chargers for your location and finding the right charging solution, such as Level 2 or DC Fast Charger. The cost of the charger(s), installation and maintenance will be added to your monthly Entergy bill.

Who can participate?
 Non-residential customers of Entergy Arkansas, LLC; Entergy Mississippi, LLC; and Entergy New Orleans, LLC.
 • Rider CI customers may provide EV charger access to its fleet vehicles, employees, customers, tenants and/or to the public, including for compensation.
 • All forms of transportation electric equipment (e.g., cars, trucks, aircraft, shipping) that use electricity as a power source are acceptable.

How does Rider CI work?
 An Entergy EV expert will consult with you about your specific electric vehicle charging needs. Once the scope of work and costs are developed and agreed upon, you enter into an agreement with Entergy to pay a net monthly Rider CI charge for the selected period (1-10 years). Entergy will install, maintain and own the charging equipment with no upfront payment from the customer.

Per the terms of the agreement, the monthly charge will be calculated based on the total installed cost of charging equipment less any applicable adjustment for (1) utilization of any available government tax or other form of incentive and (2) additional revenues anticipated to be received by Entergy, plus the agreed-upon fixed amount for any ongoing operation and maintenance services. Additional electricity usage for EV charging will be part of your monthly bill.

Once the equipment has been paid off (i.e., at the end of the selected term), Entergy will continue to maintain the equipment and provide any other services you may require for a monthly fee agreed upon by both parties.



Utility distribution network



Utility transformer



Meter



Panel




Conductor (Boring/trenching)



EV charger

Utility service **Make-ready** **Equipment**




Ready to go electric?

We're ready to get your electric vehicle charging station connected

Step 1: Request new service

First, contact us to initiate a new service request via 1-800-ENTERGY or through your key account manager. After we review and approve your request, we will open a work order and assign our designer to your project. Our designer will provide you with a load data sheet to complete. You will also need to provide a site layout diagram.

 **Your tasks:**


- Initiate new service request
- Fill out load data sheet
- Develop site layout diagram

Our tasks:

- Review request
- Assign project designer
- Schedule site visit

Step 2: Site design

We will work with you to conduct a site visit. During that visit, our designer will need the completed load data sheet and site layout diagram. Following the site visit, we will perform right-of-way checks and an engineering review. Then we will provide you with a preliminary design plan including a cost estimate and timeline for your approval. If required, we will send you a Contribution in Aid of Construction (CIAC) Invoice.


 **Your tasks:**

- Host a site visit
- Provide completed load data sheet and site layout diagram

Our tasks:


- Perform site visit
- Complete right-of-way and engineering review
- Provide preliminary design plan and cost estimate
- Review easements
- Send CIAC invoice (if required)

Continued on back



A message from Entergy Corp. ©2022 Entergy Services, LLC. All Rights Reserved.

Example E-Tech marketing collateral




Ready. Set. Charge!

eTech helps make installation easy

Considering an electric vehicle? Smart choice. EVs are both cost-efficient and energy efficient. They're convenient, too. With your EV plugged in overnight, you can wake up to a fully charged battery every morning.

The Entergy New Orleans eTech offering can help get your home EV ready—and provide personal advisory services to help you choose the best equipment for you. We'll work with you through the entire process and assist with incentives that help offset the cost of bringing EV charging to your home.

Driving toward the future



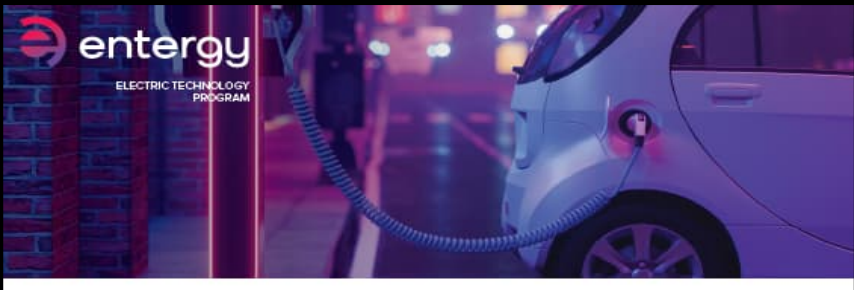
Entergy New Orleans recently installed 25 public charging stations at convenient locations throughout Orleans Parish.

Offer	Incentive	Detail
ENERGY STAR® certified level 2 charger	\$250	ENERGY STAR chargers have been deemed to enhance cost savings and environmental benefits.
ENERGY STAR certified level 2 charger + enrollment in the Energy Smart Bring Your Own Charger (BYOC) Program	\$350	Prioritized charging at off-peak hours at lower rates to save more money.
Pre-wiring for level 2 charger	\$150/circuit	Helps cover material and labor for new construction during installation of charger.

Ready to charge into the future?

For help getting started, contact an eTech energy advisor at etech@entergy.com, or by calling 833-44eTech (833-443-8324). When your installation is complete, apply for your incentive at enteryetech.com/electric-vehicles.

Learn more about the benefits of electric vehicles at emobility.entergy.com.



Ready. Set. Charge!

eTech helps make installation easy

As electric vehicles (EVs) grow in popularity, owners want access to convenient charging. Installing EV chargers now will put you ahead of rising demand and can attract and retain customers and tenants while demonstrating environmental stewardship.

Entergy New Orleans offers personal advisory services to help you choose the best equipment for your property. We'll partner with you through the entire process and assist you with incentives that help offset the cost of bringing EV charging to your property.

Equipment type	Location requirement	Incentive
Level 2 charger* <u>ENERGY STAR® certified</u>	Public, fleet and multi-unit dwellings	\$1,000/port
	Public, fleet and multi-unit dwellings located in disadvantaged community	\$2,500/port
DC fast charger †	Public and fleet	\$2,500/port, 20-50kW \$5,000/port, 51-149kW \$12,500/port, 150+kW
	Private network	\$2,500/port
Pre-wiring for Level 2 charger	Public, fleet and private network	\$200/circuit

*2-port minimum; 6kW/port minimum.
†Level 2 charger incentives cannot exceed \$25,000 per project; DC fast charger incentives cannot exceed \$50,000 per project.

Ready to charge into the future?

For help getting started, contact an eTech energy advisor at etech@entergy.com, or by calling 833-44eTech (833-443-8324). When your installation is complete, apply for your incentive at enteryetech.com/electric-vehicles.

Learn more about the benefits of electric vehicles at emobility.entergy.com.

Appendix B

Electric Vehicle Charging Infrastructure--Permitting Process Memo

November 17, 2023

Process Overview

Throughout the construction of the Level 2 Public Charging Pilot ENO and its contractor, Solar Alternatives, were responsible for obtaining three different types of permits for each curbside charger installation. ENO was responsible for obtaining all street cut permits, while Solar Alternatives was responsible for obtaining both the EV permit and electrical permit at each site.

Street cut permits are required for all underground construction-related work that takes place in the Right of Way (ROW) on public property. ENO's franchise agreement allows for the installation of equipment in the ROW, but street cut permits are required to minimize conflicts that may be found underground. When applying for a street cut permit, ENO is required to check available data sources to identify other known facilities and each permit requires Sewerage and Water Board sign off prior to submission. The street cut permit application is then reviewed by the Department of Public Works (DPW), Traffic and Engineering, and Parks and Parkways. Once reviews are complete and all divisions have approved the application, the street cut permit will be issued. For the pilot project, it was ENO's practice to apply for Street Cut permits prior to the additional contractor-required permits because if a conflict was identified, there was no reason to pursue the additional permits. The entire street cut application process took approximately 30 to 45 days per permit in most scenarios.

Once a street cut permit was issued, Solar Alternatives would then file for an EV permit (EVIN). An EV permit is similar to a building permit in that an electrical permit will be attached if it is issued. The EV permit application goes through plan review, zoning review, DPW traffic review, and often Parks and Parkways review. Once all reviewers have approved, the permit is issued. This process often took 30 plus days in addition to permit timelines mentioned above. Once an EV permit was issued, an application for an EV electrical permit (EVCH) would then be submitted. The electrical permit application is reviewed and issued by the City's Electrical division. This process often took ~15 days.

Suggested Permit Streamline Proposal

1. Combine the EV application and Street Cut Application for EV installation in the ROW or be able to attach the permits to each other.
2. Reduce redundancies. It appears that application reviews do not take place simultaneously and are funneled from one division to another throughout the permitting process. For example, street cut and EV permits are reviewed by two separate divisions, Parks and Parkways and DPW Traffic, causing delays in permitting due to unestablished timelines. If it is necessary for both divisions to review the permits, it is recommended that the departments review the permits together.
3. Automated Approval. In consideration of shortening the lag time for approval of permits, we recommend automated approval. There have been several occasions where permits were approved but the issuance of the permit was drastically delayed resulting in several

rounds of follow-up discussion before the issuance of the permit. An automated process would alleviate this issue.

4. Establish a procedural timeline. Process times vary drastically from one project to another, by developing a timeline of when permits must be reviewed would alleviate the questioning or expectancy of when the permit will be issued. Lag time should be built in to ensure the deadline is feasible given the high volume of permit applications submitted each month.