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Harry M. Barton
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February 28, 2019

Via Hand Delivery
Lora W. Johnson, CMC, LMMC
Clerk of Council
Room 1E09, City Hall
1300 Perdido Street
New Orleans, LA 70112

Re: *Resolution and Order Opening an Inquiry into Establishing a Smart Cities Initiative for the City of New Orleans and Directing Entergy New Orleans, LLC to Report with Respect to Matter Related to Grid Modernization*
Docket No. UD-18-01

Dear Ms. Johnson:

Please find enclosed an original and three copies of the Entergy New Orleans, LLC's List Of Issues for Consideration in The Council Of The City Of New Orleans' Information Gathering Process Regarding Electric Vehicles. Please file an original and two copies into the record in the above-referenced matter and return a date-stamped copy to our courier.

Should you have any questions regarding the above matter, please don't hesitate to contact me at 504-576-2984. Thank you for your assistance with this matter.

Sincerely,

Harry M. Barton

HMB/bkd
Enclosures

cc: Official Service List (via e-mail)

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BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

IN RE: RESOLUTION AND ORDER OPENING AN INQUIRY INTO ESTABLISHING A SMART CITIES INITIATIVE FOR THE CITY OF NEW ORLEANS AND DIRECTING ENTERGY NEW ORLEANS, LLC TO REPORT WITH RESPECT TO MATTER RELATED TO GRID MODERNIZATION	)	**DOCKET NO. UD-18-01**

ENTERGY NEW ORLEANS, LLC'S LIST OF ISSUES FOR CONSIDERATION IN THE COUNCIL OF THE CITY OF NEW ORLEANS' INFORMATION GATHERING PROCESS REGARDING ELECTRIC VEHICLES

NOW, before the Council of the City of New Orleans ("Council") comes Entergy New Orleans, LLC ("ENO") and, pursuant to Council Resolution No. R-18-537, submits this List of Issues for Consideration in the Council's Information Gathering Process Regarding Electric Vehicles. The Council initiated Docket UD-18-02, via Resolution No. R-18-100,[1] following a joint recommendation from the Advisors, ENO, and the City's Environmental Advisory Committee ("EAC") to address a specific issue that the EAC identified as a potential obstacle to the construction, location, and operation of electric vehicle charging stations in the City.[2] In Resolution R-18-100, the Council resolved the issue and also found that (i) "encouraging the use of electric vehicles is in the public interest," and (ii) "the construction, location and operation of

[1] Resolution No. R-18-536 merged Docket UD-18-02 into Docket UD-18-01. R-18-536, in concert with R-18-537, established concurrent procedural schedules for the development of a Smart City Master Plan and the instant Information Gathering Process related to electric vehicles.

[2] The specific issue resolved was a determination by the Council that a person or entity that purchases electricity from ENO or another utility regulated by the Council and furnishes such electricity exclusively to charge electric vehicles, to or for the public, for compensation, never was, and is not now, a utility or public utility as those terms are used in the New Orleans Home Rule Charter and the New Orleans City Code, and is not subject to the Council's utility regulatory authority.

electric vehicle charging stations on both private and public property should be encouraged." In addition to making these clear policy statements, the Council also noted that electric vehicles and electric vehicle charging stations present several regulatory issues and directed the initiation of this Docket "for the gathering of additional information, including public comment, and developing additional proposed actions as are deemed necessary."

ENO commends the Council for the approach it has taken thus far in addressing electric vehicle issues. The Council has both wisely sought to establish a comprehensive information gathering process, but also taken quick and decisive action when necessary to advance the goals of encouraging electric vehicle usage and the construction of charging stations. ENO agrees that this "dual path" approach is the right way to address electric vehicle issues and is encouraged by the Council's willingness to take actions that further its stated goals for electric vehicles even as the Information Gathering Process is in its early stages. ENO will follow the Council's lead by fully participating in this Information Gathering Process, but also by continuing to propose and implement policies and programs designed to further the adoption of electric vehicles in New Orleans. To that end, ENO proposed two initiatives in the 2018 Combined Rate Case designed to further these goals (the Electric Vehicle Charging Infrastructure rider and a Public EV Charging Pilot, which would involve installing EV chargers on City-owned property for public use) and hopes the Council will authorize ENO to pursue those ideas upon resolution of the Rate Case, even during the pendency of this Information Gathering Process. ENO recognizes that a comprehensive information gathering on electric vehicle issues is necessary, but also believes that enacting policies and approving near-term initiatives designed to further electric vehicle adoption need not wait until the Information Gathering Process is complete and the Council takes subsequent action(s), if necessary, on any recommendations that may emerge from that process.

As to the specific issues that should be addressed in this Information Gathering Process, ENO believes that R-18-537 provides a fairly complete list of the relevant considerations. As such, ENO suggests limited modifications and additions to that list in a "redline" style below:

- Definition of scope of the proceeding (*e.g.*, desired deliverables, outcomes, decisions, etc.);
- Electric vehicles sales, ownership and estimates of penetrations both current and future by usage type;
- Electric vehicle charging stations installed today; and projected to be installed in the City of New Orleans within 5 years;
- Types of electric vehicle chargers and potential issues (*e.g.*, Level 2 vs. DC fast charging, non-utility curbside chargers);
- Available Federal, State, and local incentives for electric vehicles and electric vehicle charging infrastructure;
- Optimal City-owned locations for ENO's proposal in its 2018 Combined Rate Case to invest $500,000 in public charging infrastructure (*i.e.*, the "Public Electric Vehicle Charging Pilot");
- Opportunities for the electrification of vehicle fleets (*e.g.*, buses, City-owned vehicles, commercial fleets, etc.) in New Orleans;
- Education and outreach programs for electric vehicle dealers and potential buyers, best practices for encouraging adoption;
- The potential impacts of charging stations on ENO's electric distribution system reliability and regulated utility infrastructure;
- The impact of electric vehicle charging on ENO's capacity and generation needs;
- The use of electricity generation sources other than that provided by the regulated utility to supply power to charging stations, such as on-site solar photovoltaic capacity;
- Public safety issues and concerns;
- Regulated utility interconnection requirements including monitoring, control, communications requirements, and form of standard interconnection agreement;
- Rate design, time-differentiated utility rate structures, and specialized rate tariffs for utility public charging station service, including pilot service schedules;
- Implementation and regulation of 3rd-party charge for charging; potential methods for charging electric vehicle drivers (*e.g.*, amount of time spent charging, amount of energy usage), disclosures, and consumer protection issues;
- Utilization of electric vehicles as a regulated utility electric resource (vehicle-to-grid);
- Costs and benefits attributable to electric vehicle usage and electric vehicle charging;
- Development of an "electric vehicle highway" route and coordination with adjacent parishes;

- Other ~~M~~matters related to ~~autonomous vehicles and~~ electric vehicles;[3]
- Matters related to land use issues affecting electric vehicles and electric vehicle charging;
- New commercial building construction standards and requirements that incorporate EVs.

ENO looks forward to reviewing other parties' Issues Lists and to participating in the first technical conference of the Information Gathering Process.

By: _____

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[3] Due to the numerous issues related to autonomous vehicles, ENO respectfully suggests that this topic may be too broad for, and distract from, the Information Gathering Process as related to electric vehicles. Given the concurrent efforts to develop a Smart City Master Plan, perhaps consideration of autonomous vehicles is more appropriate as a component of the more global Smart City efforts.

CERTIFICATE OF SERVICE
Docket No. UD-18-01

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.

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New Orleans, Louisiana, this 28th day of February, 2019.

Harry M. Barton