



September 23, 2019

In Re: CNO Docket UD-19-01

Letter to City Council Clarifying Position from Joint Statement

Dear New Orleans City Council, CURO Staff, Council Advisors, and Intervenors to the Docket:

PosiGen Solar is writing to clarify its position on written comments that our company filed on July 15, 2019 as an independent intervenor in the Renewable Portfolio Standard docket. We understand that we inadvertently created confusion by signing on in support of the Energy Future New Orleans coalition joint statement (hereafter "joint statement") and filing additional comments independently.

We apologize for this confusion and are writing this letter to clarify and differentiate our independent comments from those of the joint statement. We hope this letter will serve to help explain PosiGen Solar's unique position on two issues.

First, in our independent comments, PosiGen differs with the joint statement by specifically requesting a rooftop solar carve-out for low-income residents based upon Washington, D.C.'s successful program. While net-metered rooftop solar is included in Tier II resources listed in the joint statement, PosiGen asserted in our July comments that a carve-out for low-income rooftop solar is worth pursuing. This position stemmed from our June filing where we asserted that the RPS policy should address the legacy of inequality in our housing stock and neighborhoods and requested that solar and energy efficiency resources for low-income communities be included in Tier I.

We are pointing out this difference between our independent intervenor filing and the joint filing because of our significant concern that low-income residential customers will be left behind other higher income electric customers. All customers deserve fair and equitable access to new services like rooftop solar, but in particular our lowest income families urgently need access to services that will lower their extraordinarily high energy burdens.

We feel strongly that these programs are worthy of further discussion by the parties. We hope that other intervenors will include their opinion regarding the merits of a specific, low-income solar program for residential customers either within the framework of the three Alternatives or alongside them as a carve-out.

PosiGen would also like to clarify that it differs slightly with the joint statement on the issue of cost. We asserted that generation resources should be compared using a full analysis and accounting of the total cost of each resource, including spillover costs



costs like climate impacts, air pollution, water use, and others. Others may disagree and we would like to have that conversation.

This letter is solely meant to clarify our position for the Council, staff, advisors, and other intervenors. We hope this clarification is helpful while preparing your response for the next round of comments. If there are questions remaining, we urge you to reach out by phone or email to ensure that all issues raised are fully addressed.

We appreciate your time and attention. There is a lot of critical work to be done to create a resilient and just energy future for New Orleans, and PosiGen, as the largest low income clean energy provider in the United States, is proud to be part of this historic process.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Elizabeth Galante', with a stylized flourish at the end.

Elizabeth Galante

**RULEMAKING PROCEEDING TO ESTABLISH RENEWABLE PORTFOLIO
STANDARDS**

DOCKET UD-19-01

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