

November 7, 2019

BY HAND DELIVERY

Ms. Lora W. Johnson
Clerk of Council
Council of the City of New Orleans
City Hall, Room IE09
1300 Perdido Street
New Orleans, LA 70112

In Re: *Smart & Sustainable Cities Initiative for the City of New Orleans - Electric Vehicle Charging and Related Matters*, CNO Docket UD-18-01

Dear Ms. Johnson:

Enclosed please find an original and three (3) copies of the *Reply Comments on Relevant Issues Submitted by the Utility Advisors to the Council for the City of New Orleans* in the above referenced docket, which we are requesting that you file into the record along with this letter in accordance with your normal procedure.

Sincerely,



Jay Beatmann
Counsel

JAB/dpm
Enclosure

cc: Official Service List for UD-18-01

**BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS**

IN RE: INFORMATION GATHERING IN)	
CONNECTION WITH AN INQUIRY INTO)	
REGULATORY AND RELATED MATTERS)	DOCKET NO. UD-18-01
CONCERNING ELECTRIC VEHICLES AND)	
ELECTRIC VEHICLE CHARGING)	
FACILITIES)	

**REPLY COMMENTS ON RELEVANT ISSUES SUBMITTED BY UTILITY
ADVISORS TO THE COUNCIL FOR THE CITY OF NEW ORLEANS**

Pursuant to Council Resolution No. R-18-537 as modified by Resolution No. R-19-170, the Utility Advisors for the Council of the City of New Orleans (the “Advisors”) submit the comments below concerning the Consensus List of Relevant Issues (“Consensus List”) filed with the Council on September 5, 2019. The only participant comments filed with regard to the Consensus List were filed by Entergy New Orleans, LLC (“ENO”) on October 11, 2019 pursuant to the procedural schedule provided for in this docket.

At the first technical conference held August 23, 2019, the participants acknowledged that there is a broad consensus with respect to the relevant issues that could potentially be considered in this docket; however, the participants also agreed that in order to be more efficient and effective the participants should prioritize the Consensus List to ensure that the efforts of the Council are focused on the most important issues first. It was also agreed among the participants that the second technical conference, which is scheduled to be held on or before January 16, 2019, would provide an opportunity for further discussion of prioritizing the Consensus List. In light of those discussions, ENO’s comments will be considered ENO’s suggestions of certain issues that should

be prioritized. The Advisors have considered ENO's suggestions and make the following observations.

The Advisors also recognize that many of the issues listed on the Consensus List relate to additional gathering of data, which can be discussed and prioritized independent of specific individual issues.

The Advisors note ENO's comments that the Pilot program proposed in ENO's submission in the 2018 Combined Rate Case ("Rate Case"), if approved in the pending Rate Case resolution, should be a priority to determine the appropriate locations for roughly 30 to 50 electric vehicle ("EV") charging stations on city-owned property. The Advisors believe should the Pilot program go forward, it should be a priority to develop a specific procedural schedule for parties to comment on the siting of these charging stations. It should also be a priority to encourage the City administration to participate in the comment process to assist in identifying City properties that would be appropriate EV charging locations under the proposed Pilot program.

The Advisors agree that in discussing the appropriate siting locations, special attention should be given to equitable distribution of locations convenient to multi-unit dwellings and disadvantaged communities where existing or potential electric vehicle owners historically have difficulty accessing charging facilities.

The Advisors have already supported ENO's proposed continuation of its eTech program, including the \$250.00 rebate for EV charging equipment installation. This issue was addressed in the Rate Case and involves the Energy Smart Implementation Plan for Program Years 2020 - 2022. Although no specific action is required in this docket, the Advisors believe that the data gathered in the eTech program could be useful in this docket. Accordingly, the Advisors believe that it

should be a priority to determine if and how this data can be submitted in this docket without jeopardizing any individual customer's privacy or personal data.

The Advisors acknowledge that the appropriate role for utility involvement in deploying and owning EV charging infrastructure should be considered for priority treatment at the second technical conference. While ENO's comments discuss several examples of utility involvement in other states, the Advisors believe it is important to consider carefully the proper balance between utility involvement and encouraging private enterprise in developing EV charging infrastructure. Necessarily, this would include considering the propriety of requiring all ratepayers to bear the cost of free EV charging for those with electric vehicles for any charging stations located "in front of the meter."

Based upon ENO's comments concerning interconnection and logistical issues and how they are affected by the level of charging equipment installed and the distinction between home chargers and large charging stations, especially stand-alone charging stations being run as business enterprises, the matter should be discussed at the second technical conference. Participants should also consider the issue raised by ENO with respect to the use of generation sources other than electricity provided by ENO to power stand-alone commercial charging stations.

Generally, the Advisors recommend that participants should separately consider the appropriate regulatory structures for different EV configurations including, but not limited to: (1) EV charging at home or on business premises for business fleets or as an incidental service to business employees or customers (such as hotels offering charging to overnight guests, public parking decks that offer charging to those who have paid the parking fee, a large office building having chargers in the employee garage, or a restaurant or store that allows a customer to charge while on the premises); (2) EV charging stations run as commercial businesses purchasing power

from ENO and reselling to the public; (3) charging stations located on public property for the benefit of the public, whether or not charging is free to the public; and (4) EV charging stations producing their own power and selling it to the public. The regulatory issues, and the potential need for specific interconnection agreements, could vary, therefore, participants should consider treating these issues as a priority matter in the second technical conference because they can affect other issues on the Consensus List.

The Advisors also note that ENO's comments are largely limited to Level 1 and Level 2 EV chargers; however, the Advisors believe participants should also consider the appropriate treatment of Level 3 Superchargers, which are becoming increasingly popular due to their significantly faster charging speeds, and which are likely to be most often deployed in large charging stations operated as commercial businesses.

Finally, the Advisors agree that the Council should take steps to examine participation in the Louisiana DC Fast Charging Master Plan. The Advisors also believe that ensuring that New Orleans residents who own EVs have strong access to charging stations during a mandatory evacuation of the City, throughout the evacuation route, should be a priority for the Council.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon “The Official Service List”
via electronic mail and/or U.S. Mail, postage properly affixed, this 7th day of November 2019.



J. A. "Jay" Beatmann, Jr.