



March 23, 2020

**By Electronic Mail**

Ms. Lora Johnson, CMC  
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Room 1E09, City Hall 1300  
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In Re: 2018 TRIENNIAL INTEGRATED RESOURCE PLAN OF ENTERGY NEW ORLEANS,  
INC. (Docket No. UD-17-03)

Dear Ms. Johnson:

Please find enclosed an original and three (3) copies of the Alliance for Affordable Energy's Comments in the above-referenced docket. Please file the attached communication and this letter in the record of the proceeding and return one timestamped copy via electronic mail. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention.

Sincerely,

A handwritten signature in black ink that reads "Logan Burke". The signature is written in a cursive style and is positioned above a horizontal line.

Logan Burke  
Executive Director  
Alliance for Affordable Energy

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

**IN RE: 2018 TRIENNIAL**

**INTEGRATED RESOURCE PLAN FOR  
ENTRGY NEW ORLEANS, LLC.**

**DOCKET NO. UD-17-03**

**ALLIANCE FOR AFFORDABLE ENERGY'S RESPONSIVE COMMENTS TO  
ADVISOR RECOMMENDATIONS**

The Alliance appreciates this opportunity to provide comments on the final resolution for docket UD-17-03, R-20-52. This cycle of Integrated Resource Planning was productive and offered the stakeholders important information that is already helping to grow the Council's Energy Smart program, which will save rate-payers millions of dollars and improve health, comfort, and affordability across the city. In addition, this IRP cycle provides insight into the cost-effectiveness of renewable energy and energy storage, low-cost demand response and other flexible resources, which should inform the Council's final decision and rules in the Docket UD-19-01 rulemaking for a Renewable Portfolio Standard. This cycle of IRP highlighted the value of stakeholder input, and the Alliance looks forward to continuing resource planning in this way. Below are comments responsive to the recommendations laid out by the Advisors in the Council's Resolution.

- 1) Recommendation for ENO to provide the parties with an estimate of the annual DSM costs for each portfolio modeled.*

The Alliance supports this recommendation, but only if cost effectiveness testing, or expected savings from the portfolios, either as Total Resource Cost Test or Utility Cost Test, are also provided. The value of these programs, by definition, exceeds their costs, but some portfolios may be more cost-saving than others. Furthermore, should these requirements be added to reporting, an estimate of annual revenue requirements for other portfolio resources (supply side) must also be included.

- 2) *Recommendation that to the extent that the Council determines that it will use its own independent expert to produce a DSM Potential Study in the next IRP cycle, it would be helpful if the Council provided guidance to ENO and the independent consultant as to how to make resource portfolios produced using inputs from different studies more directly comparable.*

One of the most important decisions this Council made in this IRP cycle was to hire an independent DSM consultant to consider potential savings. The Alliance was pleased to see that as a result of the savings uncovered (energy, demand, and dollars) the next three years of Energy Smart programming will grow, even beyond the Council's prior savings target expectations. The Alliance therefore suggests that next IRP cycle similarly include a Council-selected independent DSM potential study consultant. The Alliance does not believe it is necessary to also conduct a second study, and that ratepayer dollars can be saved by only using a single study each cycle. However, if Entergy chooses to conduct this second study, we do encourage planning and guidance to the two study-consultants as to the method of inputs for modeling purposes, beginning at the contracting stage and in conjunction with Entergy's modeling team. The additional time needed to resolve differences in input-developments should be avoided with up-front guidance to the parties.

In addition, where resources, like Conservation Voltage Reduction are pinpointed by any DSM consultant, but the utility decides to exclude them as outside the bounds of the Energy Smart Program, the Council should direct Entergy to include the resource in another way to capture the savings from the measure.

- 3) *Recommendation that the most recent DSM planning tool of the Energy Smart Third Party Administrator and Third Party Evaluator related to specific DSM measures' metrics and costs, as well as the most recent results of the program year's implementation plan should also be considered among DSM inputs to the various planning strategies.*

The Alliance agrees that Energy Smart implementation should match expectations from potential studies and planning strategies. Without agreement across plans, reports, and analysis it is difficult for comparisons to be made and for the Council to take confident action. Where

measures are not included in the DSM planning tool the metrics and costs should be considered in the Technical Resource Manual update.

- 4) *Recommendation that the initial total supply costs from the Aurora capacity expansion module for all optimized portfolios related to the planning scenarios and planning strategies should be provided with supporting detail.*

The Alliance agrees with this recommendation. All supporting detail is useful in better understanding the impacts of adding and reducing supply. Requiring parties to ask for this detailed information adds an unnecessary step where one need not exist.

- 5) *Recommendation that future IRP final reports include more detail regarding how specific various distributed energy resources impact the load forecast, with potential ranges of projected estimates.*

The Alliance supports this recommendation. As more distributed energy resources are added to the system, whether utility, customer, or community owned, these resources will not only impact the overall capacity and energy needs, they will also impact the distribution system. As the Alliance has advocated in the past, it will be critical to include detail on how these new resources benefit or challenge load and reliability.

- 6) *Recommendation that planning strategies include specific information reflecting Council policy contained in the RPS docket, Smart Cities docket, and other dockets related to the planning of future resources.*

Integrated Resource Planning should always include information that contextualizes all policies that impact existing and potential resources. To do otherwise is to simply do capacity resource planning, and not develop holistic analysis, reporting, and planning. In fact, this is what many years of IRP have turned out. Where the Council has made clear their priorities to reduce

greenhouse gasses, improve reliability, and modernize the city's energy infrastructure, each of these priorities must inform planning. This also extends to resource planning with and for the New Orleans Sewerage and Water Board, the city's largest energy user. While not subject to the jurisdiction of the Council as a regulator, the Council does have oversight and responsibilities related to the Sewerage and Water Board, and has directed Entergy and the Board to work in conjunction to consider the best power plans in the future. Thus, not acknowledging potential changes to load from changes in the power resources at Sewerage and Water Board is ill-advised.

- 7) *Recommendation that the qualitative analysis and subjective aspects of the IRP scorecard should be improved and updated to make the scorecard a more useful portfolio evaluation tool.*

This scorecard can provide the Council and other stakeholders with valuable information about the potential impacts of a specific portfolio on New Orleanians. The Alliance is aware that such a scorecard is impossible to perfect, but we do agree that each IRP cycle should see some updates to the scorecard, especially with respect to new policies, local, national, or otherwise. Planning is always iterative, so we look forward to providing input on future scorecards including scoring methods.

- 8) *Recommendation that ENO be directed to utilize AURORA's modeling capability for an economic analysis of retirement dates for ENO's existing assets rather than utilizing fixed retirement dates.*

The Alliance believes this update must be made to resource planning in future cycles. We are aware that in the vertically integrated utility model there is little incentive for utilities to consider early retirement of existing resources. However, where old or uneconomic resources represent an unnecessary burden to customers, those assets should be known and different retirement dates should be contemplated. This is particularly true in the context of a Renewable Portfolio Standard or other policy goals, where expensive assets with fixed retirement dates may be retired early to capture multiple benefits.

**IN RE: 2018 TRIENNIAL INTEGRATED RESOURCE PLAN OF ENTERGY  
NEW ORLEANS, INC.**

**Certificate of Service Docket No. UD-17-03**

I hereby certify that I have this 23rd Day of March, 2020 served the required number of copies of the foregoing correspondence upon all other known parties of this proceeding, by USPS or electronic mail.



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Logan Atkinson Burke  
Executive Director  
Alliance for Affordable Energy

**Docket UD-17-03**

**2018 TRIENNIAL INTEGRATED RESOURCE PLAN  
OF ENTERGY NEW ORLEANS, INC.  
DOCKET NO. UD-17-03**

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