



Southern Renewable Energy Association

P.O. Box 14858, Haltom City, TX 76117

April 19, 2021

Ms. Lora W. Johnson
Clerk of Council
City Hall - Room 1E09
1300 Perdido Street
New Orleans, LA 70112

RE: Docket No. UD-19-01, *A Rulemaking Proceeding to Establish Renewable Portfolio Standards.*

Dear Ms. Johnson:

Please find attached the Southern Renewable Energy Association's response comments in Docket No. UD-19-01, *A Rulemaking Proceeding to Establish Renewable Portfolio Standards.*

If you have any questions, please call me at 337-303-3723.

Sincerely,

A handwritten signature in black ink that reads 'Simon Mahan'. The signature is fluid and cursive, with a large loop at the beginning.

Simon Mahan
Executive Director
Southern Renewable Energy Association
simon@southernwind.org
337-303-3723
5120 Chessie Circle
Haltom City, TX 76137



BEFORE THE COUNCIL OF THE CITY OF NEW ORLEANS

In Re: A RULEMAKING PROCEEDING
TO ESTABLISH RENEWABLE
PORTFOLIO STANDARDS

DOCKET UD-19-01

Southern Renewable Energy Association Responses to Comments
Regarding a New Orleans Renewable Portfolio Standard

The Southern Renewable Energy Association (SREA) appreciates the opportunity to submit the following response to the Council’s request regarding the Renewable and Clean Portfolio Standard (RCPS) for the City of New Orleans.

SREA supports the Council’s proposed modifications. With the exclusion of carbon dioxide capture and storage ("CCS") and carbon capture, utilization, and storage ("CCUS") technologies, the proposed RCPS ensures that New Orleans will adopt low-cost, reliable, and commercially proven renewable energy resources.

SREA also supports exclusion of “Beneficial Electrification” (BE) as a Tier 1 “resource” in the RCPS at this time.¹ As described, BE would have included, but “not limited to, charging infrastructure supporting electrification of motor vehicles, electrification of home and commercial appliances that use natural gas, and electrification of municipal and commercial operations that currently rely on fossil fuel use to power equipment.” As described, the BE efforts by ENO would have directly reduced the amount of renewable energy procurement required to reduce the electric power sector’s carbon emissions, while not actually requiring reducing power generation emissions. By excluding “Beneficial Electrification” as a compliance, the Council will ensure that electrification efforts will not hamper renewable energy development.

¹ On page 13, the “Tier 3 Resource” definition still includes “...or electric vehicle charging infrastructure...” and might need to be removed.

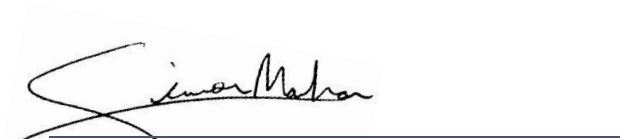
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing Southern Renewable Energy Association's Comments upon all parties listed below via electronic service as follows:

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This 19th day of April 2021.



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