



June 17, 2022

By Electronic Mail
Clerk of Council
Room 1E09, City Hall
1300 Perdido St.
New Orleans, LA 70112

**Re: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND OPENING A
RULEMAKING PROCEEDING TO ESTABLISH RULES FOR COMMUNITY SOLAR
PROJECTS (Docket No. UD-18-03)**

Dear Ms. Johnson,

Please find enclosed Madison Energy Investment's petition for intervention regarding the Community Solar Rules in the above-mentioned docket. Please file the attached intervention and this letter in the record of this proceeding. We will submit physical copies at your instruction. If you have any questions, please do not hesitate to contact me.

Thank you for your time and consideration.

Respectfully,

A handwritten signature in cursive script that reads 'Gerard K. Neely'. The signature is written in black ink and is positioned above a horizontal line.

Gerard K. Neely
Director, Business and Market Development
Madison Energy Investments

Cc: Known parties Docket UD 18-03

Before

The Council of the City of New Orleans

**IN RE: RESOLUTION AND ORDER
ESTABLISHING A DOCKET AND
OPENING A RULEMAKING PROCEEDING
TO AMEND RULES FOR COMMUNITY
SOLAR PROJECTS**

Docket No. UD-18-03

6/17/2022

Madison Energy Investments Petition for Intervention and Inclusion on Service List

Madison Energy Investments (“MEI”) respectfully requests that the Council of the City of New Orleans (“the Council”) grants MEI the right to intervene out-of-time in the above captioned proceeding and participating as a party therein.

On December 16, 2021, the Council adopted Council Resolution R-21-472 opening a comment period for parties to respond to intervenor AAE’s Motion to Amend the Community Solar Rules. January 10, 2022, was the deadline for all Parties to file comments in response to intervenor AAE’s December 8, 2021 Motion to Amend the Community Solar Rules. On February 3, 2022, the Council adopted R-22-76 Resolution and Order Amending the Community Solar Rules approving the Alliance for Affordable Energy’s December 8, 2021 Motion to Amend the Community Solar Rules modifying the definition of “Low Income Customers”.

MEI finances, owns and operates distributed generation assets across the United States, and currently owns and operates over 300MW of community solar. MEI’s vast experience and particular interest in community solar poise us as reputable party to kick-start the first projects of New Orleans’s Community Solar Program. Given the scope and intention of this docket, MEI feels that it can be a productive and useful stakeholder in this proceeding.

MEI has been working tirelessly for nearly a year with various stakeholders to make this program a reality and during this process identified and completed pre-emptive work for both privately and city-owned sites that could serve as potential host sites. Through our further due diligence, we have found that there are certain rules to the program that contradict one another and impend on what we believe is the city’s overall goal. Certain aspects of the program are unfavorable – not just for MEI and other interested developers and financiers – but also for the citizens and businesses of New Orleans, those depended on the reliability, affordability and access to the power system that the City of New Orleans is dependent on.

We have gathered a team of various interested parties, including but not limited to: Solar Alternatives, Gulf States Renewable Energy Association, Solar Energy Industries Association and the Coalition for Community Solar Access, who have contributed to our suggested amendments and will support our following motion.

These findings have led to our efforts to submit a motion to amend the rules for the aforementioned, and therefore respectfully seek intervenor status in order to fully participate in this matter. MEI requests that it be placed on the service list of this proceeding and be served with all pleadings, notices orders, and other filings.

All communications and pleadings in this proceeding should be directed to:

Gerard Neely
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Respectfully Submitted,



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