



September 19, 2022

By Electronic Mail

Ms. Lora Johnson, CMC
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 RENEWABLE PORTFOLIO STANDARDS
(Docket No. UD-19-01)**

Dear Ms. Johnson,

Please find enclosed the Comments of the Alliance for Affordable Energy in the above-mentioned docket. Please file the attached communication and this letter in the record of the proceeding. We will file physical copies at your instruction. If you have any questions, please do not hesitate to contact me.

Thank you for your assistance with this matter.

Sincerely,

Logan Burke
Executive Director
Alliance for Affordable Energy

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

**IN RE: A RULEMAKING
PROCEEDING TO ESTABLISH
RULES FOR COMMUNITY SOLAR
PROJECTS**

**DOCKET NO. UD-18-03
RESOLUTION NO. R-22-370**

COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY

Alliance for Affordable Energy (“the Alliance”) respectfully submits these comments in response to Resolution R-22-392, heard by the New Orleans City Council (“the Council”) on September 1, 2022, with requests to intervenors regarding Entergy New Orleans LLC (“ENO”) filed Renewable and Clean Portfolio Standard Compliance Plan for years 2023-2025, filed August 19, 2022. The Alliance is pleased to see that Entergy expects to more than meet the RCPS compliance in the coming three years with little incremental cost to customers.

Sewerage and Water Board Electrification

The Alliance does not support the electrification credit requested by Entergy in their Compliance Filing. Entergy refers to Council resolution R-22-258 in their filing outlining the new agreement between Sewerage and Water Board (“SWB”) and Entergy re: the construction and utilization of the Sullivan Substation, that is expected to shift the vast majority of power consumption for SWB to Entergy New Orleans, and obviate the need for diesel, gas, and oil fired generation on site at the Carrollton Site. We agree that this is a wise choice, for various reason, including reducing overall costs to SWB, modernizing our critical infrastructure, and reducing pollution in Orleans parish. However, while the structure of the Agreement in Principle between Entergy New Orleans and SWB describes ownership by ENO, it is also clear that the vast majority of the investment in the project comes from SWB, not ENO. Only if the total project cost rises beyond the \$30 Million of SWB’s Contribution in Aid of Construction, does Entergy begin to “invest” in the project. This is a good solution because SWB’s contribution will save significant money

for both SWB customers and ENO customers. However, ENO does not offer justification for why they should receive credit for a project they *may* invest in.

If Entergy receives approval to apply Clean Energy Credits (“CEC”) with their multiplier proposed as high as 4.61 in 2025, this multiplier obscures the actual percentages of clean energy attributable to their compliance with the RCPS. Worse, in 2040, when the “multipliers” no longer apply, and the percentage of unbundled RECs allowed to count toward compliance begins to decline, the sudden “loss” of these Clean Energy Credits will represent a gap in the utility’s compliance.

In SWB’s 2018 Operations Report, prepared for the board by Black and Veatch, the SWB is reported to have generated “approximately 32.5 million kWh” and purchased “approximately 70.7 million kWh of power.”¹ Entergy is silent on their expected *total* MWh sales to SWB in their compliance filing, as well as whether they propose to apply the multiplier (and therefore claim CECs) to the entirety of the electric load served to SWB once the substation is completed, or if they intend to apply only the incremental CECs (MWh x 4.61 multiplier).

If Entergy were to receive approval to claim CECs and their proposed multiplier to the entirety of SWB’s load (assuming SWB load stays flat) it would represent one of the largest portions of the total compliance portfolio with at **least 475,751 CECs**. This is nearly four times larger than Entergy’s largest solar contract (Iris Solar = 123,149) and would represent over 11% of the total RCPS CEC compliance requirement in 2025. Even if Entergy is only requesting to claim CECs for the incremental new load (35,570 MWh²) due to SWB switching away from self-generation the CECs would reach 163,978 in 2025. Entergy is asking for a lot of credit for not much new clean energy, and credit toward their RCPS filing for actions the SWB desires to take, even without Entergy investment unless necessary. Finally, Entergy’s filing shows that in each of the

¹ March 20, 2020. 2018 Sewerage and Water Board, Operations Report, Black and Veatch. Page 6.

² Sewerage and Water Board of New Orleans, Louisiana, *Comprehensive Annual Financial Report for the years ended December 31, 2020 and 2019*, p.IV-6

next three years the utility is already expected to have an average annual surplus margin of 110,164 CECs. Entergy's filing doesn't show a need for the utility to conduct all this unwarranted multiplication, and the Council should deny the unreasonable request for both the approval of the Sewerage and Water Board as a Qualified Measure, and the Tier 3 credit calculations provided in Entergy's filing.

CONCLUSION:

The Alliance for Affordable Energy appreciates this opportunity to provide comments on Entergy's RCPS compliance plan. We are encouraged to see that Entergy's efforts to significantly increase Energy Efficiency is playing a leading role in meeting compliance, in addition to the new solar portfolio. While we also look forward to the modernization and electrification of Sewerage and Water Board for many reasons, we encourage the Council to decline Entergy's request to claim credit toward RCPS compliance for this transition, as there does not appear to be a reasonable reason to approve the request.

In Re: RULEMAKING PROCEEDING TO ESTABLISH RENEWABLE PORTFOLIO STANDARDS (Docket No. UD-19-01)

Certificate of Service Docket UD-19-01

I hereby certify that I have, on this 19th day of September 2022, served the foregoing correspondence upon all other known parties of this proceeding by USPS or electronic mail.



Logan Burke
Executive Director
Alliance for Affordable Energy

Service List Docket No. UD-19-01

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