September 30, 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 PROVIDING GUIDANCE AND ESTABLISHING PROCEDURAL DEADLINES WITH RESPECT TO PROPOSED PUBLIC DIRECT CURRENT FAST CHARGING STATION PROJECT (UD-18-01 and UD-18-07)

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: RESOLUTION AND ORDER
PROVIDING GUIDANCE AND DOCKET NOs. UD-18-01
ESTABLISHING PROCEDURAL UD-18-07
DEADLINES WITH RESPECT TO RESOLUTION NO. RR-22-393
PROPOSED PUBLIC DIRECT
CURRENT FAST CHARGING
STATION PROJECT

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 for comments to intervenors regarding Entergy New Orleans LLC (“ENO”) filed Request to Modify its Electric Rate Schedules regarding Electric Vehicle Charging Infrastructure (“EVCI”), submitted to the Council on July 21, 2022. The Alliance appreciates this opportunity to provide comments regarding Entergy’s proposed DC Fast Charger proposal.

DC Fast Charger Proposal requires modification

The Alliance is supportive of all efforts to reduce carbon emissions, and is glad to see both the City of New Orleans and ENO pursuing electrification of our transportation systems. We are also encouraged to see Entergy is actively monitoring federal funding that could reduce costs of this transition away from fossil fuels, including Infrastructure Investment and Jobs Act funding.\(^1\) The Alliance agrees that Entergy’s proposal merits consideration, however not as filed, and the proposal requires modifications in order to meet equity and climate goals for New Orleans.

\(^1\) July 21, 2022. Entergy New Orleans’ Request to Modify its Electric Rate Schedule, Pages 5 & 7.
Costs allowed from ratepayers

The Alliance agrees with Entergy that there is a significant need for DC Fast Charging infrastructure and other lower-voltage infrastructure to support the transition to electrified transportation. However, ENO’s proposal to use ratepayer funds for either the capital investment for these chargers, and for operations and maintenance of this infrastructure puts an unreasonable risk on the ratepayers of New Orleans who may be forced to pay for these chargers, which represent a new opportunity for revenue for the utility. The language in Entergy’s proposal is imprecise and uncertain, including that the cost of the Project will be “…offset in large part…” and that “IIJA funding could reduce the cost of the DCFC Station Project,” and “IIJA funds may reimburse…” 2 While it may be that revenues from Entergy’s proposed FCEV Schedule offset some of the project costs, Entergy’s filing does not give the Alliance confidence that the proposed initial proposed rates will reduce risk to residential customers.

As the affidavit from Entergy witness Hill points out, the rate the utility is proposing is not based on either “historical data or sufficient projections regarding cost of service and sales volumes.” 3 Furthermore, ENO’s current assumptions suggest the revenues will offset only 65% of the project costs. 4 While this project would be the first of its kind in Orleans Parish, it certainly will not be the last, and this pilot should not set a precedent for residents to carry these project costs. Finally, as proposed, it is unclear who would be responsible for the fuel costs for this program, as ENO proposes that the FCEV Schedule not be subject to riders including the Fuel Adjustment Clause, but is silent as to how the fuel operations costs will be covered. The electricity that will be sold through these projects will have value, and residents should not be required to absorb those costs through their own FAC.

The Alliance proposes that if the Council approves Entergy’s proposal, that no portion of the cost of installation, operation, or maintenance, including fuel/energy costs, of the approved DCFC stations be eligible for recovery from ratepayers, either directly or indirectly.

Opportunity to expand electrification to public vehicles

2 Id.
3 July 21, 2022. Affidavit of Samantha Frailey Hill on Behalf of Entergy New Orleans, LLC., page 4
4 Id.
Electrification of transportation is a necessary step in the actions required to mitigate the worst impacts of climate change, but it is not just light duty private vehicles that should be electrified. Indeed, a significant increase in public transit, is necessary, as the overall resources required with transit are lower than the current system of transportation that depends on private ownership of vehicles. Furthermore, the benefits of electrification go beyond the long-term climate impacts of greenhouse gas emissions, and include immediate benefits for the occupants of public transit. School children who ride buses each day to and from New Orleans schools are exposed to particulate matter and other air pollutants from diesel exhaust. Particulate matter reductions resulting from bus electrification would improve health and safety for those young riders, in addition to reducing busing fuel costs and GHG emissions.

The Alliance encourages the Council to require ENO to cooperate with the Orleans Parish School Board and/or the Regional Transit Authority to site at least one charging station to be available for bus charging, in order to encourage the transition of public vehicles away from fossil fuels.

Conclusion

The Alliance respectfully submits these comments, and looks forward to the equitable expansion of zero carbon emissions transportation in New Orleans. Measures like electrification should be considered a priority but without certainty of impacts on residential customers, Entergy should recover all costs of the project from the customers who purchase power from the charging projects, and/or any possible federal funding.
RESOLUTION AND ORDER PROVIDING GUIDANCE AND ESTABLISHING PROCEDURAL DEADLINES WITH RESPECT TO PROPOSED PUBLIC DIRECT CURRENT FAST CHARGING STATION PROJECT

Certificate of Service Dockets UD-18-01 and UD-18-07

I hereby certify that I have, on this 30th day of September 2022, served the foregoing correspondence upon all other known parties of this proceeding by USPS or electronic mail.

Logan Burke
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