October 14, 2022

By Electronic Mail

Ms. Lora Johnson, CMC
Clerk of Council
Room 1E09, City Hall
1300 Perdido St.
New Orleans, LA 70112

IN RE: 2021 TRIENNIAL INTEGRATED RESOURCE PLAN OF ENTERGY NEW ORLEANS, LLC and APPLICATION OF ENTERGY NEW ORLEANS, LLC FOR APPROVAL OF THE IMPLEMENTATION PLAN FOR PROGRAM YEARS 13 THROUGH 15 OF THE ENERGY SMART PLAN (Docket Nos. UD-20-02 and UD-08-02)

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: 2021 TRIENNIAL
INTEGRATED RESOURCE PLAN
OF ENTERGY NEW ORLEANS, LLC

DOCKET Nos. UD-20-02 and
UD-08-02

REQUEST TO SUBMIT COMMENTS OUT OF TIME, AND COMMENTS FOR
THE ALLIANCE FOR AFFORDABLE ENERGY

The Alliance for Affordable Energy (“the Alliance”) respectfully requests to that the Alliance be granted leave to submit these comments regarding Resolution R-22-412, heard by the New Orleans City Council (“the Council”) on September 18, 2022, as part of Docket Nos. UD-20-02 and UD-08-02 out of time. This request to file these comments out of time is due to staff oversight regarding the timing of the initial filing deadline, September 30, 2022 and the deadline for reply comments, due this day, October 14, 2022.

In Resolution R-22-412 The Council requested input on specific questions, including whether the full three year implementation plan should be approved, what programs should include autoenrollment, and whether some programs should be changed. Below, we provide our comments on Entergy’s Implementation Plan.

I. The Council should approve three years of goals and budgets

The history of the Energy Smart program is full of extensions, last-minute decision-making, and almost always delays in program implementation for the beginning of a new three year program cycle. This has typically been due to IRP procedural changes. Unfortunately, this has led to uncertainty in the energy efficiency marketplace, with customers, contractors, and administrators alike frustrated or unsure about planning, staffing, and implementation every three years. The good news is that the Council is currently considering, in Docket No. UD-22-04, shifting DSM planning of all types for the Energy Smart program such that the regular IRP cycle does not stymie progress. And in the short term, this is an opportunity to begin implementation on time, with certainty
for the next three years of goals and budgets, but only if the Council acts soon. The Alliance is aware that planning and implementation of some of Energy Smart projects go well beyond a 12 month cycle, and that building a local market for efficiency contractors and workers is an important part of ensuring there are qualified contractors available to do the work.

The Alliance encourages the Council to approve a PY 13 implementation plan as soon as possible, along with direction for energy and demand goals and budget as the baseline policy for all three program years (13, 14, and 15), but with some flexibility to allow for outcomes of UD-22-04 to inform PY 14 and 15. This would mean programs could move forward beginning in January 2023 with no lag, there could be market certainty for planning and contracting, and stakeholders would have an opportunity to address some of the questions in UD-22-04 to apply to the next two program years. Certainly, if the Council desires, it has the authority to approve a three year implementation plan now, and direct changes along the way, however a Council action that acknowledges other on going dockets, and allows and even expects flexibility now will make necessary changes less challenging in the coming two years.

II. Income Qualified Programming Should Reach More Households

Based on prior program year reports, the Income Qualified Weatherization (“IQW”) Program has been successful and in high demand. In fact an apparent adjustment in programming raised last year’s savings over 183% of the kwh goal. Even so, qualified customers in Orleans Parish far outstrip the availability of the program. It is encouraging to see that the proposed plan for the IQW program starts the energy savings at nearly same level as achieved last year. We encourage the Council to consider implementing an auto-enrollment plan for customers who fall in any of the following categories: 1) in arrears 2) participate in the Low Income Home Energy Assistance Program 3) have been disconnected for inability to pay in the prior 12 months.

On the other hand in PY 12, the Appliance Recycling and Replacement program had very low realized savings (5% of goal) as compared with budget spent (61% of budget), and has disappointing benefit/cost ratios. Entergy’s implementation plan refers to
providing a refrigerator replacement option for income qualified customers. The Alliance recommends the majority of this program be geared to income qualified participants. In addition, directing the refrigerator replacement program to Multi-Family households could help attract the harder to reach renter population.

III. School Kit, Education and Community Outreach Should be Local

The Alliance is disappointed to see such a significant change in the Education program. Energy Wise Alliance, which has been providing the in-school programming for at least 5 years, is a New Orleans based non-profit organization with roots developed in the local education community, and has more than reached their goals, even in while managing program years impacted by Covid-19. It is unclear why a large national company was selected to deliver a program that has been successful with local educators. We urge the Council and Entergy to consider the impact this change has on local opportunities to weave community engagement and energy literacy together.

IV. A Peak Time Rebate Program Should be Expanded

The Residential Peak Time Rebate Pilot is only proposed to draw 4% of eligible participants or 1,931 in the first year. Entergy’s prior Peak Time Rebate Pilot\(^1\), launched as part of a DOE effort in 2011 was widely successful for the two years it ran, with 96% of participants saying they would continue the program on a permanent basis. Based on its prior approval rating and high benefit/cost metrics, this program should encourage greater participation. The Alliance notes that the benefit/cost metrics described in the implementation plan are likely underestimated in a high-gas and high-energy market costs scenario like those experienced to-date in 2022.

V. Conclusion

The Alliance respectfully provides these comments and urges the Council to take action quickly to ensure the Energy Smart program is well positioned to continue to provide

energy savings to all New Orleans customers in 2023, but is also prepared for adjustments in response to other on-going docket and demand side programs, including UD-22-04 and leveraging of federal dollars now available for energy efficiency, electrification, demand reduction, and distributed energy resources.

IN RE: 2021 TRIENNIAL INTEGRATED RESOURCE PLAN OF ENTERGY NEW ORLEANS, LLC
Certificate of Service Dockets UD-20-02 and UD-08-02

I hereby certify that I have, on this 14th day of October 2022, served the foregoing correspondence upon all other known parties of this proceeding by USPS or electronic mail.

Logan Burke
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