January 9, 2023

By Hand Delivery and U.S. Mail

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

In Re: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND PROCEDURAL SCHEDULE WITH RESPECT TO ACHIEVING 100% RENEWABLE AND CLEAN ENERGY FOR THE CITY OF NEW ORLEANS (Docket No. UD-22-02)

Dear Ms. Johnson:

Please find the enclosed Reply 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 submit physical copies at your instruction. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention.

Sincerely,

Jesse S. George
New Orleans Policy Director
Alliance for Affordable Energy

4505 S. Claiborne Ave, New Orleans, LA 70125 | Office: 504.208.9761 | www.all4energy.org
In Re: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND PROCEDURAL SCHEDULE WITH RESPECT TO ACHIEVING 100% RENEWABLE AND CLEAN ENERGY FOR THE CITY OF NEW ORLEANS DOCKET NO. UD-22-02 JANUARY 9, 2023

REPLY COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY

I. INTRODUCTION

On June 9, 2022, the New Orleans City Council (“the Council”) adopted Resolution R-22-265 establishing the instant docket. That resolution makes explicit reference to the Council’s goal – established in Resolution R-22-11 on January 6, 2022 – of powering “all municipal operations with 100% renewable energy by January 2025.” Pursuant to the procedural schedule established in R-22-26, the Alliance for Affordable Energy (“the Alliance”) and Entergy New Orleans, LLC (“ENO”) filed comments on December 2, 2022. The Alliance hereby submits the following reply comments in response to ENO’s filing:

II. THE USE OF THE ENO GREEN POWER OPTION RIDER SHOULD BE ONLY A SHORT-TERM MECHANISM FOR THE COUNCIL TO ACHIEVE ITS GOAL

ENO proposes that the City of New Orleans could opt into the ENO Green Power Option (“GPO”) approved through the 2018 ENO rate case in order to achieve its goal of 100% renewable energy for municipal operations. While this could help the Council to meet its goal on paper relatively quickly, the reliance on purchased renewable energy credits (“RECs”) from outside markets would not provide the City with the full benefits of a transition to renewable energy – including local economic and workforce development, air quality and other
environmental benefits, as well as the true resilience that local renewable energy resources can provide in the face of extreme heat and cold, climate disaster, and routine fair-weather outages.

The mechanism the Council elects to pursue its goal can either pay for the development of renewable energy projects in faraway places or create investment in the local community. As with the difference between renting and buying a home, the Council’s decision will mean the difference between meeting a basic need and gaining equity in a tangible asset. In our initial comments, the Alliance discussed options such as community choice aggregation, power purchase agreements with local renewables developers, and municipally-owned on-site renewable generation resources, as more direct – and potentially more cost-effective – mechanisms for achieving the Council’s goal that would also provide the other benefits associated with a transition to renewable energy. The Council should explore these options first.

III. THE COUNCIL SHOULD APPROACH A GREEN TARIFF WITH CAUTION

ENO also suggests the adoption of a green tariff to further the Council’s goal of 100% renewable energy. As the Alliance noted in our initial comments, however, this option is the least desirable, as it likely would lead to heavy reliance on RECs purchased from other markets, thus depriving the city of the economic and environmental benefits of local renewable energy, or on expensive, utility-owned renewables projects, neither of which is in the best interest of ratepayers. The Alliance’s testimony against such a tariff in ENO’s 2019 rate case (Docket No. UD-18-07), which was attached to our initial comments as Appendix A, elucidates a variety of reasons why the Council should approach the adoption of a green tariff with caution.
IV. CONCLUSION

We thank the Council for the opportunity to provide these reply comments, and we look forward to continuing to work together, along with ENO, the Mayor’s Office, and other stakeholders, to achieve this important goal.

Submitted respectfully,

Jessa S. George
New Orleans Policy Director
Alliance for Affordable Energy
Before
The Council of the City of New Orleans

In Re: RESOLUTION AND ORDER
ESTABLISHING A DOCKET AND
PROCEDURAL SCHEDULE WITH RESPECT
TO ACHIEVING 100% RENEWABLE AND CLEAN
ENERGY FOR THE CITY OF NEW ORLEANS

DOCKET NO. UD-22-02
JANUARY 9, 2023

CERTIFICATE OF SERVICE

I do hereby certify that I have, this 9th day of January 2023, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

Jesse S. George
Alliance for Affordable Energy
Service List

Lora W. Johnson, lwjohnson@nola.gov
Clerk of Council
City Hall - Room 1E09
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-1085
Fax: (504) 658-1140
Service of Discovery not required

Erin Spears, espears@nola.gov
Chief of Staff, Council Utilities Regulatory Office
Bobbie Mason, bfmason1@nola.gov
Christopher Roberts, cwroberts@nola.gov
Jessica Hendricks, Jessica.Hendricks@nola.gov
Byron Minor, Byron.Minor@nola.gov
City Hall - Room 6E07
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-1110
Fax: (504) 658-1117

Keith Lampkin, CM Morrell Chief-of-Staff, Kdlampkin@nola.gov
1300 Perdido St. Rm. 2W50
New Orleans, LA. 70112

Andrew Tuozzolo, CM Moreno Chief-of-Staff, avtuozzolo@nola.gov
1300 Perdido St. Rm. 2W40
New Orleans, LA. 70112

Paul Harang, 504-658-1101 / (504) 250-6837, Paul.harang@nola.gov
Interim Chief of Staff
City Hall - Room 1E06
1300 Perdido Street
New Orleans, LA 70112

Donesia D. Turner, Donesia.Turner@nola.gov
Ashley Spears, Ashley.Spears@nola.gov
Law Department
City Hall - 5th Floor
New Orleans, LA 70112
Tel: (504) 658-9800
Fax: (504) 658-9869
Service of Discovery not required
Norman White, Norman.White@nola.gov
Department of Finance
City Hall - Room 3E06
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-1502
Fax: (504) 658-1705

Greg Nichols, grnichols@nola.gov
Deputy Chief Resilience Officer
Office of Resilience & Sustainability
1300 Perdido Street, Suite 8E08
New Orleans, LA 70112
Tel: 504-658-4958
Cell: 504-253-1626

ADMINISTRATIVE HEARING OFFICER

Hon. Jeffrey S. Gulin, judgegulin@gmail.com
3203 Bridle Ridge Lane
Lutherville, MD 2109
Tel: (410) 627-5357

CITY COUNCIL CONSULTANTS and SUPPORT STAFF

Clinton A. Vince, clinton.vince@dentons.com
Presley Reed, presley.reedjr@dentons.com
Emma F. Hand, emma.hand@dentons.com
Adriana Velez-Leon, adriana.velez-leon@dentons.com
Dee McGill, dee.mcgill@dentons.com
Denton Law Firm,
1900 K Street NW
Washington, DC 20006
Tel: (202) 408-6400
Fax: (202) 408-6399

Basile J. Uddo, (504) 583-8604 cell, buddo@earthlink.net
J. A. “Jay Beatmann, Jr. (504) 256-6142 cell, (504) 524-5446 office direct,
jay.beatmann@dentons.com

c/o DENTONS US LLP
650 Poydras Street
Suite 2850
New Orleans, LA 70130
Joseph W. Rogers, jrogers@legendcgl.com
Victor M. Prep, vprep@legendcgl.com
Byron S. Watson, bwatson@legendcgl.com
Legend Consulting Group
6041 South Syracuse Way, Suite 105
Greenwood Village, CO 80111
Tel: (303) 843-0351
Fax: (303) 843-0529

ENTERGY NEW ORLEANS, LLC

Courtney R. Nicholson, (504) 670-3680, cnicho2@entergy.com
Entergy New Orleans, LLC
Vice-President, Regulatory and Public Affairs
Barbara Casey, (504) 670-3567, bcasey@entergy.com
Entergy New Orleans, LLC
Director, Regulatory Affairs
Polly Rosemond, prosemo@entergy.com
Kevin T. Boleware, (504) 670-3673, kbolewa@entergy.com
Brittany Dennis, bdenni1@entergy.com
Keith Wood, (504) 670-3633, kwood@entergy.com
Derek Mills, (504) 670-3527, dmills3@entergy.com
Ross Thevenot, (504) 670-3556, rtheven@entergy.com
1600 Perdido Street, L-MAG 505B
New Orleans, LA 70112

Vincent Avocato, (281) 297-3508, vavocat@entergy.com
Entergy New Orleans, LLC
2107 Research Forest Drive, T-LFN-4
The Woodlands, TX 77380

Brian L. Guillot, (504) 576-6523, bguill1@entergy.com
Leslie M. LaCoste (504) 576-4102, llacost@entergy.com
Lacresha D. Wilkerson, (504) 576-6571, lwilke1@entergy.com
Ed Wicker, (504) 576-3101, ewicker@entergy.com
Linda Prisuta, (504) 576-4137, lprisut@entergy.com
Entergy Services, LLC
Mail Unit L-ENT-26E
639 Loyola Avenue
New Orleans, LA 70113
Fax: 504-576-5579
Joe Romano, III  (504) 576-4764,  jroman1@entergy.com
Tim Rapier,  (504) 576-4740,  trapier@entergy.com
Farah Webre,  (504) 576-6038,  fwebre@entergy.com
Entergy Services, LLC
Mail Unit L-ENT-3K
639 Loyola Avenue
New Orleans, LA 70113
Fax: (504) 576-6029

W. Raley Alford, III,  (504) 523-1580,  wra@stanleyreuter.com
Stanley, Reuter, Ross, Thornton, & Alford, LLC
O/B/O Entergy New Orleans, LLC
909 Poydras Street, Suite 2500
New Orleans, Louisiana 70112
Fax: (504) 524-0069

INTERVENORS

ALLIANCE FOR AFFORDABLE ENERGY

Jesse S. George,  jesse@all4energy.org
Logan A. Burke,  logan@all4energy.org
Sophie Zaken,  regulatory@all4energy.org
4505 S. Claiborne Ave
New Orleans, Louisiana 70125
Tel: (504) 208-9761

DEEP SOUTH CENTER FOR ENVIRONMENTAL JUSTICE

Monique Harden,  moniqueh@dscej.org
9801 Lake Forest Blvd
New Orleans, Louisiana 70127
Tel: (504) 272-0956

NATIONAL AUDUBON SOCIETY

Brent Newman,  Brent.newman@audubon.org
3801 Canal Street, Suite 400
New Orleans, LA 70119
Tel: 303-681-8420

Nicholas Dixon,  Nicholas.dixon@audubon.org
Canal Street, Suite 400
New Orleans Louisiana 70119
Tel: 225-315-3026 3801