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June 16, 2023

VIA ELECTRONIC MAIL
Ms. Lora W. Johnson, CMC, LMMC
Clerk of Council
City Hall - Room 1E09
1300 Perdido Street
New Orleans, LA 70112

Re: Rulemaking Proceeding to Establish Rules for Community Solar Projects (CNO Docket No. UD-18-03)

Dear Ms. Johnson:

Attached please find the Additional Comments of Entergy New Orleans, LLC ("ENO") for filing in the above-referenced docket. ENO makes this filing pursuant to Council Resolution No. R-23-130. ENO submits this filing electronically and will submit the requisite original and number of hard copies once the Council resumes normal operations or as you direct. Thank you for your assistance in this matter, and please let me know if you have any questions or concerns.

Sincerely,

Leslie M. LaCoste

LML/jlc

Enclosures

cc: Official Service List UD-18-03 *(via electronic mail)*

BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

IN RE: RULEMAKING PROCEEDING TO ESTABLISH RULES FOR COMMUNITY SOLAR PROJECTS	**)))**	**DOCKET NO. UD-18-03**

ADDITIONAL COMMENTS OF ENTERGY NEW ORLEANS, LLC

Entergy New Orleans, LLC ("ENO" or "the Company"), per Resolution R-23-130 issued by the Council of the City of New Orleans ("Council") on April 6, 2023, hereby submits these Additional Comments. The Company appreciates the opportunity to provide these comments in response to Council Resolution No. R-23-130 and the technical conference on April 25, 2023.

INTRODUCTION

As discussed in prior comments, the Company has serious concerns about the ongoing efforts of various intervenors (some without any ties to New Orleans) to change the Council's Community Solar Rules ("Rules"), long after they were issued, to suit their own financial purposes and maximize their profits at the expense of New Orleans and its citizens.

By way of overview, the Rules generally require a developer ("Subscriber Organization") seeking to develop a qualifying community solar garden ("CSG") project to find and enroll customers ("Subscribers"), who in turn agree to financially participate in the project to receive an allocated share of the monthly energy output. This arrangement allows low-income and other residents to have access to solar power. Under the Rules, ENO is required to enter into a purchase power agreement ("PPA") with a facility for up to ten years: (1) to facilitate the physical delivery of electricity to ENO that will be credited to Subscribers on their bills, and (2) allow payment by ENO to the developer for any unsubscribed energy up to 20% of the monthly output of the facility (should the project not be fully subscribed). To protect non-participating customers, ENO has no obligation to pay for any unsubscribed energy beyond the 20% cap.

The Council enacted these Rules after years of consideration and deliberation among stakeholders. The Rules appropriately balance the interests of participating customers in CSG projects; non-participating customers who otherwise could potentially end up subsidizing the projects without enjoying any benefits; and developers seeking to develop the projects.

Considering this balance, the Council recently rejected the efforts of certain intervenors to change the Rules on a variety of issues, including the rate impact to ENO customers; a so-called "consolidated billing" structure; requiring ENO to enter a PPA to buy 100% output from a CSG project; increasing the PPA from 10 to 20 years; changing ownership of Renewable Energy Credit ("RECs") from individual Subscribers to a Subscriber Organization; and changing the requirements for low income Subscribers. Resolution No. R-23-130. In essence, the Council properly refused to, among other things, flip the risk of developing a project from the developer (that is currently required to find a sufficient level of Subscribers to be profitable) to ENO's entire customer base (to guarantee the developer makes a profit regardless of the number of project Subscribers). The Council thereby protected non-participating customers, many of whom are low income, from paying higher rates so that developers can maximize their profits.

Since the Council issued its ruling, the intervenors seeking changes to the Rules have not come forward with any new evidence or arguments to justify their position. Their primary evidence is the lack of participation, which is not dispositive of a flaw in the Rules. Rather, it's a result of financial risks that developers appear to be trying to pass on to ENO's customers. Indeed, the intervenors have not provided the Council with any basis to revisit its ruling. Nonetheless, considering questions posed at the technical conference, and to the extent the Council may be considering limited changes to its Rules and a potential path forward, the Company provides these Additional Comments. Should the Council consider modifying the Rules to include consolidated billing[1] and a standard 20-year PPA term, ENO believes these limited changes potentially would support a pilot program focused 100% on low-income customer participation using the current bill credit formula, as described more fully below.

COMMENTS

1. Potential Cost Impacts of CSG Projects

During the technical conference, questions were posed regarding the potential cost implications under the existing Rules, specifically rate impacts to all ENO customers. The analysis described below attempts to provide some perspective on the amount of costs that could be borne by ENO customers from a large-scale implementation of community solar.

While there are currently no active CSG projects in New Orleans, the Rules include a total capacity limit equal to 5% of ENO's annual peak load, or approximately 59 MW based on ENO's 2022 peak. Under the Rules, the Subscriber credit rates (expressed on a $/kWh basis) are updated monthly for qualifying low-income residential customers and annually in May for non-low-income customers with the updated rates in effect for the following June – May time period. Figure 1, below, shows the Subscriber credit rate by month for each type of customer starting in June 2021. The Subscriber credit rates in Figure 1 reflect the financial value each type of Subscriber to a CSG project would receive for the energy (kWh) allocated for their respective share of a CSG project.

[1] As detailed below, ENO cannot guarantee that it has the capability or capacity to support consolidated billing, but is open to evaluating its capability to do so.

Figure 1. CSG Subscriber Credit Rates

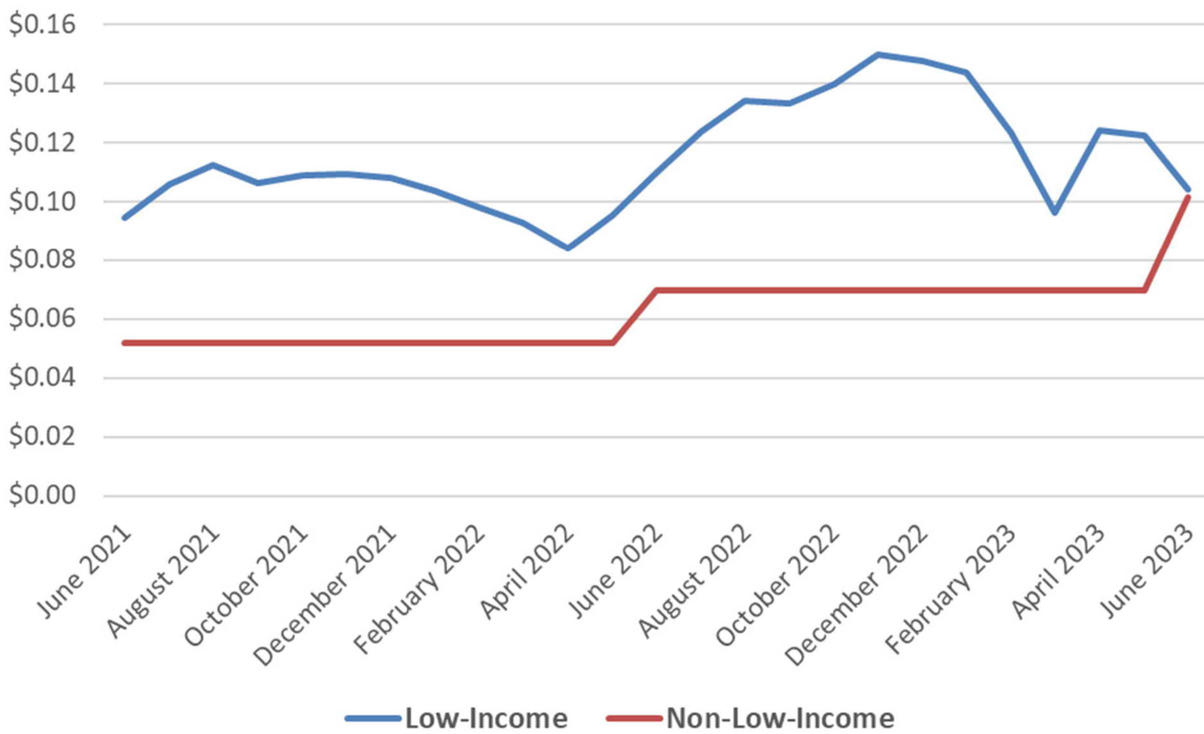

Exhibit 1 shows the results of a calculation performed for purely illustrative purposes that assumes 55 MW-AC in aggregate CSG projects are constructed in New Orleans, for which 40% of subscribers are low-income residential customers and the other 60% of subscribers are non-low-income customers. Using the PVWatts model[2] and assuming the 55 MW-AC of total CSG capacity is a 50/50 mix of rooftop and ground-mounted solar with single-axis tracking, the total energy (kWh) production by month can be modeled. The monthly generation (kWh) values from the PVWatts modeling can then be used to calculate a combined average production amount by month. Multiplying the monthly Subscriber credit rates shown in Figure 1, above, for the illustrative 40/60 split of low-income to non-low-income subscribers by the combined average

[2] See https://pvwatts.nrel.gov/.

energy production, yields the total bill credit amounts that would have been paid for each month going back to June 2021.

Using the PVWatts model's estimated hourly solar production data for each type of project (rooftop versus ground-mounted with single-axis tracking), the value of the energy can be calculated based on the Midcontinent Independent System Operator ("MISO") real-time hourly Locational Marginal Prices ("LMPs") at the ENO Load Zone for June 1, 2021 to May 31, 2023. The applicable MISO Planning Resource Auction ("PRA") values for capacity for Local Resource Zone ("LRZ") 9 for the same 24-month timeframe and the methodology in the Rules[3] can be used to develop the total estimated capacity value for the 55 MW-AC of CSG projects.

Exhibit 1 shows the applicable Subscriber credit rates, total solar PV production, resulting illustrative total bill credit amounts, and the underlying value of energy and capacity by month for the period June 2021 through May 2023. For this illustrative exercise, the difference between the total bill credit amounts each month for the assumed mix of Subscribers and the underlying value of energy and capacity for the 55 MW-AC total portfolio of CSG projects, reflect approximately $5.9 million in net costs that would ultimately would have been borne by all ENO electric customers over a two-year period through the Fuel Adjustment Clause ("FAC").[4] Extending this analysis over a 20 year period and assuming the current credit rate formulas are retained, the total net cost borne by ENO electric customers over that period would be approximately $59 million in nominal dollars. It is important to note that this total would be paid by non-participating customers assuming the current Rules, and that if the credit rates were increased as requested by MEI and others, the cost borne by customers would be even greater.

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[3] See Resolution R-19-111, Appendix A – Community Solar Rules for the Council of the City of New Orleans, Section VIII, Subscription Credits, Paragraph (E).

[4] Other costs such as those for billing and customer service and certain inputs like annual degradation of solar output have been ignored in this calculation but would also be borne by ENO customers.

2. CSG Subscriber Credit Rates

Intervenors have argued that the Council should significantly increase the credit rates provided to both low-income and non-low-income Subscribers. As shown by the analysis above, it is axiomatic that the higher the credit rate provided to a participant, the more cost will ultimately be borne by ENO's non-participating customers given that ENO recovers any CSG credits provided to Subscribers through the FAC. It is not clear from previous comments (or from discovery responses) as to the exact level of Subscriber credit rates that the intervenors are seeking to propose, but it is clear that any upward revision to the current credit rates would increase overall costs. The intervenors have not addressed this issue with evidence, but simply argued that inflated credit rates coupled with adoption of consolidated billing and other changes are necessary to generate interest among potential Subscriber Organizations to develop CSG projects in New Orleans. The absence of evidence is telling; indeed, there is no justification to increase the credit rates. However, as noted below, the Council may be inclined to consider other refinements to the existing Rules that may stimulate further interest in developing CSG projects without increasing the credit rates and passing unnecessary, even higher costs to non-participating customers.[5]

3. Consolidated Billing

Several intervenors have advocated for eliminating the notion of "Subscriber Funds" paid monthly (or possibly upfront in full) by Subscribers to a Subscriber Organization in favor of a so-called "consolidated billing" model. ENO has raised concerns about the potential complexity, feasibility, and cost of billing system upgrades needed to implement the proposed model and the appropriate party that would bear those costs (Subscriber Organizations, Subscribers, all of ENO's customers, or some combination thereof). In addition, at this time, the compatibility with ENO's

[5] ENO still maintains its objection to the Low-Income and Public Entity Benefits Adders mentioned in the Motion of Madison Energy Investments to Amend Community Solar Rules filed on July 13, 2022.

systems, along with the scope of work, time, and the total costs involved in implementing a consolidated billing model are being evaluated.

ENO's understanding of the proposed model is that a Subscriber would receive a net monthly bill credit (or charge) without a corresponding payment made separately to the Subscriber Organization. The net monthly credit (or charge) would reflect the difference between the applicable Subscriber credit rate and the cost to become a Subscriber in a specific CSG project, and ENO would separately enter into a PPA with the Subscriber Organization for each CSG project that would receive consolidated billing treatment.

The following is a hypothetical example to illustrate ENO's understanding of the process under a consolidated billing framework. A Subscriber Organization for a given CSG project enters into a fixed term PPA with ENO at a fixed rate for energy that will be allocated to Subscribers, assumed here to be \$0.08/kWh. Assume also that the CSG project is fully subscribed, and that for a given month, the CSG Subscriber credit rate for a low-income customer is \$0.12/kWh. In addition, assume a low-income residential Subscriber is allocated 600 kWh for a particular month for their proportional share of the project. In that case, the resulting net bill credit the customer would receive would be \$0.12/kWh minus \$0.08/kWh, *i.e*., \$0.04/kWh, which is then multiplied by the customer's 600 kWh share to yield a total bill credit of \$24. The Subscriber Organization (*i.e*., the project owner and operator) would receive a payment for all of the energy produced by the CSG project at the agreed-upon PPA price of \$0.08/kWh. ENO would recover the cost incurred based on the energy produced and the \$0.12/kWh credit rate (which assumes the CSG project is entirely subscribed by low-income customers) in its monthly FAC.

Under the Rules as currently written, a participating customer and the CSG Subscriber Organization (the owner and operator of a CSG project) would have entered into a financial arrangement entitling the customer to a specific capacity allocation (kW) or %-based share of a given CSG project in exchange for a monthly Subscription payment made by the Subscriber. For example, under the Rules, if a CSG project produced 100,000 kWh in a given month and a Subscriber were entitled to 0.5% of the energy produced based on their Subscribed share of the project, the customer would receive a bill credit based on 100,000 kWh multiplied by 0.5%, or 500 kWh, which is in turn multiplied by the prevailing Subscriber credit rate. In this hypothetical example, assuming the Subscriber is a low-income customer and the Subscriber credit rate that month is $0.12/kWh, the resulting CSG bill credit would be 500 kWh multiplied by $0.12/kWh, or $60. This CSG bill credit would offset, in part or in whole, the monthly subscription fee the Subscriber had paid out of their own pocket to the Subscriber Organization under the separate financial arrangement.

As stated, ENO is exploring the various system and process modifications that would be required to implement a form of consolidated billing, as well as the costs involved and possible allocation of those costs.

4. <u>Length of PPA Term</u>

In Resolution No. R-23-130, the Council decided there was insufficient evidence to support shifting the PPA term from 10 years with two 5-year extension options to a standard term of 20 years. As part of the current Rules, a PPA based on avoided cost rates would exist between ENO and the Subscriber Organization as a backstop measure to address treatment for any unsubscribed energy up to a maximum of 20% of a given CSG project.[6] A change to a standard 20-year PPA term, according to the intervenors, would presumably increase the ability of Subscriber Organizations to secure financing for CSG projects as compared to the current 10-year term with

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[6] ENO understood from the discussion at the technical conference that the Intervenors agree with retaining the 20% cap on purchases of unsubscribed energy in any PPA subsequently approved for use by the Council.

two extension options, which in turn (if the intervenors are correct) likely may improve the prospects of creating viable projects without subjecting ENO customers to the cost of increased monthly bill credits. To the extent the Council supports ENO's pursuing the low-income pilot concept described below without wholesale changes to the Rules, it would make sense to test the change to a standard 20-year PPA in that context.

5. <u>Low-Income Community Solar Pilot</u>

Should the Council be inclined to consider limited refinements to the Rules, ENO proposes a pilot that would target 100% low-income participation, while avoiding the costly step of arbitrarily inflating Subscriber credit rates and increasing the costs borne by non-participating customers.

A pilot could include a project (or portfolio of projects) in the range of 5 to 10 MW-AC focused exclusively on 100% low-income subscribers and potentially utilizing consolidated billing to apportion monthly bill credits to Subscribers and PPA payments to the Subscriber Organization. Such a pilot could be helpful to consider technical and financial viability and perhaps provide a model for further CSG development in New Orleans. To be clear, ENO would not need to own or operate any CSG projects under the pilot but could play a facilitating role limited to activities such as:

- Facilitate one or more CSG projects to support the pilot up to 10 MW-AC total;
- Enter into one or more long-term PPAs with Subscriber Organizations;
- Communicate the offering to eligible low-income residential customers;[7]
- Facilitate enrollment of Subscribers (subject to limitations in the Council's Rules);
- Calculate and render the net bill credit (or charge[8]) each month to each Subscriber; and
- Render payments to Subscriber Organizations under the terms of the relevant PPAs.

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[7] As far as targeting Subscribers, the focus for the pilot could begin with reaching out to eligible low-income customers that are currently in a deferred payment arrangement.

[8] For purposes of designing a low-income residential pilot offering, ENO would propose that a low-income subscriber never receive a net charge, meaning any negative difference between the Subscriber credit rate and the PPA price for a given month would be reset to zero and ENO would only recover the PPA payment.

6. REC Ownership

The issue of REC ownership does not bear directly on the low-income focused pilot project described above, but there are policy implications here that the Council should consider. The Rules provide that Subscribers receive any RECs associated with their subscriptions.[9] Intervenors have suggested the Rules be changed to allow Subscriber Organizations to receive the RECs so they can be monetized and create an additional revenue stream for the Subscriber Organizations. Their suggestion would allow developers to control and sell the RECS to other entities, including even to out-of-state parties, thus allowing out-of-state businesses to claim credit for emissions reductions undertaken and funded by New Orleans and its citizens and to profit at their expense. The Council properly denied their effort in Resolution No. R-23-130, and no new arguments or evidence has been presented to require the Council to reach a different result.

If the Council, however, is inclined to consider a change regarding RECs, the Company should be allowed to receive the RECs and retire them on behalf of participating customers such that CSG projects can be counted towards ENO's compliance obligation under the Council's Renewable and Clean Portfolio Standard ("RCPS"). As it currently stands, even though all customers pay for bill credits provided under the Council's CSG program (which is true given either the current Rules or the proposed consolidated billing model), the energy (MWh) generated by CSG projects supporting the program cannot be counted by ENO as a source of compliance credits under the RCPS calculation since ENO cannot track and retire the RECs through its North American Renewables ("NAR") registry.

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[9] ENO is not aware of any market for residential or smaller commercial customers to trade, sell, or retire the limited number of RECs they are entitled to receive. Thus, such RECs are intangible assets with no direct value to the subscriber or other customers under the current framework.

Thus, when ENO is short of its RCPS compliance obligation (as was the case in 2022) and may seek to purchase unbundled RECs on the market to make up the shortfall, the net effect is that all customers would potentially pay two costs for each MWh of solar generated through the CSG program – the credits paid to low-income Subscribers based on the retail rate ***and*** the prudently-incurred cost of a like amount of unbundled RECs or clean energy procured by ENO to help achieve compliance under the RCPS. If ENO were allowed to receive the RECs associated with any CSG project and count them towards RCPS compliance, it would help mitigate the payment of additional, prudently-incurred compliance costs by other customers.[10]

CONCLUSION

In Resolution No. R-23-130, the Council properly rejected the intervenors' efforts to change the Rules on a variety of issues. Since the Council issued its ruling, the intervenors have not come forward with any new evidence or arguments, and thus have failed to meet their burden to change its Rules. However, considering questions posed at the technical conference, and to the extent the Council is considering certain limited changes to its Rules, the Company hopes these comments are helpful and provide a potential path forward.

Respectfully submitted,

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[10] In the alternative, ENO would propose that the calculation of Compliance Load under the RCPS rules be modified such that the total amount of annual energy (MWh) generated by CSG projects would be subtracted from the Compliance Load used to assess the annual clean energy requirement. This change would prevent ENO customers from potentially having to pay the second of the two costs described above.

Exhibit 1

Month	CSG Output (kWh)*	Total Bill Credits	Weighted Average Bill Credit (¢/kWh)**	Energy Value	Capacity Value	Weighted Average Value (¢/kWh)	Difference (Bill Credits - Value)
June 2021	10,237,068	$705,072	6.89	$347,881	$3	3.40	$357,188
July 2021	9,713,123	$712,422	7.33	$384,058	$3	3.95	$328,361
August 2021	9,551,568	$726,286	7.60	$393,811	$3	4.12	$332,472
September 2021	9,411,855	$691,342	7.35	$451,430	$3	4.80	$239,909
October 2021	9,076,521	$676,476	7.45	$512,114	$3	5.64	$164,359
November 2021	7,475,391	$558,071	7.47	$361,683	$3	4.84	$196,385
December 2021	6,192,114	$459,346	7.42	$236,290	$3	3.82	$223,052
January 2022	6,115,654	$443,424	7.25	$228,033	$3	3.73	$215,388
February 2022	7,520,071	$528,679	7.03	$298,353	$3	3.97	$230,323
March 2022	9,362,849	$637,445	6.81	$409,864	$3	4.38	$227,578
April 2022	10,136,757	$656,115	6.47	$682,027	$3	6.73	($25,914)
May 2022	11,068,883	$765,462	6.92	$930,753	$3	8.41	($165,294)
June 2022	10,237,068	$877,731	8.57	$945,676	$876	9.25	($68,821)
July 2022	9,713,123	$887,279	9.13	$871,902	$876	8.99	$14,501
August 2022	9,551,568	$911,797	9.55	$931,008	$876	9.76	($20,087)
September 2022	9,411,855	$895,034	9.51	$727,493	$876	7.74	$166,665
October 2022	9,076,521	$886,962	9.77	$521,508	$876	5.76	$364,577
November 2022	7,475,391	$760,580	10.17	$408,657	$876	5.48	$351,046
December 2022	6,192,114	$624,316	10.08	$547,406	$876	8.85	$76,035
January 2023	6,115,654	$607,238	9.93	$188,369	$876	3.09	$417,993
February 2023	7,520,071	$684,841	9.11	$175,405	$876	2.34	$508,561
March 2023	9,362,849	$752,890	8.04	$270,027	$876	2.89	$481,986
April 2023	10,136,757	$928,045	9.16	$255,540	$876	2.53	$671,629
May 2023	11,068,883	$1,005,414	9.08	$360,241	$876	3.26	$644,297
2021	61,657,640	$4,529,014	7.35	$2,687,267	$21	4.36	$1,841,726
2022	105,861,854	$8,874,823	8.38	$7,502,681	$6,147	7.09	$1,365,995
2023	44,204,214	$3,978,428	9.00	$1,249,582	$4,380	2.84	$2,724,466
	211,723,708	**$17,382,266**	**8.21**	**$11,439,530**	**$10,549**	**5.41**	**$5,932,187**

Notes:

* Modeled assuming 55 MW-AC with a 50/50 mix of rooftop and ground-mounted solar with single-axis tracking

** Weighted average of monthly low-income and non-low income Subscriber credits

CERTIFICATE OF SERVICE
Docket No. UD-18-03

I hereby certify that I have served the required number of copies of the foregoing pleading upon all other known parties of this proceeding individually and/or through their attorney of record or other duly designated individual, by: ☒ electronic mail, ☐ facsimile, ☐ hand delivery, and/or by depositing same with ☐ overnight mail carrier, or ☐ the United States Postal Service, postage prepaid.

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New Orleans, Louisiana, this 16th day of June, 2023.

Leslie M. LaCoste