



July 3, 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 OPENING A RULEMAKING
PROCEEDING TO ESTABLISH RENEWABLE PORTFOLIO STANDARDS (Docket No.
UD-19-01)

Dear Ms. Johnson:

Please find the enclosed Response of the Alliance for Affordable Energy to Entergy New Orleans, LLC's Renewable and Clean Portfolio Standard Compliance Demonstration Report for Compliance Year 2022 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

Before
The Council of the City of New Orleans

**In Re: RESOLUTION AND ORDER
ESTABLISHING A DOCKET AND
OPENING A RULEMAKING PROCEEDING
TO ESTABLISH RENEWABLE PORTFOLIO
STANDARDS**

DOCKET NO. UD-19-01

JULY 3, 2023

**Response of the Alliance for Affordable Energy and Energy Future New Orleans Coalition
to Entergy New Orleans LLC's Renewable and Clean Portfolio Standard Compliance
Demonstration Report for Compliance Year 2022**

I. Introduction

On May 1, 2023, pursuant to Section 4(f) of the Renewable and Clean Portfolio Standard (“RCPS”) the Council of the City of New Orleans (“the Council”) adopted in Resolution No. R-21-182, Entergy New Orleans, LLC (“ENO”) filed its Compliance Demonstration Report (“the Report”) for compliance year 2022. On June 8, 2022, the Council adopted Resolution No. R-23-255, providing an opportunity for intervenors in this docket to comment on ENO’s Report by July 3, 2023. Accordingly, the Alliance for Affordable Energy (“AAE”), and on behalf of the Energy Future New Orleans Coalition (“EFNO”), respectfully submits this Response to ENO’s Compliance Demonstration Report for compliance year 2022.

II. The Vast Majority of ENO’s Compliance Credits Are from Non-Renewable Sources

AAE and EFNO acknowledge that ENO has met the compliance requirements for compliance year 2022. However, we would note that the vast majority – almost 79% – of ENO’s compliance came from existing nuclear power generating facilities, a non-renewable resource. Nuclear power is dirty, expensive, and does not provide the full benefits, such as local economic and labor development, of truly renewable energy.

III. AAE and EFNO Do Not Oppose Recovery of RCPS Compliance Costs Through the Fuel Adjustment Clause

In its Report, ENO proposes to recover the cost of RECs purchased for the 2022 compliance year through the Fuel Adjustment Clause (“FAC”) on customer bills. AAE and EFNO do not oppose this recovery mechanism, as it accurately reflects the nature of the associated costs.

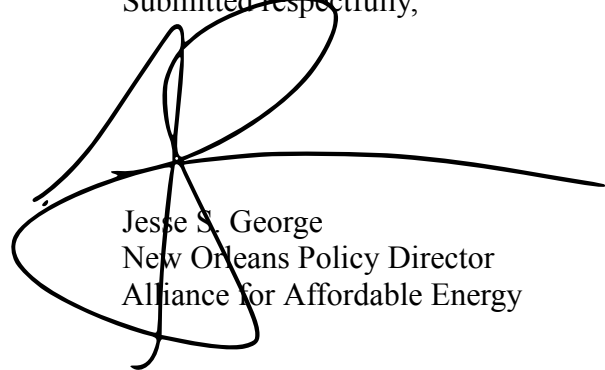
IV. The Council Should Amend the RCPS to Create a Carveout For Locally-Produced Renewable Energy

In order to spur the development of truly renewable energy in New Orleans, the Council should amend the RCPS to include an escalating carveout or mandate for locally-produced renewable energy. AAE and EFNO advocated for this policy when the RCPS was first created, but the Council elected to include a multiplier for locally-produced renewable energy instead. This has not spurred the development of local renewable energy projects the way that a mandate would, as evidenced by the complete lack of community solar developments in the city since the adoption of the Community Solar Rules in 2018. In fact, between the New Orleans Solar Station, Paterson Solar Station, and local commercial rooftop solar, these accounted for only 1.45% of ENO’s 2022 compliance credits. A mandate for locally-produced renewable energy under the RCPS would provide a strong incentive to third-party renewable energy developers, who could help to bring the full benefits of local renewable energy to New Orleans.

VIII. Conclusion

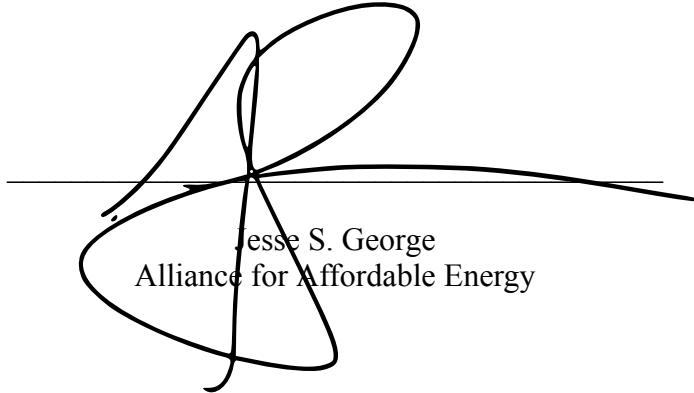
The Alliance and EFNO appreciate this opportunity to comment on ENO’s 2022 Compliance Demonstration Report. The RCPS is a powerful tool for preserving New Orleans’ future, but the Council can do more to ensure that the full benefits of renewable energy accrue to the city. We look forward to the Council’s continuing efforts to refine this important policy.

Submitted respectfully,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

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

I hereby certify that I have this 3rd day of July 2023, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

A handwritten signature in black ink, identical to the one above, consisting of several loops and a long horizontal stroke extending to the right.

Jesse S. George
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