Final comments of Together New Orleans in System Resilience and Storm Hardening
Docket No. UD-21-03

July 21, 2023

By Electronic Mail

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

Re: SYSTEM RESILIENCE AND STORM HARDENING, DOCKET NO. UD-21-03

Dear Ms. Johnson:


TNO is submitting this filing electronically and will submit printed copies as you request.

If you have any questions, please do not hesitate to contact me.

Sincerely,

[Signature]
Broderick A Bagert, Jr.
Organizer
Together New Orleans

CC: Official Service List (UD 21-03)
BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS

In Re: FINAL COMMENTS REGARDING SYSTEM RESILIENCE AND STORM HARDENING

DOCKET NO. UD-21-03

FINAL COMMENTS OF TOGETHER NEW ORLEANS

Together New Orleans (“TNO”), pursuant to New Orleans City Council Resolution No. R-23-74, respectfully submits its Final Comments in response to the grid hardening and system resilience proposals. TNO appreciates the opportunity to participate in this deliberative process to address what TNO believes is one of the most important challenges facing our community.

TNO final comments consist of eight observations on the challenge we face and its proposed contribution to help address that challenge.

#1) Long-duration power outages represent a major threat to the residents, the economy and the social fabric of the New Orleans community. Fueled by climate change, exacerbated by prior underinvestment, rendered deadlier by new extremes of heat and cold, outages are now the leading cause of death from disaster in New Orleans and across the Gulf Coast. Long-duration outages cost untold trauma among families and uncounted millions in economic damages, when they occur. And they will occur.

#2) It is not a responsible or viable option, in the face of this threat, to do nothing or take only cosmetic steps.

#3) Action to address the threat of outages should include investments in grid hardening, to make outages less likely to occur, and in grid resilience, to make outages less deadly and disruptive when they do occur. ENO and TNO’s proposal, respectively, address those two objectives of
reliability and resilience, without duplication or overlap. Components of both proposals should be approved.

#4) New Orleans residents face one of the highest energy cost burdens in the nation, and Council must also prioritize affordability in its actions. This inevitably will mean trade-offs. Any aspects of proposals, including TNO’s own, found to have a low benefit to ratepayers, found to duplicate already-funded responsibilities or found to serve private more than public interests cannot be afforded and should not be funded. Proposals that make our community safer in important ways, create significant value for ratepayers and leverage external funding should be prioritized and funded.

#5) Two recent developments in federal energy policy, the Infrastructure Bill and Inflation Reduction Act, create a new opportunity for local utility systems to attract federal funding by providing a local match for federal funding programs that require it. The Infrastructure Bill, especially its Grid Resilience components, create opportunities for federal funding worth hundreds of millions of dollars in potential subsidies for precisely the sorts of projects under consideration in this Docket. The Inflation Reduction Act, similarly, includes provisions under which the Federal government will cover 30% to 50% of the project costs of resilience investments that rely on renewable generation, such as solar + storage resilience hubs. Both of these opportunities require a local match or “cost share.” New Orleans should use utility system funding to attract and leverage this federal funding by helping to provide that local match.

#6) TNO’s Community Lighthouse proposal, to build eighty-six solar + storage resilience hubs serving every neighborhood in New Orleans, prioritizing the most vulnerable communities, will be funded predominantly from funds raised independently by TNO. Sixty-eight percent of the project’s total costs will come from sources other than utility system funds. Council should
approve TNO’s proposal to take advantage of this unparalleled opportunity for leveraging system resources.

#7) TNO’s Community Lighthouse proposal will bring significant value to the grid as an energy resource. Its network of distributed solar and battery storage powering the resilience hubs can function as a demand response asset, discharging behind the meter to reduce customer load during peak load periods; as a resource adequacy asset in MISO’s capacity market via FERC 2222; as a frequency regulation asset; a voltage regulation asset; a congestion relief asset and as a source of carbon free renewable energy, displacing more carbon intensive fuel sources. The value these resources bring to the grid strengthen the value of approving the Community Lighthouse proposal.

#8) Any project that includes public funding, including TNO’s proposal, should embrace the highest standards of transparency and public accountability. TNO supports Council adopting formal performance metrics to track performance and endorses regular public reporting, preferably including a public-facing, real-time dashboard. TNO further endorses measures to assure resilience hubs serve the public.

CONCLUSION

TNO appreciates the opportunity to provide these further comments in support of its proposal and looks forward to taking this extraordinary enterprise of collaboration and analysis to fruition and implementation.
CERTIFICATE OF SERVICE
UD-21-03

I hereby certify that a copy of the foregoing TNO Responses to Alliance For Affordable Energy’s First Set of Data Requests has been served upon “The Official Service List” via electronic mail and/or U.S. Mail, postage properly affixed, this 21st day of July 2023.

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New Orleans, Louisiana, this 21st day of July, 2023

Broderick Bagert, Jr.