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August 4, 2023

VIA ELECTRONIC DELIVERY

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

**Re: *Rulemaking Proceeding to Establish Renewable Portfolio Standards
Council Docket No. UD-19-01***

Dear Ms. Johnson:

Entergy New Orleans, LLC (“ENO”) respectfully submits its Reply Comments in the above referenced docket. As a result of the remote operations of the Council’s office related to Covid-19, this filing is being electronically submitted. We will submit the original and requisite number of hard copies once the Council resumes normal operations, or as you direct. ENO requests that you file this submission in accordance with Council regulations as modified for the present circumstances.

Should you have any questions regarding this filing, please contact my office at (504) 576-4102.

Thank you for your assistance with this matter.

Sincerely,

Leslie M. LaCoste

LML/ef

Enclosures

cc: Official Service List in this docket (*via electronic mail only*)

**BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS**

IN RE: A RULEMAKING)	
PROCEEDING TO ESTABLISH)	
RENEWABLE PORTFOLIO)	DOCKET NO. UD-19-01
STANDARDS)	

ENTERGY NEW ORLEANS, LLC’S REPLY COMMENTS

Entergy New Orleans, LLC (“ENO” or “the Company”) submits these Reply Comments in response to the comments submitted by the Alliance for Affordable Energy (“AAE”) regarding ENO’s Renewable and Clean Portfolio Standard (“RCPS”) Compliance Demonstration Report for Compliance Year 2022.

AAE suggests that the RCPS rules should be amended to establish a carve-out for “locally-produced renewable energy.”¹ The Council should not do so. In fact, the Council previously rejected this idea during the RCPS rulemaking because, as noted by the Advisors, “a carve out that requires a specific amount of a certain type of resource be added to the portfolio without regard to the cost of that resource could increase rates.”² Instead, as noted by AAE, the Council approved the multiplier framework that gives additional compliance credits for local clean energy sources and is less likely to result in increased costs to ENO customers:³ “The Council is persuaded that the use of multipliers rather than carve-outs to encourage high priority resources strikes an appropriate balance between incentivizing the adoption of high-priority resources and controlling costs to customers.”⁴ Nothing has changed since the Council’s decision that would merit additional consideration of AAE’s proposed carve-out in this docket.⁵

¹ AAE Reply Comments, p. 3.

² Docket UD-19-01, Resolution R-21-182, Appendix C, at p. 55.

³ AAE Reply Comments, p. 3.

⁴ Docket UD-19-01, Resolution R-21-182, Appendix C, at p. 59.

⁵ AAE also takes issue with the number of compliance credits from nuclear generation. AAE Reply Comments, p. 2. AAE’s complaint is misguided given that nuclear is recognized as a source of clean energy under the RCPS rules that contributes zero carbon emissions to the environment.

Accordingly, and as discussed in the Company's prior comments, the Council should 1) find that ENO achieved the RCPS target for 2022 and remained within the Customer Protection Cost Cap; and 2) approve ENO's proposal to recover the costs associated with 2022 compliance as described in the Compliance Demonstration Report Covering Compliance Year 2022. The comments submitted by the AAE do not require a different result.

CERTIFICATE OF SERVICE

Docket No. UD-19-01

I hereby certify that I have served the required number of copies of the foregoing report upon all other known parties of this proceeding, by the following: electronic mail, facsimile, overnight mail, hand delivery, and/or United States Postal Service, postage prepaid.

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New Orleans, Louisiana, this 4th day of August 2023.



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