

Mrs. Johnson:



October 15, 2019

By Hand Delivery

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

In Re: Establishing a Docket and Opening a Rulemaking Proceeding to Establish Renewable Portfolio Standards (Docket UD-19-01)

Dear Ms. Johnson:

Please find enclosed an original and two (2) copies of a reply comments from Audubon Louisiana, Vote Solar, 350 New Orleans, PosiGen Solar, the Sierra Club, and the Alliance for Affordable Energy in the above mentioned docket. Please file the attached communication and this letter in the record of the proceeding and return one timestamped copy to our courier, in accordance with normal procedures. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention.

Sincerely,

Logan Burke
Executive Director
Alliance for Affordable Energy

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

IN RE: A RULEMAKING PROCEEDING

TO ESTABLISH RENEWABLE PORTFOLIO

STANDARDS

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DOCKET NO. UD-19-01

October 15, 2019

COMMENTS OF AUDUBON LOUISIANA, VOTE SOLAR, 350 NEW ORLEANS,

POSIGEN SOLAR, SIERRA CLUB, AND ALLIANCE FOR AFFORDABLE ENERGY

ON ADVISORS' REPORT ON RENEWABLE PORTFOLIO STANDARDS

Audubon Louisiana (“Audubon”), Vote Solar, 350 New Orleans, and Alliance for Affordable Energy jointly submit these comments in the Council of the City of New Orleans (“Council”) Docket No. UD-19-01 pursuant to Council Resolution No. R-19-109, dated March 28, 2019.

We continue to support the Council’s groundbreaking decision to initiate this Renewable Portfolio Standards (“RPS”) rulemaking docket. We have been actively engaged in this proceeding in our own right, and as an active member [active members] of the Energy Future New Orleans (“EFNO”) coalition.

On 3 September 2019, the Advisors to the Council of the City of New Orleans (“Advisors”) submitted extensive comments reflecting their views on the comments submitted by the parties to this proceeding. The purpose of these comments is to address the Advisors’ Report.

Introduction and Overview

1 In July 2017, the City of New Orleans (“City”) set itself on a course of climate responsibility
2 through adoption and publication of “Climate Action for a Resilient New Orleans” (“Climate
3 Action”) and committed to a 50% reduction in greenhouse gas pollution by 2030. The City
4 further committed to a complementary goal of 100% low-carbon electricity, among other goals,
5 by that same date. Climate Action made the case for its aggressive goals and established essential
6 objectives that include incremental annual energy savings, new renewable energy generation,
7 ending dependence on coal, affordability, equity, and resilience, among others. Transportation,
8 waste reduction, and cultural transformation initiatives are also key elements of the Climate
9 Action vision.

10 In our view, establishing workable and strong renewable portfolio standards remains a
11 reasonable and necessary major step in achieving the Climate Action vision, and more
12 importantly, in achieving a 100% renewable energy future for the City of New Orleans.
13 Realizing a 100% renewable energy goal is completely aligned with our organizational missions
14 as well.

15 Audubon Louisiana’s mission is to conserve and restore natural ecosystems, focusing on birds,
16 other wildlife, and protecting their habitats for the benefit of humanity and the earth's biological
17 diversity. The National Audubon Society, which includes Audubon Louisiana, 22 other state
18 offices, and chapters and members in all 50 states, has the local and national presence to advance
19 public and political support for climate solutions in communities across the country. Securing
20 even a single victory that builds resilience while reducing carbon emissions in any major city or
21 state builds momentum for more, and progress in one place seeds progress in others.

1 Vote Solar is an independent 501(c)3 nonprofit working to repower the U.S. with clean energy
2 by making solar power more accessible and affordable through effective policy advocacy. Vote
3 Solar seeks to promote the development of solar at every scale, from distributed rooftop solar to
4 large utility-scale plants. Vote Solar has over 80,000 members nationally, including members
5 residing in New Orleans and Algiers. Vote Solar is not a trade group nor does it have corporate
6 members.

7 350 New Orleans is a 501(c)(3) climate activist and energy transition advocacy group connecting
8 our region to the international climate change movement led by 350.org. Our mission is to lend
9 support to initiatives in New Orleans that raise consciousness and promote sound policy around
10 climate change mitigation. We exist because climate change poses unprecedented threats to life,
11 and coastal Louisiana is especially vulnerable. Rising seas, hotter temperatures, and stronger
12 storms have grave implications for the future of our coasts, communities, and cultures.

13 PosiGen Solar, founded and headquartered in New Orleans, Louisiana, is the recognized national
14 leader in low to moderate income clean energy financing for homeowners. With rooftop solar
15 and energy efficiency improvements installed at 16,000+ homes in Louisiana, New York, New
16 Jersey and Connecticut, our average family is net positive financially more than \$500 per year,
17 dramatically reducing energy poverty and increasing community wealth. PosiGen hereby signs
18 on in support of the Coalition reply comments, but also wants to make clear that we are filing
19 separate PosiGen comments to which we request separate and complete written responses.

20 Sierra Club is a non-profit organization with 3.5+ million members with a mission to explore,
21 enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the
22 earth's ecosystems and resources; to educate and enlist humanity to protect and restore the

1 quality of the natural and human environment; and to use all lawful means to carry out these
2 objectives.

3 The Alliance for Affordable Energy, a 501(c) 3 nonprofit, safeguards Louisiana’s future by
4 protecting consumers’ right to an affordable, equitable, and environmentally responsible energy
5 system. The Alliance is the only dedicated consumer advocate in Louisiana working for
6 residential utility customers. We monitor, educate, and participate in state and city utility
7 regulation to advocate for the public's best interests.

8 We continue to urge the Council to adopt a Resilient and Renewable Portfolio Standard (“R-
9 RPS”) for New Orleans that would require 55% of Entergy New Orleans’ (“ENO”) retail sales to
10 be served by resilient and renewable resources by 2033, and 100% by 2040.

11 A 100% R-RPS goal will be transformative of almost every aspect of life and work in New
12 Orleans. Design and implementation of the R-RPS requires a holistic vision and approach
13 because of the magnitude and import of the task. It requires a view that transcends the narrow
14 question of electricity supply and embraces a view of affordability, environmental performance,
15 equitable access to clean energy, and, of course, the strength, empowerment, and durability that
16 comes from clean community energy development (“CCED”). Implementing the R-RPS means
17 that some procedures must be changed, and rules that might limit the R-RPS might need
18 amendment. In the end, the R-RPS must embody and exemplify the “triple bottom line” of true
19 sustainability—economic sustainability, environmental sustainability, and equitable
20 sustainability.

21 The Advisors properly recognize that ENO must be compelled to meet an RPS and cannot be
22 relied upon to achieve the important goals of an RPS through voluntary action. However, we
UD-19-01 – Audubon, Vote Solar, 350 New Orleans, PosiGen Solar, Sierra Club, Alliance for
Affordable Energy Comments on Advisors’ Report

1 take issue with several deficiencies in the Advisors’ Report. Our greatest concern with the
2 Advisors’ Report is that the Advisors do not seem to fully share a broad transformative and
3 sustainability-based view of the design and approach for renewable portfolio standards (“RPS”)
4 to direct ENO’s operations in New Orleans. In particular, we note the following issues:

- 5 • The Advisors do not seem to fully appreciate, and reflect in their report, the value and
6 character of clean, community energy development. CCED resources are not just locally
7 sited, they support local jobs and provide energy security. CCED resources are not a
8 choice to prefer local economic development benefits over energy supply economics.
9 CCED resources are an option that provides superior energy economics and economic
10 development.
- 11 • The Advisors do not seem to have a vision and internalized understanding of the
12 relationship between an RPS and dynamic energy technology markets, especially non-
13 utility markets for distributed energy resources (“DER”) products and services. The R-
14 RPS should set the standard and qualification criteria; the *means* by which the R-RPS is
15 implemented is what ensures that private investment that reduces rate base investment is
16 maximized, that aggregation strategies minimize deployment costs and increase customer
17 participation, that aggressive efficiency is coupled with clean local generation, and that
18 local value chains are efficient and contribute to maximum local economic development.
19 The potential that distributed energy resources can contribute to these outcomes was not
20 addressed adequately by the Advisors in their review of the comments.
- 21 • The Advisors appear to assume that the status quo for utility regulation is the structure in
22 which any RPS must be implemented. Again, we maintain that the transformational
23 nature of the RPS necessitates an openness to modifications in procedures and rules.

1 These include potential changes in resource planning under the Integrated Resource
2 Planning (“IRP”) process, and to the creation of an advisory committee to inform R-RPS
3 implementation. Importantly, the current rules allow the Council to provide direction
4 ahead of each new IRP cycle that can strongly inform the inputs and requirements for
5 analysis. This course, which does not require a rule change, will ensure that ENO’s
6 planning takes full account of the Council’s intentions regarding an RPS—as an input
7 into the planning process.

- 8 • The Advisors appear to address the RPS as primarily an electricity supply source issue,
9 and did not internalize how energy impacts economic, environmental, and social aspects
10 of energy services in New Orleans. Again, a more holistic approach is required to ensure
11 that the R-RPS is a win for all communities in New Orleans.
- 12 • The Advisors describe three optional RPS structures: (1) a traditional RPS, (2) an
13 aggressive RPS, and (3) a modified R-RPS. (Report at 15-16). We feel that there has been
14 too little data and analysis to narrowly constrain the pathways at this time. These
15 scenarios might be a good starting point for structuring scenarios under an IRP process,
16 for example. But the record is simply not adequate to decide on one of the three courses
17 offered by the Advisors. In particular, the EFNO parties offered the R-RPS proposal as an
18 integrated whole, not as a menu from which portions of the proposal would be selected,
19 or deselected, without an opportunity to consider the implications of such decisions.

20 *Issues of Agreement*

21 We agree with several aspects of the Advisors’ Report:

- 1 • We enthusiastically agree with the Advisors the various parties brought more than a
2 “simple RPS” to the Council. We believe that comprehensively addressing the energy
3 profile for ENO and New Orleans must include addressing climate and energy justice
4 concerns and a focus on maximizing clean community energy development. (Report at
5 1.)
- 6 • We agree that careful consideration by the Council of its goals for the RPS and New
7 Orleans’ energy economy is essential. The metric for goal setting and reflection in any
8 RPS must be a triple bottom line perspective that addresses economics, environment, and
9 equity—all at the same time. (Report at 1.)
- 10 • We agree that the climate change threat to New Orleans is real and great. (Report at 1.)
- 11 • We agree that ENO cannot be relied upon to achieve 100% renewable or even “clean”
12 energy by themselves. (Report at 2.) The history of Council leadership on CCED is also,
13 unfortunately, a history of ENO’s failure to lead.
- 14 • We agree that an RPS alone is not enough to drive rapid decarbonization. (Report at 5,
15 14.) This is a major reason that EFNO offered a more comprehensive R-RPS for the
16 Council’s consideration, and it is a reason why the ENO and Air Products comments lack
17 sufficient merit.
- 18 • We strongly agree that getting to zero climate pollution emissions by a date certain is
19 necessary. (Report at 15.) We continue to assert that 2040 is an achievable deadline, and
20 again reiterate that the goal must maximize renewable, just, local, and locally-
21 empowering resources development.
- 22 • We strongly agree that more data is needed. (Report at 17.)

- 1 • We strongly agree that the RPS should be implemented in a way that avoids the risk of
2 backsliding. (Report at 20.) We also believe that RPS design and implementation should
3 avoid the risk of gaming.
- 4 • We agree that the impacts of multipliers should be modeled and carefully studied.
5 (Report at 21.) We believe that supplemental planning processes would be an excellent
6 venue for such analysis.
- 7 • We agree that ENO should be required to report RPS progress on an annual basis, and
8 that ENO should be held fully accountable for any failures to meet RPS obligations.
9 (Report at 23.)
- 10 • We agree that multi-year budget and program cycles are appropriate to support ENO and
11 market resource development flexibility. (Report at 28.) Again, supplemental planning
12 processes would provide a good framework for the development of such approaches.

13 *Issues of Qualified Agreement*

14 We agree with several additional aspects of the Advisors' Report, but with important and
15 necessary qualifications:

- 16 • We agree that ENO's carbon emissions rates can be calculated as "well-below national
17 averages." (Report at 2.) However, this fact is not sufficiently rich as a metric for RPS
18 design or success by itself. The sources, costs, and consequences of New Orleans'
19 emissions footprint are vitally important and should drive the structure of the RPS.
- 20 • We agree that the recommended policies articulated by the National Renewable Energy
21 Laboratory ("NREL") are instructive. (Report at 4.) It is critical that this guidance applies

1 to the mechanics of RPS crafting, and not to the broader energy policy that must form the
2 foundation for an RPS.

- 3 • We agree that megawatts do not necessarily translate to megawatt hours—capacity and
4 energy are not the same. (Report at 10.) However, the Advisors’ Report does not include
5 energy and capacity statistics and assumptions for the resource choices addressed in its
6 three RPS options, nor does it reflect analysis of sources, sinks, economic impacts, and
7 other important aspects of resource options.
- 8 • We agree that an RPS for New Orleans should be based on sound resource assessment
9 baselines. (Report at 13.) However, we strongly disagree with the Advisors’ inconsistent
10 application of this concept in its report. On the one hand, the Advisors criticize
11 assertions based on the Google Project Sunroof tool, which is designed to be indicative of
12 solar potential, but not technically prescriptive. At the same time, the Advisors attack the
13 Project Sunroof numbers by relying upon the purported conclusions of an ENO study that
14 the Advisors did not read and that is not in the record in this proceeding.
- 15 • We agree that a Council policy of maximizing economic (and other) development
16 through energy policy is an entirely appropriate course for the Council. (Report at 15.)
17 We strongly disagree that “decarbonization,” on the one hand, and “economic
18 development” on the other are either/or choices. More thoughtful evaluation of the
19 principles of sustainability and energy justice, and the benefits of CCED reveals that a
20 well-designed and implemented RPS—such as offered in the R-RPS proposal from
21 EFNO—can foster superior environmental performance, economic value, and energy
22 justice.

23 *Issues of Disagreement*

1 In addition to the general concerns already discussed, Audubon disagrees with several specific
2 aspects of the Advisors' Report:

- 3 • We disagree that the Moniz report offer valuable and specific guidance for the Council's
4 efforts. (Report at 5.) We understand that the Advisors have a business relationship with
5 Dr. Moniz that should be publicly detailed. On the merits, the EFI report and California
6 study by the Advisors is inapt. It deals with an a very large state with an entirely different
7 resource mix and customer makeup. The EFI report and California analysis simply does
8 not merit the attention given to it by the Advisors in their report.
- 9 • We further disagree that the California report is instructive. (Report at 6.) The EFI
10 California report appears to have adopted as a priority the continued investment in and
11 operation of nuclear and fossil gas resources (albeit with the addition of unproven and
12 currently uneconomic direct carbon capture and storage). The California report is shaped
13 around one of the largest and most diverse states and economies in the world.
- 14 • We disagree with the Advisors' implied assumption that new technology is required to
15 achieve zero carbon emissions and that capturing and selling CO₂ is worth exploring in
16 the context of New Orleans' RPS. (Report at 9.) While new technology could help, as
17 could improvements in existing technologies, the new technology requirements cited in
18 the EFI study primarily relate to carbon capture, carbon products and marketing, and
19 advanced nuclear. None of these options is necessary to achieve a 100% RPS for New
20 Orleans. A switch to renewable energy avoids the need to rely on unproven and
21 unmeasured markets for carbon capture.

- 1 • We disagree that ENO’s 2018 IRP should be used as a baseline for the Council’s RPS.
2 (Report at 10.) Any prior ENO IRP has not been based on a policy of 100% renewable or
3 non-carbon resources by a date certain. Prior IRPs do not “solve for” an RPS.
- 4 • We strongly disagree that ENO’s “generic planning assumptions” are a reasonable
5 baseline for evaluating and making decisions about New Orleans’ RPS. (Report at 10.)
6 ENO’s current planning assumptions simply do not account for an RPS.
- 7 • We strongly disagree with the Advisors’ implication that ENO’s progress toward RPS
8 goals can be fairly measured solely or heavily against generating resource targets and
9 achievements in California, Nevada, and Washington states. (Report at 11.) The RPS for
10 New Orleans must account for the contribution that different kinds and site locations of
11 generation can make to ensuring that the citizens of New Orleans have access to clean,
12 affordable, renewable, and community-empowering energy resources—under all kinds of
13 conditions.
- 14 • We strongly disagree with the Advisors’ position that the Council should not prioritize
15 renewable energy. (Report at 14.) The Advisors appear to have a bias in favor of
16 expensive nuclear and fossil resources (e.g., gas with carbon capture) that is inappropriate
17 and unjustified for New Orleans.
- 18 • We disagree with the Advisors’ position that the legal standard for proponents of policy
19 positions at this stage of the proceeding should be “convincing proof” of the economics
20 of options available to the Council. (Report at 15.) The Advisors appear to use this
21 standard against ideas with which they disagree, but not on ideas that they propose. In
22 any event, the Council’s decisions on the RPS have not yet reached a “convincing proof”
23 legal test level.

- 1 • We strongly disagree with the Advisors’ unsubstantiated assertion that the R-RPS
2 proposal from EFNO is “likely to be the least successful” in meeting the Advisors’ cost
3 caps. (Report at 16.) There is simply too little modeling and analysis, much less
4 transparency on assumptions, to support the Advisors’ cost-effectiveness assertions. The
5 Advisors’ comments suggest an inappropriate bias.
- 6 • We strongly disagree that EFNO’s proposal for an R-RPS was “incomplete and
7 potentially faulty” such as to merit dismissal or ignoring of the proposal in whole or part.
8 (Report at 24.) The Advisors’ statement suggests that EFNO (and every other party) bore
9 a burden to produce an uncontroverted plan in order to secure Council consideration. Not
10 only is this the wrong approach at this stage, when the Council needs to cast a wide net in
11 order to shape its RPS actions, but it is also inconsistent with the standard of proof the
12 Advisors chose to apply to their preferred EFI/California study.
- 13 • We disagree that studies *not* submitted for evaluation should be relied upon as
14 “suggesting” findings to support Council action. (Report at 17.) The ENO solar potential
15 study, if it exists, was not submitted into the record—it cannot form a credible foundation
16 for attacking anything submitted by EFNO.
- 17 • We strongly disagree with the Advisors’ hypothetical assumption that the R-RPS would
18 be implemented in a way to allow and encourage gaming and back-sliding. (Report at
19 19.) The Advisors are correct to note that an R-RPS should be implemented so as to
20 prevent and address backsliding and gaming. It is inappropriate to use an assumption of
21 faulty implementation as a basis for attacking the R-RPS concept and proposal. Any
22 proposal implemented poorly will underperform.

- 1 • We disagree that use of RECs should be eliminated over time. (Report at 20.) RECs from
2 remote MISO renewable resources may offer early-year cost savings, but local benefit
3 policy priorities may argue against allowing REC-based remote resources to qualify for
4 the RPS as higher targets are achieved. However, RECs, in general and perhaps
5 specifically from local resources, are a potentially useful tool for competitively securing
6 the benefits and development of local, durable resources. The Advisors seem to confuse
7 RECs as an accounting mechanism with the nature and location of the source of any
8 particular REC itself.
- 9 • We strongly disagree with the Advisors that the impacts of credit multipliers can be
10 understood with simplistic examples. (Report at 22.) As the costs for renewables and
11 other clean energy resources continue to fall, and as costs for fossil and nuclear resources
12 rise, the implications of RPS credit multipliers change. More dynamic scenario analysis is
13 required prior to final decisions. The RPS is not just an accounting framework—it is also
14 a powerful policy driver impacting resources and their economics.
- 15 • We disagree that any future failure by ENO to meet its RPS targets should result in a
16 delay in RPS implementation. (Report at 23.) It is vital that the RPS be implemented in a
17 way that grows non-utility markets for distributed energy resources and services. In this
18 way, New Orleans is not forced to continue a cycle of dependence on ENO for the
19 sustainability, affordability, and strength of the New Orleans energy economy. Likewise,
20 we disagree that ENO failures in any one year can simply be addressed by “catching up”
21 in later years. What ENO fails to do should be addressed by competitive, non-utility
22 market actors.

- 1 • We disagree with the Advisors’ assumption that ENO will be the sole provider of
2 resources to meet RPS requirements. (Report at 25.) Much more analysis of competitive,
3 non-utility provision of services should be explored.
- 4 • We disagree that ENO’s cost impact estimates are a credible starting point for evaluating
5 the costs of an RPS. (Report at 26.) Much more data, transparency, and analysis is
6 required.
- 7 • We disagree that a cost cap of 1% of total retail revenues should set on ENO incremental
8 expenditures to comply with any RPS. (Report at 27.) The Advisors offered no analytical
9 foundation for the 1% number. EFNO offered a detailed structure relating to a cap on any
10 monthly charge, allocated by customer class (EFNO R-RPS proposal at 14, Section 14.)
11 A bill impact cap is preferable to a retail revenue cap because it ensures a fair distribution
12 of cost impacts. EFNO also provided important details relating to how bill impacts should
13 be calculated. In addition, we disagree with the Advisors’ recommendation that cost-
14 effective energy efficiency spending should count against any cap.
- 15 • We disagree that increased energy efficiency program expenditures should count against
16 the RPS cap on costs, even if they are cost-effective. (Report at 27.) Only net costs
17 should count against any cap. That is why benefit-cost analysis and IRP analysis are so
18 important to the RPS.
- 19 • We disagree with the Advisors that supporting rule changes relating to the IRP, to
20 customer engagement and advice, and other functions should be off-limits in addressing
21 and developing the RPS. (Report at 28, et seq.) As previously explained, an RPS is so
22 profoundly transformational that the Council must stay open to conforming rule changes.
23 Nor does EFNO advocate any violation of legitimate due process rights.

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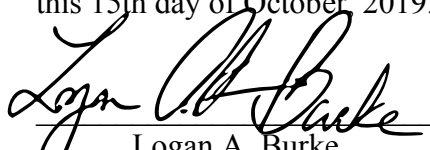
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served by hand delivery to the Clerk of Council with a copy to the Director, Council Utilities Regulatory Office, and upon all known parties of record via electronic mail. New Orleans, Louisiana
this 15th day of October, 2019.


Logan A. Burke

**RULEMAKING PROCEEDING TO ESTABLISH RENEWABLE PORTFOLIO
STANDARDS
DOCKET UD-19-01**

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