



September 30, 2022

By Electronic Mail

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

**RE: RESOLUTION AND ORDER PROVIDING GUIDANCE AND ESTABLISHING
PROCEDURAL DEADLINES WITH RESPECT TO PROPOSED PUBLIC DIRECT
CURRENT FAST CHARGING STATION PROJECT (UD-18-01 and UD-18-07)**

Dear Ms. Johnson,

Please find enclosed the Comments of the Alliance for Affordable Energy in the above-mentioned docket. Please file the attached communication and this letter in the record of the proceeding. We will file physical copies at your instruction. If you have any questions, please do not hesitate to contact me.

Thank you for your assistance with this matter.

Sincerely,

Logan Burke
Executive Director
Alliance for Affordable Energy

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

**IN RE: RESOLUTION AND ORDER
PROVIDING GUIDANCE AND
ESTABLISHING PROCEDURAL
DEADLINES WITH RESPECT TO
PROPOSED PUBLIC DIRECT
CURRENT FAST CHARGING
STATION PROJECT**

**DOCKET NOs. UD-18-01
UD-18-07
RESOLUTION NO. RR-22-393**

COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY

Alliance for Affordable Energy (“the Alliance”) respectfully submits these comments in response to Resolution R-22-392, heard by the New Orleans City Council (“the Council”) on September 1, 2022, with requests for comments to intervenors regarding Entergy New Orleans LLC (“ENO”) filed Request to Modify its Electric Rate Schedules regarding Electric Vehicle Charging Infrastructure (“EVCI”), submitted to the Council on July 21, 2022. The Alliance appreciates this opportunity to provide comments regarding Entergy’s proposed DC Fast Charger proposal.

DC Fast Charger Proposal requires modification

The Alliance is supportive of all efforts to reduce carbon emissions, and is glad to see both the City of New Orleans and ENO pursuing electrification of our transportation systems. We are also encouraged to see Entergy is actively monitoring federal funding that could reduce costs of this transition away from fossil fuels, including Infrastructure Investment and Jobs Act funding.¹ The Alliance agrees that Entergy’s proposal merits consideration, however not as filed, and the proposal requires modifications in order to meet equity and climate goals for New Orleans.

¹ July 21, 2022. Entergy New Orleans’ Request to Modify its Electric Rate Schedule, Pages 5 & 7.

Costs allowed from ratepayers

The Alliance agrees with Entergy that there is a significant need for DC Fast Charging infrastructure and other lower-voltage infrastructure to support the transition to electrified transportation. However, ENO's proposal to use ratepayer funds for either the capital investment for these chargers, and for operations and maintenance of this infrastructure puts an unreasonable risk on the ratepayers of New Orleans who may be forced to pay for these chargers, which represent a new opportunity for revenue for the utility. The language in Entergy's proposal is imprecise and uncertain, including that the cost of the Project will be "...offset in large part..." and that "IIJA funding could reduce the cost of the DCFC Station Project," and "IIJA funds may reimburse..."² While it may be that revenues from Entergy's proposed FCEV Schedule offset some of the project costs, Entergy's filing does not give the Alliance confidence that the proposed initial proposed rates will reduce risk to residential customers.

As the affidavit from Entergy witness Hill points out, the rate the utility is proposing is not based on either "historical data or sufficient projections regarding cost of service and sales volumes."³ Furthermore, ENO's current assumptions suggest the revenues will offset only 65% of the project costs.⁴ While this project would be the first of its kind in Orleans Parish, it certainly will not be the last, and this pilot should not set a precedent for residents to carry these project costs. Finally, as proposed, it is unclear who would be responsible for the fuel costs for this program, as ENO proposes that the FCEV Schedule not be subject to riders including the Fuel Adjustment Clause, but is silent as to how the fuel operations costs will be covered. The electricity that will be sold through these projects will have value, and residents should not be required to absorb those costs through their own FAC.

The Alliance proposes that if the Council approves Entergy's proposal, that no portion of the cost of installation, operation, or maintenance, including fuel/energy costs, of the approved DCFC stations be eligible for recovery from ratepayers, either directly or indirectly.

Opportunity to expand electrification to public vehicles

² Id.

³ July 21, 2022. Affidavit of Samantha Frailey Hill on Behalf of Entergy New Orleans, LLC., page 4

⁴ Id.

Electrification of transportation is a necessary step in the actions required to mitigate the worst impacts of climate change, but it is not just light duty private vehicles that should be electrified. Indeed, a significant increase in public transit, is necessary, as the overall resources required with transit are lower than the current system of transportation that depends on private ownership of vehicles. Furthermore, the benefits of electrification go beyond the long-term climate impacts of greenhouse gas emissions, and include immediate benefits for the occupants of public transit. School children who ride buses each day to and from New Orleans schools are exposed to particulate matter and other air pollutants from diesel exhaust. Particulate matter reductions resulting from bus electrification would improve health and safety for those young riders, in addition to reducing busing fuel costs and GHG emissions.

The Alliance encourages the Council to require ENO to cooperate with the Orleans Parish School Board and/or the Regional Transit Authority to site at least one charging station to be available for bus charging, in order to encourage the transition of public vehicles away from fossil fuels.

Conclusion

The Alliance respectfully submits these comments, and looks forward to the equitable expansion of zero carbon emissions transportation in New Orleans. Measures like electrification should be considered a priority but without certainty of impacts on residential customers, Entergy should recover all costs of the project from the customers who purchase power from the charging projects, and/or any possible federal funding.

**RESOLUTION AND ORDER PROVIDING GUIDANCE AND ESTABLISHING
PRCEDURAL DEADLINES WITH RESPECT TO PROPOSED PUBLIC DIRECT
CURRENT FAST CHARGING STATION PROJECT**

Certificate of Service Dockets UD-18-01 and UD-18-07

I hereby certify that I have, on this 30th day of September 2022, served the foregoing correspondence upon all other known parties of this proceeding by USPS or electronic mail.



Logan Burke
Executive Director
Alliance for Affordable Energy

Lora W. Johnson, lwjohnson@nola.gov

Clerk of Council
City Hall - Room 1E09
1300 Perdido Street
New Orleans, LA 70112
(504) 658-1085 - office
(504) 658-1140 - fax
Service of Discovery not required

Erin Spears, espears@nola.gov

Chief of Staff, Council Utilities Regulatory Office

Bobbie Mason, bfmason1@nola.gov

Christopher Roberts, cwroberts@nola.gov

Jessica Hendricks, Jessica.Hendricks@nola.gov

City Hall - Room 6E07
1300 Perdido Street
New Orleans, LA 70112
(504) 658-1110 - office
(504) 658-1117 – fax

Keith Lampkin, CM Morrell Chief-of-Staff, Kdlampkin@nola.gov

1300 Perdido St. Rm. 2W50
New Orleans, LA. 70112

Andrew Tuozzolo, CM Moreno Chief of Staff, avtuozzolo@nola.gov
1300 Perdido St. Rm. 2W40
New Orleans, LA. 70112

Paul Harang, 504-658-1101 / (504) 250-6837, Paul.harang@nola.gov
Chief of Staff
City Hall - Room 1E06
1300 Perdido Street
New Orleans, LA 70112

Donesia D. Turner, Donesia.Turner@nola.gov
Ashley Spears, Ashley.Spears@nola.gov
Law Department
City Hall - 5th Floor
New Orleans, LA 70112
(504) 658-9800 - office
(504) 658-9869 - fax
Service of Discovery not required

Norman White, Norman.White@nola.gov
Department of Finance
City Hall - Room 3E06
1300 Perdido Street
New Orleans, LA 70112
(504) 658-1502- office
(504) 658-1705 – fax

Tara Richard, Tgrichard@nola.gov
Mayor's Office
City Hall – Room 2E04
1300 Perdido Street
New Orleans, LA 70112

Kenya M. Clay, kmclay@nola.gov
Interim Director of Special Projects, CAO
City Hall – Room 9E06
1300 Perdido Street
New Orleans, LA 70112
(504) 658-8901 - office

Jonathan T. Wisbey, jtwisbey@nola.gov

Chief Technology Officer
City Hall – Room 8W03
1300 Perdido Street
New Orleans, LA 70112
(504) 658-8481

Kimberly W. LaGrue, kwlagrue@nola.gov

Chief Information Officer, ITI
City Hall – 3rd Floor
1300 Perdido Street
New Orleans, LA 70112
(504) 658-7636

ADMINISTRATIVE HEARING OFFICER

Hon. Jeffrey S. Gulin, judgegulin@gmail.com

3203 Bridle Ridge Lane
Lutherville, MD 2109
(410) 627-5357

NEW ORLEANS CITY COUNCIL CONSULTANTS

Clinton A. Vince, clinton.vince@dentons.com

Presley Reed, presley.reedjr@dentons.com

Emma F. Hand, emma.hand@dentons.com

Herminia Gomez, herminia.gomez@dentons.com

Dee McGill, dee.mcgill@dentons.com

1900 K Street NW
Washington, DC 20006
(202) 408-6400 - office
(202) 408-6399 – fax

Basile J. Uddo (504) 583-8604 cell, buddo@earthlink.net

J. A. “Jay Beatmann, Jr. (504) 256-6142 cell, (504) 524-5446 office direct,
jay.beatmann@dentons.com

Dee McGill (504) 524-9101, dee.mcgill@dentons.com

c/o DENTONS US LLP
650 Poydras Street, Suite 2850

New Orleans, LA 70130

Joseph W. Rogers, jrogers@legendcgl.com

Victor M. Prep, vprep@legendcgl.com

Legend Consulting Group

6041 South Syracuse Way, Suite 105

Greenwood Village, CO 80111

(303) 843-0351 - office

(303) 843-0529 – fax

ENERGY NEW ORLEANS, LLC

Courtney R. Nicholson (504) 670-3680, cnicho2@entergy.com

Entergy New Orleans, LLC

Vice-President, Regulatory and Public Affairs

Barbara Casey, (504) 670-3567, bcasey@entergy.com

Entergy New Orleans, LLC

Director, Regulatory Affairs

Polly Rosemond, prosemo@entergy.com

Kevin T. Boleware, (504) 670-3673, kbolewa@entergy.com

Brittany Dennis, bdenni1@entergy.com

Keith Wood, (504) 670-3633, kwood@entergy.com

Derek Mills, (504) 670-3527, dmills3@entergy.com

Ross Thevenot, (504) 670-3556, rtheven@entergy.com

1600 Perdido Street, L-MAG 505B

New Orleans, LA 70112

Vincent Avocato, (281) 297-3508, vavocat@entergy.com

Entergy New Orleans, LLC

2107 Research Forest Drive, T-LFN-4

The Woodlands, TX 77380

Brian L. Guillot, (504) 576-6523, bguill1@entergy.com

Leslie M. LaCoste (504) 576-4102, llacost@entergy.com

Entergy Services, LLC

Mail Unit L-ENT-26E

639 Loyola Avenue

New Orleans, LA 70113

Fax: 504-576-5579

Joe Romano, III (504) 576-4764, jroman1@entergy.com

Tim Rapier, (504) 576-4740, trapier@entergy.com

Farah Webre, fwebre@entergy.com

Lacresha D. Wilkerson, (504)576-6571, lwilke1@entergy.com

Linda Prisuta, lpisut@entergy.com

Ed Wicker, ewicker@entergy.com
Mail Unit L-ENT-4C
639 Loyola Avenue
New Orleans, LA 70113
Fax: (504) 576-6029

ALLIANCE FOR AFFORDABLE ENERGY

Logan Atkinson Burke, (504) 208-9761, logan@all4energy.org
Sophie Zaken, regulatory@all4energy.org
4505 S. Claiborne Ave
New Orleans, LA 70125

GULF STATES RENEWABLE ENERGY INDUSTRIES ASSOCIATION (GSREIA)

Jeffrey D. Cantin, President (504) 383-8936, jcantin@gsreia.org
400 Poydras St., Suite 900
New Orleans, LA 70130

EV LOUISIANA (“EVLA”)

Jeffrey D. Cantin, Director (504) 931-0954, info@ev-la.org
2803 Saint Philip Street
New Orleans, LA 70119