



January 12, 2023

By Electronic Mail

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

IN RE: RESOLUTION AND ORDER ESTABLISHING RULEMAKING TO CONSIDER SAVINGS TARGETS AND PROGRAM DESIGN FOR ENERGY EFFICIENCY, CONSERVATION, DEMAND RESPONSE AND OTHER DEMAND-SIDE MANAGEMENT PROGRAMS AS WELL AS CUSTOMER-OWNED DISTRIBUTED ENERGY RESOURCES AND BATTERY STORAGE

Dear Ms. Johnson,

Attached please find the Responsive Comments of the Alliance for Affordable Energy and the National Audubon Society in the above matter. Please file the attached document 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,

Susan Stevens Miller
Senior Staff Attorney
Earthjustice

Cc: Official Service List for Docket UD-22-04

BEFORE THE COUNCIL OF THE CITY OF NEW ORLEANS

**IN RE: RESOLUTION AND ORDER)
ESTABLISHING RULEMAKING TO)
CONSIDER SAVINGS TARGETS)
AND PROGRAM DESIGN FOR)
ENERGY EFFICIENCY,)
CONSERVATION, DEMAND)
RESPONSE AND OTHER DEMAND-)
SIDE MANAGEMENT PROGRAMS)
AS WELL AS CUSTOMER-OWNED)
DISTRIBUTED ENERGY)
RESOURCES AND BATTERY)
STORAGE)**

DOCKET NO. UD-22-04

**RESPONSIVE COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY AND
THE NATIONAL AUDUBON SOCIETY**

Date: January 12, 2023

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**RESPONSIVE COMMENTS OF THE ALLIANCE FOR AFFORDABLE
ENERGY AND THE NATIONAL AUDUBON SOCIETY**

As provided in the Council of the City of New Orleans (“Council”) Resolution No. R-22-413¹, the Alliance for Affordable Energy (“AAE” or “the Alliance”) and the National Audubon Society (“Audubon”) (collectively, the “Joint Parties”) submit these Responsive Comments containing observations and perspectives on several issues raised in other parties’ comments submitted on October 31, 2022, and in the Technical Conference that was convened on December 8, 2022. We will note that there are several key points of agreement between the Alliance; Entergy New Orleans, LLC (“ENO” or “the Company”); and other intervenors that

¹ Resolution No. R-22-413, Resolution and Order Establishing Rulemaking to Consider Savings Targets and Program Design for Energy Efficiency, Conservation, Demand Response and Other Demand-Side Management Programs as Well as Customer-Owned Distributed Energy Resources and Battery Storage (Sept. 15, 2022) (“Resolution No. R-22-413”), <https://council.nola.gov/council/media/Assets/Committees/Climate/R-22-413-Rulemaking-Docket.pdf>.

suggest the Council can confidently continue to pursue high efficiency savings in New Orleans, though there are important nuances for it to consider.

In particular, the Joint Parties will comment on the following:

- The Company’s recommendation not to set savings goals above 2.0%;
- “Enforcement” of building efficiency standards;
- Geographic targeting of programs, and program models for consideration to increase participation and savings in such efforts.
- Comprehensive Analysis of Current Energy Smart Programs and New Savings Opportunities.

As requested during the Technical Conference, the Joint Parties will also provide information and resources to inform the Council and Advisors regarding the operational characteristics and mandates of Demand-Side Management (“DSM”) Working Groups in several other jurisdictions.

1. The Council Should Establish an Overall Savings Goal of at Least 2%.

In initial comments in this proceeding, AAE recommended that the Council “[m]aintain the 2% goal as a minimum achievement threshold for energy efficiency (“EE”) savings funded through [ENO] program funds beginning in PY16 for at least the next three-year program cycle.”² In its comments, the Company noted that both the GDS and Guidehouse potential studies determined that at least 2.0% annual savings were achievable through the latter years of this decade.³ ENO also observed that implementation of the federal Energy Independence and

² Comments of the Alliance for Affordable Energy at 2 (Oct. 31, 2022) (“AAE Comments”).

³ Energy New Orleans, LLC’s Comments on Proposed Changes to the Council’s Energy Efficiency and Related Policies, at 2 of 13 (Oct. 31, 2022) (“ENO Comments”).

Security Act statute, coupled with new local building code updates, will reduce available savings and thus “does not recommend setting targets above the 2% threshold.”⁴

While the Joint Parties and ENO both agreed that 2.0% savings is an appropriate requirement for the coming program cycle, AAE raised important considerations regarding which savings ENO should pursue. Specifically, AAE recommended that “at least 15% of total portfolio savings should result from the participation of [income qualified (“IQ”)] households in program offerings that are specifically designed to serve the needs of the IQ community, such as the IQ Weatherization program.”⁵ The Joint Parties agree that the overall level of savings is important and that savings for all sectors should be maximized, but prioritization of programs for IQ households within the total 2% is at least equally important. For example, AAE has proposed an arrearage management program (attached as Appendix A) through the working group established pursuant to Council Resolution R-22-143 that would pair debt forgiveness over time with enrollment in the Energy Smart program. Customers who have fallen into arrears should be actively directed into the program in order to provide them the improvements necessary to keep from falling behind. We urge the Council and Advisors to insist that this prioritization is reflected in ENO’s portfolio design, and not allow it to default to the proposed commercial sector savings increase while simultaneously decreasing much needed residential and IQ energy efficiency services.

In comments filed in October, AAE recommended “the Council set a Demand Reduction target that aligns with the achievable potential identified in the study, with a long-term goal of demand reductions from DR programs to reach 7% of projected peak load, and reduction targets

⁴ *Id.* at 2–3 of 13.

⁵ AAE Comments at 10 (internal citation omitted).

at intervals along the way, including 6% by 2030.”⁶ In its comments ENO stated that it “is looking forward to working with stakeholders to determine demand reduction goals as well as a performance incentive mechanism that allows a reasonable reward for ENO hitting those goals.”⁷ The Joint Parties suggest that it would be beneficial for the Council, upon establishing the DSM Working Group, to direct it to: (1) consider and develop a recommendation for demand reduction goals for Energy Smart; and (2) provide the Council with a report detailing its recommendations.

The Joint Parties also, again, call attention to the importance of the discount rate in determining the amount of cost-effective savings that are potentially available to ENO. ENO states that “[b]ecause ENO is investing its own funds to implement Energy Smart programs, it is reasonable to evaluate cost effectiveness of those programs using ENO’s WACC.”⁸ The Joint Commenters find this statement to be flawed because ENO recovers its Energy Smart program expenditures from its ratepayers—meaning in effect that it is ratepayer dollars, and not ENO’s own funds that are invested. In discussing how to determine the discount rate that should be used in cost-effectiveness testing, the *National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources* says that “[t]he utility WACC is typically used to indicate the time preference for investor-owned utilities . . . [t]he key goal of utility investors is to maximize the returns on their investment.”⁹ However, the manual further states that “[a]n objective of utility cost-effectiveness analysis is to identify those resources that will best serve utility customers

⁶ *Id.* at 18.

⁷ ENO Comments at 4 of 13.

⁸ *Id.* at 6–7 of 13. WACC refers to “Weighted Average Cost of Capital.”

⁹ Woolf, Tim, et. al., *National standard Practice Manual: For Benefit-Cost Analysis of Distributed Energy Resources*, National Energy Screening Project, at p.G-3 of Appendix G. Discount Rates (Aug. 2020), <https://www.nationalenergyscreeningproject.org/national-standard-practice-manual/>.

over the long term . . . [t]hus, the utility customer time preference is an important consideration in determining the appropriate discount rate for analyses.”¹⁰

Further, the discount rate used in cost-effectiveness testing is divorced from ENO’s ability to earn a return on dollars it invests in Energy Smart. ENO’s cost-recovery for Energy Smart investments is determined by the Council—a fact that is discussed by ENO in its comments.¹¹ Therefore, ENO’s WACC is not the correct discount rate to use for benefit-cost analysis of Energy Smart programs. The Joint Parties raise the issue of the discount rate again in anticipation that other stakeholders may raise concerns that much higher levels of IQ participation will not be possible to achieve while maintaining portfolio cost-effectiveness. Such discussions, if they occur, should be based on analyses using a discount rate that reflects the customer or societal perspective rather than WACC.

2. Geographic Targeting of Programs, and Program Models for Consideration.

During the Technical Conference, ENO indicated that it is planning to implement geographic targeting of program outreach to areas experiencing high energy burdens and heat island effects, and in fact that Aptim has already begun this work. In its written comments, ENO indicated that “[o]ver the last three years alone, the [Energy Smart] Program has helped 2,334 income-qualified customers by installing energy savings measures in their homes and apartments at no cost to them. In many cases, these customers live in geographic areas of the city that are affected by heat islands or particularly severe energy burdens.”¹² The Joint Parties appreciate these efforts and look forward to their continuation and expansion.

¹⁰ *Id.*

¹¹ ENO Comments at 4–6 of 13.

¹² *Id.* at 1–2 of 13.

In support of this approach, the Joint Parties suggest consideration of a program model similar to the “Neighborhood Energy Savers” (“NES”) program implemented by Duke Energy in its Carolina territories. NES targets communities where a relatively high percentage of households meet income-eligibility criteria, and effectively goes door-to-door to provide direct-install measures to as many households as want to receive them. Importantly, the direct-install includes an assessment of the opportunity to install comprehensive energy efficiency measures such as insulation and air-sealing, which are subsequently installed at no cost to the household where applicable. Energy Smart could reduce energy burdens by using an example such as NES as a model in its efforts to target those communities that most need support.

The Joint Parties also support the Sierra Club’s geographic targeting model developed with DTE Energy in Michigan.¹³ Their model notably incorporates pre-weatherization health and safety measures and provides a blueprint of how to work with stakeholders to develop such a program.¹⁴

3. Savings From “Enforcement” of Building Efficiency Standards.

In its written comments, ENO notes that “many examples illustrate that the best scenario exists when energy efficiency programs support the enforcement of building efficiency standards. As such, ENO recommends using the energy efficiency programs to support enforcement of building efficiency standards.”¹⁵ The Joint Parties agree with ENO that Energy Smart can find additional savings by supporting building energy efficiency standards. However, as the Joint Parties observed during the Technical Conference, experience in other jurisdictions

¹³ See Sierra Club Comments at 6–8 (Oct. 31, 2022).

¹⁴ *Id.* Please refer to Sierra Club’s comments and associated exhibits filed in this docket on Oct. 31, 2022 for more details.

¹⁵ ENO Comments at 7 of 13.

suggests that “enforcement” is not the best term to use when discussing the role of energy efficiency programs with respect to codes and standards. As many code officials might tell you, their role in enforcement can make it hard to gain cooperation of building owners because of the fear that they will be assessed fines for non-compliance. However, this is not to say that there is not a significant role for the program to play in supporting code verification and compliance. Success in this regard hinges on customers’ understanding that the program’s role is support and that it will not be reporting violations to code enforcement officials. For example, when Vermont implemented an energy code for new homes, Efficiency Vermont modified its home energy rating reports so that they could produce a compliance certificate for homes that met the standards, thus saving the builders from having to do self-certification.¹⁶ As builders began to recognize how easy this made it for them to comply with the code, program participation increased, and the program was able to support an increase in reported savings.

4. Discussion: Demand-Side Management Working Group.

In its initial comments, AAE recommended implementation of a DSM Working Group. In the Technical Conference, parties asked AAE to provide information about such working groups to better inform its consideration. As consultants to AAE and other groups across the country, Energy Futures Group (“EFG”) participates in numerous energy efficiency collaboratives and DSM stakeholder groups. Some of these, along with other working groups and some of their operating characteristics, are referenced in the matrix provided in Appendix B. The Joint Parties would also refer the Advisors and parties’ to review the report *Energy*

¹⁶ The Joint Parties’ consultant for this case and author of this document, Jim Grevatt of Energy Futures Group, was Director of Residential Programs at Efficiency Vermont at this time.

*Efficiency Collaboratives: Driving Ratepayer-Funded Efficiency through Regulatory Policies Working Group.*¹⁷

In its experience, EFG agrees with the report referenced above that successful collaboratives reflect certain overarching principles, including the following:

- Have clear objectives and operating procedures;
- Are public, transparent, and inclusive;
- Evaluate their work to ensure it is productive and useful;
- Have a strong, experienced facilitator—preferably who is independent of any of the parties to the collaborative;
- Have influence with regulators.¹⁸

While all of these characteristics are important, having influence with regulators deserves special attention. The report states that a “A virtuous cycle can be created if a collaborative does quality work and the commission gives weight to the findings and conclusions of the collaborative.”¹⁹ The Joint Parties agree. Clear directives from the Council regarding tasks the DSM Working Group should accomplish, and the successful accomplishment of those tasks, will be critical to achieving this level of influence. Doing so will improve the programs, better align them with policies of the Council, and streamline regulatory processes.

The Arkansas Parties Working Collaboratively (“PWC”) provides an instructive model for how a DSM Working Group can support the work of regulators. The Arkansas Public Service Commission routinely tasks the PWC with specific deliverables and timelines. When work

¹⁷ The State and Local Energy Efficiency Action Network, *Energy Efficiency Collaboratives: Driving Ratepayer-Funded Efficiency through Regulatory Policies Working Group* (Sept. 2015), <https://www.energy.gov/sites/default/files/2021-07/EECollaboratives-0925final.pdf>.

¹⁸ *Id.* at 27–29.

¹⁹ *Id.* at 6.

products are received, the Commission can act on recommendations from the group, implementing recommendations through regulatory decision-making.²⁰ ENO's sister company participates in the PWC, and thus can bring its experience to bear for ENO.

For example, the Council could task the DSM Working Group with drafting principles and objectives for geographically targeted energy efficiency programs, considering Sierra Club's recommendations and other successful models, which it could then approve and direct ENO to implement. If all parties agree to the principles and objectives, it could save the Council from a more drawn-out process where it must serve as the arbiter of divergent viewpoints, thus streamlining the entire process. Other issues, such as benefit-cost testing protocols, ENO performance incentives, the possible addition of demand savings and greenhouse gas reduction targets, and strategies for leveraging Inflation Reduction Act funding could similarly be directed to the DSM Working Group for development.

The Joint Parties encourage the Council to prioritize establishing the DSM Working Group and identifying an appropriate facilitator for Energy Smart as early as practicable in 2023. The DSM Working Group should then develop a set of operating principles and practices to submit to the Council for approval. The Joint Parties recommend the Council also provide the DSM Working Group with prioritized tasks for 2023 with specific timelines and deliverables, including the development of a fulsome geographic targeting program to be submitted to the Council for approval by September 1, 2023. Assuming the program is submitted with the broad agreement of the DSM Working Group, the Council could approve the program on an expedited schedule so that Energy Smart can ramp up the benefits it provides to highly energy-burdened households.

²⁰ *Id.* at 17.

5. Comprehensive Analysis of Current Energy Smart Programs and New Savings Opportunities.

We would additionally encourage the Council to initiate a deeper, more comprehensive analysis of Energy Smart program designs and operational practices to identify new savings efficiency opportunities going forward. This work could run in tandem with the DSM Working Group and be completed ahead of Council decision-making on future implementation plans. Such analysis could include comparing Energy Smart programs to offerings in other jurisdictions as a way to identify potential new program offerings and deployment strategies. It could also include evaluation of changes to customer incentive levels as a way to maximize savings, increase adoption of underutilized measures, and reach underserved customer segments. Useful insights could also be drawn through a comprehensive set of surveys for participating and non-participating customers, energy efficiency installers, and third-party program administrators, with a focus on existing constraints and potential new savings opportunities drawn from their hands-on experience in the field.

We are confident that such an analysis will enable the Council to identify significant new savings opportunities, which could be essential to maintaining and growing efficiency savings in the future, while helping to make up for reduced savings from lighting and changing baselines. In the past, the Council has hired its own consultants to conduct demand side management potential analysis, which in turn supported the Council's success in pursuit of the 2% annual savings target. For many of the same reasons, we propose that the Council be the one to hire and oversee this proposed comprehensive analysis of current Energy Smart programs and new savings opportunities.

6. Conclusion.

In conclusion, AAE and Audubon appreciate this opportunity to respond to filed comments and comments made at the Technical Conference. The Joint Parties reserve the right to offer further recommendations as the case proceeds and as stakeholders continue to confer.

Respectfully,

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Arrearage Management Program Proposal of the Alliance for Affordable Energy

OBJECTIVES

The objective of the Arrearage Management Program (“AMP”) is to help utility customers meet their energy needs by providing arrearage forgiveness. The goals are:

- Reduce or eliminate existing arrearages.
- Bring accounts current.
- Put customers in a position to avoid disconnection and remain current in their payment obligations to ELL going forward.
- Benefit nonparticipating customers by reducing uncollectible expenses and other costs of service, such as those related to collection and disconnection.

ELIGIBILITY

- Customer, if eligible, shall participate in low income benefits program(s) (such as LIHEAP)
- Active customer or customer who was disconnected in last 6 months
- Minimum arrearage balance of \$300 that is a minimum of 60 days past due
- Enrolled or willing to enroll in budget billing

PARAMETERS:

- Each month, customers receive a credit or matching payment toward their unpaid account balances.
- Customers who enter the program with arrearages of \$3,600 and under receive monthly credits equivalent to 1/12 of their arrearages, allowing for complete arrearage forgiveness within 12 months.
- Customers who enter the program with arrearages of over \$3,600 receive monthly credits equivalent to 1/24 of their arrearages, and their time in the program may be extended to allow for full arrearage forgiveness.
- Participants shall be enrolled in the energy efficiency program and shall receive an energy audit, LEDs and low-flow showerheads at a minimum, and full Income Qualified Weatherization through Energy Smart if qualified.
 - The reconnection fee for terminated customers is waived.

EDUCATION & OUTREACH

The Utility shall make all reasonable efforts to personally contact and helpfully educate every delinquent customer on the AMP. The utility shall commence communication with the delinquent customers in a manner most likely to lead the customer to participate in the AMP.

The utility shall contact each delinquent customer regardless of that customer's current participation in another payment option.

All communications shall include a way for the customer to contact a customer service representative.

REPORTING

One-Year Impact Analysis

Each year the utility will prepare an analysis examining a full year of bills, payments, arrears, collections actions, and terminations before and after enrollment.

Included in this analysis should be heating type, household income, poverty level, program status (active versus removed participants), arrearages (average monthly credits), and shut-off status at enrollment.

Cost Recovery

The utility shall create a regulatory asset of the alleged costs of the AMP specific administration and may seek recovery of these costs in its next rate case.

Appendix B
Matrix of Work Groups
page 1 of 1

	EmPOWER Maryland	Illinois Stakeholder Advisory Group	Arkansas Parties Working Collaboratively	Dominion Energy Virginia Collaborative	Duke Carolinas Collaborative	Dominion Energy SC Advisory Group
Topics addressed	LI and portfolio goals, evaluation protocols, savings methods, cost recovery	Utility Plans, TRMs, evaluations	TRM, evaluations, new program development, non-energy benefits valuation	New program ideas, planning, EM&V plan and protocols, statutory goals, program performance	Enhanced and increased program participation, new programs, pilot programs, cost effectiveness, program performance	Potential Study, program performance, enhanced program ideas
Multiple Targeted Work Groups	X	X		X	X	
Meeting Frequency	As needed, dependent on Commission directives for reports	As-needed for multiple subgroups		4x/year plus subgroups	6x/year plus additional targeted meetings	4x/year
Specific directives from Commission	Yes - the PSC provides direction for work groups to address specific topics, work group reports filed with Maryland PSC, Case No. 9648.	Yes - the SAG is given specific assignments by the ICC	Yes - the Commission provides direction for specific work items that they must report back on		Commission directs topics for discussion but generally not for reporting back with recommendations	
Independent Facilitation	No	Yes	Yes	Yes	No	Yes
Facilitation	Typically Commission Staff, the Independent Evaluator, DHCD, or a PULJ	https://www.celajohnsonconsulting.com/	https://johnsonconsults.com/	https://www.ipa-llc.org/	Facilitated by Duke staff	https://www.crai.com/
Additional Information	https://webpsc.psc.state.md.us/DMS/case/9648	https://www.ilsag.info/	https://www.academia.edu/9361374/All Together Now How Collaboration Works in Arkansas			

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I, Maya DeGasperi, hereby certify that I have this 12th day of January, 2023, served copies of the foregoing on all known parties on the Official Service List for Docket No. UD-22-04 by electronic mail.



Maya DeGasperi
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Earthjustice

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