



April 17, 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 Second Joint Reply Comments of the Alliance for Affordable Energy and the National Audubon Society to the Advisors Report 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,

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

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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

**SECOND JOINT REPLY COMMENTS OF THE ALLIANCE FOR AFFORDABLE
ENERGY AND THE NATIONAL AUDUBON SOCIETY ON ADVISORS' PROPOSED
REVISIONS**

Date: April 17, 2023

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DOCKET NO. UD-22-04

SECOND JOINT REPLY COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY AND THE AUDUBON SOCIETY ON THE ADVISORS' REPORT

I. SUMMARY OF REPLY COMMENT RECOMMENDATIONS

Building on the recommendations presented by the Alliance for Affordable Energy and the National Audubon Society throughout this proceeding, the recommendations presented for consideration by the Council in these reply comments can be summarized as:

- Maintain the 2% annual efficiency savings target through Program Year 15 and beyond, until such time as there is new information indicating there are compelling reason for the targets to be reconsidered.
- Accept the Advisors' recommendation for a 3% demand target, with a requirement that the company demonstrate actual savings capability, rather than registered enrollment.
- The Demand Side Management Working Group should be modeled after the Arkansas Parties Working Collaboratively, with a subject matter experienced independent facilitator and specific actionable deliverables with timelines tied to future Council decision-making.
- Geographic targeting for the Energy Smart program should follow the approach outlined by the Sierra Club.
- Income qualified programs should be exempt from the Total Resource Cost test requirements for standard programs.

- A New Orleans specific benefit-cost analysis framework should be created to reflect local policy priorities, including carbon reduction, energy justice, reducing energy burden, stimulating economic development, and other impacts. A working group established for this purpose should take advantage of the updated and expanded capabilities of the National Standard Practice Manual.
- The Council should recognize the unique value of a Demand Side Management in-depth analysis and task the Demand Side Management Working Group with developing a scope of work for future consideration by the Council.

II. BACKGROUND

On September 15, 2022, the Council of the City of New Orleans (“Council”) issued Resolution No. R-22-413 regarding considerations related to setting goals for Energy Smart programs beginning in Program Year (“PY”) 16. In the Resolution, the Council establishes “Docket No. UD-22-04 to consider modification of the Energy Smart energy efficiency and conservation program as well as potential Council policy with respect to [demand-side management [(“DSM”)] and customer-owned [distributed energy resources] and energy storage.”¹ On October 31st, 2022, stakeholders filed comments proposing changes to the Energy Smart Program. After a technical conference held on December 8th, 2022, stakeholders filed responsive comments on January 12th. On March 1st, the Advisors filed a report on the stakeholders’ proposed changes and additional guidance. The Advisors agreed with many of the changes that the stakeholders put forward for the Energy Smart program, however they requested more detailed explanations on the method of these changes.² The Advisors reiterated this in the

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, at 4 (Sept. 15, 2022) (“Resolution No. R-22-413”), <https://council.nola.gov/council/media/Assets/Committees/Climate/R-22-413-Rulemaking-Docket.pdf>.

² See Advisors’ Report Regarding Parties’ Proposed Changes and Additional Guidance (Mar. 1, 2023).

March 20th Technical Conference. On March 29th, the Alliance for Affordable Energy (“AAE” or “the Alliance”) and the National Audubon Society (“Audubon”) (collectively “Joint Parties”), as well as the Sierra Club and Entergy New Orleans (“ENO” or, “the Company”) filed responsive comments to the report. The Joint Parties provide these comments in reply to the comments filed on March 29th.

III. COMMENTS

A. The 2% Savings Target Should be Maintained.

We continue to propose that the Council keep the 2% savings target in place through PY 15 and beyond. Energy Smart’s increasing success over the past five years and the associated financial benefit to customers are directly tied to the Council’s decision to set clear targets for high efficiency savings. This is consistent with findings by the American Council for an Energy Efficient Economy (“ACEEE”) that jurisdictions with long-term efficiency savings targets achieve far higher savings performance than those jurisdictions which lack such targets.³

Maintaining the Council’s 2% target not only supports continued achievement of high savings, it sends a signal to the public that the Council remains committed to both reducing energy waste and helping customers lower their energy bills. It also sends a signal to trade allies, on whom future efficiency savings success depends, that the City’s pursuit of energy savings is not slackening. Trade allies should have this clarity to ensure they continue to maintain their workforce and capacity readiness going forward.

How we attain and maintain high energy efficiency savings requires constant evolution over time, as market transformation reduces potential for some measures and new technologies

³ See Rachel Gold, Annie Gilleo, & Weston Berg, Next-Generation Energy Efficiency Resource Standards, ACEEE (Aug. 2019) (“ACEEE Study”), <https://www.aceee.org/sites/default/files/publications/researchreports/u1905.pdf>.

and delivery methods create new opportunities for others. DSM potential studies and the DSM in-depth analysis that we propose will continue to shed new light on future savings opportunities, but the 2% target should remain in place unless and until new information indicates that there is a compelling reason for the targets to be reconsidered.

B. The Joint Parties Concur with the Advisors' Recommendation for a 3% Demand Target but Recommend the Company Collect Actual Savings Instead of Depending on Registered Enrollment.

The Joint parties agree with the Advisors' recommendation to implement a 3% demand target. However, we propose that the Council require that actual demand savings be collected, rather than basing the target merely on registered enrollment in demand savings programs. While the Company has requested that it only be required to achieve 3% based on customer enrollment numbers, we strongly encourage the Council to establish demand saving targets that are tied to actual program performance capabilities. As part of ENO's overall portfolio, demand response has an important energy resource role to play in maintaining grid reliability, particularly during times of high demand. If the strategy for pursuing demand response does not prioritize performance of the resource, it will increase the risk of grid disruption vulnerability at the times when stability is most important. How the demand response program is designed will be key to ensuring adequate customer participation to achieve the 3% savings levels. If, for example, program designs include options for customers to opt-out of specific events, ENO should plan to enroll enough participants to ensure it is able to achieve the required savings levels net of enrolled customers who do not participate.

C. The Demand Side Management Working Group Should Be Modeled After the Arkansas Parties Working Collaboratively Working Group and Should Have Flexibility to Meet as Frequently as Needed.

The Joint Parties agree with the Company, Advisors, and the Sierra Club that the Council should follow the Arkansas Parties Working Collaboratively ("PWC") working group as a model

for the proposed New Orleans DSM Working Group. The Joint Parties appreciate that the Arkansas PWC has an independent facilitator with subject matter expertise, and that the facilitator takes responsibility to ensure that the PWC successfully fulfills its responsibility to complete and present the regulators with deliverables on which decisions can be made.⁴ These essential attributes of how the PWC operates should be emulated when establishing the DSM Working Group in New Orleans. Regular meetings for the DSM Working Group should be held at least quarterly, but the group or subcommittees thereof should have flexibility to meet more frequently in order to complete deliverables.

D. Geographic Targeting

The Joint Parties continue to support the Sierra Club’s proposal to use geographic targeting for the Energy Smart program and encourage the Council, Advisors, and the Company to fully consider Sierra Club’s proposal.

E. New Orleans Specific Benefit-Cost Analysis Framework

The Joint Parties support exempting Income Qualified programs from the Total Resource Cost test requirement, though such programs should still strive to deliver substantial impact value for the dollars spent. We continue to support the creation of a New Orleans-specific Benefit-Cost Analysis (“BCA”) framework (including the development of a societal discount rate) through a focused working group established by the Council.⁵ Establishing a jurisdictional

⁴ See Joint Comments in Response to Order No. 7 Concerning the Proposed PWC Procedural Guidelines, Docket No. 13-002-U, at Ex. A, PWC Proposed Procedural Guidelines (Jan. 10, 2014), https://apps.apsc.arkansas.gov/pdf/13/13-002-u_153_1.pdf; see also Order No. 7, Docket No. 13-002-U (Ark. P.U.C. Feb. 20, 2014), https://apps.apsc.arkansas.gov/pdf/13/13-002-u_159_1.pdf.

⁵ See Joint Reply Comments of the Alliance For Affordable Energy and the National Audubon Society on Advisors’ Proposed Revisions, at 7–9 (Mar. 29, 2023) (“Joint Parties’ March Comments”).

test has value because it could inform the establishment of a societal discount rate, as suggested by ENO in its March 29th comments⁶; would take advantage of the updated and expanded capabilities for BCA set out in the updated National Standard Practice Manual; and would allow integration of the Council’s policy priorities including energy justice, reducing energy burden, stimulating economic development, and other impacts.⁷

F. DSM In-Depth Analysis

The Joint Parties disagree with ENO’s suggestions that an in-depth analysis on Energy Smart program designs and operational practices is potentially duplicative of existing Evaluation Measurement and Verification (“EM&V”) and DSM potential studies, and that hiring a consultant is not necessary to support New Orleans’s ability to maintain high efficiency savings levels going forward.⁸

The central purpose of the DSM in-depth analysis is to answer how New Orleans will continue to achieve sustained annual savings of 2% or more. To do so, it strives to create a comprehensive strategy and roadmap for meeting the Council’s efficiency savings goals over the long term, something neither EM&V nor DSM potential studies provide.

Through 2021, Energy Smart has saved New Orleans customers approximately \$231 million, with the vast majority of those savings (\$171 million) occurring since the Council established escalating targets beginning in 2017.⁹ As noted above, there is a strong correlation between the highest achieving jurisdictions and regulatory requirements for high savings targets. Collectively, savings among jurisdictions with energy efficiency resource standards are four

⁶ See Entergy New Orleans, LLC’s Comments in Response to the Advisors’ Report, at 6 (Mar. 29, 2023) (“ENO’s March Comments”).

⁷ Joint Parties’ March Comments at 9.

⁸ See ENO’s March Comments at 6.

⁹ Figures based on Energy Smart Annual Reports found here: https://www.energy-neworleans.com/energy_efficiency/energy_smart_filings/.

times higher than those without targets.¹⁰ While setting and maintaining targets is clearly impactful, actually achieving and sustaining high savings over time nevertheless requires considerable effort. Doing so will yield considerable financial benefit to customers and help the city achieve its decarbonization targets as well, so figuring out the concrete, actionable steps that will ensure New Orleans is able to reach its efficiency savings targets in both the near-term and long-term is worth the investment.

This current rulemaking has provided an opportunity to reflect on where Energy Smart stands today, and to consider where to go next. Assuming the Council re-affirms its intent to continue pursuing high levels of DSM, the next logical question is where to find new potential savings and how to capture enough new savings each year over the near-, mid-, and long-term.

A DSM in-depth analysis seeks to identify and overcome obstacles to capturing more savings through existing Energy Smart programs, while also looking nationally for new strategies to achieve higher efficiency savings going forward. It is intended to provide deeper, more comprehensive, far-sighted and solutions-oriented insights, beyond the scope of what EM&V and DSM potential studies provide, to support sustained high levels of DSM savings in New Orleans over the long term. Our recommendation at this time is only that the Council include development of a scope of work for this DSM in-depth analysis as a near term task for the DSM Working Group. It is not necessary for the Council to make decisions at this time about funding the study, only to establish the development of a scope of work as a deliverable for presentation to the Council next year.

In our March 29th comments, we did not provide the specifics of such a scope of work, because we believe the diverse perspectives of participants in the DSM Working Group will lend

¹⁰ ACEEE Study at iv.

valuable insight into the design of this analysis. However, to add dimension to this recommendation, we offer the following concepts to generally characterize what such a study could examine.¹¹

Example Scope of Work Elements:

- Deep analysis of existing program barriers, opportunities, and solution strategies
 - Identifying underperforming measures and customer segments
 - Reviewing customer incentive levels and their impact on participation
 - Assessing the relative degree to which all cost-effective efficiency savings are being captured for participating customers
- Consumer awareness marketing analysis
 - What percentage of the population is knowledgeable about Energy Smart and its offerings?
 - What strategies are most likely to increase consumer awareness and participation?
- National review of potentially applicable measures, programs, and delivery channels that are not currently offered in New Orleans
- National review of regulatory policies that could be used to remove barriers to increased efficiency savings
- Recommendations on strategies to integrate and leverage utility program investment with external funding to increase total efficiency savings

The analysis would likely begin with a review of Energy Smart’s existing program design, and include both a comparison to past performance results (building on top of EM&V analysis), and identification of limiting factors in the DSM potential studies—but would also bring distinct value by going much further to produce a comprehensive strategic roadmap for achieving the Council’s savings goals over the long term.

EM&V is primarily concerned with accurately counting past savings for attribution to utility administered programs. Rather than a rearview look at past program performance, the focus of the in-depth analysis is forward looking with a time horizon that extends from the present to strategies for achieving high savings over the long-term. While EM&V includes

¹¹ These are provided only as examples and are not intended to be prescriptive.

process review, it is quite limited in scope and piecemeal at best, lacking the comprehensive portfolio-wide view of an in-depth analysis focused on strategic opportunities. The Technical Resource Manual (“TRM”), which is informed by EM&V could also be of some use to the in-depth analysis, but is not itself concerned with strategies for achieving increased overall savings.

The in-depth analysis is also distinct from DSM potential studies in several important ways. While forward looking, DSM potential studies are inherently conservative in nature. To name just a few of the factors, DSM potential studies, by design, limit future savings based on existing technologies, policies, and projected market adoption dynamics. Most importantly, DSM potential studies are not substantially concerned with how to identify and overcome these limiting factors, which is key to developing a strategic roadmap for sustained long-term savings. Past experience has shown that it is possible to exceed savings levels once described as the upper limit of efficiency potential in previous DSM potential studies. The in-depth analysis we propose actively seeks to identify and overcome the factors that limit efficiency savings in DSM potential studies, while also providing a level of specificity that is actionable for program design in ways that DSM potential studies are not.

The in-depth analysis would go further than EM&V, the TRM, and DSM potential studies by gathering information needed to lay out a pro-active plan by which the Council and ENO can confidently pursue new efficiency savings strategies. This could include, for instance, additional information gathering from on-the-ground sources through surveys of participants, non-participants, program administrators, trade allies, and other stakeholders. Such a survey could examine respondents’ a) familiarity with Energy Smart program offerings, b) their personal experiences with program offerings and operations, and c) observations they may have on ways to improve the programs. This view of what is currently working and not working with

existing Energy Smart programs will help with identifying any other barriers limiting current program effectiveness and finding opportunities to capture new savings. Moreover, by drawing on national research and exploring ways to leverage external resources, like the next decade's worth of federal funding allocations from the Bipartisan Infrastructure Law / Inflation Reduction Act, the analysis will also identify ways to go beyond existing program offerings to deliver higher future efficiency savings impact.

To be clear, the scope of work for the in-depth analysis clearly goes beyond what is already available through EM&V and DSM potential studies. The in-depth study provides the basis on which proactive problem solving can take place, lays out a comprehensive strategy to ensure savings goals will be reached over the long-term, and details a roadmap of actionable choices for capturing new efficiency savings well into the future. Properly designed and executed, such an analysis should give due consideration to related goals of lowering customer energy bills, achieving equitable outcomes, and reducing New Orleans' carbon footprint. Without such an analysis, New Orleans will lack a clear understanding of how to successfully achieve sustained high efficiency savings levels going into the future.

IV. CONCLUSION

In conclusion, the Joint Parties appreciate the opportunity to respond to the Advisors' Report Regarding Parties' Proposed Changes and Additional Guidance and welcome the opportunity to answer any further concerns about the Parties' proposed changes.

[continued for signatures]

Respectfully,

Date: April 17, 2023

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OWNED DISTRIBUTED ENERGY RESOURCES AND BATTERY STORAGE**

I, Maya DeGasperi, hereby certify that I have this 17th day of April, 2023, served copies of the foregoing on all known parties on the Official Service List for Docket No. UD-22-04 by electronic mail.



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