



January 31, 2024

Via Electronic Mail

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

In Re: ESTABLISHING A SMART CITIES INITIATIVE FOR THE CITY OF NEW ORLEANS,
ELECTRIC VEHICLES CHARGING, AND RELATED REGULATORY ISSUES (Docket No.
UD-18-01)

Dear Ms. Johnson:

Please find the enclosed Final 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 submit physical copies at your instruction. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention.

Sincerely,

Jesse S. George
New Orleans Policy Director
Alliance for Affordable Energy

**Before
The Council of the City of New Orleans**

**In Re: ESTABLISHING A SMART CITIES
INITIATIVE FOR THE CITY OF NEW ORLEANS,
ELECTRIC VEHICLES CHARGING, AND
RELATED REGULATORY ISSUES**

DOCKET NO. UD-18-01

JANUARY 31, 2024

**FINAL COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY ON THE
REVISED RESILIENCE PROPOSALS OF ENTERGY NEW ORLEANS, LLC AND
TOGETHER NEW ORLEANS**

I. INTRODUCTION

On September 7, 2023, the New Orleans City Council (“the Council”) adopted Resolution R-23-396 under the instant docket to establish procedural deadlines around continuing efforts to encourage the development of electric vehicle (“EV”) charging infrastructure and EV adoption in the City of New Orleans. Per the procedural schedule, on October 9, 2023, Entergy New Orleans, LLC (“ENO”) filed a report on the status of its infrastructure, investments, and incentives around EVs. Subsequently, on November 8, 2023, the parties held the first of two technical conferences required by the procedural schedule, followed by a round of preliminary comments filed on November 17, 2023. The parties held a second technical conference on December 5, 2023, and on December 19, 2023, ENO filed an Idle Fee Application under docket UD-18-07, pursuant to its stated intent under this docket to implement idle fees for EV charging stations. The Alliance for Affordable Energy (“Alliance”) now submits the following final comments in accordance with the procedural schedule:

II. ENO'S PROPOSED IDLE FEE IS REASONABLE

As the Alliance noted in our preliminary comments, we are generally supportive of this idea as the most direct way to address the issue of drivers remaining at EV charging stations past the point of full charge. We conditioned our support on the fee being set at a reasonable level and also on the existence of a cap that would limit the maximum penalty.

In its Idle Fee Application under UD-18-07, ENO has proposed an idle fee of \$0.30 per minute after a grace period of 30 minutes, with a cap of \$30 total. In contrast, Electrify American charging stations have a per-minute idle of \$0.40¹, whereas Tesla-owned supercharging stations charge as much as \$1.00 per minute for idle vehicles.² Thus, ENO's proposal seems reasonable, and the Alliance does not object to its implementation.

III. ENO'S PROPOSED ACCOUNTING METHODOLOGY FOR EV CHARGING REVENUE IS REASONABLE

The Alliance supports ENO's proposal to account EV charging revenue as operating revenue, to record revenues received under the EV schedule to Federal Energy Regulatory Commission's ("FERC") account 456 (Other Electric Revenues), and to treat them as miscellaneous revenues for ratemaking purposes. The Alliance appreciates this opportunity to use revenues from EV charging to meet ENO's annual revenue requirements without increasing residential costs.

IV. THE ALLIANCE REURGES THE COUNCIL AND ENO TO PRIORITIZE PUBLIC TRANSIT WHEN CONSIDERING EV CHARGING INFRASTRUCTURE

One of the primary concerns of EV drivers identified at the first technical conference is "range anxiety", or the uncertainty of knowing whether one's destination will have sufficient

¹<https://www.electrifyamerica.com/glossary/#:~:text=Idle%20Time,unplugged%20and%20moved%20your%20vehicle.>

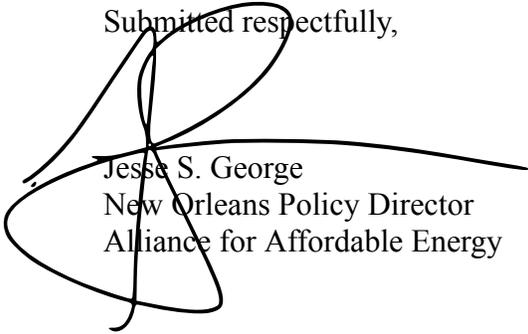
² <https://www.tesla.com/support/charging/supercharger/fees#:~:text=Supercharger%20Congestion%20Fee>

charging infrastructure to allow charging for a return trip. As EV adoption expands along with the geographic footprint of charging infrastructure, it will be important for the Council to adopt regulations and policies to encourage maximal investment in electrifying and expanding public transit as the most efficient use of these resources.

V. CONCLUSION

The Alliance thanks the Council for this opportunity to comment, and we urge the Council to require clear accounting around the costs to ratepayers of ENO-owned EV charging infrastructure.

Submitted respectfully,



Jesse S. George
New Orleans Policy Director
Alliance for Affordable Energy

**Before
The Council of the City of New Orleans**

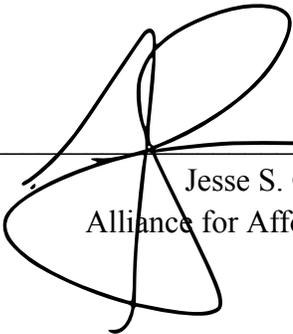
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JANUARY 31, 2024

CERTIFICATE OF SERVICE

I do hereby certify that I have, this 31st day of January 2024, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



Jesse S. George
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