VOTE SOLAR

350 NEW ORLEANS

June 3, 2019

By Hand Delivery

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

In Re: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND OPENING A RULEMAKING PROCEEDING TO ESTABLISH RENEWABLE PORTFOLIO STANDARDS
DOCKET NO. UD-19-01

Dear Ms. Johnson,

Please find enclosed an original and three (3) copies of the parties Vote Solar and 350 New Orleans first round of comments in accordance with the procedural schedule established in Resolution R-19-109, with the Service List for the above-mentioned docket. Please file the attached communication and this letter in the record of the proceeding and return one time stamped 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 consideration.

RECEIVED
JUN 03 2019
BY:

Best Regards,

Andy Kowalczyk 06-03-19
Just Transition Group
350 New Orleans

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BEFORE THE CITY COUNCIL OF NEW ORLEANS

UTILITY, CABLE, TELECOMMUNICATIONS AND TECHNOLOGY COMMITTEE

Establishing a Docket and Opening a Rulemaking Proceeding to Establish Renewable Portfolio Standards	**Docket No. UD-19-01**

OPENING COMMENTS OF VOTE SOLAR AND 350 NEW ORLEANS ON ESTABLISHMENT OF A RESILIENT AND RENEWABLE PORTFOLIO STANDARD (R-RPS)

Vote Solar[1] and 350 New Orleans appreciate this opportunity to provide comments regarding the establishment of a Renewable Portfolio Standard for the City of New Orleans. Vote Solar and 350 New Orleans join with several other parties in calling for the establishment of an ambitious and homegrown renewable energy standard that addresses New Orleans' unique challenges by bolstering energy resilience and promoting equitable access to the economic, environmental, and health benefits of a cleaner electrical grid. We propose a "resilient" renewable energy portfolio standard ("R-RPS") that anchors twin policy objectives of improving the operation and resilience of the grid while promoting a just sharing of a twenty-first century clean energy economy with **all** of the City's citizens. We recognize that the achievement of such

[1] Vote Solar is a 501(c)3 nonprofit working to repower the U.S. with clean energy by making solar power more accessible and affordable through effective policy advocacy. Vote Solar seeks to promote the development of solar at every scale, from distributed rooftop solar to large utility-scale plants. Vote Solar has over 80,000 members nationally, including members in Louisiana and within New Orleans. Vote Solar is not a trade group and does not have corporate members.

important goals will be iterative and require ongoing collaboration with a diverse set of stakeholders and experts. But establishing the roadmap and setting those objectives is a critical and timely first step that is already within the Council's reach.

We recognize with humility that a home-grown solution is required that addresses the unique attributes, opportunities, and urgencies of the City of New Orleans, but offer the following responses to Council questions based on our experiences across the country. We are actively working to support local partners and community organizations to bring the Council a fully articulated R-RPS proposal, based on the outlines discussed in our and other intervenor responses. We expect to present this full proposal in reply comments, as it will be informed by the written comments of all intervenors as well as the informal input of essential community stakeholders who best understand the challenges facing residents of New Orleans with high energy burdens and vulnerable environmental conditions driven by the energy sector.

For a successful R-RPS to benefit all citizens of New Orleans, equity must be a central pillar. Low-income and underserved communities in New Orleans face unique barriers and vulnerabilities that an R-RPS should be designed to relieve. Locally-sited renewable energy resources like rooftop solar paired with battery storage (e.g., onsite residential or community-based) and renewable microgrids (sited in critical areas of the community to ensure continuity of essential services to protect public health during emergency conditions) could stimulate new local economies and provide significant quality of life improvements for vulnerable populations through lower bills and improved service continuity and quality. An equitable approach to an R-RPS should inform all aspects of this effort: R-RPS renewable penetration goals, hearing procedure, and implementation processes. Ratepayers, low-income

households, and communities of color are perhaps the most important and traditionally most overlooked stakeholders in the electricity system of New Orleans, and the Council should ensure that they get adequate opportunity to provide input into the R-RPS, both now and as it is implemented over time.

In addition, we propose that a Renewable Portfolio Standard in New Orleans should put a special emphasis on renewable energy resources that provide energy resiliency (i.e., provide participating customers and critical infrastructure a source of power after outages and emergency conditions). Encouraging distributed renewable energy—i.e., resources interconnected to the ENO distribution system—inherently help the transition to a more resilient New Orleans. According to the US Energy Information Administration, Entergy New Orleans ranked in the lowest-performing tenth of investor-owned utilities in System Average Interruption Duration Index (excluding weather events) in 2017. Through a resilient RPS (R-RPS), distributed renewable power could provide points of stability and resiliency at times when the broader grid is not providing electricity. Homes[2], schools, police and fire stations, and even grocery stores with this capacity will provide critical support during and in the direct aftermath of extreme weather events like heat waves or tropical storms. The focus should be on preserving life, public health, and quality of life.

At the outset of this process, the Council should carefully consider the goals that they intend to achieve through crafting this policy. Examples across the country show that Renewable Portfolio Standards are effective tools for not only creating a cleaner energy mix, but also

[2] We propose that any program supporting residential battery storage as part of a resilience measure should prioritize low-income citizens that depend on electric-powered medical devices or on critical medicines that require constant refrigeration.

bolstering jobs, supporting healthy communities, and supporting a local clean energy economy. If developed and designed effectively, an R-RPS could blaze a trail to show the country how to create a more equitable and resilient grid in New Orleans. Vote Solar and 350 New Orleans look forward to working with and learning from stakeholders throughout this process to achieve an R-RPS that truly reflects and advances the interests of **all** New Orleanians. We thank the Council for opening this docket and appreciate the opportunity to provide these comments for consideration.

SPECIFIC RESPONSES TO THE COUNCIL'S QUESTIONS

1. **What would an appropriate RPS target for New Orleans be, and should it be a requirement or a goal?**

RESPONSE to Q1: Vote Solar and 350 New Orleans urge the council to develop a mandatory renewable energy standard, rather than a voluntary goal. A voluntary renewable energy goal sends an unclear policy signal to all stakeholders: Utilities are left to make their own decisions about what level of disrupting business as usual is appropriate for achieving the goal, and ratepayers lack a standard of accountability or timeline for the benefits of clean energy. In contrast, a requirement sets clear goals for utilities and solid expectations for other stakeholders. Similarly, frequent interim goals maintain accountability and transparency, and ensure that Entergy New Orleans is making adequate and appropriate investments toward a resilient, renewable-powered grid.

Utilities within the Midcontinent Independent System Operator ("MISO") and the Southeast are already leading on ambitious renewable energy targets. This year, a major utility

company serving customers throughout MISO and Texas publicly stated that they could achieve an 80% reduction in carbon emissions by 2030 cost-effectively "[w]ith the renewable, carbon-free generation, and energy storage technologies available today." Consumers Energy, DTE Energy, Florida Power & Light, and the broader Entergy holding company have also set carbon reduction goals of between 50% and 90% by 2040 or earlier. That these utilities have engaged in procuring and deploying renewable energy at scale without enabling legislation suggests that an ambitious renewable portfolio standard is not only possible, but practical and timely.

a. What percentage of ENO's load should be met through renewable resources, and what data or other information exists indicating that the target is achievable in New Orleans?

RESPONSE to Q 1.a: In an environment of increasing ambition for reduction in carbon emissions, an R-RPS provides accountability and allows all citizens of New Orleans participate in the transition to clean energy. Vote Solar and 350 New Orleans urge the Council to set an R-RPS requirement that 55% of all retail sales will be met with renewable energy products by 2033, with annual interim goals progressing linearly from the baseline period to the goal date. We support establishing a 100% carbon-free grid by 2040, but believe that it would be wise to calibrate the target date and means of achieving/counting a carbon-free grid at some point after the Council, ENO, and stakeholder have significant experience with the initial R-RPS phases.

Using solar capacity values from ENO's 2018 Integrated Resource Plan and projected 2034 load from its 2015 Integrated Resource Plan, we estimate that ENO could generate an equivalent amount of energy to its total 2034 load with 1.9 gigawatts of solar power. For context, a Google Sunroof survey estimates that 2.7 gigawatts of solar capacity are available on New

Orleans' rooftops alone. As another example, Florida Power and Light recently announced plans for a 1.5-gigawatt community solar program.[3]

As noted above, other MISO utilities' ambitious carbon plans show that high penetrations of renewables are not only workable but economical. Even in the time between ENO's 2015 and 2018 IRPs, the ground has shifted for ENO's anticipated solar portfolio—from zero planned incremental megawatts of solar capacity in 2015 to at least 200 and up to 400 megawatts in 2018. Projections from utility industry leaders[4] and experts[5] indicate that the trend of economical solar power will only accelerate in the coming years.

b. In what year should ENO be required to meet this target, and should ENO have specific, incremental targets to meet?

RESPONSE to Q.1.b: ENO stands at the precipice of a transformation of its generation portfolio. In preparatory materials for the 2018 Integrated Resource Plan, ENO anticipated that 17-46% of its market coal and legacy gas capacity would be retired by 2028, growing to 57-76% in 2038. Those resources represented more than 60% of ENO's operating capacity as of 2015. The anticipated retirement of the Union Power Station in 2033 and the turnover of these legacy resources constitute a major need for generation capacity in 2033. By specifically targeting 2033 as the goal for the R-RPS, ENO can build a renewable and resilient resource mix to address that capacity shortfall and seamlessly integrate new renewables into its portfolio.

1. How should a New Orleans RPS target be satisfied?

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[3] See Florida Power & Light's SolarTogether Program.
[4] PV Magazine (2019). "NextEra: Solar and Wind plus Batteries will be 'massively disruptive' to conventional generation."
[5] GreenTech Media (2019). "WoodMac: Solar Plants Cheaper than Natural Gas 'Just About Everywhere' by 2023."

a. **Should ENO be allowed to purchase RECs to satisfy the requirement and if so what, if any, limitations should be applied to the use of RECs? If RECs are allowed, how should they be certified or verified?**

RESONSE to Q.2.a: Yes, Vote Solar and 350 New Orleans envision a three-tier framework through which Entergy could satisfy its compliance obligations through customer programs that reduce compliance load (e.g., community solar, net metering) and other renewable energy resources that are registered with M-RETS (Tier 3), a registration process and standard that is consistent with other states within MISO that recognize tradeable RECs for RPS compliance.

b. **What resources should be included in the definition of resources that may be used to meet the target (whether through the addition of resources to ENO's system or through the purchase of RECs)--solar water heat, solar space heat, geothermal electric, solar thermal electric, solar thermal process heat, solar photovoltaics, wind (large and small), biomass, hydroelectric, geothermal heat pumps, combined heat & power, landfill gas, hydroelectric (large and small), geothermal direct-use, anaerobic digestion, fuel cells using renewable fuels, other?**

RESPONSE to Q.2.b: The list of eligible technologies should be expansive, but should not include any resources that produce local air emissions (biomass, anaerobic digestion) or that require water discharge permits. All Tier 3 resources (MISO-connected renewables) should exclude carbon-emitting technologies. It would be contradictory for New Orleans to temper an aggressive push to address climate threats with acceptance of carbon-emitting resources, even if the carbon intensity is lower than ENO's existing fleet. Vote Solar and 350 New Orleans intend to work with local stakeholders to produce a more complete definition of eligible "renewable energy resources" and will provide that definition in its reply comments.

c. **Should there be a requirement that some portion of the RPS must be met through specific types of renewables (or RECs), such as solar for distributed generation?**

d. Should the Council consider adopting a method of encouraging local renewable resources, such as by providing ENO with greater credit toward meeting the RPS requirement for local resources than for remote resources?

RESPONSE to Q.2.c and d: The heart of fashioning an R-RPS that achieves specific, local objectives is utilizing a multi-tiered compliance system that gives preference to resources that are determined to provide maximum benefit to the community and to advance the overarching objectives of the policy. In the case of a resilient and renewable policy standard, Vote Solar and 350 New Orleans recommend that "renewable resilience projects", including renewable microgrids, solar+storage on individual residences and businesses, be given top preference. As a Tier 1 resource, renewable resilience projects would play an important role in not only providing an onsite generating resource for critical infrastructure (hospitals, schools, grocery stores, pumping stations) that would be capable of islanding and operating during grid outages, but in also providing grid support services throughout the year.

A Tier 1 resiliency resource would be differentiated from a Tier 2 customer program resource (e.g., net metered, community solar, energy efficiency, etc.) because it would require some dedication of the Tier 1 resource to be used and dispatchable by ENO to enhance its operation of the distribution system. This could include the automated use of smart inverters and energy storage devices to provide frequency regulation and other ancillary services, as well as the interoperability with the distribution communication network to support grid modernization efforts. We could foresee participation in a Council-approved demand-response and grid interoperability program being a condition for receiving Tier 1 status and the multiplier effect for associated renewable energy credits associated with these Tier 1 resources. By applying a multiplier to the REC associated with renewable generation from a Tier 1 resource, the

participating customer (or owner of the resource) would receive a premium for dedicating some part of the facility to being used and useful in the utility's grid operations. However, these conditions would suspend in the event of a grid outage, where an individual customer or microgrid would island and operate the resilience resource entirely for the benefit of the host customer during times of prolonged grid outages.

Vote Solar and 350 New Orleans envision Tier 1 resources benefiting critical infrastructure by keeping the power on during storm events where buildings such as hospitals, police stations, fire stations, schools, and pumping stations are used to provide public services in the midst of an ongoing emergency. Receiving a premium for installing onsite resiliency projects may provide the double benefit of producing cost savings for local agencies as well as physical assurance of back-up power at mission critical moments. The public benefits of having these facilities in a resilience posture is not captured by a simple "avoided utility cost" perspective, but must be examined as a broader societal and economic goal. Preparing for the worst, by installing devices and adopting programs that improve the reliability and performance of the grid on an ongoing basis, makes sense as both a grid and a social strategy for dealing with the extreme weather and climate-related challenges that face New Orleans.

Vote Solar and 350 New Orleans propose that a second Tier, which would receive a REC multiplier less than Tier 1 but still creating a premium, would include customer-facing program such as net metering, community solar, feed-in tariffs, energy efficiency, and non-Tier 1 demand response (i.e. not associated with operation of a resiliency resource). In the case of facilities that are not readily or feasibly registered with M-RETS, as in the case of small rooftop solar facilities on residential dwellings, Vote Solar and 350 New Orleans propose that the Council adopt a

methodology to allow ENO to count all estimated customer generation from net metering as a decrement to compliance load. In other words, while the net metering facility might not practically be able to afford registering with M-RETS, ENO should be able to adjust its compliance load by the amount of generation that is exported to the grid and later netted against those customers' purchases from the utility.

Alternatively, Vote Solar and 350 New Orleans would suggest that the Council adopt a special treatment of net metered systems to allow ENO to aggregate and estimate the gross generation of the total installed capacity of the entire net metering program each month. A new net metering tariff could be filed stating that all renewable attributes associated with the net metered facility are surrendered to ENO as a condition of taking service under the net metering tariff. This would allow ENO the opportunity to count generation from an existing program to satisfy its Tier 2 requirements. Net metering policy should be enshrined and protected within the R-RPS as a valuable means of leveraging private investment by customers and third-party owners of such facilities. The R-RPS should provide that net metering customers will face the identical rate for purchases they would have faced without net metering and that the full retail netting mechanism be extended to all interested customers without limit (subject to technical and cost limitations inherent in the interconnection process).

Vote Solar and 350 New Orleans propose that Tier 1 and Tier 2 systems should be limited to renewable energy resources that are interconnected directly to the distribution system within the footprint of ENO's service territory. This local nexus amplifies the economic impact to the city and increases the ability of the R-RPS to achieve its equitable goals. Vote Solar and 350 New Orleans would propose that no less than 10% of the total R-RPS compliance come

from Tier 1 resources with no less than 50% of the total compliance requirement coming from a combination of Tier 1 and Tier 2 resources.

Unlike Tier 1 and 2 resources, Vote Solar envisions that the third category (Tier 3) of renewable energy resources could be located anywhere on the MISO system. This would allow up to 50% of all RPS requirements to come from large-scale renewable facilities that could be expected to provide renewable generation at or below ENO's avoided cost. In order to encourage new generation, Vote Solar recommends that Tier 3 resources have an in-service date of approximately January 1, 2020 or later. Tier 1 and Tier 2 would have no such requirement as it would be the interest of the Council to recognize existing investments by its citizens in resources and in the local industry that will deliver the benefits of the R-RPS.

Vote Solar and 350 New Orleans would also recommend the formation of a citizen advisory council, appointed to reflect the diverse population of the city, to oversee the ongoing mission to implement the R-RPS in a manner that achieves the goal of equitably sharing the economic and resiliency benefits with underserved and low-income populations. The citizen advisory council could make specific recommendations to the Council and a process could be built into the R-RPS rules to allow for periodic rule calibration to help achieve the diversity and equity goals of the R-RPS. Vote Solar and 350 New Orleans encourage the Council to adopt complimentary policies and initiatives to ensure that job training is available to help open avenues for inclusion and prosperity for minority-owned businesses, electrical contractors, and installers. The shift to a clean energy economy in New Orleans could create the largest new source of economic growth seen in New Orleans in generations. It is imperative that communities of color not only be included in this clean energy economy, but that they be given

every opportunity to lead the transition and create new sources of wealth from within. New Orleans could be a model for the entire country by showing how the clean energy economy can be a source of uplift and economic opportunity for socially and economically disadvantaged communities and businesses.

2. How should the RPS standard be enforced, should the Council consider a penalty or Alternative Compliance Payment structure?

RESPONSE to Q.3: Vote Solar and 350 New Orleans recommend that any Renewable Energy Credit-based accounting system for an R-RPS include an alternative compliance payment as a backstop. Alternative compliance payments demonstrate a clear and predictable impact for utilities if they do not comply with a given interim requirement for renewable energy. The alternative compliance payment can be thought of the policy implementation of a clean energy requirement: A clear signal to Entergy New Orleans about the expectations of the Standard and the penalties for non-compliance. Vote Solar and 350 New Orleans recommend that the Council implement the following ACP best practices:

- Differentiate the level of alternative compliance payment by class of resource to account for the difference in cost of procuring different resources.
- Set the alternative compliance payment at a level that is high enough to incent the appropriate amount of investment in the technology. An escalating alternative compliance payment could "find" the appropriate ACP level for incenting investment over time.

Each alternative compliance payment also represents a foregone investment in renewable energy, and therefore un-fulfilled economic, resilience, and health benefits for ratepayers. To ensure those benefits are distributed to ratepayers, Vote Solar and 350 New Orleans recommend that revenue generated by alternative compliance payments be earmarked for investments in resilient and renewable energy through a deposit in a specially designated fund. The District of Columbia, for example, uses alternative compliance payments for its local distributed generation carve-out to fund the DC Solar for All program. Vote Solar and 350 New Orleans recognize the District of Columbia's approach as an incredible enabling tool for accessible and equitable solar power.

Finally, the alternative compliance payment structure is not mutually exclusive with other compliance and enforcement mechanisms, and multiple mechanisms might be complementary. Additional incentives to utilize resilient and renewable energy as a non-wires alternative to transmission and distribution investment could better integrate distributed renewable generation into distribution planning, for example, or a performance incentive mechanism could adjust the utility's rate of return according to other desired outcomes (e.g. reduced SAIDI). In general, the Council should ensure that each of its policy objectives is supported by clear goals, reporting requirements, and specific signals through compliance and enforcement mechanisms.

1. **What protection should be put in place to protect ratepayers from unreasonable increases in rates due to the RPS?**

    a. **What would be an unacceptable level of rate impact resulting from compliance with an RPS?**

b. If a limit on rate impacts is established, how should it be structured--as a flat cap, as an Alternative Compliance Payment structure, or through some other structure?

RESPONSE to Q.4.a-b: Vote Solar and 350 New Orleans acknowledge that any policy change—especially one that is purposefully designed to improve energy equity in the electric system in New Orleans—must be conscious of any unintended consequences or negative cost impacts to customers. Given the recent success of independently owned and built renewable energy resources competing head-to-head on pricing with traditional utility-owned generation, we do not expect an RPS to present significant cost impacts to any class of ratepayers. However, to the extent that specific resources are given preference and additional encouragement through REC multipliers (e.g., Tier 1 and Tier 2 resources), there will be some amount of upfront, short-term incremental costs required to "prime the pump" to achieve the success of the broad overarching goals of establishing an effective R-RPS. Vote Solar and 350 New Orleans encourage the Council to look beyond the grid, to the deeper long-term societal and economic benefits that the envisioned resilient renewable grid can provide.

To cap the impact of these incremental costs, Vote Solar and 350 New Orleans propose that the Council adopt a fixed monthly R-RPS rider that is reset annually to reflect changes in account balances (including any offsets for known and measurable grid benefits provided by the addition of Tier 1 and Tier 2 systems). Following the model used in North Carolina's RPS law, the Council could adopt a per customer cost cap of $1/month for residential customers and adopt a modest cost cap of $10/month for all non-residential customers. In North Carolina's experience, now over 10 years into its RPS law, the cost caps have never been reached as the

incremental costs of procuring renewable energy has been lower than expected. A $1 cost cap would ensure that low-usage customers are protected from rate shock.

In the event that incremental costs exceed the per customer caps, Vote Solar and 350 New Orleans would recommend that utilities be allowed to track those balances as a regulatory asset and recover the reasonable, Council-approved carrying costs into the future until such time as the balances are reduced below the monthly per customer caps. This would protect customers and be fair to the utility.

Of course, Vote Solar and 350 New Orleans suggest that the R-RPS should come with strict accountability measures to ensure that ENO is acting as efficiently as possible on administering and satisfying its R-RPS obligations. For customer programs, either Tier 1 or Tier 2 programs where ENO is responsible for designing, overseeing, managing, and implementing Council-approved programs that satisfy R-RPS requirements or serve to reduce compliance load, Vote Solar proposes that no more than 7.5% of all individual program costs should be related to administration. Any administrative and operational costs above 7.5% of a programs total costs (including the costs of incentives, purchase of power, etc.) should be disallowed and absorbed by shareholders. ENO should have an incentive to provide efficient delivery of programs to ensure that the majority of incremental costs of the R-RPS are helping deliver the benefits promised by this policy.

The rate cap does not limit the Council from adopting additional incentives or policies that are targeted at achieving specific elements of the R-RPS. Job training, property tax abatements for renewable energy resources, and rebates or grants for solar-paired energy storage devices for city buildings or agencies could be achieved outside of the regulatory structure and

be funded by other mechanisms that are not included in retail electric rates. Additional policies could be put through a separate cost-benefit analysis to support the Council's action independent of its regulatory function over ENO.

Respectfully submitted this 3rd day of June, 2019,

BY /s/ Thadeus B. Culley

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June 3, 2019

RULEMAKING PROCEEDING TO ESTABLISH RENEWABLE PORTFOLIO STANDARDS

DOCKET UD-19-01

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