



BEFORE THE  
THE CITY OF NEW ORLEANS

DOCKET NO. UD-17-01

May 25, 2017  
Via Hand Delivery

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

**In Re: RULEMAKING TO ESTABLISH INTEGRATED RESOURCE PLANNING COMPONENTS AND REPORTING REQUIREMENTS FOR ENTERGY NEW ORLEANS, INC. UD-17- 01**

Dear Ms. Johnson,  
Please find attached the Alliance for Affordable Energy's comments for the above mentioned docket. Please accept this original, and three (3) copies of this filing into the official record, and return one (1) stamped copy to our courier.

Respectfully submitted,

Logan A. Burke  
Executive Director  
Alliance for Affordable Energy

Cc: 17-01 Service List via e-mail

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MAY 25 2017

BY: Angela Sarkis

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

<b>IN RE: RESOLUTION AND ORDER</b>	)	
<b>ESTABLISHING A RULEMAKING</b>	)	<b>DOCKET NO. UD-17-01</b>
<b>PROCEEDING REGARDING</b>	)	
<b>INTEGRATED RESOURCE PLANNING</b>	)	

**The Alliance for Affordable Energy’s comments and specific language recommendations for  
the Proposed Electric Utility Integrated Resource Plan Rules**

The Alliance for Affordable Energy appreciates the opportunity to offer these comments and specific language recommendations<sup>1</sup> in response to the Council Advisor’s report and Proposed Electric Utility Integrated Resource Plan Rules (“Proposed Rules.”) The sincere considerations of resource planning rules by the Intervenors and Entergy New Orleans Inc. (“ENO”), followed by a thorough revision of the Council’s 2010 IRP criteria by the Advisors should initiate IRP cycles that offer the Council a more robust understanding of the decisions before them in the 2018 planning cycle and in the future. We look forward to a collaborative, inclusionary process that results in transparent and thoughtful planning that is in line with national IRP trends.

Our remaining concerns are related to ensuring a public process that is responsive to community participation, includes current data, and is rooted in contemporary regulatory policies and priorities, in order to avoid the pitfalls of previous planning cycles. Perhaps most important, the resulting planning process and report should resolve with a clear path for the best resources to fulfill the needs of the city of New Orleans, from which the Council can make clear-eyed well informed policy decisions. Additionally, we believe it is important to address the question of the Council’s jurisdiction and regulatory guidance within their own planning policy.

**Public Inclusion**

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<sup>1</sup> See attached Appendix

The Proposed Rules represent a significant improvement over the previous IRP criteria. In particular, the Alliance supports the foundational steps at the start of each cycle, beginning with the Initiating Resolution outlining Council’s policy objectives, followed by a meaningful public education and “kickoff” meeting. These two items, along with the final IRP Rules themselves, should create a solid common understanding among the parties about the purpose, priorities, and opportunities for engagement in planning. If the 2015 IRP cycle was acrimonious as a result of varying perceptions of planning, the combination of a regulatory and public kickoff serves to reduce tensions among parties at the outset with clear expectations and education. Important to the value of the kickoff meeting, stakeholders should be afforded an opportunity to voice questions and concerns. Customers who attend these meetings are devoting significant time to the cause of improving their city. We also support a web-portal through which stakeholders can submit their questions and priorities, and access public meeting videos.

Two points related to stakeholder engagement are worth noting. More, and more diverse, stakeholders are now engaged with energy issues in New Orleans than when the 2010 criteria were developed. The Alliance acknowledges that this expanded interest in energy democracy has benefits and costs. However, as citizen consumers become more invested in these topics, and develop an appreciation for the complexities of energy matters, the benefits outweigh the costs: confidence in decisions based on the public interest increases, improvements for New Orleans’ future grows, and greater consensus may be found. The work of educating and the time spent investing in consumer understanding pays back through civic engagement and agency, higher customer satisfaction, and more informed citizens ready to collaborate with their electric utility to grow the city of New Orleans. To this end, technical conferences, should be open to all stakeholders, as they have been historically.<sup>2</sup> The Alliance would support ground rules to allow these working meetings to be conducted efficiently, and with transparency.

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<sup>2</sup> Advisors Report and Proposed Electric Utility Integrated Resource Planning Rules, at 13.

Another approach in the interest of consensus building that should be included is a default assumption of a Stakeholder Planning Scenario and Strategy from the outset, rather than waiting for disagreement to force a Stakeholder Scenario. The development of remaining consensus Scenario(s) and/or Strategy(ies) can therefore be undertaken with the expectation that Stakeholder priorities are fully included without setting up a dynamic that could keep parties from finding consensus in the middle.

The addition of language supporting public access to documents and information as an “Interested Person” is a welcome change that the Alliance appreciates, and will be a valuable opportunity for a more open process. The Alliance also looks forward to CURO managing an electronic filing system.

### **IRP Purpose**

The IRP’s purpose is to empower the Council, stakeholders, and the public with accurate, comprehensive, forward looking information, especially as it relates to the optimization of demand side management and renewable energy resources, and where these non-traditional resources are acknowledged to be the least-cost resource. Additionally, the IRP can help in evaluation of the merits and implications of related policy priorities and connecting the dots between individual options and the big picture, which is critical for clear vision and leadership in these dynamic times. Excessive deference to the utility in the IRP process is unnecessary and counterproductive for the purposes stated above. While many of these above are reflected in the current draft IRP rules, there are numerous instances in the proposed revised rules where the interests of the utility are put before those of the public and where greater deference is given to the utility over the information needs of the Council, intervenor parties, and the public.

Nationally, as utilities grapple with disruptive changes to the utility business model, the interests of all parties will need careful balance and deep analysis, to ensure fairness in access, impact, and economic burden. A “utility 2.0” is a necessary next step, and the IRP should be a guiding process to consider how resources will be distributed. New Orleans has particular

needs, and the changes made to the system should be done thoughtfully, with the input and interest of the public as a guiding factor.

### **Jurisdiction**

The Integrated Resource Plan is a policy of the New Orleans City Council created for purposes related to their unique information needs as utility regulators and to ensure the public interest is dutifully served through better informed resource acquisition decision making. The IRP is explicitly intended to be distinguished from internal utility resource planning, which historically minimized or ignored demand side management and renewable energy resources, was conducted without transparency or public involvement, and generally resulted in individual resource acquisition requests being presented to the Council without the benefit of robust knowledge regarding potential resource alternatives.

By contrast, Integrated Resource Planning is distinguished in several important ways including, but not limited to:

- The fair evaluation of non-traditional energy resources, such as demand side management and renewable energy
- Evaluation of a broad range of alternative portfolios responding to differentiated strategies and risk considerations
- A focus on seeing the big picture and not limiting decisions to isolated utility resource acquisition requests
- Transparency and the ability of the Council and public to affect input assumptions and modeling choices
- Ability to connect Council vision and leadership to future needs, conditions and technology forecasts
- Focus on best interests of ratepayer and city, rather than business decisions related to shareholder interests.

These priorities differentiate the IRP from internal utility resource planning and in so doing serve a distinct public policy purpose that neither prevents nor limits the utility's (and cross-corporation) internal resource planning activities. As such, the clear articulation by Council of public interest policy objectives, procedural and substantive requirements, and various inputs related to any aspect of the IRP do not in any way impinge on utility rights related to management of their company, as suggested by the reference to Georgia Power Co. Vs. Georgia Public Service Commission.

Moreover, the City's Home Rule Charter gives the Council the power to institute proceedings affecting the "Council's powers of supervision, regulation and control granted hereunder over public utilities or affecting in any way the interests of the ratepayers."<sup>3</sup> A robust and accurate Council IRP process should protect the interests of the ratepayers by helping the utility avoid imprudent investments.

Also, thanks to the broad jurisdictional and plenary authority given to utility regulatory authorities in Louisiana, the New Orleans City Council has Constitutional power to adopt and enforce "reasonable rules"<sup>4</sup> for the purpose of regulation. The IRP follows a reasonable rule, whose objectives includes protecting the interests of both the citizens of New Orleans and the utility ratepayers. Finally, the it is Council's right to direct the utility to include specific scenarios, strategies, or portfolios where they find appropriate, "in connection with national interest in energy conservation."<sup>5</sup>

Thus, the City Council is within its jurisdiction to supervise IRP proceedings, and direct the utility to include Council preferences in modeling for this critical purpose of protecting the public interests. Additionally, the Alliance would like to clarify that we are not recommending the utility have no opportunity within the IRP to select the Scenarios and Strategies they believe are

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<sup>3</sup> New Orleans City Charter, § 3-130 (1).

<sup>4</sup> Bowie vs. LPSC, sec. 3, Nov. 29, 1993

<sup>5</sup> 73B C.J.S. Public Utilities § 175

most prudent business decisions, but simply that the Council has the right to give their guidance within the process.

### **Overview and Definitions**

Section 1 of the Advisor’s Proposed Rules lays out an expectation of a final IRP report related to Council’s policy priorities, transparency, public participation, and utility compliance. These points<sup>6</sup> describe both a process and result that is comprehensive and responsive to an array of valid concerns. However, the Section on Objectives (Section 3) underscores a notion that the IRP is a utility document, rather than a policy of the Council, that directs integrated resource planning through the Council’s stated priorities. This tension is confusing and should be resolved.

Presently, the language in the Proposed Rules suggests that council policies enacted between the Initiating resolution and a date, wherein inputs would be “finalized” would not be considered in the modeling performed. This does not allow the council to engage with the process of the IRP between the Initiating Resolution and a Concluding Resolution, and would prevent decisions made by the Council that would directly impact the outcome of the IRP from being included. For example, should the council resolve to direct the utility to develop a certain amount of community solar, with the decision enacted between an initiating resolution and a finalized or “lock in” date, this resource decision would not necessarily be applied to the modeling software or any of the strategies, leaving out a significant parameter.<sup>7</sup> By contrast, it is reasonable to assume that state or federal policies that are enacted prior to the “lock in” date would be included, since to do otherwise would run counter to the concept that the finalized inputs best reflect the known conditions affecting future resource determinations at that time. We recommend that this idiosyncrasy be resolved by clarifying that new policies and direction that would impact the IRP enacted 15 days prior to a “lock in” date will be incorporated into the modeling.

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<sup>6</sup> Advisors, Section 1, (A-E) p. A-1

<sup>7</sup> Advisors, A-6, at 3.(a)) and A-10).

The Alliance supports the use of an Initiating Resolution for the council to offer their priorities and objectives, followed by the development of Planning Scenarios and Planning Strategies through collaboration between the utility and stakeholders. The Alliance would recommend, in the interest of fostering cooperation among the parties, that the Utility and Stakeholders each develop their respective Planning Scenarios, through the stakeholder and technical conference process, and collaborate on at least one, but likely two consensus Planning Scenarios. This will ensure that the utility and the stakeholders are able to present what they consider to be the best information regarding their respective Planning Scenarios without having to contend with the other party to do so. It will also ensure that the two consensus planning scenarios can be designed to provide meaningful diversity, rather than being structured in such a way as to ensure replication of the same outcome. Because the utility will provide a Scenario that they deem appropriate, there is no conflict with this approach and the utility's desire to protect their business administration independence.

The Proposed Rules definition of "resource portfolios"<sup>8</sup> describes portfolios that are "prescribed," however, the development of "resource portfolios" outlines a method by which the portfolios are selected through modeling, and are thereby specifically *not* prescribed. The definition that describes using the software to optimize a resource portfolio based on planning scenarios and strategies appears to be a fair method of selecting appropriate options for the city, allowing the capacity expansion model to perform its function, and should give the Council options from which to choose, based on needs, cost, existing policy, and city priorities. A distinction should be made as to the portfolios resulting from optimization, presumably the "Resource Portfolios" and portfolios that include resources that have been chosen outside the modeling outputs.

For this, we recommend an opportunity for of a limited number of "Alternative Portfolios," which would include hand selected resources that may be run at the request of the council,

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<sup>8</sup> Advisors at A-3.



utility, or stakeholders. An alternative portfolio may be modeled between the draft IRP and the final report to compare a portfolio of independently selected resources that would serve as a comparative point of reference to “check” for Council on priority resources, for example, resources chosen for a clean energy mix, or for reliability. Such comparison may reveal that the cost difference between a “least cost resources,” as an output selected by capacity modeling, and an alternative mix of resources are either relatively close in regards to cost, risk and other comparisons or are far apart. Such a “prescribed” portfolio is described in the Advisor’s Proposed Rules, related to a resource chosen for reasons outside least-cost planning.<sup>9</sup>

A missing definition in this document is for “Integrated Resource Planning,” or “Integrated Resource Plan.” It is important to distinguish between the process, and the final report, as the very purpose of Resource Planning is to transparently conduct a public process that should also consist of comprehensive, accurate, and analytically robust findings – to be utilized for Council and public engagement. The final report should reflect this process, and should *inform* council action and utility resource decisions. While this report should not serve as a resource acquisition document, it should reflect the realities of the utility’s anticipated needs.

The Alliance recommends the following definition:

“Integrated Resource Planning” is an open, public process through which all relevant supply side and demand-side resources and the factors influencing choice among them, are investigated for the optimal set of resources to meet current and future electric service needs at the lowest total cost to customers and the Utility, in a manner consistent with the long-run public interest, given the expected combination of costs, risks and uncertainty.

### **Section 3. Objectives**

The Alliance does not support the position that the Utility’s financial integrity be included, or ranked as the 2<sup>nd</sup> most important objective of Integrated Resource Planning<sup>10</sup>. The well-

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<sup>9</sup> Advisors at A-8

<sup>10</sup> Advisors at A-4

established regulatory compact<sup>11, 12, 13, 14</sup> provides more than enough protection for the utility to cover its costs and receive fair compensation. If anything, the rank of this objective is counter to the point that the utility should not make decisions for resources based on sales into a market or outside the public interest. The objective to preserve a utility's financial integrity is vital, however is not an appropriate guiding factor for a resource planning process or report. It is therefore unnecessary to state this as a priority or objective for the Council-directed planning process.

#### **Section 4. Load Forecast**

The Alliance agrees with the Advisor's Proposed Rules requirements for Load Forecast in section 4. In particular, the requirements related to historic coincident peak demand for all customer classes, along with a discussion of forecasting methodologies and variables will provide greater confidence in Load Forecasts for future IRPs.

Additionally, the Utility should prepare an evaluation of the load forecast used in the last filed IRP, including an assessment of the annual accuracy of the previous forecasting and a comparison of forecasted versus actual data; an explanation of the reasons for any significant deviation between the previous forecasts and the actual annual peak demand and energy that occurred; and information on the impact that historical demand-side resources had on the prior load forecast. This "look back" at the IRP offers context and a measure of precision in resource planning.

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<sup>11</sup> *Federal Power Commission v. Hope Natural Gas Co.*(1944)

<sup>12</sup> *Indiana Gas Co., Inc. v. Office of Utility Consumer Counselor ("Indiana Gas I")*, 575 N.E.2d 1044, 1046 (Ind.Ct.App.1991)

<sup>13</sup> *United States Gypsum, Inc. v. Indiana Gas Co.*, 735 N.E.2d 790, 797 (Ind.2000)

<sup>14</sup> *PacifiCorp v. Public Service Com'n of Wyo.*, 2004 WY 164, 103 P.3d 862 (Wyo. 2004).

Although not explicitly described, the Alliance assumes that the language in the Proposed Rules, Section 4 (A)<sup>15</sup> on multiple Load Forecasts includes an opportunity for stakeholders to propose a reasonable load forecast for use in a Stakeholder Planning Scenario, as this is the foundational variable in the IRP, and prior IRP cycles have included over-stated “reference” cases.

## **Section 5. Resource Options**

### **Independent Demand Side Management Potential Study**

One of the most important reasons for the Council creating Integrated Resource Planning rules initially was to unequivocally acknowledge that Demand Side Management is a legitimate resource alternative to traditional power generation, while ensuring that evaluation of DSM resources is done fairly, accurately, and in such a way as to maximize benefits to customers.

In each of the previous IRP proceedings, there have been major issues with the handling of DSM analysis. These issues have centered around failure to include all cost effective programs, not relating DSM to the system’s needs, assumed costs and incomplete accounting of DSM benefits, long ramp up times and low participation rates, and loading order in modeling software that minimizes DSM selection by not requiring supply resources to directly compete. The root of the problem is a persistent conflict of interest between DSM’s impact on capacity requirements and energy sales, on the one hand, and the Utility’s historic preference and financial motivations for construction of new generation resources on the other. It is our hope that the former conflict, related to the split-incentive, will be tempered following the adoption of decoupling following the anticipated 2018 rate case.

Within the context of profit motive, it is problematic that the Utility itself hire and manage the contractors who determine DSM potential, are responsible for program delivery, and conduct the performance evaluations. The Utility has operated DSM programs in New Orleans that have failed to grow appreciably over the span of Energy Smart’s first five years, while

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<sup>15</sup> Advisors’ Proposed Rules, p A-4, Section 4 (A)

comparable programs overseen by Entergy Arkansas grew nearly 600% over the same period of time. The DSM potential studies produced under the Utility's management have been far more conservative than proactive, which is inconsistent with the Council's priorities for substantial DSM growth and out of step with analysis conducted by the American Council for an Energy Efficient Economy, and successfully being achieved by large numbers of utilities across the country. Looking at both changes in DSM analysis results over time and comparison to actual achieved program savings, the DSM potential studies have come in below achievable levels.

Research shows that jurisdictions with IRP processes alone underperform with respect to DSM savings than those with Energy Efficiency Resource standards in place. In order to achieve forward leaning targets like those described by the Council, it will be important to get to the root of the discrepancy between many DSM potential studies and what is actually achievable.

Ultimately, it is the ratepayers who end up paying for the DSM potential study and it is in the public interest that this work be administered with greater independence from the utility, more transparency, with a more explicit aim to maximize DSM benefits to customers.

Independence and the aim to maximize DSM benefits does not equate to putting a thumb on the scale for the benefit of the Alliance or any other intervenor. One of the most important central tenets of New Orleans' IRP concerns meeting customer needs through DSM rather than more expensive supply resources. It is appropriate that every effort be made to proactively seek out and identify the full depth and breadth of DSM potential available.

Finally, the Alliance continues to support the addition of the Societal Cost Test to the consideration of DSM. The inclusion of non-energy benefits and costs should be fully represented in the evaluation. Externalities like health and environmental benefits brings equity to the table, is in the interest of ratepayers, and should be incorporated.

## **Section 6 . Transmission and Distribution**

The Alliance supports the Advisors' proposal related to transmission and distribution. These

additions should offer a clear picture of the full array of resources that should deliver energy to New Orleans customers, and how planned expansions will impact service and cost.

In particular, these rules seek to illuminate an issue of concern in the conclusion of the 2015 IRP and the selection of a Combustion Turbine, even where the optimization modeling in the IRP did not select this resource. The Advisor's Proposed Rules<sup>16</sup> outlines the need to clarify where resources are pre-selected for a portfolio, outside the optimization modeling, to support reliability. We agree that transparency on this point would help clarify the selection of resources that appear not to relate to optimization or to be a least-cost resource. If reliability is presented as a reason for adding a resource or choosing a particular resource over another, the evaluation should be supported by measurable criteria. Additionally, if there are other reasons for selection of resources outside the optimization model (eg. Council priorities), the reason should be supported and explained as such.

In Section 6, the Advisor's Proposed Rules rightfully make reliability a critical element. However, there is a distinction to be made on reliability that should help refine the issue for all involved. Reliability can be impacted by transmission, distribution, or generation, and each of these are distinct. Where the issues may be conflated, in a city with regular outages, it would be useful for the utility to include their most recent annual SAIDI/SAIFI filing as an appendix and an analysis of the reliability of the components of the system such that outages are identified and distinguished between distribution, transmission, and generation causes.

As resources that impact reliability include the distribution system, which experiences regular outages, voltage dips and spikes, an examination and reporting of the status and needs of this local system, along with the Advisor's recommendation<sup>17</sup> of a quantification of costs and benefits for distribution-level resource additions would support the purpose of the IRP to offer customers reliable and least affordable service. This is especially true as greater penetrations of

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<sup>16</sup> Advisors, Section 6, part D, ( p. A-8)

<sup>17</sup> Advisors Report/Draft Criteria, p. A-8, Section 7 (E).

Distributed Energy Resources are connected to the distribution system, and are accounted for in system planning.

## **Section 7. Integrated Resource Plan Analyses**

### **Constraints on Optimization Modeling**

On page A-8, the Advisors indicate that:

“The optimization process shall be constrained to mitigate the over-reliance on forecasted revenues from external capacity market sales and external energy market sales driving the selection of resources.”

We agree with this notion and believe that the manner in which the market sales are constrained should be specifically disclosed. Similarly, we recognize that there are other constraints placed by the Utility on the optimization process that can have significant impact on modeling outputs, each of which should also be identified and the disclosed.

While Integrated Resource Planning is a policy of the Council that is distinct from the Utility’s internal resource planning analysis, the optimization process is reliant upon complex modeling software that is available only to the utility. The use of this software has historically been a “black box” whose specific operations are known only to the utility, yet whose effects have the potential to significantly impact the outputs relied upon for resource selection and cost analysis. Prior to running the market modeling analysis, various constraints are first selected by the Utility that affect how the analysis is conducted (like the market sales constraints proposed by the Advisors). Since no other party in these proceeding is given access to the modeling software, there is a strong public interest justification for requiring the utility to identify the factors that are being constrained and indicate what specific constraints are being used and why. Possible examples of such factors may include, but are not limited to, market sales, resource loading order (for example with DSM), geography, reliability, whether existing generation resources compete or are hardwired in, as well as the treatment of short- and medium-term PPA resources and market purchases. The information provided should

essentially consist of the key ingredients and basic recipe used to guide the optimization modeling software.

The Alliance supports the development and use of a scorecard for Portfolios to give greater context to the full benefits and costs of each. This solution to the concern of resilience, social impact, and other valuable metrics may be a useful tool, but only if developed transparently. Parties should work with the utility to offer input on the development of the scorecard, as there is potential for subjective “value” ranking for each of the metrics. The matrix should allow a broad enough numbering system to allow for granular comparisons among the portfolios, and the scorecard should be developed and discussed before the final IRP report.

#### **Section 10. Submission and Public Presentation of IRP Report**

Successful conclusion of an Integrated Resource Planning cycle involves process and substance elements, each of which should be evaluated distinctly at the end of an IRP cycle. We believe that it is appropriate that the Council would separately determine whether compliance requirements have been met for each of these elements, and that doing so provides the greatest public interest value. As such, we recommend that Acceptance of the IRP relate to satisfactory compliance by the Utility with the process requirements set forth in the IRP rules, while a decision whether to Approve a plan may be separately determined based on the Council’s assessment of the substance therein. The authority of the Council to conclude the IRP with an affirmative determination of process compliance should serve as motivation to ensure complete, timely, and transparent conduct during the planning process. This would take the form of a Council decision to Accept the filing as compliant with the IRP rule’s process requirements. However, the value and purpose of Integrated Resource Planning is not served by merely going through the motions, but ultimately rests on the substantive quality of the plan itself with respect to accuracy, comprehensiveness, flexibility, the presentation of alternative options and the various implications of different choices. On the substance, the Council would therefore have the authority to Approve, Reject, or take no position, depending on their assessment of the quality of the substance of the IRP plan submitted by the Utility. The value

of this approach is to give the Utility and Parties to the IRP proceeding something to aspire to as they conduct their work, rather than a mere focus on minimum compliance.

While it is recognized that the IRP is itself not a resource acquisition proceeding, a Council decision to Accept or Reject would be understood to have more bearing on the relative importance given to the IRP in resource acquisition and prudence proceedings than an outcome where the Council took no position. This is appropriate, given the large amount of work and investment that goes into an IRP. There should be a meaningful relationship between the IRP and subsequent resource decisions and that this is at the heart of why the IRP has value in the first place. Conversely, the purpose of the IRP is undermined if it is treated as nothing more than a plan on a shelf. Ultimately, by exercising this authority the Council is able to connect and align the Integrated Resource Planning efforts with their vision, while evaluating the impact of their guidance to the process and the potential need for follow up policy action.

### **Conclusion**

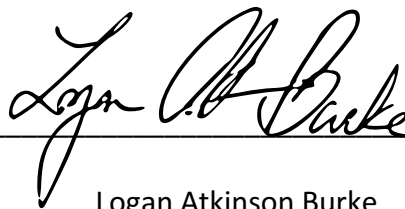
These proposed rules, and our specific language recommendations, have the potential to support thoughtful resource consideration, encourage meaningful public engagement, improve New Orleans' energy system, and ensure Council priorities guide both the process and the resulting IRP report.



**In Re: RULEMAKING TO ESTABLISH INTEGRATED RESOURCE PLANNING COMPONENTS AND REPORTING REQUIREMENTS FOR ENTERGY NEW ORLEANS, INC. UD-17- 01**

**Certificate of Service Docket No. UD-17-01**

I hereby certify that I have this 25th Day of May, 2017, served the required number of copies of the foregoing correspondence upon all other known parties of this proceeding, by USPS or electronic mail.



Logan Atkinson Burke  
Alliance for Affordable Energy

**UD-17- 01**

**In Re: RULEMAKING TO ESTABLISH INTEGRATED RESOURCE PLANNING COMPONENTS AND REPORTING REQUIREMENTS FOR ENTERGY NEW ORLEANS, INC.**

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