



August 15, 2024

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

Ms. Johnson and Councilmembers:

Thank you for the opportunity to comment on the following rule changes in New Orleans' community solar program. Working Power (WP) is pleased to submit comments in support of changes to the existing community solar program. Working Power co-develops and co-owns community solar projects that catalyze local economic development and maximize community benefit beyond typical clean energy generation. WP's model stems from over a decade of experience led by parent company Urban Ingenuity (UI). We have advised and directly invested over **\$150M**, resulting in **18MW** of clean energy deployment and over **\$20.5M** in community benefits.

Working Power is developing community solar with the Orleans Parish School Board on currently vacant land at Abramson Sci Academy and George Washington Carver High School. The installed solar will be dedicated to low-income households participating in the city's community solar program. Thanks to the work of this council, we can make this development happen and bring the benefits of solar to low-income residents of New Orleans.

Based on our experience and best practices from leading community solar programs in New York, Washington, DC, and other states across the country, we believe the following revisions to the existing program would support successful community solar development:

- **Clarity in the calculation of the credit rate.** Entergy New Orleans should confirm that credits will be calculated using the same methodology shown in the NREL study submitted to the community solar docket. Any discrepancies from this methodology should be highlighted so developers can accurately model their projects to ensure economic viability and, ultimately, the ability to provide stated savings to subscribers.
- **Net crediting on utility bills.** On-bill net crediting ¹is the industry standard for community solar. Net crediting supports the utility paying the community solar array owner directly to minimize risk and eliminates the need for subscribers to receive two bills. Subscribers receive a utility bill with the integrated solar subscription and savings, reducing complexity and confusion and supporting greater community solar participation. The existing Geaux Green program platform could be modified to facilitate net crediting for community solar subscribers in New Orleans.
- **Executing the interconnection agreement after all studies are completed before construction begins.** Currently, the interconnection agreements are not signed until after construction. This is a huge risk, especially for community organizations—solar projects hedge on the interconnection approval. There is no project without it. By the time construction begins, developers have already spent millions of dollars to make these projects successful. This leaves the risk that utilities could

¹ <https://www.ysgsolar.com/blog/national-grid-launches-net-crediting-value-stack-community-solar-cdg-projects-ysg-solar>

reject an approved project. Explaining this risk to financiers and tax equity investors is challenging and makes it hard to develop in New Orleans.

- **Remove the deposit.** While deposits seem necessary to keep developers accountable, they act as more of a barrier to entry to community groups. While nominal fees are required for interconnection studies in other states, there are no required deposits during the study period. Solar should be owned by the people it serves; enacting deposits makes already smaller groups less likely to join the renewable energy market. It's clear the city council wants to keep creating an equitable program, and this would be a significant first step in doing so.
- **Streamlining development.** The current process laid out on the Entergy New Orleans website is complicated and overwhelming for new developers to manage. We have come up with the following ways to streamline the development process:
 - Establish clear time limits for interconnection studies² such as the NY State Standardized Interconnection Requirements³
 - The utility sharing information such as hosting capacity maps or estimated costs for standard utility upgrades. Massachusetts has created a hosting capacity map that spans the entire state⁴
 - Eliminate the 20-year PPA term to ensure operational systems are compensated for energy produced and are not prematurely taken offline.

We have been delighted to see New Orleans' community solar program improve with each rule change. These proposed changes are essential for a successful program that promotes business development and increases New Orleans' access to affordable, clean energy.

Sincerely,



Ian Fischer, Co-founder & Co-Executive Director
Working Power

² <https://irecusa.org/blog/regulatory-engagement/improving-interconnection-timelines-the-need-for-data-and-enforcement/>

³ <https://dps.ny.gov/system/files/documents/2024/02/sir-effective-february-1-2024.pdf>

⁴ <https://www.eversource.com/content/residential/about/doing-business-with-us/interconnections/massachusetts/hosting-capacity-map>

