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September 13, 2024

VIA ELECTRONIC MAIL

Clerk of Council
Clerkofcouncil@la.gov
City Hall - Room 1E09
1300 Perdido Street
New Orleans, LA 70112

Re: Community Solar Program Implementation (CNO Docket No. UD-18-03)

Dear Clerk of Council:

Attached please find Entergy New Orleans, LLC's ("ENO") comments filed pursuant to Resolution No. 24-310 for filing in the above-referenced docket. ENO submits this filing electronically and will submit the requisite original and number of hard copies once the Council resumes normal operations or as you direct.

Thank you for your assistance in this matter, and please let me know if you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Leslie LaCoste', with a stylized flourish at the end.

Leslie M. LaCoste

LML/rh

Enclosures

cc: Official Service List UD-18-03 (*via electronic mail*)

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

IN RE: RESOLUTION AND ORDER)	
RELATED TO MADISON ENERGY)	DOCKET NO. UD-18-03
INVESTMENTS, INC. MOTION TO)	
AMEND COMMUNITY SOLAR RULES)	

**ENTERGY NEW ORLEANS, LLC’S COMMENTS
PURSUANT TO RESOLUTION NO. 24-310 (AS AMENDED)**

Entergy New Orleans, LLC (“ENO” or the “Company”) respectfully submits its Comments Pursuant to Resolution No. 24-310 (as amended) (“Comments”) issued by the Council of the City of New Orleans (“Council”) on July 25, 2024. Resolution No. 24-310 (as amended) (“Resolution”) seeks comments in response to the Joint Motion of Together New Orleans (“TNO”) and the Alliance for Affordable Energy (“AAE”) to Amend Community Solar Rules (“Motion”) filed August 19, 2024, in the instant docket. The Motion makes numerous proposals for further amendments to the amended Community Solar Rules (“Rules”) adopted by the Council in Resolution R-23-507 that were discussed along with other topics at a Technical Conference hosted by the Council Utilities Regulatory Office (“CURO”) on August 27, 2024. The Company offers these Comments on these issues for the Council’s review as it considers further possible amendments to its Rules.

1. Application and Interconnection Process

In its role as administrator of the Council’s Community Solar program, ENO has worked closely this year with numerous Subscriber Organizations that have registered with CURO and submitted interconnection applications for CSG Facilities. It has become clear that edits and additions to the Council’s Rules are necessary to support an effective application process. Based

on the Company's experience so far, and in an attempt to address perceived issues, ENO circulated to the Service List on August 26, 2024, a proposed redline of Section VII (D) of the Rules, attached hereto as Appendix A, which it reviewed with the parties at the Technical Conference the following day. Parties were generally supportive of the proposed changes and agreed that they would address several of the significant issues that have arisen. The proposed redline focuses on three main areas:

a. Creation and Administration of Two Queues—Section VII (D) makes reference to a “queue,” but it is clear that the process for projects to apply to participate in the program and to subsequently achieve commercial operation involves two different tracks that must be separately identified and administered. To fairly organize and process CSG Facility applications, ENO proposes to add two defined terms to Section II—Application Queue and Construction Queue. Conditions and time requirements would be added to Section VII (D) that must be met by the Subscriber Organization for projects to be entered into these queues and to remain in them following submission of an application. Having two queues organized in this manner would allow projects to initiate the application process, make a preliminary selection of the CSG Facility category under which they would seek to participate, and decide whether to pursue required studies and system upgrades. Provided the Subscriber Organizations complete the required studies and make timely decisions to continue through the application process, the projects in question would move into the Construction Queue in the order in which they joined the Application Queue.

At the Technical Conference, and in comments circulated via email to the Service List immediately thereafter, Mr. Gary Kassem of SunConnect suggested that if the Council adopts the Company's proposal through a resolution, the 45-day deadline included in Section VII (D)(9)(c) of the Company's proposed redline should start on the day the resolution takes effect, thereby “grandfathering in” the projects already in the existing queue as they are moved to the new

Application Queue. In other words, if the Council were to issue a resolution effective October 1 adopting the Company's proposal, projects already in the queue would be moved to the new Application Queue and would have until November 15 to submit an executed study agreement or lose their place in the Application Queue. The Company supports this suggestion as a reasonable measure to transition from the current framework.¹

It is important to note that available capacity under the two CSG Facility categories defined by the Rules—the Open Category and the Low-Income Category—would ultimately be allotted to projects based on their position in the Construction Queue and their completion of all requirements to achieve commercial operation. Having the Construction Queue, not the Application Queue, stand as the source for determining how much capacity has been claimed under the two categories is important to avoid confusion among Subscriber Organizations. Under the current Rules, the single queue contemplated does not draw a distinction between projects that have simply applied to participate and those that have taken the necessary steps to commit to construction. Maintaining the current framework will lead to uncertainty, potential disputes as time passes, and unclear guidelines for projects seeking to move forward. If the Council adopts the Company's proposal on this issue, the Construction Queue would represent the clearest picture of which projects are proceeding and have secured capacity under the Rules.

b. Execution of Interconnection Agreements—Concerns have been raised by intervenors about the requirement that interconnection agreements be executed after project construction is complete. Having further considered the issue in the context of Community Solar

¹ Mr. Kassem made an additional suggestion that the Company be required to provide the Subscriber Organization with 10 days' notice of the impending 45 day deadline. The Company does not agree that a further notice obligation should be created. Subscriber Organizations can reasonably be expected to monitor the clear deadlines of the Rules as they apply to their own projects and contact the Company if it has questions about the relevant dates. Creating another notice obligation would unnecessarily add to the administrative burden of the Company.

projects, ENO is open to executing the interconnection agreement upon completion of all required studies, with the understanding that this initial execution does not waive any obligations of the Subscriber Organization to complete construction and testing to ENO's satisfaction prior to receiving permission to operate.

Additionally, TNO suggested in its Motion that ENO execute the standard offer Power Purchase Agreement ("PPA"), Form CSG-4, once studies are completed but prior to construction, in order to help Subscriber Organizations obtain financing. At the Technical Conference, TNO and others suggested that their efforts to secure financing would be bolstered if ENO were to execute the Form CSG-4 prior to construction or to provide some sort of Letter of Intent regarding ENO's execution of the PPA, or if ENO or CURO were to issue some sort of written description of the Council's Community Solar Rules and the obligations contained therein. TNO argued that these additional documents would ostensibly provide assurance to financial firms from whom the Subscriber Organizations would seek backing. The Company believes that the Council's Rules are unambiguous and clearly describe ENO's obligations to administer the Community Solar program and purchase the output of qualifying CSG Facilities under the standard offer PPA. It is the Subscriber Organizations' obligation to secure financing for their projects. ENO asserts that there is no additional benefit to the financing efforts of the Subscriber Organizations by requiring (1) ENO to execute a standard offer PPA at an arbitrary point before the project is constructed, (2) ENO to enter into a non-binding Letter of Intent that simply reiterates obligations placed on ENO by its retail regulator, or (3) CURO or ENO to provide an interpretation of the Council's Rules. In fact, such documents could inadvertently conflict with the Council's Rules and cause confusion regarding the rights and obligations of the parties under the Rules. The Council should recognize that such additional measures are unnecessary and decline to adopt any such further requirements.

c. Reduction of Deposits and Extension of Timelines—The requirements in the Rules for Subscriber Organizations to post deposits are both a protection for customers seeking opportunities to participate in the Community Solar program as well as a tool to help ensure that projects in the queue will be built in a reasonable timeframe without blocking other projects in the queue from having an opportunity to move forward. Recognizing the concerns raised by intervenors about the amounts and timing of both furnishing and forfeiting deposits, the Company proposes edits in Section VII (D)(10) that seek to strike a balance by phasing in deposits at lower amounts, allowing more time for projects to develop before deposits are required, and extending the point at which deposits are forfeited due to lack of progress.

SunConnect argued at the technical conference, and in its comments circulated thereafter, that timelines for furnishing deposits should not commence until after ENO completes any required system upgrades associated with interconnecting a CSG project. The Company disagrees with this suggestion because the work required to construct and interconnect projects will not be performed sequentially. Subscriber Organizations will be able to construct their projects while ENO is undertaking required system upgrades so there is no need to delay the collection of deposits for projects in the Construction Queue beyond the extended timelines proposed by the Company in its redline.

d. Forms CSG-APP and CSG-RPAR—As discussed in the Company’s January 2024 Compliance filing and at the Technical Conference, Form CSG-APP—Application replaces previous forms CSG-1—Program Application, and CSG-2—Interconnection Application. The consolidation of these two forms into one streamlines the application processes for Subscriber Organizations seeking to participate in the program. Form CSG-APP broadens the acceptable

proof of site control required at the time application is made to include Letters of Intent and Memoranda of Understanding which are more likely to be available at this point in the process.

Form CSG-RPAR provides a means for Subscriber Organizations to request preliminary information about possible project location(s) before submission of a full interconnection application. The form also enables a process through which the Company can provide timely responses to *ad hoc* requests from Subscriber Organizations seeking to site new CSG Facilities. As discussed in the Technical Conference, the Company provides responsive reports within 20 business days following receipt of Form CSG-RPAR, and several Subscriber Organizations have already availed themselves of this process to gather information about projects.

At the Technical Conference, TNO and others requested that acceptable proof of site control for purposes of submitting Forms CSG-APP and CSG-RPAR be further expanded to include emails from property owners expressing interest in the projects. The Company supports this proposed modification.

Parties at the Technical Conference requested ENO provide and maintain maps of available feeder capacities and a list of costs for common utility system upgrades required by distribution interconnections. Given the difficulties which arise with trying to track feeder capacities on a real time basis, and the fact that much of the available land that could be used for CSG Facility projects is located on a limited number of feeders in New Orleans East, the Company is not in a position to provide hosting capacity maps.² The Company has, however, looked into the option of providing a list of costs for common utility system upgrades and believes that this can be made available in the near term as an additional tool besides Form CSG-RPAR to help Subscriber Organizations gather information about potential projects.

² This is consistent with standard practice at the other Entergy operating companies, none of which maintain hosting capacity maps of their distribution systems.

2. Maintenance Deadlines

a. Sunny Day Outage vs. Force Majeure--Section 4.5 is included in the form CSG-4 PPA to provide incentives for a Subscriber Organization to maintain its CSG Facility in working condition as much as reasonably possible in order for subscriber customers to be able to receive the benefits of participation and to ensure that the energy that is supposed to be available to serve the grid in fact shows up. Intervenors propose changes to Section 4.5 that would quadruple the time frames under which a CSG Facility could be out of service for an outage not attributable to force majeure, allowing up to two years instead of the six months currently provided, and up to a year for other technical issues instead of the three months allowed. CCSA proposes to remove this section entirely because it maintains such customer protections are unnecessary. TNO and AAE go further to propose amendments to Section 6.3 that would double the time a CSG Facility can be out of service following a force majeure event to two years from one.

In setting the time periods for maintenance and repair and force majeure, the Council recognized that customers would rely on the operational CSG Facilities to provide the benefits they expect from their subscriptions, and that ENO would need to be able to rely on the continued operation of CSG Facilities that would represent distributed supply side resources on the grid. The changes proposed by the intervenors would weaken the incentive for a Subscriber Organization to make repairs as expeditiously as possible and return their facilities to production, and also would inject additional uncertainties into system planning. These outcomes create unnecessary risks for ENO and its customers, and they should be rejected by the Council.

3. Low Income Certification

Several parties have suggested that the requirement to recertify annually the status of Subscribers participating as Low-Income Subscribers should be waived completely and stricken

from the Rules. The current requirement that a Subscriber Organization recertify the low-income status of its Subscribers each year recognizes the fact that customers' situations may change over time and the program should reflect current information for purposes of calculating accurate Subscriber Credits. As discussed at the Technical Conference, accepting active participation in one of five main programs that exist to help low-income families—LIHEAP, SNAP, Medicaid, WIC, and TANF—as proposed by Intervenor in comments, would streamline the process for Subscriber Organizations to recertify Subscribers in their projects. The Company suggests that a complete waiver of the need to recertify low-income status creates a risk that low-income subscriber credits will be issued to non-qualifying participants and is not in the best interest of the Program or non-participating customers who ultimately bear the costs. The Company suggests that if the Council chooses to modify the current annual recertification requirement, it should consider a biennial requirement so recertification is accomplished every two years for existing Low-Income Subscribers.

4. Section 3.3 Requirements

TNO's suggested change to Section 3.3 of Form CSG-4 would add an unnecessary layer of additional oversight for CURO³. As drafted, Section 3.3 states that ENO has the unilateral right to reject changes to the monthly subscription information submitted by Subscriber Organizations that violate key provisions of the Rules regarding characteristics of CSG Facilities, enumerated in subsections (a) through (d) of the PPA.⁴ As the administrator of the Council's program, ENO, rightfully, has the responsibility to determine whether a Subscriber Organization is complying with basic, explicit requirements, *e.g.*, no customer owning more than 40% interest in a CSG Facility

³ TNO Motion, p. 2.

⁴ The requirements captured in Section 3.3 a-d of Form CSG-4 are taken directly from the Rules, Section III(b)(1) and (3), Section IV(b)(4), and Section V(b).

or subscriptions meeting the minimum levels in the Rules. Moreover, as discussed at the Technical Conference, Section XIV of the Rules already provides a mechanism for CURO to enforce the Council's Rules so the proposed modification to Section 3.3 of the PPA is unnecessary.

5. Standard Offer PPA Renewals

The Form CSG-4 Standard Offer PPA originally approved by the Council included a 10-year term with two optional 5-year renewals, equaling 20 years total. No further renewals were contemplated beyond 20 years. In 2022, Madison Energy Investments ("MEI") filed its Motion to Amend the Community Solar Rules, and requested, among other things, a change to a 20-year term rather than the then-existing 10-year term plus two 5-year renewals.⁵ In order to address concerns about obtaining financing in the absence of a stated 20-year term, in Resolution No. R-23-507, the Council approved the requested change for the PPA in Section 4.1 to reflect a 20-year term.

Now, however, after the Council granted the requested 20-year term, TNO is suggesting that the PPA should continue indefinitely until the Subscriber Organization chooses to terminate it. As discussed at the Technical Conference, the possibility of renewals beyond a 20-year term was never raised by MEI or any other party in any pleadings in this docket before the Council adjusted the term to 20 years in Resolution R-23-507. In fact, TNO has filed financial analyses in the docket that used a 20-year term in the modeling assumptions to demonstrate viability of projects;⁶ at no time has TNO or any other party filed analysis suggesting that a term longer than 20 years is required for CSG Facility projects to be financially viable.

⁵ Motion of Madison Energy Investments to Amend Community Solar Rules, filed July 13, 2022.

⁶ See, NREL Analysis submitted with TNO Comments, filed July 10, 2023.

TNO proposes to add the following language to Form CSG-4, “Subscriber Organization shall be allowed to continue to operate and Subscribers shall continue to receive bill credits during negotiation and after the end of the initial term without interruption **until the Subscriber Organization elects to stop providing credits**” [Emphasis added].⁷ TNO’s request is a remarkable and unjustified overreach which the Council should flatly reject. Renewal terms are not included in utility-scale solar PPAs to which ENO or other Entergy Operating Companies are a party. Allowing a Subscriber Organization the unilateral right to an unlimited term PPA places extraordinary risk on ENO and its customers and goes far beyond the purpose of the Community Solar program to provide customers with access to solar power. As with other solar PPAs, the parties would be free to explore options for renewal that may take effect after the 20-year term ends.

There is no reason for the Council to add renewal terms beyond 20 years to the standard offer PPA since such renewals are not necessary for projects to achieve financial viability. Further, the Council should reject the request of TNO and others to modify the standard offer PPA to grant a unilateral renewal right to Subscriber Organizations that binds the Company and future Councils to aging solar projects in perpetuity.⁸

⁷ TNO Motion, at 3.

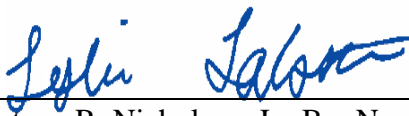
⁸ As the Council has recognized, “while the Home Rule Charter of the City of New Orleans vests the Council with the authority to supervise, regulate and control all utilities providing service in the City, that authority does not allow the Council, or other parties for that matter, the ability to substitute their own decisions for those of the utility...regulators are not the managers of the Company...Public Regulation must not supplant private management. A 20-year term limitation is a sound business decision of the Company and in accordance with the aforementioned, its business decision should not be substituted by Subscriber Organizations.” Council Resolution R-17-332, *In re: Rulemaking Proceeding Regarding Integrated Resource Planning*, Docket No. UD-17-01, at p. 18 (quoting *Georgia Power Co. v. Georgia Pub. Serv. Comm’n*, 85 S.E. 2d 14 (Ga. 1954)). Granting the renewal rights requested by Intervenor would effectively allow Subscriber Organizations to substitute their business judgment for ENO’s regarding the appropriate length of term for the standard offer PPA, which currently reflects the 20 year term used widely throughout the solar industry.

6. Request for Council Approval to Continue Accepting Applications

As of September 10, 2024, the Company has received applications for CSG Facility projects totaling 55.2 MW-AC, leaving 4.8 MW-AC remaining capacity under the program limit.⁹ Section V(A)(2) requires that, “Prior to accepting CSG Facility applications beyond the Community Solar Program Capacity Limits or the CSG Facility Category Limits, the Utility shall seek and obtain Council approval.” The Company, therefore, requests the Council grant approval for the Company to continue accepting applications beyond the overall program limits and beyond the Category Limits. Such approval would allow projects to enter the current queue (or Application Queue if the proposal herein is adopted by the Council) such that they would have an opportunity to move forward if projects above them in the queue drop out. Otherwise, the Company will be required to begin rejecting applications soon.

⁹ Rules, Section V(A)(1).

Respectfully submitted,

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**ATTORNEYS FOR
ENTERGY NEW ORLEANS, LLC**

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

***IN RE:* A RULEMAKING
PROCEEDING TO ESTABLISH
RULES FOR COMMUNITY SOLAR
PROJECTS**

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DOCKET NO. UD-18-03

**APPENDIX A
Technical Conference
ENO Proposed Redlines
08/27/2024**

Section VII (D) Processing of CSG Facility Applications

(1) The Utility shall process applications from Subscriber Organizations filed in accordance with the CSG Facility application procedure in the order in which the utility receives the application.

~~(2) Within 10 business days of receipt, the Utility shall notify the Subscriber Organization whether the application is rejected due to the capacity limits established by these Rules.~~

(3) Within 10 business days of receipt, the Utility shall notify the Subscriber Organization whether the application is complete. If the application is incomplete, the Utility shall provide a written list detailing all information that must be provided to complete the application.

(4) A Subscriber Organization receiving notice of an incomplete application shall revise and submit the required information within 10 business days after receipt of the list of incomplete information. Failure to submit the required information within 10 business days shall result in the application being rejected ~~Subscriber Organization losing their place in the queue~~, but shall not otherwise prejudice the Subscriber Organization's ability to file a new, complete application in the future.

(5) The Utility shall notify a Subscriber Organization within 10 business days of receipt of a revised application whether the application is complete or incomplete.

(6) The Utility shall grant an extension of time of an additional 10 days to provide such information upon request from the Subscriber Organization.

(7) The Utility shall reject an application that is not submitted in accordance with CSG Facility application procedure.

(8) The Utility shall assign ~~each CSG Facility~~ a unique identification number to each complete application and the application shall be deemed accepted as of the date the identification number is assigned.

(9) Application Queue—The Utility shall establish an Application Queue based on application acceptance date. An initial engineering review will be conducted by the Utility for each complete application.

(a) The Subscriber Organization shall have 45 days from the date of receipt of the initial review response to agree in writing to commence the required interconnection studies before the project is removed from the Application Queue.

(b) If the Subscriber Organization intends to pursue a group initial study for multiple projects, this intention shall be stated during the application process. The Subscriber Organization shall have 45 days to agree in writing to move forward with the required

interconnection studies before the projects involved in the group are removed from the Application Queue.

(c) Failure to submit an executed study agreement within 45 days following receipt of the initial review shall result in the Subscriber Organization losing its place in the Application Queue for the affected project(s), but shall not otherwise prejudice the Subscriber Organization's ability to file a new, complete application in the future for the same project(s).

(d) Upon completion of required interconnection studies, the Subscriber Organization has 90 days to execute an interconnection agreement or be removed from the Application Queue. Following execution by the Subscriber Organization, the Utility will execute the interconnection agreement as well. Execution by the Utility at this point does not waive any further obligations of the Subscriber Organization to complete construction or testing as required by the Utility to grant permission to operate or render Notice of Satisfaction.

(10) Construction Queue—Upon execution of an interconnection agreement, the CSG Facility project will be added to the Construction Queue.

(a) If, within 18 months following execution of an interconnection agreement, a CSG Facility fails to begin operating, ~~within 12 months of an approved application by the Subscriber Organization,~~ the Subscriber Organization ~~shall~~ should provide to the Utility ~~an additional an~~ initial deposit of ~~\$25~~ \$50 per kW for the project to remain in the Construction Queue ~~to continue under the Community Solar Program.~~

(b) The Utility shall return the CSG Facility deposit upon commencement of operation, unless the CSG Facility fails to begin operating within ~~24~~ 18 months of executing an interconnection agreement ~~an approved application.~~

(c) If a CSG Facility fails to begin operating within 24 months of executing an interconnection agreement, the Subscriber Organization shall provide to the Utility an additional deposit of \$25 per kW for the project to remain in the Construction Queue.

(d) The Utility shall return the CSG Facility deposit upon commencement of operation, unless the CSG Facility fails to begin operating within 36 months of executing an interconnection agreement, in which case the full deposit shall be forfeited by the Subscriber Organization.

(11) Any forfeited deposits shall be credited back to Utility customers via the Fuel Adjustment Clause.

(12) The Utility's interconnection process shall include an analysis of any potential reliability impacts, positive or negative, of the interconnection of the CSG Facility at the requested location.

(13) If the Utility participates as a Subscriber Organization, it will have the same rules applied to it as any other Subscriber Organization.

(14) If the Utility or any of its affiliates participate as a Subscriber Organization, the Utility may not recover any portion of its CSG Facility costs through its base rates. If a Utility or any of its affiliates participate as a Subscriber Organization, it must not offer its own CSG Facility, or that of its affiliate any preferential treatment or benefit not available to other Subscriber Organizations.

Additional Definitions for Section II

Application Queue—The sequential list of CSG Facility projects for which a completed application has been accepted by the Utility.

Construction Queue—The sequential list of CSG Facility projects with a signed interconnection agreement.

CERTIFICATE OF SERVICE

Docket No. UD-18-03

I hereby certify that I have served the required number of copies of the foregoing pleading upon all other known parties of this proceeding individually and/or through their attorney of record or other duly designated individual, by: ☒ electronic mail, ☐ facsimile, ☐ hand delivery, and/or by depositing same with ☐ overnight mail carrier, or ☐ the United States Postal Service, postage prepaid.

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New Orleans, Louisiana, this 13th day of September 2024.



Leslie M. LaCoste