

January 15, 2025

Via Electronic Mail

Aisha Collier Assistant Clerk of Council

Room 1E09, City Hall

1300 Perdido St New Orleans, LA 70112

clerkofcouncil@nola.gov

Re: Docket UD-24-02 Proposal to Enhance Distributed Energy Resource Programs for the City of New Orleans

Dear Ms. Collier,

On behalf of Resilience New Orleans, I respectfully submit these comments in response to Docket UD-24-02 Proposal to enhance distributed energy resource programs issued on October 24, 2024 in Resolution R-24-624. Please file the attached communication and this letter in the record of the proceeding.

Please do not hesitate to reach out to me with any questions related to this filing.

Sincerely,

Casey DeMoss

Executive Director

Resilience New Orleans

casey@resilienceneworleans.org



Before

The Council of the City of New Orleans

**Re: DISTRIBUTED ENERGY RESOURCE
PROGRAM**

DOCKET UD-24-02

RESILIENCE NEW ORLEANS PROPOSAL

By and through its undersigned Resilience New Orleans (RNO) respectfully submits this proposal to the Council of the City of New Orleans (“the Council”) and intervening Parties in the above captioned proceeding in response to the Council’s October 24, 2024 Resolution R-24-624, providing for program proposals by interested parties by December 20, 2024.

RNO is a Louisiana-based nonprofit with a mission to advocate for sensible energy and electric policies to best ensure New Orleans remains a vital place to live and work. RNO seeks to ensure that New Orleans’s has a resilient, reliable and clean power grid and that electricity is affordable to all customers.

RNO has members served by Entergy New Orleans and there are no other parties representing the interests of RNO and its members. RNO therefore possesses standing to intervene, and respectfully seeks intervenor status to fully participate in this matter. RNO requests that we be placed on the service list of this proceeding and be served with all pleadings, notices orders, and other filings.

RNO has developed a framework for accomplishing DER goals including expanding Energy Smart, incentivizing electrification, creating a Time of Use tariff, and developing a new funding source to help ratepayers cover the cost of new back-up battery systems.

Abuse of SERI Credits Is a Top Concern: To answer the Council’s question about SERI credits, RNO does not support the use of SERI credits for third party developers or nonprofits. The Louisiana state solar tax credit was abused by third party solar developers and funds for a customer program should largely benefit customers. The split should be 90% customers with a cap of 10% on administrative fees if customer funds are used. The program should be clear that



all customers benefit, not just the ones utilizing the program, since the cost shifts are borne by all.

Other RNO positions:

1. Expand Energy Smart's Residential Battery Program to Achieve DER Goals

Entergy New Orleans' Energy Smart program is a comprehensive energy efficiency initiative developed by the New Orleans City Council and administered by Entergy New Orleans. It aims to help residents and businesses reduce energy consumption and lower utility bills by offering cash incentives for energy efficiency audits, upgrades, and more. Since its inception, Energy Smart has provided over \$43.7 million in incentives, assisting more than 113,000 homes and businesses in saving approximately 350 million kWh of energy.

Energy Smart runs a Residential Battery Pilot program that allows homeowners to earn up to \$550 by enrolling their home battery systems, contributing to grid stability and enhancing energy resilience.

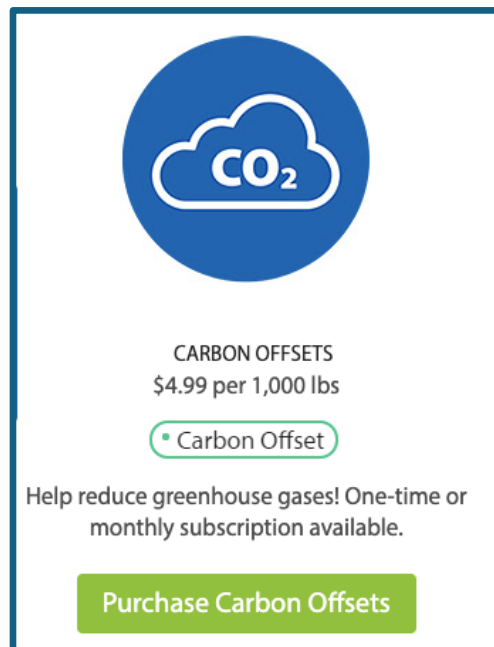
To obtain DER goals at a significantly lower cost, the Battery pilot should be expanded to incentive purchases of battery systems to help more homeowners, and possibly business customers. Allowing businesses to participate could help achieve carbon goals more quickly, but commercial customers shouldn't be allowed to deplete or expand the budget. Residential customers should have a protected budget carveout if the program is expanded to include commercial ratepayers.

2. Create a "New Orleans Carbon Offset" program to raise ~\$4,491,000/year

Carbon offsets are a way for individuals or companies to remove their own carbon emissions from the atmosphere. It is defined as a certificate representing the reduction of one metric ton (2,205 lbs) of carbon dioxide emissions. There are companies that do this for profit, like [Native Energy](#) or [Terrapass](#), that have raised significant funds and completed numerous renewable energy projects, not to mention made a nice profit for the companies.



There is no reason that the New Orleans City Council, Office of Council Utility Regulatory Office could not set up a carbon-offset program for itself. The program could be marketed to eco-friendly tourists, festivals, conventions, hotels, and businesses that want to offer a little eco-lagniappe to our great city. Terrapass charges \$4.99 per 1,000 lbs (photo below) of calculated carbon emissions. This is potentially very lucrative for New Orleans as a way to pay for renewable energy goals, including storage.



The Carbon Offset Math

If just 5% of New Orleans' [18 million annual visitors](#) offset 1000 lbs of their carbon emissions at a cost of \$4.99/1000 lbs., it would raise \$4,491,000 annually for the city's renewable energy goals.

3. Offer a "Time of Use" pricing tariff

Time-of-Use (TOU) tariff offers a smarter, cost-effective way for customers to manage their electricity bills while supporting a greener grid. By charging different rates based on the time of day, TOU pricing encourages energy use during off-peak hours when demand is lower, and electricity is cheaper and cleaner.



Peak shaving benefits include:

Cost Savings: When customers shift energy-intensive activities (like battery charging) to off-peak hours they enjoy lower rates.

Grid Stability: By reducing demand during peak hours, TOU pricing helps prevent outages and minimizes stress on the grid.

Environmental Impact: Off-peak power often comes from renewable energy sources, reducing our city's carbon footprint.

TOU pricing empowers consumers to take control of their energy usage while contributing to a more sustainable and reliable energy system.

4. Facilitate Electrification through Energy Smart

Energy Smart provides a framework for integrating other distributed energy resources such as electric vehicle batteries, heat pumps, smart thermostats, electric water heaters, and electric appliances. The best DER program ensures customers are moving toward electrification, and that shift in energy use creates tangible benefits to all electric grid customers.

RNO appreciates the opportunity to submit ideas about our DER program to the Council and Parties and looks forward to discussing the possibilities at forthcoming technical conferences.

In conclusion, RNO does not support the use of SERI credits for third party developers or nonprofits. Customer funds are not needed if the Council develops a new funding source like a Carbon offset program to cover the costs of new battery programs. Electrification and battery investments are important keys to safeguard our grid.

Respectfully submitted on this 20th day of December, 2024.

/s/ Casey DeMoss

Casey DeMoss

Executive Director

Resilience New Orleans

casey@resilienceneworleans.org



Before

The Council of the City of New Orleans

Re: Resolution and Order R-24-624 Re: Distributed Energy Resource Program

(Docket No. UD-24-02)

CERTIFICATE OF SERVICE

I do hereby certify that I have, on this 20th day of December, 2024, served the foregoing PROPOSAL upon all other known parties of this proceeding by electronic mail.

Casey DeMoss

Casey DeMoss, Resilience New Orleans