



February 12, 2019

Via Hand Delivery
Lora W. Johnson
Clerk of Council
Room 1E09, City Hall
1300 Perdido St.
New Orleans, LA 70122

RE: Draft Resolution R-19-20, RESOLUTION AND ORDER DIRECTING ENTERGY NEW ORLEANS, LLC TO MAKE A NEW FILING TO ADDRESS NEW ORLEANS TRANSMISSION RELIABILITY ISSUES

Dear Ms. Johnson,

Please accept this correspondence to the New Orleans City Council regarding the above referenced matter.

Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in black ink that reads "Logan A. Burke". The signature is written in a cursive, flowing style.

Logan A. Burke
Executive Director
Alliance for Affordable Energy

February 12, 2019

To: Members of the Council of the City of New Orleans
Mr. Jason R. Williams, Councilmember-at-Large
Ms. Helena Moreno, Councilmember-at-Large
Mr. Joseph I. Giarrusso, District "A" Councilmember
Mr. Jay Banks, District "B" Councilmember
Ms. Kristen Gisleson Palmer, District "C" Councilmember
Mr. Jared C. Brossett, District "D" Councilmember
Ms. Cyndi Nguyen, District "E" Councilmember

Dear Councilmembers,

We, the undersigned, provide the Council with the attached report prepared by Strategen Consulting showing that the possibility of a transmission reliability issue can be cost-effectively solved with renewable solar energy and battery storage resources. The Strategen report provides a detailed evaluation of only one of several alternative options to the proposed Entergy gas plant. We stand by our position that all alternative options should be considered, including renewable energy, battery storage, transmission upgrades, demand response, energy efficiency, or some combination of these reliable and resilient resources.

We urge the Council to take the time to consider the Strategen Consulting report in relation to draft Resolution R-19-20. We commend the Council for proposing this resolution to direct Entergy to conduct, for the first time, a thorough evaluation of energy options along with detailed cost estimates for: 1) transmission upgrade; 2) renewables, battery storage or demand response solution, or any combination thereof; 3) conventional generation; and 4) some combination of the first three options.

We recognize that the justification for the proposed gas plant has not been sufficiently established. We are also aware that a study conducted by MISO in 2014 found that, following the completion of three planned transmission upgrades (which were completed in 2016) there were no reliability constraints and no voltage reliability concerns posed by the closure of the Michoud power plant. Yet, even with the possibility of two transmission failures occurring during peak time (the transmission reliability issue), there is an array of sustainable solutions available that can ensure equity and justice for New Orleans ratepayers and neighborhoods.

While the attached analysis by Strategen Consulting provides the Council with a look at one potential solution, battery storage and renewable solar energy, we provide it simply to demonstrate that options exist. A fair evaluation of all options is owed to New Orleans residents and businesses who would be asked to bear the costs of the selected option.

We urge the Council to reopen the proceeding on the proposed Entergy gas plant in order to thoroughly consider the options and vote to approve R-19-20. The company's evaluation of the options should be done in conjunction with an all-source solicitation to allow bids for alternative resources that provide peak capacity services, including renewables and battery storage facilities. Entergy's analytical effort could inform that all-source solicitation process, which would ensure

independent analysis is brought to the Council's attention for a final decision. As described in the proposed Resolution R-19-20, a period of 180 days should be allowed for such information to be provided to the Council for final review and decision.

Many of the recent solar and storage projects noted in the attached Strategen Consulting report came about by utilities conducting all resource solicitations and not through their own reviews. Indeed, utilities like Xcel and APS acknowledge they are unfamiliar with these resources and have gone to the market for the information.

In conclusion, we respectfully request the Council rescind and repeal the approval of the proposed Entergy gas plant by the previous Council, and direct the company to perform a complete analysis of alternatives, including battery storage, renewables, and demand response, in conjunction with an open all-source solicitation that will provide additional independent, market-based information on the current technical and economic options actually available to meet the peak and reliability needs of the company.

This material is submitted with the assistance of Clean Energy Group (<http://www.cleanegroup.org/>), a nationally recognized nonprofit expert in storage technologies.

Thank you for your attention to this matter,

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