

May 9, 2025

BY E-MAIL

Clerk of Council
Council of the City of New Orleans
City Hall, Room IE09
1300 Perdido Street
New Orleans, LA 70112

*Re: Resolution and Order Establishing a Docket and Procedural Schedule to Enhance
Distributed Energy Resource Programs; NOCC Docket UD-24-02*

Dear Clerk:

Attached please find the *Motion to Extend the Date to File Advisors' Report and Other Remaining Dates in Procedural Schedule* on behalf of the of Advisors to the Council of the City of New Orleans in the above-referenced matter. The Advisors submit this filing electronically and will submit the original and requisite copies as you direct. Thank you.

Sincerely,



Jay Beatmann

/jb

Attachment

cc: Official Service List for UD-24-02

BEFORE THE COUNCIL OF THE CITY OF NEW ORLEANS

**RE: RESOLUTION AND ORDER
ESTABLISHING A DOCKET AND
PROCEDURAL SCHEDULE TO
ENHANCE DISTRIBUTED ENERGY
RESOURCE PROGRAMS**

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DOCKET NO. UD-24-02

**MOTION TO EXTEND THE DATE TO FILE ADVISORS' REPORT AND OTHER
REMAINING DATES IN PROCEDURAL SCHEDULE**

The Advisors to the Council of the City of New Orleans (“Council”), through undersigned counsel, respectfully submit this Motion to Extend the Date to File Advisors’ Report and Other Remaining Dates in the Procedural Schedule in the above-captioned proceeding. On October 24, 2024, the Council adopted Resolution No. R-24-624 (“Initiating Resolution”), initiating a proceeding and procedural schedule to evaluate ways to increase the availability of distributed energy resources (“DER”), battery storage, and related facilities, including any changes to Entergy New Orleans, LLC (“ENO”)-related policies, funding mechanisms, and establishing a vendor-neutral program to facilitate these goals. The Initiating Resolution directed the Advisors to submit on June 2, 2025, an Advisors’ report summarizing the comments received, recommending changes to existing Council policies, analyzing proposed funding mechanisms, and providing additional guidance to the parties on how to fulfill the Council’s goals for this Docket.

On December 20, 2024, parties filed proposals for changes to existing policies and in some instances proposed new programs and potential funding mechanisms pursuant to the Council’s directive in the Initiating Resolution. Notably, several parties propose to use millions of ratepayer

refunds to establish their respective programs; however, none of the proposals filed included a cost/benefit analysis to support their respective recommended programs. In addition, none of the parties included any cost/benefit analyses in their comments, reply comments, or initial discovery responses. Such cost/benefit analyses are critical to assist the Council in its overall evaluation of the proposals made in this docket.

On April 29, 2025, the parties participated in a second technical conference wherein ENO and Together New Orleans/Alliance for Affordable Energy (“TNO/AAE”), the proponents of the two major program proposals, indicated that they would each be filing cost/benefit analyses into the Docket supporting their recommended programs.

On May 8, 2025, at 4:11 p.m., TNO/AAE filed a cost/benefit analysis. No other such analyses have been filed to date. Given the content of the TNO/AAE filing and assuming other analyses will be filed, it is necessary for the Advisors, and other parties if they so choose, to conduct additional discovery in order to obtain clarification and answers to questions about the analyses. Even with expedited discovery responses, typically fifteen (15) days, they would not be due until only days before the Advisors’ report is due. Absent a detailed review of the cost/benefit analyses the Advisors will not be in an informed position to make the recommendations required by the Council as part of the Advisors’ report. Accordingly, the Advisors request that the date to file the Advisors’ report be extended to July 16, 2025, and that a deadline for any other party to file their costs/benefit analyses be set as May 30, 2025. The remaining dates in the procedural schedule should also be extended, as shown in the chart below, to correspond with the new Advisors’ report deadline.

Filing	Original Date	Proposed New Date
Advisors Report	June 2, 2025	July 16, 2025
Parties file comments on Advisors' Report	June 20, 2025	August 8, 2025
Parties' file Revised Proposals	August 1, 2025	September 22, 2025
Certification of Record	August 22, 2025	October 14, 2025

RESPECTFULLY SUBMITTED:



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon "The Official Service List" via electronic mail and/or U.S. Mail, postage properly affixed, this 9th day of May 2025.

A handwritten signature in blue ink, appearing to read "Jay Beatmann", is positioned above a horizontal line.

J. A. "Jay" Beatmann, Jr.

RE: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND PROCEDURAL SCHEDULE TO ENHANCE DISTRIBUTED ENERGY RESOURCE PROGRAMS

On May 9, 2025, the Advisors to the Council of the City of New Orleans (“Council”) filed a Motion to Extend the Date to File Advisors’ Report and Other Remaining Dates in the Procedural Schedule in the above-captioned proceeding to allow adequate time to analyze, evaluate the cost/benefit analyses that are expected to be filed in this docket and to conduct discovery related thereto. Considering said motion, the Advisors’ request is hereby GRANTED. Accordingly, the deadline for parties to file a cost/benefit analysis in this Docket shall be May 30, 2025 and the remaining deadlines in this proceeding are extended as follows:

Filing	Original Date	New Date
Advisors Report	June 2, 2025	July 16, 2025
Parties file comments on Advisors' Report	June 20, 2025	August 8, 2025
Parties' file Revised Proposals	August 1, 2025	September 22, 2025
Certification of Record	August 22, 2025	October 14, 2025

Thus, done and signed this day of May 2025.

Honorable Calvin Johnson
Hearing Officer