

May 22, 2025

Via Electronic Mail

Aisha Collier
Assistant Clerk of Council
Room 1E09, City Hall
1300 Perdido St
New Orleans, LA 70112

Re: Resolution and Order **R-25-255** (Docket No. **UD-18-03**)

Dear Ms. Collier,

Per R-25-255, NOLA Solar Holding Company LLC (NOLA Solar) and SunConnect Corporation (SunConnect) respectfully submit the following comments relating to UD-18-03, New Orleans' community solar program.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Erica E. Buster". The signature is fluid and cursive, with the first name "Erica" and last name "Buster" clearly distinguishable.

Erica Buster
NOLA Solar Holding Company LLC and SunConnect Corporation

NOLA Solar Holding Company LLC

May 22, 2025

Via Electronic Mail

Aisha Collier
Assistant Clerk of Council
Room 1E09, City Hall
1300 Peridido Street
New Orleans, Louisiana 70112

Re: Resolution No. R-25-255: Comments Submission (Letter of Agreement with Together New Orleans Filing regarding the Community Solar Program Implementation (UD 18-03) dated April 2, 2025)

Dear Ms. Collier, Council Members, Council Staff, CURO, and Advisors:

NOLA Solar Holding Company LLC (NOLA Solar) and SunConnect Corporation (SunConnect) respectfully submit this letter of agreement with the comments submitted by Together New Orleans (TNO) on April 2nd, 2025. Further, we would like to add commentary on the following matters.

NOLA Solar has five projects in the program and interconnection queue. These projects are slated to begin construction in late 2025 and should be operational by summer of 2026. One of the biggest things holding them back is resolution of the community solar program rules. Without final resolution, these projects are expensive to finance since potential investors/financiers view the market as unstable. Outside investors look at the New Orleans program, and see the Docket Resolutions, but no corresponding updates in the rules. NOLA Solar and SunConnect would like to impress the importance of solidifying these rules expeditiously.

That said, the comments that TNO has submitted will make the program stronger and fairer. We agree with their proposed changes; however we would like to add detail expanding on to three of their suggestions as another experienced community solar developer.

I. Timing of Executing Interconnection Agreements

In addition to defining when an Interconnection Agreement can be executed, defining upgrade payment terms is critical. As we understand it, current payment terms for Interconnection Upgrades are on a 30-day invoice and require payment in full of 100% of the upgrade costs. This will create

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significant hardships for developers and potentially kill projects. With interconnection costs quoted in *millions*-of-dollars, 3rd party financing will be critical. Typical payment terms for these kinds of financing vehicles require 60-90 days for disbursement.

Other states with successful Distributed Generation programs commonly split payments for interconnection upgrades. For example: In Massachusetts and New York, 25% of the upgrade payment is due within 60 business days of a signed agreement. The final 75% installment is due 120 business days after the first payment was made. This setup gives utilities what they need to start engineering and procurement, while not placing unreasonable burden on projects.

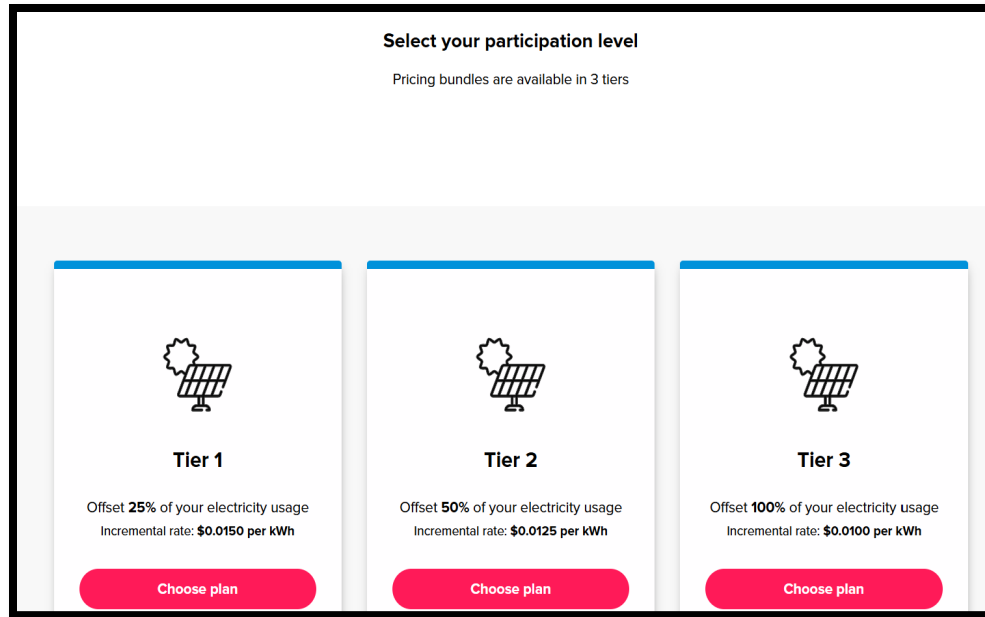
We suggest implementing similar payment terms ensuring subscriber organizations have time to make payments and are not required to pay exorbitant carrying costs while also giving ENO what they need to initiate construction of the necessary upgrades.

II. Consolidated Billing

We reiterate TNO's stance that Council must compel Entergy New Orleans to implement consolidated billing for the Community Solar Program. Ironing out these details is critical to the economic viability of subscriber organizations within the program. Project financing requires subscriber management to be ironed out. Leaving this open gives investors/financiers the impression of instability in the market. Without firm rules around consolidated billing, subscriber organizations cannot get their projects financed.

We understand ENO submitted a filing requesting the Council to reconsider the requirement for consolidated billing, citing the high costs associated with its implementation. This response is unfounded as **ENO currently has a platform on their website that could be utilized for the consolidated billing process.**

Link to page here: ENO Green Select Plans - <https://renew-neworleans.entergy.com/green-select/plans#pricing-cards>



This image is part the landing page for the site referenced above. As you can see, ENO is currently selling solar credits through this platform. This platform could easily be adapted to support consolidated billing by simply implementing a discount to the to the rate rather than a premium.

III. Deposits under the old rules

We want to emphasize the importance of clarity from Council on this matter.

We applaud the Council on their dedication to creating a sustainable community solar program. The progress over the last couple of years has been substantial. We urge the Council to implement these suggestions and truly launch this program. This will make for a stable, financeable market where projects can thrive and build a cleaner more affordable future for New Orleanians.

Sincerely,

Erica Buster, Vice President
NOLA Solar Holding Company LLC and SunConnect Corporation