

May 27, 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, Finance New Orleans respectfully submits 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,

Annie Clark
Finance New Orleans

Dear Councilmembers,

As New Orleans' dedicated Green Bank, Finance New Orleans is deeply committed to expanding equitable access to affordable, clean energy across our city. We strongly support the thoughtfully proposed revisions to the community solar program rules under Docket UD-18-03.

The current framework presents significant, demonstrable impediments to vital community solar development. For financiers like Finance New Orleans, the absence of clear, fair, and consistent regulations makes underwriting and providing essential project financing impossible. These proposed changes are not merely administrative adjustments; they reflect market realities and establish a more efficient, transparent process that fosters accountability for all stakeholders, including Entergy New Orleans, in ensuring timely interconnections and project advancement. The proposed updates are critical in addressing these barriers:

- **Timing of Executing Interconnection Agreements:** Current requirements for 100% upfront payment within 30 days pose significant financial hardships for developers, misaligning with typical financing disbursement timelines. We advocate for split payment terms, post-system impact study, mirroring successful state models, to ensure project financeability and timely progress.
- **Consolidated Billing:** This is crucial for the economic viability of subscriber organizations and securing project financing, as uncertainty creates market instability. The Council previously directed this in R-24-310, and timely implementation is overdue.
- **Application Queue:** There should only be one waitlist in this program, not the two currently proposed by ENO.
- **Deposits under Old Rules:** We urge the Council to provide clarity on this matter and ensure subscriber organizations are not penalized for delays outside their control.

We strongly urge the Council to swiftly adopt these critical reforms and mandate their timely implementation, particularly consolidated billing by July 1, 2025, as previously directed in R-24-310. Finance New Orleans is actively collaborating with the City of New Orleans to deploy incentives and financing that will unlock community solar projects, creating local jobs and delivering vital cost-saving clean energy to our residents—especially those who have been historically underserved by the energy system. Our ability to underwrite and finance these transformative projects hinges entirely on the establishment of clear, equitable, and consistent rules.

We commend the Council for its leadership in advancing clean energy initiatives and respectfully request your decisive action to bring this docket to a timely and successful conclusion, paving the way for a more stable, financeable market where projects can thrive and build a cleaner, more affordable future for New Orleanians.

Sincerely,

Annie Clark
Finance New Orleans
aclark@financeauthority.org
504-920-6881

**Before
The Council of the City of New Orleans**

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

CERTIFICATE OF SERVICE

I do hereby certify that I have, this May 27, 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

A handwritten signature in blue ink, appearing to read "Annie Clark", is centered on the page.

Annie Clark, Finance New Orleans