



**ALLIANCE FOR
AFFORDABLE
ENERGY**

June 27, 2025

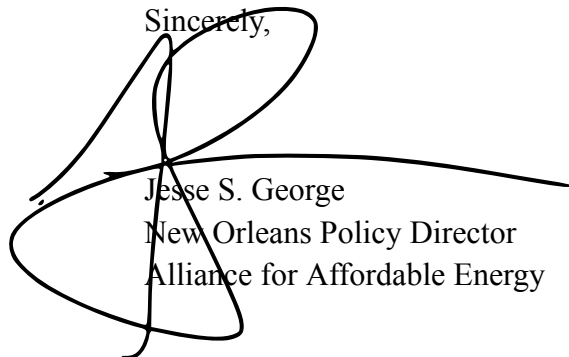
Via Electronic Mail
Clerk of Council
Room 1E09, City Hall
1300 Perdido Street
New Orleans, LA 70112

RE: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND OPENING A
RULEMAKING PROCEEDING TO ESTABLISH RENEWABLE PORTFOLIO STANDARDS
(UD-19-01)

Dear Clerk,

Please find the attached Comments of the Alliance for Affordable Energy on Entergy New Orleans, LLC's Renewable and Clean Portfolio Standard Compliance Demonstration Report for Compliance Year 2024 for filing under the docket referenced above. We will submit physical copies at your instruction. If you have any questions, please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely,



Jesse S. George
New Orleans Policy Director
Alliance for Affordable Energy

Before
The Council of the City of New Orleans

**In Re: RESOLUTION AND ORDER
ESTABLISHING A DOCKET AND
OPENING A RULEMAKING PROCEEDING
TO ESTABLISH RENEWABLE PORTFOLIO
STANDARDS**

DOCKET NO. UD-19-01

JUNE 27, 2025

**COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY ON ENTERGY
NEW ORLEANS, LLC’S RENEWABLE AND CLEAN PORTFOLIO STANDARD
COMPLIANCE DEMONSTRATION REPORT FOR COMPLIANCE YEAR 2024**

I. INTRODUCTION

On May 1, 2025, pursuant to Section 4(f) of the Renewable and Clean Portfolio Standard (“RCPS”) the Council of the City of New Orleans (“the Council”) adopted in Resolution No. R-21-182, Entergy New Orleans, LLC (“ENO”) filed its Compliance Demonstration Report (“the Report”) for compliance year 2024. On May 22, 2025, the Council adopted Resolution No. R-25-297, providing an opportunity for intervenors in this docket to comment on ENO’s Report by June 27, 2025. Accordingly, the Alliance for Affordable Energy (“AAE”) respectfully submits these Comments on ENO’s Compliance Demonstration Report for compliance year 2024:

**II. ENO’S COMPLIANCE IS STILL LARGELY DEPENDENT ON
NON-RENEWABLE RESOURCES**

AAE acknowledges that ENO has met the compliance requirements for compliance year 2024. However, we would note that the vast majority – almost 83% – of ENO’s compliance came from existing nuclear power generating facilities, a non-renewable resource. Renewable resources offer benefits beyond reducing greenhouse gas emissions that nuclear cannot, including flexibility, the creation of a local economy and workforce around distributed resources, and being truly clean and sustainable, without the long-term radioactive waste storage issues

associated with nuclear energy. As discussed below, the Council should amend the RCPS to encourage the development of locally-generated renewable energy.

III. THE COUNCIL SHOULD NOT APPROVE LARGE EVENT ELECTRIFICATION AS AN ELIGIBLE COMPLIANCE RESOURCE

In its Report, ENO proposes to include what it calls “large event electrification” as a Tier 3 resource for compliance year 2025. While a reduction in the usage of diesel generators is an admirable goal, “large event electrification” is merely an opportunity for ENO to sell more electricity, regardless of the generation source. As the Council stated rightly in the preamble to Council Resolution R-21-182 adopting the RCPS: “[T]he Council finds that the primary purpose of the RCPS will be to eliminate carbon emissions from the Utility’s generation portfolio, and that Beneficial Electrification has the potential to prolong the extent to which the Utility may keep carbon emitting resources in its portfolio.” Essentially, ENO would be creating new load by electrifying large events with no regard to the generation resources supplying that new load, which is contrary to the “primary purpose” of the RCPS, reducing dependence on carbon-emitting resources. ENO needs no additional incentive to pursue these electrification projects, as they stand to benefit directly from increased sales, and thus the Council should deny ENO’s request to include large event electrification as an eligible Tier 3 resource.

IV. THE COUNCIL SHOULD AMEND THE RCPS TO CREATE A CARVEOUT FOR LOCALLY-GENERATED RENEWABLE ENERGY

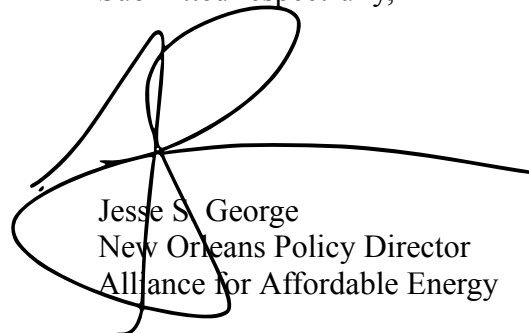
In order to spur the development of truly renewable energy in New Orleans, the Council should amend the RCPS to include an escalating carveout or mandate for locally-produced renewable energy. AAE and the Energy Future New Orleans Coalition advocated for this policy when the RCPS was first created, but the Council elected to include a multiplier for locally-produced renewable energy instead. The result is that solar energy accounted for a mere

4.5% of ENO's 2024 compliance credits. A mandate for locally-produced renewable energy under the RCPS would provide a strong incentive to third-party renewable energy developers, who could help to bring the full benefits of local renewable energy to New Orleans, including not only greenhouse gas emissions reductions, but reductions in co-pollutants, a vibrant economy and workforce around distributed energy, and increased grid resilience and reliability.

VIII. CONCLUSION

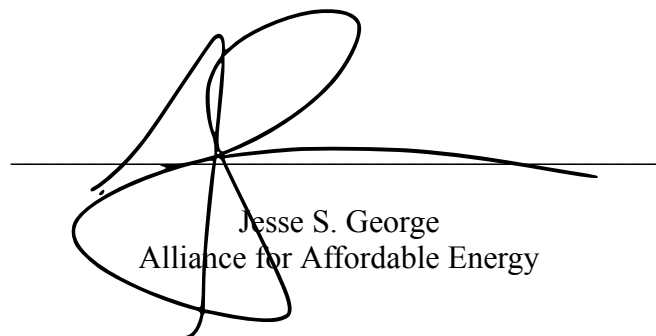
AAE appreciates this opportunity to comment on ENO's 2024 Compliance Demonstration Report. The RCPS is a powerful tool for preserving New Orleans' future, but the Council can and should do more to ensure that the full benefits of renewable energy accrue to the City of New Orleans.

Submitted respectfully,



Jesse S. George
New Orleans Policy Director
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I hereby certify that I have this 27th day of June 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



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