



August 8, 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 PROCEDURAL
SCHEDULE TO ENHANCE DISTRIBUTED ENERGY RESOURCE PROGRAMS
(UD-24-02)

Dear Clerk,

Please find the attached Comments of the Alliance for Affordable Energy on the Advisors' Report Regarding Parties' Proposed Distributed Energy Resources Programs and Policies 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,

A large, stylized handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

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
PROCEDURAL SCHEDULE TO
ENHANCE DISTRIBUTED ENERGY
RESOURCE PROGRAMS**

DOCKET NO. UD-24-02

AUGUST 8, 2025

**COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY ON THE
ADVISORS' REPORT REGARDING PARTIES' PROPOSED DISTRIBUTED
ENERGY RESOURCES PROGRAMS AND POLICIES**

The Alliance for Affordable Energy (“the Alliance”) hereby submits the following comments on the Advisors’ Report Regarding Parties’ Proposed Distributed Energy Resources Programs and Policies:

I. USE OF SYSTEM ENERGY RESOURCES, INC. SETTLEMENT FUNDS

Despite the fact that Entergy New Orleans, LLC (“ENO”) has itself shifted from its original position of complete opposition to use of System Energy Resources, Inc. (“SERI”) settlement funds for the purpose of a DER program to a concession that these funds could be used in this way under its BESS proposal, the Advisors have taken a hardline stance against use of SERI funds. The Council’s acceptance of the Advisor’s recommendation would amount to a weakening of the Council’s authority as regulator, and completely ignores the Council’s own long history of applying funds associated with Grand Gulf settlements in many ways over the years that did not reflect a direct bill credit to all customers. This precedent began in 1986 with Resolution R-86-112, which created the Entergy/City Council Economic Development Fund. This fund was used in myriad ways, all at the Council’s discretion. Some examples include a

1995 allocation to support performances at French Quarter Fest¹, the 1998 New Orleans National Convention Attraction Committee², and in 2002 the Central City Economic Opportunity Corporation, Teen Court of Greater New Orleans, and to install ornamental lights in New Orleans East³, all of which have a far more tenuous connection to utility relief than the proposal submitted by the Alliance and Together New Orleans (“TNO”), which would ultimately benefit not only participating households but all ratepayers.

The Advisors have instead recommended – in a separate docket (UD-18-07) – the use of SERI settlement funds to offset bill effects of a proposed rate increase under ENO’s formula rate plan. While this would mitigate the effect of granting ENO’s rate increase on customer bills, at least for a short time, it would amount to handing back to ENO settlement funds it agreed to return just last year, leaving ratepayers with nothing to show for it. Moving forward with a DER program with no dedicated funding source would virtually guarantee that the program would be inaccessible to low-income households, who most stand to benefit but who will be excluded without a robust funding source. The Council should reject the Advisors’ recommendation and dedicate the SERI settlement funds to a vendor-neutral, independently-administered DER program.

II. VENDOR NEUTRALITY

While the Advisors’ recommend a distributed energy resources (“DER”) expansion pilot program with vendor neutrality, their recommendations do not make a clear commitment to independent administration. The Alliance supports the goal of true vendor neutrality and

¹ Resolution R-95-356 [retrievable at https://library.municode.com/la/new_orleans/munidocs/munidocs?nodeId=172705d5d4ec5]

² Resolution R-98-335 [retrievable at https://library.municode.com/la/new_orleans/munidocs/munidocs?nodeId=17270d21b7914]

³ Resolutions R-02-139, R-02-269, R-02-557 [retrievable at https://library.municode.com/la/new_orleans/munidocs/munidocs?nodeId=172711ba4b4d0]

reiterates that the Council has already determined a vendor-neutral program to be in the public interest in the preamble of initiating resolution R-24-624.

III. THE ADVISORS' INCREMENTAL APPROACH DOES NOT MATCH THE URGENCY OF THE MOMENT

The Advisors' ultimate recommendation of a DER expansion pilot program does not match the urgency of the moment, either in terms of need or in terms of maximizing resources and impact. Nearly 1 out of every 5 New Orleanians faces utility disconnection annually due to inability to pay ENO's rising bills⁴ and the City continues to experience frequent outages and increasingly frequent extreme weather events, including extreme heat and cold.

Additionally, while the so-called One Big Beautiful Bill retains incentives for battery storage, as we noted in our joint letter with Together New Orleans dated July, 16, 2025, the solar Investment Tax Credit will be available at its current level only for projects that become operational by the end of 2027. While this program pertains to battery storage only, the possibility of combining the benefits of federal incentives for solar with an aggressive battery program in New Orleans is a remarkable opportunity. Quite simply, New Orleans cannot afford an incremental approach, but must adopt a program capable of utilizing available resources while they last to achieve maximum benefit for ratepayers, particularly low-income and medically-vulnerable residents who are most in need.

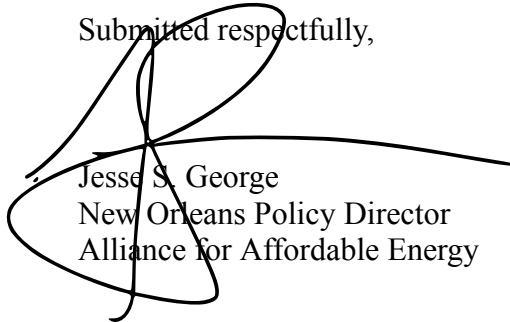
IV. CONCLUSION

The Council is very close to achieving something beneficial for the City of New Orleans, if only it has the courage and vision to do so. Frankly, New Orleans should be leading the country in the adoption of battery storage, as we are among the cities most in need. Fortunately, we have the benefit of model programs from other, forward-looking jurisdictions to guide our

⁴ <https://lailluminator.com/2023/09/24/new-orleans-shutoffs/>

efforts, such as Puerto Rico, where battery storage has played a crucial role in meeting demand this summer.⁵ We urge you to implement a vendor-neutral, fully-funded DER program to bring much-needed bill relief, reliability, and resilience to the people of New Orleans.

Submitted respectfully,



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

Before
The Council of the City of New Orleans

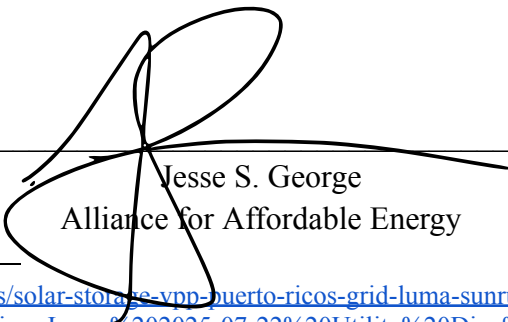
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CERTIFICATE OF SERVICE

I do hereby certify that I have, this 8th day of August 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



Jesse S. George
Alliance for Affordable Energy

⁵https://www.utilitydive.com/news/solar-storage-vpn-puerto-ricos-grid-luma-sunrun/753722/?utm_source=Sailthru&utm_medium=email&utm_campaign=Issue.%202025-07-22%20Utility%20Dive%20Storage%20%5Bissue:75179%5D&utm_term=Utility%20Dive:%20Storage

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