

OFFICE OF RESILIENCE & SUSTAINABILITY

CITY OF NEW ORLEANS

LATOYA CANTRELL
MAYOR

GREG R. NICHOLS
DEPUTY CHIEF RESILIENCE OFFICER

August 8, 2025

Via Electronic Delivery

Clerk of Council
City Hall, room 1E09
1300 Perdido St
New Orleans, LA 70112

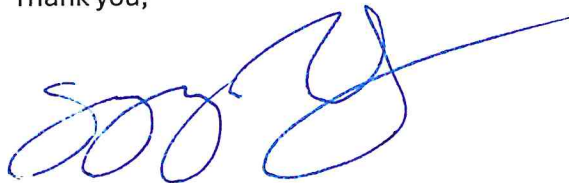
Re: City of New Orleans Docket – UD-24-02, Distributed Energy Resources

Dear Clerk of Council,

The Office of Resilience & Sustainability (ORS) respectfully submits these comments regarding UD-24-02, Distributed Energy Resources and the creation of a Virtual Power Plant (VPP) through the deployment of residential, commercial, and industrial back-up battery systems.

If there are any questions or concerns, please do not hesitate to reach out to Greg Nichols (grnichols@nola.gov) or Sophia Winston (Sophia.winston@nola.gov).

Thank you,



Greg Nichols
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To City of New Orleans Docket UD-24-02 Service List Members,

Thank you to the City Council, Entergy New Orleans, The Alliance for Affordable Energy, and Together New Orleans in their work establishing this docket and providing technical expertise and insights into the feasibility of battery storage program for residential, commercial, and industrial customers.

In many ways, New Orleans is leading the nation in forward thinking approaches to energy resilience in the face of climate change and severe weather events. In 2024, The City of New Orleans received \$9 million from the Environmental Protection Agency (EPA) to support the establishment of a solar subsidy program administered through the City's Solar for All NOLA Program. Together New Orleans, and their partners around the state of Louisiana, have catalyzed a grassroots effort to arm our community assets with solar and battery microgrid systems that provide accessible, neighborhood level resources such as cooling, charging, and air conditioning to residents experiencing power outages. These opportunities, along with Council actions to develop a Community Solar program and a Renewable and Clean Portfolio Standard, create a dynamic energy ecosystem poised to take action around a variety of reliability solutions.

New Orleanians experience some of the highest energy burden rates and some of the fastest growing electric rates in the nation. According to data from the U.S Energy Information Administration, electric rates for residential customers in Louisiana are rapidly increasing – between January 2025 to May 2025, the cost of a kilowatt hour increased from \$0.0831 to \$0.0978, a nearly 18% price increase in just 5 months.¹ We also know that residents of New Orleans experience some of the highest outage rates in the country - between 2013-2023, Louisiana experienced 198 hours of power interruptions, greatly ahead of second place West Virginia, which experienced 142 hours in the same period of time.² While state level trends may vary from energy use trends and rates in New Orleans, the rising cost of electricity has been top of mind for our residents and small businesses, forcing residents and business owners to make difficult decisions.

The recent passage of H.R.1 will have implications in the feasibility of rapidly and equitably deploying clean energy resources with the early sunset of residential (25D) and commercial (48E/Y) tax incentives for the purchase of solar panels and batteries. In order to meet the needs of New Orleanians in the absence of federal incentives, growing electric rates, and increasing risk, decision makers should:

- Build on best practices seen in existing battery incentive and demand response programs, such as programs deployed through Green Mountain Power (Vermont), National Grid (Massachusetts & New York), and Eversource (Connecticut, Massachusetts, & New Hampshire) or similar direct-to-customer rebate programs such as e-bike programs, to quickly and effectively distribute funds and batteries

¹ [Electricity data browser - Average retail price of electricity](#)

² [The-New-Orleans-Index-at-Twenty.pdf](#)



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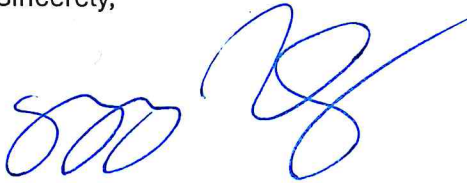
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- Ensure that incentive structures are provided directly to the vendor for a point-of-sale discount and that incentive structures provide enough up-front capital to make up for the loss of 30% federal tax credits.
- Prioritize the equitable deployment of batteries and marketing/education around their benefits for demand response and resilience.
- Pair battery systems with existing solar PV systems through a lottery system and pair low-to-moderate income battery installation with programs like Solar for All NOLA and income qualified Energy Smart programs.

Now is the time to provide resources at the local level and build on the success and innovative approaches to energy resilience and grid reliability that we are already seeing take shape in New Orleans.

Sincerely,



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

**Docket No. UD-24-02
Distributed Energy Resources
August 8, 2025**

Certificate of Service

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



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