



August 8, 2025

Via Electronic Mail

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

RE: Comments on Advisors' Report in UD 24-02 (Proposal to Enhance Distributed Energy Resource Programs for the City of New Orleans)

Dear Ms. Collier,

Solar United Neighbors (SUN) respectfully submits the following comments regarding the Advisors' Report submitted in UD 24-02 (Proposal to Enhance Distributed Energy Resource Programs for the City of New Orleans). Please file the attached communication and this letter in the record for the proceeding.

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

Respectfully submitted this 8th day of August, 2025.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Anderson", with a long horizontal line extending to the right.

Shannon Anderson
Distributed Power Plant Policy Director
Solar United Neighbors
sanderson@solarunitedneighbors.org



BEFORE THE COUNCIL OF THE CITY OF NEW ORLEANS

RESOLUTION AND ORDER ESTABLISHING)	
A DOCKET AND PROCEDURAL SCHEDULE)	UD-24-02
TO ENHANCE DISTRIBUTED ENERGY)	
RESOURCE PROGRAMS)	

SOLAR UNITED NEIGHBORS' COMMENTS ON ADVISORS' REPORT

By and through its undersigned staff, and pursuant to the scheduling order issued in UD-24-02, Solar United Neighbors (SUN) respectfully submits these comments on the Advisors' Report submitted to the Council of the City of New Orleans (Council) in this proceeding.

Overall, SUN appreciates the Advisors' support of a proposal to expand and build out distributed energy resources (DERs) in Entergy New Orleans' service territory. However, SUN is concerned that by proposing a mere extension of the Energy Smart pilot program that has failed to attract customers, the Advisors' recommendations will lead the City and its residents to miss out on a critical opportunity to lead in developing a program that will truly meet the shared goals of the Council and the Parties in saving costs, increasing energy equity, and creating a future grid powered on local, clean energy.

The following comments are offered in the spirit of continuing the conversation started with the Council's leadership in this docket and with the purpose of furthering



good faith negotiations and discussion to achieve a successful program that can be quickly implemented and meet the goals established by the Council.

The Opportunity for Distributed Solar + Storage Is Now

In previous comments, SUN referred to its work reviewing virtual or distributed power plant programs around the country that aggregate solar-powered customer-sited battery storage. Unfortunately, not all programs have realized the opportunity these programs create to meaningfully contribute to the grid. As discussed in this docket, Entergy New Orleans' pilot program has failed to attract customers. In contrast to programs that have enrolled thousands (or tens of thousands of participants) and created hundreds of megawatts of capacity, Entergy's program has only enrolled 114 customers as of July 1, creating a mere 360 kw of load shed per event.

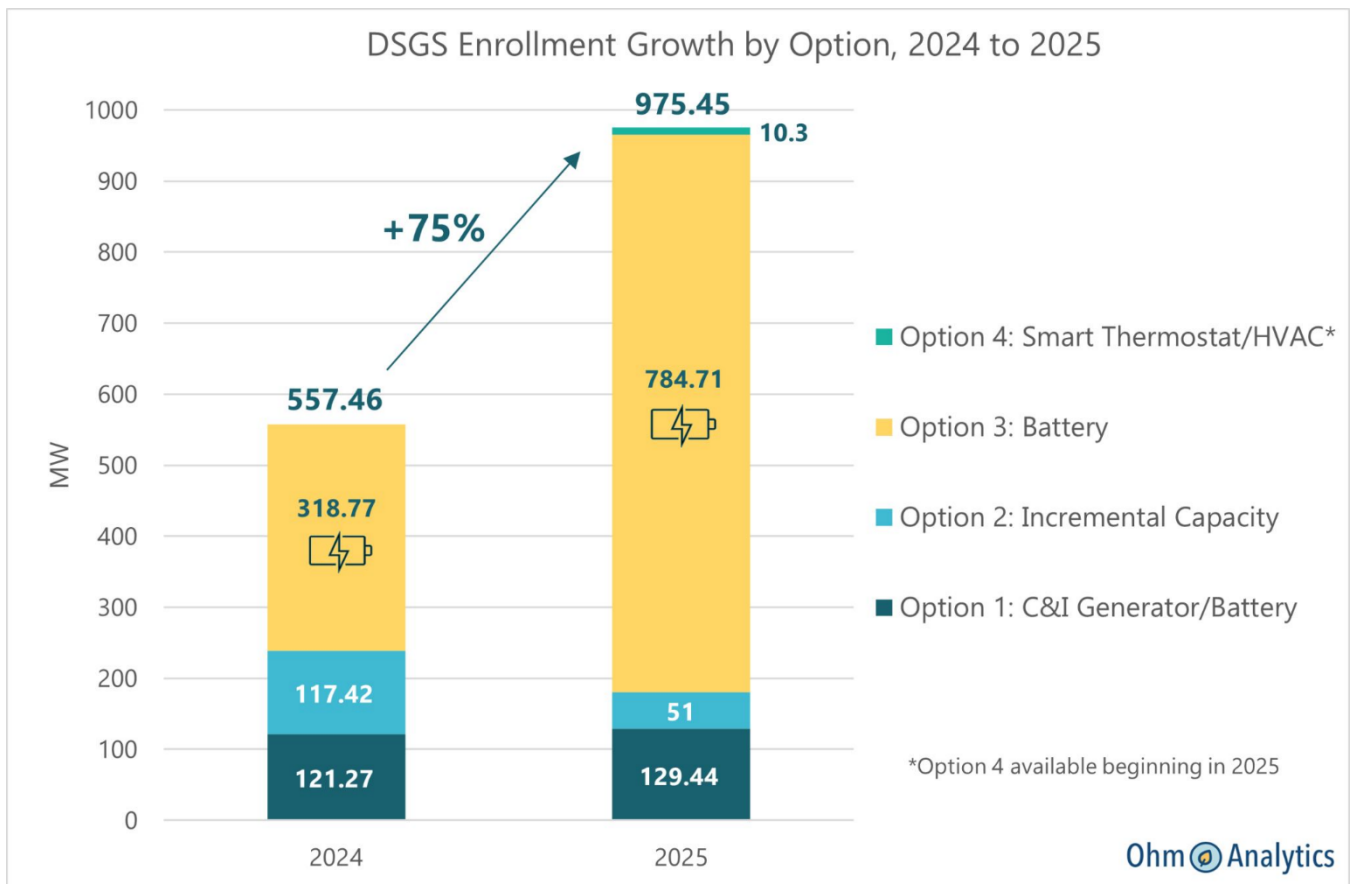
By proposing to merely extend a woefully inadequate pilot program, the Advisors' recommendations miss the mark and miss the opportunity that aggregated battery storage can create for Entergy customers.

On the other hand, aggregated storage programs that are designed to meet customer needs and interests are shining bright this summer, offering tremendous benefit to utilities and their customers. Several of these programs have had rapid expansions year-over-year, including California's Demand Side Grid Support (DSGS) program and Puerto Rico's Customer Battery Energy Sharing (CBES) program. We are including below a chart showing the explosive growth in battery storage in the DSGS



program, and for Puerto Rico, we would encourage the Council to review the real-time data posted publicly by Tesla on their dashboard: <https://www.tesla.com/puerto-rico>

These programs show that with the right incentives and program terms and conditions in place, customers will join by the tens of thousands.



Additionally, in Massachusetts and New York, the aggregated customer storage programs there continue to show up to meet grid needs and save customers money, even in extreme heat conditions.¹

¹ See <https://www.canarymedia.com/articles/clean-energy/northeast-heat-wave-solar-battery-benefits>



New Orleans could be the next place for a program like this to get successfully up and running, but stakeholders need the Council to act now to create the program that will meet our goals and truly fulfill the opportunity before us.

Incentive Financing

SUN continues to support Together New Orleans (TNO) and the Alliance for Affordable Energy's interpretation of the authorized uses for SERI credit financing. SERI funding, or similar financing, will be critical to ensure that income-qualified families are able to participate in the program. Certainly, some of these incentives could come directly through rate-based program administration costs, given the benefits all customers experience when a customer-battery aggregation program is stood up at scale. Additionally, third-party aggregators can assist with the goals of battery adoption for low- and moderate-income households through low or no cost up front financing. However, to meaningfully achieve equity goals for the program, the SERI credit incentives, or another source of income-qualified incentive financing, will be necessary. As TNO's benefit-cost-analysis shows, these credits will come back to customers through economic and societal benefits, including lower utility bills. While not a direct credit on a customer's bill straight from the SERI settlement funds themselves, the program as proposed by TNO is still a justified use of the SERI credits because it results in customer bill savings over-time as the program is stood up and implemented. Saving



customers money, coupled with achieving meaningful gains in meeting energy equity goals and needs, is a valuable and worthy use of the funds.

Need for Action

While we can certainly appreciate the caution expressed by the Advisors, SUN feels the caution is not warranted given the well-designed proposal from TNO that is before the Council. SUN stands by previous comments submitted in this docket and continues to offer its technical expertise and interest in helping the Council meet the needs of the moment before it to continue to be a leader in developing innovative and effective clean energy solutions for the people of New Orleans.

Respectfully submitted this 8th day of August, 2025.

/s/Shannon Anderson
Solar United Neighbors



CERTIFICATE OF SERVICE

I, Shannon Anderson, do hereby certify that on August 8, 2025 I served the forgoing SOLAR UNITED NEIGHBORS' COMMENTS ON THE ADVISORS' REPORT upon all other known Parties of this proceeding via electronic mail.

/s/ Shannon Anderson
Shannon Anderson
Solar United Neighbors