

Sep 5, 2025

Via Electronic Mail

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

Re: TNO Comments Re ENO's June 10 Proposal for Consolidated Billing - UD 18-03

Dear Ms. Collier,

Together New Orleans respectfully submits the following comments about ENO's June 10 proposal for consolidated billing.

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

Sincerely,

Nathalie Jordi
Together New Orleans

TNO Comments Re ENO's June 10 Proposal for Consolidated Billing

Introduction

TNO will address the majority of its comments to the proposal ENO put forward about consolidated billing in its June 10, 2025 filing. This filing was practical in nature and was, unlike ENO's other filings on the topic, responsive to the directives Council has issued on the matter.

Before turning to that June 10 proposal, TNO wishes to express its deep concern that ENO has been allowed repeatedly to disregard Council's directives on consolidated billing, delaying its implementation time and time again.

On July 25, 2024, City Council issued the following directive to Entergy New Orleans, in Resolution R-24-310:

No later than September 30, 2024, Entergy New Orleans shall submit a proposal to implement a consolidated billing program by July 1, 2025.

This directive established two deadlines: a September 30, 2024 deadline, by which ENO was required to submit a proposal to implement consolidated billing; and a July 1, 2025 deadline, by which ENO was required to implement that billing system.

ENO has been allowed to ignore both deadlines, disregarding Council's directives, and now is arguing Council never issued those directives in the first place.

ENO should not be permitted to continue to disregard the Council's will by delaying implementation of consolidated billing.

ENO June 10 Proposal

ENO's June 10 proposal for the net crediting method of consolidated billing for New Orleans' community solar program has a solid foundation, and we strongly encourage the Council to establish, as soon as possible, a consolidated working group consisting of ENO, subscriber organizations and experts to figure out implementation details. TNO's Community Solar project plans to begin construction before the end of this year; it is essential that consolidated billing is ready to go by the time it and other community solar developments come online.

TNO has many points of agreement with ENO's June 10 redlines, and a few points of difference. They are discussed below.

1. Customers in Good Standing

ENO argues that only ENO customers in good standing should be able to enroll as community solar subscribers. We propose striking this requirement. Customers not in good standing are those who would most benefit from participation in community solar. If a customer with a balance is disqualified, this will disproportionately discriminate against those who are least able to cope with a high energy burden. Also, what if a customer who signs up is in good standing but in the interim becomes past due? The subscriber organization has no way to manage for this, and it should not matter if they have a balance or not for credits to be applied and for ENO to redeem payment for credits. Thus, we propose striking the redline that appears in the Definitions, under “Subscriber.”

Proposed Redline:

“Subscriber” means a Customer of the Utility that holds a Subscription to one or more CSG Facilities and has identified one or more individual meters or accounts related to electric service to which the Subscription(s) shall be attributed. ~~At the time a Customer enrolls as a Subscriber, the Customer’s account with the Utility must be in good standing.~~

2. Utility Administrative Fee

ENO’s proposed utility administration fee (3% of the bill credit) is three times higher than the norm. Based on the charge what other jurisdictions charge, 1% of bill credits is more appropriate.

State	Admin Fee %	Fee Basis	Utilities
New Jersey	Up to 1%	Subscription Fee	Jersey Central Power & Light (JCP&L), Atlantic City Electric (ACE), Rockland Electric Company
New York	Up to 1%	Bill Credit Value	Consolidated Edison (ConEd), Central Hudson Gas & Electric, Orange & Rockland Utilities (O&R), National Grid
Maryland	1%	Bill Credit Value	Baltimore Gas & Electric (BGE), Pepco
Illinois	up to 2%	Bill Credit Value	
Virginia	1%	Bill Credit Value	
Oregon	Not specified	Subscription Fee	Portland General Electric (PGE)
Pennsylvania	TBD	TBD	

As the table above demonstrates, of all states with consolidated billing, most charge 1%, with only Illinois charging 2%. In fact, half of the utilities on this list only charge 1% of the subscription fee instead of 1% of the bill credit value, which is even less (maybe 20% less).

Proposed redline:

“Utility Administrative Fee” is the ~~3.0%~~ 1.0% amount deducted by the Utility from the subscriber Organization’s portion of the Allocated Credit that is used to defray costs

incurred by the Utility to administer Net Crediting Consolidated Billing.

3. VIII.E Time Needed to Post Credits

ENO has proposed allowing a two month delay before crediting subscribers for the solar their subscription produced, whereas one month is standard practice, and a better customer experience. A two-month delay in posting credits and therefore savings for customers is an unnecessarily long time and long delay for the utility to execute a simple multiplication exercise. There is no reason why a utility should not be able to calculate the credit allocation and savings on the same month after the generation is created, meaning posting credits in March for February generation. If the community solar credit is mismatched with the subscription fee on a subscriber's bill, it's confusing to the subscriber. In Oregon, the process takes 5 days.

Proposed redline:

VIII.E. The Utility shall calculate and render Allocated and Net Credits for each Subscription using the most recently updated monthly Subscriber report and CSG Facility Output data on a ~~one-~~ ~~two-~~ month lag.

Example: the Allocated and Net Credits for Subscribers listed on a Subscriber report as participating in February would be calculated after receipt of actual CSG Facility Output for February. These Net Credits would appear on the Subscribers' ~~March~~ ~~April~~ Utility bills. The Utility would remit the Subscriber Organization's portion of the Allocated Credits less the Utility Administrative Fee in ~~March~~ ~~April~~.

4. VIII.C Method of Communicating Subscriber Changes to the Utility

This point is mostly a clarification where we would like to figure out alignment with ENO, and what works best for them. In their June 10 proposal, ENO requests a monthly list showing each subscriber and their allocation. Is this preferred, or would it be better just to communicate whenever there is a change? We are open to either case.

If a subscription organization wishes to remove a customer, they could submit a form and then the utility can take 60 days to implement that change in allocation lists. This would also save admin time for the utility and the SO such that in months where no changes are needed, the utility simply uses what is on file and no new fields must be exchanged. A point like this - and we assume there will be many more like this - would be easy to discuss and settle in a regularly meeting working group that hammers out details.

5. VIII.G.iii: Calculation of Payment to the Subscription Organization

The text here should be changed to align with the amount of the Utility Administrative Fee in the Definitions section.

Proposed redline:

VIII.G.iii. less Utility Administrative Fee (~~1.0%~~ 3.0% of Allocated Credit)

6. Timeline

ENO proposes an eight-month window to finalize requirements and complete implementation of consolidated billing. The Council mandated consolidated billing nearly a year ago. Developers and subscribers cannot afford continued uncertainty, and the success of community solar depends on timely execution. The Council should hold ENO to the proposed eight-month schedule, with clear interim milestones and accountability mechanisms to prevent further delay.

7. Conclusion

The Sisters of the Holy Family project plans to begin construction in the next couple of months. We look forward to working with this group to implement consolidated billing as soon as possible.

Before
The Council of the City of New Orleans

Re: TNO Comments Re ENO's June 10 Proposal for Consolidated Billing - UD 18-03

CERTIFICATE OF SERVICE

I do hereby certify that I have, this Sep 5, 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

A handwritten signature in cursive script, appearing to read 'Nathalie', is positioned above a horizontal line.

Nathalie Jordi, Together New Orleans