



September 5, 2025

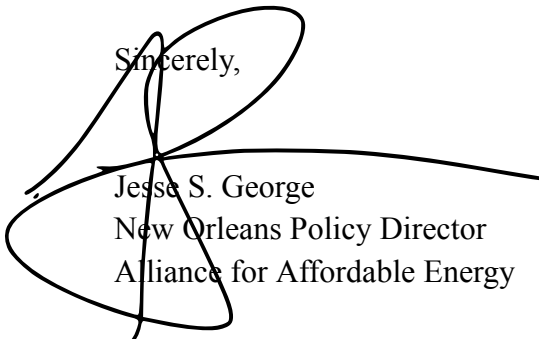
Via Electronic Mail
Clerk of Council
Room 1E09, City Hall
1300 Perdido Street
New Orleans, LA 70112

RE: A RULEMAKING PROCEEDING TO ESTABLISH RULES FOR COMMUNITY SOLAR
PROJECTS (UD-18-03)

Dear Clerk,

Please find the attached Comments of the Alliance for Affordable Energy on Entergy New Orleans, LLC's Consolidated Billing Proposal 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: A RULEMAKING PROCEEDING
TO ESTABLISH RULES FOR
COMMUNITY SOLAR PROJECTS**

DOCKET NO. UD-18-03

SEPTEMBER 5, 2025

**COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY ON ENTERGY
NEW ORLEANS, LLC'S CONSOLIDATED BILLING PROPOSAL**

On October 30, 2024, Entergy New Orleans, LLC (“ENO”) filed with the New Orleans City Council (“the Council”) its Comments Regarding Consolidated Billing Implementation. ENO supplemented those comments with a letter dated December 13, 2024 and with its Cost Estimates to Implement Net Crediting Consolidated Billing on June 11, 2025. The Alliance for Affordable Energy (“AAE”) hereby submits the following comments in response to ENO’s filings.

AAE would reiterate that consolidated billing is recognized as a best practice in community solar programs for the clarity and ease of use it provides to consumers.¹ In general, AAE agrees with the concept of net crediting consolidated billing as elucidated in its redline filing of June 11, 2025. However, the 3% Utility Administrative Fee that ENO proposes is excessive. New York, for example, allows utilities to charge a 1% discount rate to developers to cover costs associated with net crediting². It is unclear why ENO’s administrative costs should be

¹ https://www.nclc.org/wp-content/uploads/2024/02/202402_Report_Community-Solar.pdf; see Table 1 on p. 4: “State administrators must implement consolidated billing so that households do not receive separate bills for their community solar subscription, and all program costs and credits are included on their electric bill monthly.”

² <https://www.naseo.org/data/sites/1/documents/publications/Community%20Solar%20Consolidated%20Billing%20Final%5B43%5D.pdf>; see Table 1 on pg. 13

three times higher than those of utilities in New York, and ENO offers no justification for this 3% fee.

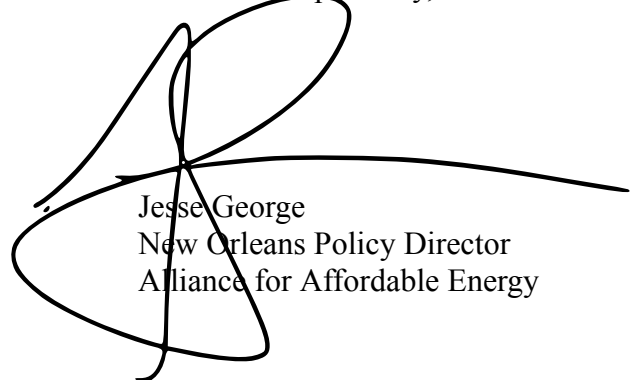
Likewise, ENO's projection of implementation costs, ranging up to \$3.1Mk, do not reflect the realities of other jurisdictions that have successfully adopted community solar consolidated billing. For example, in Oregon, Portland Gas and Electric, which serves more ratepayers than ENO, implemented community solar consolidated billing in 2023 for a cost of \$1.4M.³

ENO has delayed and resisted the clear will of the Council for long enough under this docket. The Council should:

- 1) order ENO to submit a final estimate of the cost to implement consolidated billing that is transparent and justifies all expenses;
- 2) order ENO to implement community solar consolidated billing within 8 months; and
- 3) limit the Utility Administrative Fee to no more than 1%.

AAE urges the Council to assert its regulatory authority and put an end to ENO's delay tactics. With a full queue of community solar projects in development, the Council must act now to implement this important ratepayer protection measure.

Submitted respectfully,



Jesse George
New Orleans Policy Director
Alliance for Affordable Energy

³<https://www.naseo.org/data/sites/1/documents/publications/Community%20Solar%20Consolidated%20Billing%20Final%5B43%5D.pdf>, p. 11

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

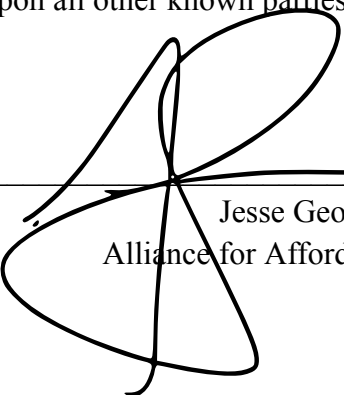
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DOCKET NO. UD-18-03

SEPTEMBER 5, 2025

CERTIFICATE OF SERVICE

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



Jesse George
Alliance for Affordable Energy

Service List

clerkofcouncil@nola.gov

Clerk of Council

City Hall - Room 1E09

1300 Perdido Street

New Orleans, LA 70112

(504) 658-1085 - office

(504) 658-1140 - fax

Service of Discovery not required

Erin Spears, espears@nola.gov

Chief of Staff, Council Utilities Regulatory Office

Bobbie Mason, bfmason1@nola.gov

Christopher Roberts, cwroberts@nola.gov

Byron Minor, Byron.minor@nola.gov

Candace Carmouche, Candace.carmouche@nola.gov

Jared Reese, jared.reese@nola.gov

Tyrianne Varnado, tyrianne.varnado@nola.gov

City Hall - Room 6E07

1300 Perdido Street

New Orleans, LA 70112

(504) 658-1110 - office

(504) 658-1117 – fax

Krystal D. Hendon, CM Morrell Chief-of-Staff, Krystal.hendon@nola.gov

1300 Perdido St. Rm. 2W50

New Orleans, LA. 70112

Sayde Finkel, CM Moreno Chief-of-Staff, sayde.finkel@nola.gov

1300 Perdido St. Rm. 2W40

New Orleans, LA. 70112

Justyn Hawkins, 504-658-1108 jahawkins@nola.gov

Chief of Staff

City Hall - Room 1E06

1300 Perdido Street

New Orleans, LA 70112

Donesia D. Turner, Donesia.Turner@nola.gov

Law Department
City Hall - 5th Floor
New Orleans, LA 70112
(504) 658-9800 - office
(504) 658-9869 - fax
Service of Discovery not required

Tanya L. Irvin, tirvin@nola.gov

Chief Deputy City Attorney
Law Department
City Hall - 5th Floor
New Orleans, LA 70112
Tel: (504) 658-9800
Fax: (504) 658-9869

Norman White, Norman.White@nola.gov

Department of Finance
City Hall - Room 3E06
1300 Perdido Street
New Orleans, LA 70112
(504) 658-1502- office
(504) 658-1705 – fax

Greg Nichols, grnichols@nola.gov

Deputy Chief Resilience Officer
Office of Resilience & Sustainability
1300 Perdido Street, Suite 8E08
New Orleans, LA 70112
Tel: 504-658-4958
Cell: 504-253-1626

Sophia Winston, sophia.winston@nola.gov

Energy Policy & Program Manager
Office of Resilience & Sustainability
1300 Perdido Street, Suite 8E08
New Orleans, LA 70112
Tel: 504-658-4914
Cell: 504-677-9756

ADMINISTRATIVE HEARING OFFICER

Hon. Jeffrey S. Gulin, judgegulin@gmail.com

3203 Bridle Ridge Lane

Lutherville, MD 2109

(410) 627-5357

NEW ORLEANS CITY COUNCIL CONSULTANTS

Clinton A. Vince, clinton.vince@dentons.com

Presley Reed, presley.reedjr@dentons.com

Emma F. Hand, emma.hand@dentons.com

Dee McGill, dee.mcgill@dentons.com

1900 K Street NW

Washington, DC 20006

(202) 408-6400 - office

(202) 408-6399 – fax

Basile J. Uddo (504) 583-8604 cell, buddo@earthlink.net

J. A. “Jay Beatmann, Jr. (504) 256-6142 cell, (504) 524-5446 office direct,

jay.beatmann@dentons.com

c/o DENTONS US LLP

650 Poydras Street

Suite 2850

New Orleans, LA 70130

Joseph W. Rogers, jrogers@legendcgl.com

Victor M. Prep, vprep@legendcgl.com

Legend Consulting Group

6041 South Syracuse Way, Suite 105

Greenwood Village, CO 80111

(303) 843-0351 - office

(303) 843-0529 – fax

ENTERGY NEW ORLEANS, LLC

Leroy Nix, lnix@entergy.com

Entergy New Orleans, LLC

Vice-President, Regulatory and Public Affairs

Deanna Rodriguez, drodri2@entergy.com

Entergy New Orleans, LLC

President and Chief Executive Officer

Entergy New Orleans, LLC

Mail Unit L-MAG-505B

1600 Perdido Street

New Orleans, LA 70112

Polly Rosemond, prosemo@entergy.com

Kevin T. Boleware, (504) 670-3673, kbolewa@entergy.com

D'Angela Savoie, dsavoil@entergy.com

Keith Wood, (504) 670-3633, kwood@entergy.com

Derek Mills, (504) 670-3527, dmills3@entergy.com

Ross Thevenot, (504) 670-3556, rtheven@entergy.com

1600 Perdido Street, L-MAG 505B

New Orleans, LA 70112

Vincent Avocato, (281) 297-3508, yavocat@entergy.com

Entergy New Orleans, LLC

2107 Research Forest Drive, T-LFN-4

The Woodlands, TX 77380

Courtney Nicholson, cnicho2@entergy.com

Heather Silbernagel, (504) 576-2806, hsilber@entergy.com

Leslie M. LaCoste (504) 576-4102, llacost@entergy.com

Lacresha D. Wilkerson, (504) 576-6571, lwilke1@entergy.com

Ed Wicker, (504) 576-3101, ewicker@entergy.com

Linda Prisuta, (504) 576-4137, lprisut@entergy.com

Entergy Services, LLC

Mail Unit L-ENT-26E

639 Loyola Avenue

New Orleans, LA 70113

Fax: 504-576-5579

Joe Romano, III (504) 576-4764, jroman1@entergy.com
Tim Rapier, (504) 576-4740, trapier@entergy.com
Erin Farrell, (504) 576-2758, efarrel@entergy.com
Entergy Services, LLC
Mail Unit L-ENT-3K
639 Loyola Avenue
New Orleans, LA 70113
Fax: (504) 576-6029

Jessica Coolidge, (504) 576-5407, jcoolid@entergy.com

Tamika Robinson, (225) 515-3575, trobi10@entergy.com

Greg Crisler, (504) 670-3538, gcrisle@entergy.com

INTERVENORS

350 NEW ORLEANS

Andy Kowalczyk, (415) 676-1047, a.kowalczyk350no@gmail.com
1115 Congress St.
New Orleans, LA. 70117

Benjamin Quimby, (978)505-7649, benjaminquimby1@gmail.com
1621 S. Rampart St.
New Orleans, LA 70113

Renate Heurich, (504)473-2710, renate@350neworleans.org
1407 Napoleon Ave, #C
New Orleans, LA 70115

AIR PRODUCTS AND CHEMICALS, INC.

Katherine W. King, Katherine.king@keanmiller.com
Randy Young, randy.young@keanmiller.com
400 Convention St. Suite 700 (70802)
P.O. Box 3513
Baton Rouge, LA 70821-3513
(225)387-0999

Carrie R. Tournillon, carrie.tournillon@keanmiller.com
900 Poydras St. Suite 3600
New Orleans, LA 70112

Maurice Brubaker, mbrubaker@consultbai.com
16690 Swingly Ridge Rd., Suite 1400 (63017)
P.O. Box 412000
Chesterfield, MO 63141-2000

Michael Weizman, weizmam@airproducts.com

ALLIANCE FOR AFFORDABLE ENERGY

Jesse George, jesse@all4energy.org
Logan Atkinson Burke, Logan@all4energy.org
Sophie Zaken, Regulatory@all4energy.org
4505 S. Claiborne Ave.
New Orleans, 70115

GULF STATES RENEWABLE ENERGY INDUSTRY ASSOCIATION (“GSREIA”)

Jeffrey D. Cantin, 504-383-8936, jcantin@gsreia.org
Stephen Wright, 504-383-8936, swright@gsreia.org
400 Poydras Street, Suite 900
New Orleans, LA 70130

MADISON ENERGY INVESTMENTS

Juliana Harless, 205-792-5854, JHarless@madisonei.com
Associate, Southeast Market
120 19th Street North, Suite 2009
Birmingham, Alabama 35203

PRORATE ENERGY, INC

Myron Katz, PhD, (504) 343-1243, Myron.Bernard.Katz@gmail.com
302 Walnut Street
New Orleans, Louisiana 70118

COALITION FOR COMMUNITY SOLAR ACCESS (“CCSA”)

Laurel Passera, (919) 526-0111, laurelp@communitysolaraccess.org
Senior Director
Policy and Regulatory Affairs
1380 Monroe Street, NW #721
Washington DC 20010

TOGETHER NEW ORLEANS

BRODERICK BAGERT, (225) 803-5876, broderick@togetherla.org

ABEL THOMPSON, (225) 978-1667, abel@togethernola.org

Nathalie Jordi , (504) 715-1742, nathalie@togetherla.org

127 ENERGY

Pierre D. Moses, (504) 669-8552, pmoses@127energy.com
952 School St., #127
Napa, CA 94559

ALGIERS SOLAR

Tom Guinan Jr., tguinan@tggreenco.com
3401 General Degaulle Dr., Suite 105
New Orleans, LA 70114

Greater New Orleans Housing Alliance (“GNOHA”)

Andreanecia M. Morris, (504) 224-8301, amorris@gnoha.org
President
4640 S. Carrollton Avenue, Suite 160
New Orleans, LA 70119

Brandon Hawkins, (504) 224-8305, bhawkins@gnoha.org
Deputy Director, Policy & Advocacy
4640 S. Carrollton Avenue, Suite 160
New Orleans, LA 70119

Green Coast Enterprises

Jackie Dadakis, (504) 281-4372, jackie@greencoastenterprises.com
CEO
636 N Carrollton Avenue
New Orleans, LA 70119

Mailing Address:
P.O. Box 58243
New Orleans, LA 70158

Regina LaMacchia, gina@greencoastenterprises.com
Director of Development

Gary Skulnik, gary.skulnik@neighborhoodsun.solar
CEO (Neighborhood Sun)

Perch Energy

Georgina Arreola,
Vice President of Policy, (209) 324-0996, garreola@perchenergy.com
P.O. Box 170718
Boston, MA 02117

Solar Alternatives

Jeff Cantin, (504) 931-0943, jdcantin@solalt.com
President
5804 River Oaks Road S.
New Orleans, LA 70123

Solstice Power Technologies

Alex Pasanen, (802) 922-0667, alexp@solstice.us
Senior Policy Coordinator,

South Coast Solar

Scott Oman, (504) 427-7202, scott@southcoastsolar.com
2605 Ridgelake Drive
Metairie, LA 70002

Working Power

Maryem Gad, (203) 510-4875, maryem@workingpower.com

SunConnect

Gary Kassem, (239) 204-4010, gkassem@sunconnectusa.com
Manager

Erica Buster, (239) 302-3797, EBuster@sunconnectusa.com
Vice President
3021 Airport Pulling Road, N Suite 201
Naples, FL 34105

Carpe Diem Developers PR, LLC

Julian Thomas, (504) 390-0403, julian.thomas@carpediemdevelopers.com
151 Calle San Francisco
Suite # 200 PMB 5014
San Juanm PR 00901-1607