



September 5, 2025

Via Electronic Mail

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

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

Dear Ms. Collier,

Finance 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,

Annie Clark
Finance New Orleans



Dear Councilmembers,

As New Orleans' Green Bank, Finance New Orleans is deeply committed to expanding equitable access to affordable, clean energy and supporting the pipeline of community solar projects in our community. While we agree with many of the points in ENO's June 10 proposal for consolidated billing, we believe that additional clarity and a more ambitious implementation plan are critical to its success. With projects actively under construction, it is essential that a consolidated billing framework is ready before they come online next year. A clear, consistent, and final consolidated billing policy is critical for these projects to secure financing from FNO or other financiers. Our comments on specific points are outlined in detail below.

The passage of HR 1 has created a tight and pressing timeline for solar and green energy development. The reduction of federal incentives for solar projects means that many future installations, particularly community-scale ones, will become economically unfeasible. To remain eligible for the remaining tax credits, projects must start construction by July 4, 2026, or be placed in service by December 31, 2027. This makes it essential to quickly accelerate implementation to ensure New Orleans can achieve its clean energy goals before these financial opportunities expire.

Utility consolidated billing—where customers receive a single bill from their utility that includes both standard electricity charges and community solar credits—is increasingly recognized as the gold standard for community solar program administration. It is not just a convenience; it's a catalyst for scaling community solar equitably and efficiently. A streamlined, customer-friendly billing process is essential to ensuring equitable access, especially for low-income communities. With a successful and sustainable consolidated billing program, New Orleans can become a leader in community solar, bringing grid security, affordability, environmental justice, and renewed economic value to the city.

The benefits of consolidated billing are as follows:

- **Simplified Customer Experience:** Consolidated billing means a single, transparent bill that is easier for customers to understand. It improves transparency by showing solar credits alongside usage, so customers can clearly see their savings.
- **Boosts Program Participation:** A streamlined billing process reduces confusion and friction, leading to higher customer satisfaction and better retention rates.
- **Enhances Operational Efficiency:** It centralizes data management, allowing utilities to manage billing and crediting more efficiently and with fewer errors. This creates a scalable infrastructure that supports broader program expansion.
- **Supports Regulatory and Equity Goals:** A unified billing system enhances consumer protection and provides inclusive access for all residents by removing barriers to participation.

While we agree with most of the June 10 redlines, we have a few points of difference that we believe are critical for the program's success:



- **Administrative Fee:** ENO's proposed 3% administrative fee is too high. A 1% fee is more consistent with what other jurisdictions charge and is more appropriate.
- **Credit Posting Timeline:** ENO has proposed a two-month delay to post credits, but a one-month timeline is standard practice and provides a better customer experience. There is no reason a utility should take two months to post credits, which unnecessarily delays bill savings for subscribers.
- **Implementation Schedule:** ENO's proposed eight-month timeline to finalize and implement consolidated billing is workable but lacks ambition. The Council mandated consolidated billing almost a year ago. Developers and subscribers cannot afford continued uncertainty. The Council should hold ENO to this timeline, with clear interim milestones and accountability measures to prevent further delays.
- **Subscriber Eligibility:** ENO's proposal to limit subscription to customers in "good standing" is a significant concern. This requirement would disproportionately exclude the very residents who would benefit most from the program's cost savings. The subscription process should not be contingent on a customer's payment history, and we believe this redline should be struck to ensure equitable access.

To ensure a fair and efficient rollout, we support a stakeholder process to define the billing framework and avoid mistakes made in other markets. We must focus on:

- Establishing clear metrics for billing timeliness and accuracy.
- Setting transparent and fair cost recovery rules upfront that may only be changed through periodic processes with stakeholder input.
- Prioritizing consumer protection and equity, as billing errors disproportionately affect low-income subscribers.
- Keeping stakeholder engagement active throughout the implementation process through advisory councils or working groups to ensure proper transparency and buy-in.

The time to act is now. Utility consolidated billing is not a theoretical improvement—it is a proven solution that has unlocked community solar growth, expanded access for low-income households, and simplified participation in states across the country. New Orleans cannot afford to delay while other cities reap the benefits of streamlined billing, equitable energy access, and market innovation. By implementing consolidated billing, the Council will remove a major barrier to community solar development, empower residents with predictable savings, and demonstrate leadership in climate and energy equity. The technical challenges are solvable, the policy models are available, and the public demand is clear.

We urge the Council to enforce your established mandates on consolidated billing, establish a stakeholder working group to resolve technical details, and require ENO to execute consolidated billing on schedule. This action is critical because our ability to underwrite and finance these transformative projects hinges entirely on the establishment of clear, equitable, and consistent rules. Finance New Orleans is actively working with stakeholders in the current pipeline of community solar projects, which will create local jobs and deliver vital bill savings to residents—especially those who have been historically underserved by the energy system. We commend the Council for its leadership and respectfully request your decisive action to make community solar work for all New Orleanians—efficiently, equitably, and without further delay.



Before

The Council of the City of New Orleans

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CERTIFICATE OF SERVICE

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

A handwritten signature in blue ink, appearing to read "Annie Clark", is written over a horizontal line.

Annie Clark, Finance New Orleans