



September 5, 2025

Via Electronic Mail

Aisha Collier
Assistant Clerk of Council
Room 1E09, City Hall
1300 Peridido Street
New Orleans, Louisiana 70112

Re: Intervenor Comments on ENO Consolidated Billing Proposal (per Resolution R-25-352)

Dear Ms. Collier, Council Members, Council Staff, CURO, and Advisors:

NOLA Solar Holding Company LLC (“NOLA Solar”) and SunConnect Corporation (“SunConnect”) respectfully submit these comments regarding Entergy New Orleans’ (ENO) consolidated billing proposal. We strongly urge the Council to remain fastidious in their Order requiring ENO to implement consolidated billing for the Community Solar Program. Addressing this issue is essential to ensuring the economic viability of the program.

The passage of the One Big Beautiful Bill will significantly impact solar and green energy development. Federal incentives for solar projects are being reduced, making many future installations economically unfeasible especially at the Community Solar scale. To qualify for remaining tax credits, projects must begin construction by July 4, 2026, or be placed in service by December 31, 2027—creating a narrow window for action. Given these constraints, there is an urgent need to accelerate implementation in order to advance New Orleans’ clean energy goals before these opportunities disappear.

We offer specific comments on ENO’s recent correspondence concerning consolidated billing as well as practices we have seen through our development experience in other states. It’s our belief that there are clear solutions to simplify consolidated billing for all parties involved.

Sincerely,

A handwritten signature in blue ink, appearing to read "Erica E. Buster".

Erica Buster
Vice President, SunConnect Corporation (on behalf of Nola Solar Holdings Company LLC)

Attachment: *Intervenor Comments – ENO’s Consolidated Billing Program*

Appendix A: Intervenor Comments – ENO’s Consolidated Billing Program

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Overview

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. In short, utility consolidated billing isn't just a convenience, it's a catalyst for scaling community solar equitably and efficiently. The benefits of consolidated billing are as follows.

- **Simplified Customer Experience.**
 - One bill, less confusion: Customers avoid juggling separate bills from their utility and solar provider, making it easier to understand charges and savings.
 - Improved transparency: Consolidated billing clearly shows solar credits alongside usage, helping customers see the value of their subscription.
- **Boosts Program Participation**
 - Higher retention rates: A streamlined billing process reduces friction, leading to better customer satisfaction and lower dropout rates.
- **Enhances Operational Efficiency**
 - Centralized data management: Utilities can manage billing and crediting more efficiently, reducing errors and administrative overhead.
 - Scalable infrastructure: Consolidated billing supports broader program expansion by simplifying backend processes.
- **Supports Regulatory and Equity Goals**
 - Consumer protection: Utilities are better equipped to handle disputes, partial payments, and service continuity under a unified billing system.
 - Inclusive access: Simplified billing can help reach underserved communities by removing barriers to participation.

Entergy New Orleans (ENO) has raised several arguments against implementing utility consolidated billing for the Community Solar Program. They continue to push against implementing this critical piece of the community Solar Program citing:

- **High Implementation Costs**
 - ENO estimates that modifying its billing systems to support consolidated billing would cost approximately \$1.55 million. These costs include:
 - IT system upgrades
 - Integration with third-party solar providers
 - Ongoing administrative overhead
- **Risk to Non-Participants**

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- ENO has expressed concern that the costs and risks associated with consolidated billing could be passed on to non-participating ratepayers, especially if the program does not scale efficiently or if billing errors occur
- **Technical and Operational Complexity**
 - ENO argues that consolidated billing introduces significant complexity, including:
 - Monthly calculations of bill credits for each subscriber based on their share of solar output
 - Splitting credits between subscribers and developers (e.g., 10%/90%)
 - Updating subscriber lists and allocations across multiple projects
 - Ensuring accurate crediting and dispute resolution within the utility’s billing system

It’s our opinion that the hurdles that ENO has presented are solvable. By utilizing framework learned from other markets and leaning into stakeholder feedback we can create a consolidated billing mechanism that will be cost-effective, consumer friendly, and sustainable for the New Orleans Community Solar Program.

Implementation Costs Pose Negligible Risk to Non-participants

Community solar delivers broad public benefits, expanding access to clean energy, supporting grid resilience, and advancing equity by including renters and low-income households who are otherwise excluded from renewable options. These outcomes serve the public interest and align with Council policy goals.

In ENO’s July 15, 2025 letter, they argue that expenditures to implement Consolidated Billing are not worth the increased cost to the customer base (all of which benefit from locally sourced energy, even if they are not community solar subscribers). ENO states:

*ENO anticipates additional and continuous expenditures would be required to implement and maintain consolidated billing – **expenditures that would be shouldered by ENO’s entire customer base, even those who do not participate in community solar, many of whom are most vulnerable to cost pressures. regarding about bearing costs for non-participants.** [Emphasis added]*

ENO’s IT estimate for implementing billing management for \$1.55 Million along with employment of two new analysts costing \$125,000 each (about \$250,000 annually). Since there are approximately 209,000 customers in Entergy New Orleans territory, the potential cost to ratepayers (where ratepayers bear all expenses) is \$8.61 annually (or \$0.72 monthly); assuming the cost is distributed equally. This is a minimal cost considering the overall public benefits that the community systems add. Utility cost structures are, by necessity, shared. All customers routinely support system costs for infrastructure, programs, and services from which they may not individually benefit to the same extent, such as electric vehicle infrastructure, energy efficiency programs, demand response pilots, or transmission upgrades driven by regional reliability needs.

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The electric utility is a shared platform, and cost distribution is not, and cannot be, perfectly individualized. This is a feature of a modern, integrated utility system, not an exception.

In their June 2025 Redline, ENO suggested implementing a 3% Utility Administration Fee. As proposed, this comes to roughly \$5,500/MW-DC based on the rate data available from October 2024 to April 2025. The program is about 60MW-AC, equivalent to about 90MW-DC installed. Meaning this fee would net ENO about \$500,000 annually for 20+ years; assuming there is no rate escalation (which there will inevitably be rate escalation). \$500K is double what ENO said they needed to manage the consolidated billing program - *two Analysts at \$115 - \$125k each* (~\$250,000 Annually). The intent of Consolidated Billing is to simplify billing for subscribers (low-income subscribers in particular), lower risk to Subscriber Organizations making financing more viable, and ensure these projects can: 1) be built, and 2) bring sustainable savings to low-income communities. **As such, we suggest either removing this Utility Administration fee entirely, or lower the fee to a more reasonable level, equal to that required to manage the system. From the math presented thus far, that level would be less than 1%.**

In contrast to other programs supported by the ratepayer, Community Solar has the effect of reducing subscribers’ bills and making energy more affordable. Affordability lowers the risk of non-payment, as does the simplicity that consolidated billing brings to subscribers. This fact, along with the other benefits provided by locally produced community solar far outweigh the cost of the Program (even with Consolidated Billing). System-wide benefits, such as reduced peak load, deferred capacity investment, avoided procurement of marginal energy, and potential locational benefits on the distribution grid, accrue broadly. In that light, modest administrative costs, if any, borne by the wider customer base are not categorically unfair, particularly when weighed against the program’s role in creating a more inclusive and sustainable energy system.

The recent energy shortages that led to blackouts in parts of the ENO territory show the importance of locally generated energy. These shortages and blackouts highlight the importance of distributed generation resources, and call into question the real costs of not implementing programs such as this one. As the demand for energy increases due to increased draw from datacenters and large industrial manufacturing, strain is added to the grid and blackouts like the one experienced in New Orleans earlier this summer will become more frequent. We are already seeing the direct effects correlated to these activities – rising electricity prices overall. We argue that in light of recent events, the Community Solar Program with Consolidated Billing brings much needed local benefit to both subscribers and the ratepayers as a whole, making cost (if any) negligible.

Achieving Technical and Operational Simplicity

Utility consolidated billing processes are cleaner and reduce the red-tape/paperwork that can confuse ratepayers. **Utilities are uniquely positioned to manage billing for community solar systems because of their existing infrastructure, regulatory oversight, and customer relationships.**

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In their July 15th, 2025 letter, ENO states:

*Furthermore, ENO continues to maintain that consolidated billing (as ENO understands the term) is an unwise regulatory objective that will impose unnecessary costs onto ENO’s customers, in particular low-income customers (whether subscribed to community solar or not); unquantifiable business risks to ENO to the extent ENO is expected to undertake the responsibility of billing its customers for subscriber fees on behalf of third party developers; **and customer satisfaction issues given the program’s likelihood of causing confusion among subscriber customers as to the respective roles of ENO and subscriber organizations.** [Emphasis added]*

We disagree that consolidated billing would cause confusion for customers. Utility-consolidated billing makes it easier for customers in low-income bill assistance programs to access community solar benefits and cost savings. An article in North American Clean Energy sums up this idea well stating:

...the foremost thing regulatory bodies can do is to implement utility-consolidated billing (UCB) using the net crediting methodology. Under this UCB construct, community solar customers see their community solar discounts reflected directly on their regular electricity bill, much like utility assistance for LMI households or any other discount. It’s worth underscoring the good this policy offers: The customer relationship with their utility remains unchanged beyond the lower payment amounts due by customers and reduced collections for the utility. By making community solar more accessible, it becomes more equitable and makes the customer experience easier.¹

The last thing disadvantaged households need is another bill on their mind, and they may decide the monthly savings aren’t worth the hassle of a separate payment when doing nothing is the simplest approach.

ENO (as part of a larger parent utility company) has modernized and established billing systems. They already use sophisticated billing platforms capable of handling complex rate structures, time-of-use pricing, and energy credits as well as Customer Information Systems that track usage, payments, and account history. This makes them well-equipped to integrate community solar credits and charges into a single, streamlined bill. Since ENO (similar to all utilities) is heavily regulated, they are publicly held accountable for billing accuracy, dispute resolution, and data privacy—unlike many third-party solar providers. This ensures transparency

¹ North American Clean Energy, Volume 2024 July/August. *How Utility Consolidated Billing Can Improve Community Solar* by Bruce Stewart and Georgina Arreola. Accessed on 9/2/2025 via <https://www.nacleanenergy.com/solar/how-utility-consolidated-billing-can-improve-community-solar>

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and consumer protection. The regulatory framework already embedded in their business model provides a layer of trust and oversight that benefits consumers.

In ENO’s June 10, 2025 letter they comment:

However, if updated Rules approved by the Council introduce requirements that necessitate a new bill design, this would increase the estimated cost and require several additional months to produce.

The basis of ENO’s business is handling customer billing within the highly regulated constructs of the retail energy industry. We do not understand how an entire new bill design is needed for consolidated billing; and if it was, how it couldn’t be adapted from an operational program with similar billing characteristics. The Entergy [Green Select](#) program provides a promising framework for customer participation in renewable energy through the purchase of Renewable Energy Certificates (RECs). It includes user-friendly features such as online enrollment and auto-pay, which could be readily adapted to support consolidated billing (including auto-enrollment of consolidated billing customers) for Community Solar. By applying a discount to the rate—rather than a premium—this platform could be leveraged to enhance accessibility and participation in the program.

Further, utilities are best situated to efficiently allocate credits. They have Real-time metering data from both the solar facility and the customer and the ability to automatically calculate and apply credits based on actual energy production and subscription size. This reduces errors and ensures timely, accurate crediting. They also already manage customer relationships with the ratepayers. They have departments dedicated to customer service operations, including call centers and online portals which ensure accurate crediting and dispute resolution within the utility’s billing system. And they even have Low-income and assistance programs which can be integrated with community solar billing to ensure equitable access. This makes them the natural point of contact for billing-related questions and support.

There are clear synchronicities with other programs offered by Entergy; particularly their Green Select program. We believe, given the capabilities and advanced billing systems already in place and the smaller scale of the Community Solar Program, implementing consolidated billing should be a simple programming iteration. One whose administration and management could be absorbed by another department with limited added personnel and overhead.

In their June 2025 Redline, ENO proposes a Guaranteed Savings Rate for subscribers of 10% for non-low income households and 20% for low income households. We advise against setting separate minimums for the groups. Subscriber Organizations will need flexibility in the coming years as we head into developmental headwinds. Costs are rising – for steel, construction, services, etc. – and in order for a project to be successful, it needs to be economically viable. Low-income projects are particularly vulnerable to these price increases as they are more complex and therefore more expensive to manage. Setting a 20% minimum may make some of these projects unfeasible. The market will set discounts and it is our experience that they usually come in above

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the floor. **If the Council wishes to implement a Guaranteed Savings Rate, we suggest a flat 10% across the program.**

ENO has commented both in recent filings and the Technical Conference held on July 31st, 2025 that a large hurdle they face with implementation revolves around the non-uniformity of splitting credits between subscribers and developers. They claim that the management of different subscriber discounts for each subscriber will be cumbersome to manage and have set forth complex monthly reporting in Section VIII, Subscription Credits and consolidated Billing.

We understand the technical difficulty and propose a solution where credits are on a set “menu.” For example, instead of a system where each subscriber might have a bill discount of any value between 10% and 100%, we suggest setting up a tiered system. In a tiered system, discounts would be issued in increments: 10%, 15%, 20%, etc. This decreases the optionality and might make system programming easier.

Another issue ENO has raised and tries to address in the above-mentioned section relates to the splitting of credits and management of accounts. Their concern is the frequency of updates across subscriber lists and allocations across multiple projects. This could be easily remedied through scheduled updates. **Many Community Solar Programs limit list and allocation updates to set timelines. Ensuring that updates occur in batches rather than ad hoc which reduces the need for constant management. We’d propose setting a similar schedule, and suggest quarterly updates for subscriber allocations; since there is a two-month lag for billing, quarterly updates would allow batch replacements for subscriber attrition.** We would also suggest only requiring the low-income verification documentation when a Subscriber is enrolled and utilize self-attestation for low-income designation throughout the tenure of their offtake. As suggested by their low-income billing rate schedules, ENO knows which of its households are low-income designated, therefore making the monthly documentation requirement and unnecessary burden on the subscriber, the subscriber organizations, and ENO’s internal resources. In fact, this entire process could be automated through the system ENO develops to manage consolidated billing. From subscriber on-boarding to bill management and low income verification, ENO could “cut out the middle man” and utilize their Customer Information Systems. **As ENO’s representative, said in the Technical Conference: *Automated is Best.***

Given the concerns ENO has laid out regarding control over billing management, customer protections, program cost, and the effects on low-income ratepayers, another solution could be instituting auto-enrollment as part of the Consolidated Billing Program. **This could provide optionality where ENO auto-enrolls 100% low-income subscribers for community solar bill discounts.** This would simplify the on-boarding and management processes and put total control of subscribers in the hands of a highly regulated entity that is positioned in a place of trust with the customers. This would provide better customer protection through single entity management and keep predatory companies from abusing the system.

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A consolidated billing process is the ideal method to demonstrate a user-friendly customer experience. A unified, single bill provides a simplified experience for the subscriber by providing transparency and a better understanding of their energy costs and solar credit. To contrast, the dual-billing approach increases the likelihood of confusion, delays in payment, and a surge in customer service inquiries to ENO. Utilities are in a unique position to scale consolidated billing across multiple projects and providers. And they excel at implementing standardized processes that reduce administrative burden and improve market efficiency. This helps community solar grow faster and more sustainably.

Industry Precedent and Adaptability

Utility Consolidated Billing is increasingly becoming the best practice for community solar programs. It’s customer friendly, improving transparency and creating an easy billing system for subscribers to understand. This makes it more inclusive by allowing customers to participate without needing to navigate complex billing arrangements. It enhances consumer protections by utilizing the robustly regulated utility billing systems and dispute resolution processes. It has higher retention rates and lower acquisition costs, helping boost availability and retention of subscribers. As such, it lowers barriers to entry and creates a more scalable infrastructure. All of which support New Orleans Equity and Energy goals.

ENO makes an assertion in their July 15th, 2025 letter that Developers are advocating for consolidated billing to avoid operational costs and maximize their profits. They also state:

To date, there has been no finding that consolidated billing is in the public interest.

Developers, industry advocates, and consumer groups are all advocating for consolidated billing because not only does it make these beneficial solar projects viable in a time of economic and political headwinds, but it’s also the best practice. National Renewable Energy Laboratory (NREL), in collaboration with the Lawrence Berkeley National Laboratory, published a paper titled, *Community Solar Consolidated Billing: An Exploration of Implementation and Alternatives*² in 2024. The report analyzes the public interest and practical implications of implementing utility consolidated billing for community solar programs. The key points found for the benefit of public interest are:

- **Improved customer experience** through simplified billing.
- **Increased transparency** and trust in billing practices.
- **Higher retention rates and lower subscriber acquisition costs.**
- **Enhanced access for low-income customers**, especially when paired with consumer protections and on-bill financing mechanism

² [Community Solar Consolidated Billing: An Exploration of Implementation and Alternatives](#)

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Another report, *Community Solar Consolidated Billing: Review of State Requirements, Policies, and Key Considerations*,³ published by the National Association of State Energy Officials (NASEO) echoes NREL’s findings.

States continue to adopt and mandate consolidated billing in their community solar programs. Initially pioneered by New York, Illinois, Oregon, and Virginia have followed suit. Minnesota, Colorado, and New Jersey are exploring implementation of consolidated billing in their programs as well. This uptick in adoption shows the on-going success of the programs that are currently operating as well as the benefits it brings to the subscribers. In fact, National Grid in New York took their Consolidated Billing platform a step further by creating a low-income specific program where projects can sign up to have their system’s low-income subscribers auto-enrolled and managed by the utility. This has created a new level of accessibility and equity within the program.

In ENO’s October 30, 2024, comments they reference challenges in New York’s implementation of consolidated billing. We see the challenges they reference not as a deterrent, but as a roadmap. New York utilities serve millions of customers across six jurisdictions and they were instituting a new process from scratch. In New Orleans, a much smaller program encompassing only one utility, we can learn from New York’s experiences; tailoring a solution that fits our scale and needs. We believe the implementation schedule that Council has laid out will help ensure proper implementation and stakeholder engagement.

Recommendations for Implementation and Conclusions

Utility Consolidated Billing will create a successful, sustainable program and cement New Orleans as a leader in Community Solar. With Consolidated Billing, these projects can effectively bring grid security, affordability, environmental justice, and renewed economic value to the city. We appreciate the Council’s continued leadership in advancing community solar in New Orleans. While ENO has raised concerns about the costs and complexities of consolidated billing, we believe those challenges are outweighed by the long-term benefits to customers and the program’s overall success. **A streamlined, customer-friendly billing process is essential to ensuring equitable access, especially for low-income communities.**

To ensure a fair and efficient rollout, we support a stakeholder process to define the billing framework. To avoid mistakes made by other markets, we must focus on: establishing clear metrics for billing timeliness and accuracy; set transparent and fair cost recovery rules upfront that may only be changed through periodic processes including stakeholder input; prioritize consumer

³ National Association of State Energy Officials. *Community Solar Consolidated Billing: Review of State Requirements, Policies, and Key Considerations* by Sandy Fezeli 2023. Accessed 9.2.2025 via <https://www.naseo.org/data/sites/1/documents/publications/Community%20Solar%20Consolidated%20Billing%20Final%5b43%5d.pdf>

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protection and equity as billing errors disproportionately affect low-income subscribers, and keep stakeholder engagement active throughout the implementation process through advisory councils or working groups to ensure proper transparency and buy in.

We also encourage the Council to:

- Set clear parameters for credit splits and billing logic.
- Phase in the program with a focus on low-income subscribers. After all, majority of the project queue is made up of low-income designated system.
- Consider adaptation of an auto-enrollment process for low-income households to ease ENO’s concern to add additional support. (Appendix A).

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 move forward with urgency and commitment. Let’s make community solar work for all New Orleanians—efficiently, equitably, and without further delay.

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Appendix A

Support for Auto-Enrollment of Low-Income Subscribers into Utility-Administered Consolidated Billing Program

As the Council considers implementation pathways for consolidated billing under the Community Solar Program, we respectfully submit this comment in support of a utility-administered, auto-enrollment model for low-income subscribers. This approach is both more cost-effective and more equitable than third-party aggregation and aligns with the Council’s stated goals of protecting ratepayers and expanding access to clean energy.

As we look to the future of the Community Solar Program and the Consolidated Billing implementation hurdles, we still see a large gap that needs bridged – bringing affordable, clean energy to mostly overlooked communities. 30% of a system’s output on a 60MW program is not going to have a far-reaching effect in New Orleans’ overall energy goals. Approximately 40% of Entergy’s 3 million residential customers live below the poverty line⁴. Entergy New Orleans (ENO) speaks to this on their website; we wholeheartedly agree:

We have a moral obligation and a business imperative to help find lasting solutions for our customers in need.

To this vein, many of ENO’s comments since their October 2024 filing concern the protection of disadvantaged, low-income households. And we agree that those communities are often the ones that disproportionately miss out on the opportunities afforded by programs like Community Solar. Especially in dual billing scenarios where the contracts and billing formats are complex. Consolidated Billing management solves the billing complexity, but contracting can still be difficult for consumers to understand and lead to apathy among the customers that would be best served by the program. This is where auto-enrollment is a perfect pairing. In this scenario, the utility both aggregates and manages the low-income subscriptions for a community solar project. They act as a regulated, trusted conduit for bill savings. Other states have successfully implemented similar programs. For example, National Grid in New York implemented a program in 2022⁵.

⁴ Entergy New Orleans: <https://www.entergy.com/communities/low-income/>

⁵ National Grid, NYSEERDA to Launch Innovative Clean Energy Program for Income-Eligible Customers ([Article Link](#))

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Reduces Complexity and Risk

Entergy New Orleans (ENO) has expressed concern about the administrative burden and risk of billing errors associated with third-party coordination:

...the magnitude of data expected to be exchanged monthly raises significant concerns for ENO and seems to present the potential for billing errors.⁶

...customer satisfaction issues given the program’s likelihood of causing confusion among subscriber customers as to the respective roles of ENO and subscriber organizations⁷.

Auto-enrollment by the utility would streamline data flows, reduce billing errors, and clarify customer relationships, thereby improving program performance and customer experience.

Ensures Equitable Access for Low-Income Households

ENO acknowledges that low-income customers are disproportionately impacted by cost shifts and may be excluded from participation:

Consolidated billing... will impose unnecessary costs onto ENO’s customers, in particular low-income customers (whether subscribed to community solar or not).⁸

The majority of the costs... will effectively be shifted to non-participating customers, including many low-income customers who will not have the opportunity to participate.⁹

Auto-enrollment ensures that low-income customers receive the benefits intended for them, rather than being left behind due to marketing gaps or third-party enrollment inefficiencies.

⁶ ENO October 2024 Consolidated Billing Comments, Page 14 of 21

⁷ Letter from ENO to Council dated July 15th, 2025; Page 2

⁸ Letter from ENO to Council dated July 15th, 2025; Page 2

⁹ ENO October 2024 Consolidated Billing Comments, Page 11 of 21

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More Cost-Effective Than Third-Party Aggregation

ENO outlines the costs of implementing consolidated billing with third-party coordination:

ENO anticipates additional and continuous expenditures would be required to implement and maintain consolidated billing – expenditures that would be shouldered by ENO’s entire customer base, even those who do not participate in community solar, many of whom are most vulnerable to cost pressures.¹⁰

Additional FTEs to administer the program would be needed to support enrollment, enable data transfers between subscriber organizations regarding subscriber lists, to perform reconciliations to ensure that all activity is complete and accurate for any given period, release payments to developers, to review invoices to ensure credits are properly reflected, and possibly other tasks.¹¹

Auto-enrollment simplifies these processes by eliminating the need for third-party coordination, reducing staffing and IT costs, and minimizing ongoing administrative overhead.

Aligns with ENO’s Own Recommendations

ENO itself recommends limiting participation to low-income customers to reduce cost shifts:

... and limit participation to low-income customers.¹²

Auto-enrollment operationalizes this recommendation efficiently, ensuring that the program is both targeted and inclusive.

Enhances Equity and Program Viability

Third-party aggregation risks excluding the very customers the program is meant to serve. ENO estimates:

Only 7,000 to 9,000 customers (representing only 4%–5% of ENO residential customers) might be able to participate.¹³

¹⁰ Letter from ENO to Council dated July 15th, 2025; Page 2

¹¹ Letter from ENO to Council dated December 13th, 2024, Page 2

¹² ENO October 2024 Consolidated Billing Comments, Page 16 of 21

¹³ ENO October 2024 Consolidated Billing Comments, Page 12 of 21

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Auto-enrollment can dramatically increase participation among eligible low-income households, improving equity and strengthening the program’s public value.

Recommendations and Conclusion

To quote the ENO representative from the July 31st, 2025 Technical Conference, *Automated is best. Since ENO will be implementing a system to facilitate Consolidated Billing, including an auto-enrollment feature at this time would be a cost-effective way to maximize simplicity in the aggregation and management processes.* Given Consolidated billing is in its infancy stages within the Community Solar Program, we see the auto enrollment feature as a part of the Consolidated Billing conversation. Also, as it has been incorporated into other working Consolidated Billing models (e.g.: National Grid New York’s Low-Income Program) it’s our position that a new docket would not be necessary to consider this as part of Consolidated Billing as a whole.

It would be our recommendation that Subscriber Organizations be given the option to aggregate projects themselves or opt-in to have ENO auto-enroll. If ENO is auto-enrolling, then Subscriber Organizations would be required to allocate 100% of their system’s output to individual low-income customers.

As mentioned before, Entergy has a database of customers that could be used for an auto enrollment process. This would allow for a more streamlined process and added efficiency. Having this option would reduce barriers for customers and provide a simplified process. ENO’s *Power to Care*¹⁴ program showcases their involvement and knowledge of their low-income customers in their current billing systems. And, the Entergy [Green Select](#) program provides a promising framework for the billing platform, which could be readily adapted to support both auto-enrollment and consolidated billing for Community Solar.

Aggregation of low-income subscribers could easily be executed by ENO through an auto-enrollment program that allows Subscriber Organizations to **opt-in if they meet certain qualifications such as 100% low-income subscription levels.** This helps solve the issue of inbounding which creates another layer for ENO to manage and therein making the program more costly to ENO and Ratepayers. It also would result in higher low-income adoption by requiring projects opting to utilize ENO auto-enrollment to subscribe 100% low-income offtake to program, rather than only 30% subscription minimums.

Utilizing an auto-enrollment feature which requires a Subscriber Organization to opt-in and allocate 100% of the energy produced to low-income subscribers expands the program to the households who can most benefit from energy savings. And it could **provide 3.3x the reach and accessibility to low-income households.** Utility aggregated subscription processes are cleaner and

¹⁴ <https://www.entergy.com/care/>

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reduce the red-tape/paperwork that can confuse ratepayers. They also offer better customer protections through single entity management (keep predatory companies from abusing the system).

A utility-administered auto-enrollment model for low-income subscribers offers a streamlined, cost-effective, and equitable pathway to achieving the Council’s goals for community solar. I urge the Council to consider this approach as it finalizes implementation plans for consolidated billing.

We ask Council to consider the benefits of simplifying the program using auto-enrollment as they analyze the implementation and facets of consolidated billing.