



September 26, 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 Reply Comments of the Alliance for Affordable Energy 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 26, 2025

REPLY COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY

Under the procedural schedule that the New Orleans City Council (“the Council”) established in resolution R-25-352, intervenors were instructed to file comments on Entergy New Orleans LLC’s (“ENO”) consolidated billing proposal by September 5, 2025. However, ENO itself made a filing on that date proposing to establish yet another procedural schedule of more than four months to further consider the issue of consolidated billing. The Alliance for Affordable Energy (“AAE”) hereby submits the following reply comments in response to ENO’s filing.

ENO’s filing attempts to re-litigate the issue of whether or not consolidated billing is in the public interest, after the Council has already affirmed its intent to implement consolidated billing in resolution R-25-352, which was reaffirmed to all parties by the Council’s Advisors when they stated plainly at the technical conference held on July 30, 2025 that consolidated billing was the will of the Council. Now, a month before the Advisors are set to issue their final report to the Council on this matter, Entergy proposes that the Council establish yet another procedural schedule of more than four months to further drag out these proceedings.

As we said in our filing of September 5, 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 of Council approval; 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

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

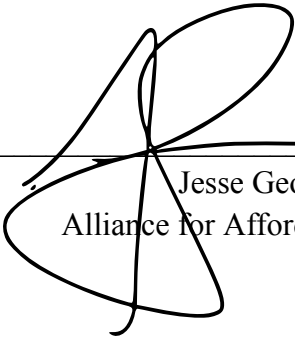
**IN RE: A RULEMAKING PROCEEDING
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CERTIFICATE OF SERVICE

I do hereby certify that I have, this 26th day of September 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



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