

Sep 26, 2025

Via Electronic Mail

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

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

Dear Ms. Collier,

Gulf States Renewable Energy Industries Association (GSREIA) respectfully submits the attached filing in docket **UD-18-03** pertaining to the City's **Community Solar program**.

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

Sincerely,

Monika Gerhart
Gulf States Renewable Energy Industries Association

Sept 26, 2025

**Reply Comments of Gulf States Renewable Energy Industries Association (GSREIA) Re:
Entergy New Orleans' Consolidated Billing Filings, CNO Docket No. UD-18-03**

Gulf States Renewable Energy Industries Association (GSREIA) respectfully submits these reply comments pursuant to Resolution R-25-352. GSREIA is an affiliate of the national Solar and Energy Industries Association (SEIA). As such, GSREIA works closely with a broad network of SEIA affiliates in jurisdictions nationwide that have productive community solar programs.

GSREIA is concerned that the September 5 filing is counterproductive to the Council's goals to finalize and implement a robust Community Solar program. GSREIA is concerned that the amount of resources required by these further delays has already impacted the value of private capital vis-à-vis renewable energy tax credits, as well as the administrative and financial costs to refinance projects that are otherwise shovel ready. GSREIA is concerned by the perception of the stability of the market by entities who invest in projects in other jurisdictions. GSREIA is concerned that ENO's de facto litigation strategy presents a considerable diversion of resources from energy production that could otherwise meet community needs, with Council posited as the arbiter. New Orleanians deserve affordable and reliable access to electricity. GSREIA is concerned these actions run counter to Council's efforts to meet these needs.

The purpose of this procedural schedule is not to revisit whether consolidated billing should exist, a question has been answered by the Council through multiple Resolutions and directives, but to refine the details of implementation.

The Council already rejected arguments that were rehashed again in the September 5 filing, and in contrast to ENO's own June 10 filing. Intervenors in this docket have collectively worked to identify a net crediting model that is efficient, widely adopted in jurisdictions nationwide, and derived by consensus with the intervenors in this docket.

ENO's September 5 submission sends the wrong message to the clean energy market. Instead of focusing on implementation, the utility devotes page after page to reopening debates the Council has already resolved. That posture is damaging not just in this docket but to New Orleans' reputation as a place where serious investment in renewables can take root.

From an industry perspective, here are the facts:

- **Consolidated billing is not experimental.** It is the mechanism that underpins some of the country's most successful community solar programs. When investors see states like New York and Illinois scaling projects rapidly under net crediting, they take note. When they see ENO suggesting New Orleans might walk backwards, they take note of that too—and not in a good way.
- **The cost arguments are a distraction.** Every utility program involves shared infrastructure and administrative costs. That is how a utility system works. What matters is whether the program drives broader savings and access. Community solar, especially

under consolidated billing, does exactly that by expanding customer participation and reducing churn.

- **Franchise concerns are disingenuous.** Customers remain ENO's customers. The only change is that bills are simpler and credits flow smoothly. Pretending otherwise confuses the issue.

Most importantly, delay carries its own price. Every month of uncertainty makes projects harder to finance, tax credits harder to capture, and investor interest harder to sustain. The clean energy industry knows how to work through the mechanics—data exchange protocols, dispute resolution, credit posting—all of these have been solved elsewhere. What we cannot work with is perpetual indecision.

GSREIA urges the Council to cut through the noise. The June 10 framework is a perfectly workable starting point. The specific refinements can be hashed out quickly if ENO engages constructively. What matters now is keeping the program on schedule so New Orleans can attract capital, deliver projects, and show that this city is serious about community solar.

Only by moving decisively now can the Council ensure that it finally delivers its promise of community solar: lower bills, cleaner energy, and equitable access for all New Orleanians.

Respectfully submitted,

Monika Gerhart

Gulf States Renewable Energy Industries Association

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

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

CERTIFICATE OF SERVICE

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

Monika Gerhart, Gulf States Renewable Energy Industries Association