



October 10, 2025

Via Electronic Mail

Clerk of Council
Council of the City of New Orleans
Room 1E09, City Hall
1300 Perdido Street
New Orleans, LA 70112
Clerkofcouncil@nola.gov

Re: Renewable and Clean Portfolio Standard (CNO Docket No. UD-19-01)

Dear Clerk:

Please find enclosed the Alliance for Affordable Energy's comments related to the above captioned docket. Please file the attached communication and this letter into the record. The Alliance submits this letter electronically and will submit the requisite original and number of hard copies as you direct.

Thank you for your time and attention,
Sincerely,

A handwritten signature in black ink, reading "Logan Atkinson Burke". The signature is written in a cursive style with a horizontal line underneath it.

Logan Atkinson Burke
Executive Director
Alliance for Affordable Energy

Before
The Council of the City of New Orleans

**In Re: RESOLUTION AND ORDER
ESTABLISHING A DOCKET AND
OPENING A RULEMAKING PROCEEDING
TO ESTABLISH RENEWABLE PORTFOLIO
STANDARDS**

DOCKET NO. UD-19-01

OCTOBER 10, 2025

**COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY ON ENTERGY
NEW ORLEANS, LLC’S RENEWABLE AND CLEAN PORTFOLIO STANDARD
COMPLIANCE PLAN FOR COMPLIANCE YEARS 2026-2028**

I. INTRODUCTION

On August 14, 2025, pursuant to Section 4(e) of the Renewable and Clean Portfolio Standard (“RCPS”) the Council of the City of New Orleans (“the Council”) adopted in Resolution No. R-21-182, Entergy New Orleans, LLC (“ENO”) filed its Compliance Demonstration Plan (“the Plan”) for compliance years 2026-2028. On September 25, 2025, the Council adopted Resolution No. R-25-484, providing an opportunity for intervenors in this docket to comment on ENO’s Plan by October 10, 2025. Accordingly, the Alliance for Affordable Energy (“AAE”) respectfully submits the following comments:

**II. ENO’S COMPLIANCE IS STILL LARGELY DEPENDENT ON NON-
RENEWABLE RESOURCES AND PURCHASED RENEWABLE ENERGY
CERTIFICATES**

AAE acknowledges that ENO’s Plan has met the technical compliance requirements under the RCPS. However, we would note that the vast majority of ENO’s projected compliance continues to be from existing nuclear power generating facilities, an expensive non-renewable resource, and from purchased renewable energy certificates (“RECs”), meaning that the RCPS is still doing little to steer ENO toward truly renewable generation resources. Renewable resources offer benefits beyond reducing greenhouse gas emissions that nuclear cannot, including

flexibility, the creation of a local economy and workforce around distributed resources, and being truly clean and sustainable, without the long-term radioactive waste storage issues associated with nuclear energy. As AAE has advocated since the drafting of the RCPS, the Council should amend the RCPS to encourage the development of locally-generated renewable energy.

III. THE COUNCIL SHOULD NOT APPROVE LARGE EVENT ELECTRIFICATION AS AN ELIGIBLE COMPLIANCE RESOURCE

In its Plan, ENO proposes to include what it calls “large event electrification” as a Tier 3 compliance resource. While a reduction in the usage of diesel generators is an admirable goal, “large event electrification” is merely an opportunity for ENO to sell more electricity, regardless of the generation source. As the Council stated rightly in the preamble to Council Resolution R-21-182 adopting the RCPS: “[T]he Council finds that the primary purpose of the RCPS will be to eliminate carbon emissions from the Utility’s generation portfolio, and that Beneficial Electrification has the potential to prolong the extent to which the Utility may keep carbon emitting resources in its portfolio.” Essentially, ENO would be creating new load by electrifying large events with no regard to the generation resources supplying that new load, which is contrary to the “primary purpose” of the RCPS, reducing dependence on carbon-emitting resources in its own generation portfolio. ENO needs no additional incentive to pursue these electrification projects, as they stand to benefit directly from increased sales, and thus the Council should deny ENO’s request to include large event electrification as an eligible Tier 3 resource.

IV. THE COUNCIL SHOULD NOT APPROVE THE ELECTRIFICATION OF THE NEW ORLEANS SEWERAGE & WATER BOARD AS AN ELIGIBLE COMPLIANCE RESOURCE

Similar to its proposal to treat “large event electrification” as an eligible compliance resource, ENO proposes to treat the impending electrification of the New Orleans Sewerage & Water Board (“S&WB”) as a Qualified Measure. Again, while electrification is a prudent step for the S&WB, for ENO, it simply represents a massive new retail load to serve, regardless of the generation resource. It would create a massive increase in demand while doing nothing to change ENO’s generation portfolio. In fact, ENO’s decision to balk on its previous commitment of \$30M to the project seriously jeopardized its development.¹ ENO should not receive compliance credit for a project that the S&WB undertook for its own purposes, and would have done so even without Entergy’s involvement.

V. ENO SHOULD RECEIVE COMPLIANCE CREDIT ONLY FOR COMMUNITY SOLAR PROJECTS THAT IT DEVELOPS

ENO proposes to treat all community solar resources currently in development as Tier 1 resources. Harkening back to the “primary purpose” of the RCPS as described in the adopting resolution, the goal is to eliminate carbon emissions from ENO’s generation portfolio. Community solar projects, developed and owned by third parties, are not part of ENO’s generation portfolio. In fact, community solar is being undertaken *in spite* of ENO’s persistent resistance to its development, including most recently in their resistance to consolidated billing under docket UD-18-03. Furthermore, the Council’s most current Community Solar Rules make it clear that the “owner” of the RECs is the Subscriber, who may transfer them (for example to the Subscriber Organization) as they choose.² ENO should not receive compliance credit for projects that it has actively opposed. If ENO would like to retire RECs generated using local

¹https://www.nola.com/news/politics/entergy-pulling-30m-funding-commitment-for-s-wb-substation-leaving-pumping-power-in-doubt/article_d0e56718-7d45-11ec-b6e8-3b01c9c1ebed.html

² CNO Resolution R-25-352, Community Solar Rules, section XII. B-C, at pg 16-17.

Community Solar, they have the right to contract with either project Subscribers or the Subscriber Organizations who may aggregate transferred RECs.

VI. THE COUNCIL SHOULD SEEK CLARITY FROM ENO ON CHANGES TO ITS ACQUISITION OF RECS

On page 2 of ENO's Plan, under section 2.b pertaining to the Green Select program, ENO states, "In previous years, ENO sourced RECs for Green Select customers from the same pool of generated or purchased RECs that would otherwise be used for RCPS compliance. As of 2025, ENO intends to separately purchase RECs that will be used to serve Green Select obligations. As a result, no RECs or CECs in Table 1 will be associated with the Green Select program." ENO offers no explanation for this change in the acquisition of RECs. The Council should require clarity from ENO as to why it has implemented this change.

VII. CONCLUSION

AAE appreciates this opportunity to comment on ENO's 2024 RCPS Compliance Plan. The RCPS is a powerful tool for preserving New Orleans' future, but the Council can and should do more to ensure that the full benefits of renewable energy accrue to the City of New Orleans.

Submitted respectfully,



Logan A. Burke
Executive Director
Alliance for Affordable Energy

Before
The Council of the City of New Orleans

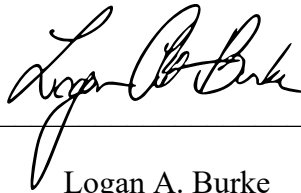
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CERTIFICATE OF SERVICE

I hereby certify that I have this 10th day of October 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

A handwritten signature in black ink, appearing to read "Logan A. Burke", is positioned above a horizontal line.

Logan A. Burke
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, tlirvin@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 AND SUPPORT STAFF

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
Byron S. Watson, bwatson@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, vavocat@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, lwilkel@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

INTERVENORS

ALLIANCE FOR AFFORDABLE ENERGY

Logan Atkinson Burke, logan@all4energy.org

Sophie Zaken, regulatory@all4energy.org

Jesse George, jesse@all4energy.org

4505 S. Claiborne Ave.

New Orleans, LA. 70125

Office: (504) 208-9761

350 NEW ORLEANS

Andy Kowalczyk, a.kowalczyk350no@gmail.com

1115 Congress St.

New Orleans, LA 70117

Benjamin Quimby, 978-505-7649, ben@350neworleans.org

1621 S. Rampart St.

New Orleans, LA 70113

Marion Freistadt, 504-352-2142, marionfreistadt@yahoo.com

1539 Adams St.

New Orleans, LA 70118

CENTER FOR CLIMATE AND ENERGY SOLUTIONS

Marty Niland, Press@c2es.org

Bob Perciasepe, 703-516-4146

3100 Clarendon Blvd, Suite 800

Arlington, VA 22201

GULF STATES RENEWABLE ENERGY INDUSTRIES ASSOCIATION

Stephen Wright, 318-663-3810, swright@gsreia.org

522 Marilyn Dr.

Mandeville, LA 70448

Jeff Cantin, 877-785-2664, jcantin@gsreia.org
2803 St. Philip St.
New Orleans, LA 70119

NATIONAL AUDUBON SOCIETY

Karen J. Profita, 225-768-0820, kprofita@audubon.org
5615 Corporate Blvd., Suite 600B
Baton Rouge, La. 70808

SOUTHERN RENEWABLE ENERGY ASSOCIATION

Simon Mahan, 337-303-3723, simon@southernwind.org
5120 Chessie Circle
Haltom City, Texas 76137

AIR PRODUCTS AND CHEMICALS, INC.

Katherine W. King, Katherine.king@keanmiller.ocm
Randy Young, randy.young@kean miller.com
400 Convention St. Suite 700
Baton Rouge, LA. 70802
Or
P.O. Box 3513
Baton Rouge, LA 70821-3513

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

Maurice Brubaker, mbrubaker@consultbai.com
16690 Swigly Ridge Rd., Suite 140
Chesterfield, MO 63017
Or
P.O. Box 412000
Chesterfield, MO. 63141-2000

NEW ORLEANS CHAMBER

Sandra Lindquist, (504) 799-4260, sandra@neworleanschamber.org
1515 Poydras Street, Suite 1010
New Orleans, La. 70112

SIERRA CLUB

Dave Stets, 804-222-4420, Davidmstets@gmail.com

2101 Selma St.

New Orleans, LA 70122

Joshua Smith, joshua.smith@sierraclub.org

2101 Webster Street, Suite 1300

Oakland, California 94612-3011

(415) 977-5660

POSIGEN SOLAR

Ruthie Dewit, 510-910-6512, rdewit@posigen.com

Kyle Wallace, 208-608-6179, kwallace@posigen.com

145 James Drive East, Suite 300

St. Rose, La. 70087

VOTE SOLAR

Lindsey Hallock (lindsey@votesolar.org)

1911 Ephesus Church Road

Chapel Hill, North Carolina 27517

DEEP SOUTH

Monique Harden, 504-510-2943, moniqueh@dscej.org

3157 Gentilly Boulevard, #145

New Orleans, La. 70122