

RESOLUTION

NO. R-25-629

CITY HALL: December 18, 2025

BY: COUNCILMEMBERS MORRELL, MORENO, HARRIS, KING, GREEN AND THOMAS

IN RE: 2024 TRIENNIAL INTEGRATED RESOURCE PLAN OF ENTERGY NEW ORLEANS, INC.

DOCKET NO. UD-23-01

RESOLUTION AND ORDER ACCEPTING AND APPROVING ENTERGY NEW ORLEANS, LLC'S 2024 TRIENNIAL INTEGRATED RESOURCE PLAN

WHEREAS, pursuant to the Home Rule Charter of the City of New Orleans (“Charter”), the Council of the City of New Orleans (“Council”) is the governmental body with the power of supervision, regulation and control over public utilities providing service within the City of New Orleans; and

WHEREAS, pursuant to its powers of supervision, regulation, and control over public utilities, the Council is responsible for fixing and changing rates and charges of public utilities and making all necessary rules and regulations governing the terms and conditions of service, and to govern applications for the fixing and changing of rates and charges for public utilities; and

WHEREAS, Entergy New Orleans, LLC (“ENO”) is a public utility providing electric service to all of New Orleans; and

WHEREAS, the Council has required utilities subject to its jurisdiction to complete an Integrated Resource Plan (“IRP”) under rules set forth by the Council since 2008;¹ and

¹ Council Resolution No. R-08-295, “Resolution Regarding Proposed Rulemaking to Establish IRP Components and Reporting Requirements for Entergy New Orleans, Inc.”

WHEREAS, subsequent to ENO’s 2015 Triennial Integrated Resource Plan, the Council in Resolution R-17-332 adopted new Electric Utility Integrated Resource Plan Rules (“IRP Rules”) to govern the triennial integrated resource plan process for ENO; and

WHEREAS, in Resolution R-17-429, the Council amended the IRP Rules; and

WHEREAS, in the IRP Rules, the Council set forth specific objectives for the IRP, including, but not limited to: (1) optimize the integration of supply-side resources and demand-side resources, while taking into account transmission and distribution, to provide New Orleans ratepayers with reliable electricity at the lowest practicable cost given an acceptable level of risk; (2) maintain the Utility’s financial integrity; (3) anticipate and mitigate risks associated with fuel and market prices, environmental compliance costs, and other economic factors; (4) support the resiliency and sustainability of the Utility’s system in New Orleans; (5) comply with local, state, and federal regulatory requirements and regulatory requirements and known policies (including such policies identified in the Initiating Resolution) established by the Council; (6) evaluate the appropriateness of incorporating advances in technology, including, but not limited to, renewable energy, storage, and DERs, among others; (7) achieve a range of acceptable risk in the trade-off between cost and risk; and (8) maintain transparency and engagement with stakeholders throughout the IRP process by conducting technical conferences and providing for stakeholder feedback regarding the Planning Scenarios, Planning Strategies, input parameters, and assumptions;² and

WHEREAS, pursuant to the IRP Rules, the Council adopted its Initiating Resolution for the 2024 IRP, Resolution R-23-254, which established a procedural schedule for the 2024 IRP in

² IRP Rules at Section 3.A.

new docket UD-23-01, and set forth certain policy objectives, as well as addressing other procedural matters; and

WHEREAS, subsequent to the issuance of the Initiating Resolution, the Council declined to retain an independent consultant to perform a DSM Potential Study for the 2024 IRP cycle, noting that while it had engaged consultants in the 2018 and 2021 IRP cycles, this decision carries no precedential effect for future proceedings; and

WHEREAS, interventions in the proceeding were filed by the Alliance for Affordable Energy (“AAE”), Air Products and Chemicals, Inc. (“Air Products”), the Southern Renewable Energy Association (“SREA”), and the Sewerage and Water Board of New Orleans (“SWBNO”); and

WHEREAS, over the course of the proceeding, ENO held five technical meetings with the Advisors and Intervenors to discuss the details of the IRP analysis and get feedback from stakeholders on various components of the analysis, including a technical meeting to discuss the Energy Smart Implementation Plan. ENO also held three public meetings regarding the development of the IRP and the IRP report to assist in informing the public of the IRP and obtaining public comment on it; and

WHEREAS, ENO submitted its IRP Report to the Council on December 13, 2024. AAE and the Office of Resilience and Sustainability (“ORS”) filed joint comments on the 2024 IRP Report with the Council on March 10, 2025. Thereafter, ENO filed responsive comments with the Council on April 28, 2025, the Advisors submitted their Advisors’ Report on June 2, 2025; and

Final 2024 IRP Compliance with the Council's Requirements

WHEREAS, under Section 10.E of the IRP Rules, if the IRP fulfills the requirements of the IRP Rules and is developed in compliance with the procedural schedule, it is in compliance with the Council's substantive and procedural requirements; and

WHEREAS, the IRP Rules and Initiating Resolution set forth specific procedural requirements and a specific procedural schedule. The table below indicates whether each requirement of the IRP Rules and Initiating Resolution has been met; and

| IRP Rules Requirement <i>(IRP Rules Section 9 and Initiating Resolution as modified by R-23-254)</i> | Action(s) Taken | Whether Requirement Was Met |
|--|---|-----------------------------|
| Initial public meeting (kickoff and educational meeting) no later than September 15, 2023. | Meeting held August 23, 2023 | Yes |
| Technical Meeting 1 of the parties between October 30 and November 9, 2023 (discussion of Planning Scenarios and Strategies) | Meeting held November 9, 2023 | Yes |
| Completion of DSM Potential Studies by February 1, 2024 | Filed February 1, 2024 | Yes |
| Technical Meeting 2 of the parties (to confirm Scenarios and Strategies), between February 20 and March 1, 2024. | Meeting held February 29, 2024 | Yes |
| Technical Meeting 3 of the parties (finalization of Scenarios and Strategies and lock down of inputs) between May 1 and May 14, 2024 | Meeting held May 7, 2024 | Yes |
| Finalization of all IRP inputs, May 17, 2024 | Final inputs received by ENO on May 16, 2024. ENO sent confirmation email on May 21, 2024 | Yes |
| Completion of all optimized portfolio development and results by September 6, 2024 | Completed on time, circulated to parties September 6, 2024, in advance of Technical Meeting 4 | Yes |
| Technical Meeting 4 of the parties (to review the optimized portfolios and finalize scorecard metrics) between September 23 and October 4, 2024. | Meeting held October 2, 2024 | Yes |
| 2024 IRP Final Report filed by December 13, 2024. | Filed December 13, 2024 | Yes |

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|---|--------------------------------|-----|
| Second Public Meeting (present IRP Report) between January 21 and January 31, 2025. | Meeting held January 31, 2025 | Yes |
| Third Public Meeting (to receive public comment on IRP Report) between February 18 and February 28, 2025. | Meeting held February 26, 2025 | Yes |
| Technical Meeting 5 of the parties (to discuss Energy Smart Implementation Plan) between February 18 and February 28, 2025. | Meeting held February 27, 2025 | Yes |
| Intervenor Comments filed by March 10, 2025. | Comments filed March 10, 2025 | Yes |
| ENO Reply Comments filed by April 28, 2025. | Comments filed April 28, 2025 | Yes |
| Advisor Report filed by June 2, 2025. | Report filed on June 2, 2025 | Yes |

WHEREAS, the Advisors concluded that ENO did meet the procedural requirements of the IRP Rules and the Initiating Resolution, and no party has alleged that ENO had failed to meet the procedural requirements; and

WHEREAS, the Council finds that ENO has met the procedural requirements of the IRP Rules and Initiating Resolution; and

WHEREAS, the IRP Rules and Initiating Resolution set forth numerous substantive requirements for the IRP analysis and Report; and

WHEREAS, the IRP Rules require the Utility to include a reference Planning Scenario that represents the Utility’s point of view on the most likely future circumstances as well as two alternative Planning Scenarios that account for alternative circumstances.³ The IRP Rules require the Utility to seek to develop a position agreed to by the Utility, Advisors, and a majority of the Intervenors regarding assumptions surrounding each of the Planning Scenarios and that if such consensus is not reasonably attainable, the Utility shall model a fourth Planning Scenario based

³ IRP Rules at Section 7.C.1.

upon input agreed to by a majority of the Intervenors.⁴ In this IRP Proceeding, ENO created three Planning Scenarios with the consensus of the Parties;⁵ and

WHEREAS, the Council finds that the three Scenarios modeled sufficiently capture the range of reasonably likely possible futures; and

WHEREAS, the IRP Rules then require that the utility develop two to four Planning Strategies which constrain the resource portfolios optimization process to achieve particular goals, regulatory policies and/or business decisions over which the Council, the Utility, or stakeholders have control.⁶ The IRP Rules require a Planning Strategy that allows the optimization to identify the lowest cost option for meeting the needs identified in the IRP process, a reference Planning Strategy agreed to by the Utility, Advisors and a majority of the Intervenors, and alternate Planning Strategies that reflect known utility regulatory goals of the Council.⁷ The IRP Rules require that if the Utility, Advisors and a majority of the Intervenors do not agree to a single Reference Planning Strategy, the Utility shall model a separate Stakeholder Planning Strategy based upon input determined by a majority of the Intervenors;⁸ and

WHEREAS, in this IRP proceeding the parties agreed to four Planning Strategies:

Strategy 1 - the least cost planning strategy; *Strategy 2* - the reference strategy; *Strategy 3* - an RCPS compliance strategy; and *Strategy 4* - the Stakeholder Planning Strategy;⁹ and

⁴ IRP Rules at Section 7.C.2.

⁵ Advisors' Report at 24.

⁶ IRP Rules at Section 7.D.

⁷ IRP Rules at Sections 7.D.1-7.D.3.

⁸ IRP Rules at Section 7.D.2.

⁹ Final 2024 IRP at 58-59.

WHEREAS, as is required in the IRP Rules,¹⁰ ENO included as Appendix A to its Final 2024 IRP a Rules Compliance Matrix setting forth each requirement of the IRP Rules and Initiating Resolution, and explaining how ENO met each requirement,¹¹ which the Council’s Advisors have verified;¹² and no party has challenged; and

WHEREAS, the Council finds that the Final 2024 IRP meets the content requirements of the IRP Rules and Initiating Resolution; and

Whether or Not the Final 2024 IRP Should be Approved, Approved Subject to Conditions or With Modifications, Approved in Part and Rejected in Part, or Rejected

WHEREAS, the second part of Section 10.E of the IRP Rules states:

Further, after consideration of all the evidence entered into the record, the Council may approve the accepted Utility IRP, approve it subject to stated conditions, approve it with modifications, approve it in part and reject it in part, reject it in its entirety, or choose to terminate the proceeding without either approving or rejecting the accepted Utility IRP. Nothing in this provision limits the Council’s ability to take any action with respect to the IRP that is within its authority, including the Council’s ability to open a prudence investigation for noncompliance on the part of the Utility.

WHEREAS, having determined that the Final 2024 IRP should be accepted as in compliance with the Council’s requirements, the Council must now determine what further findings, if any, to make with respect to the 2024 IRP; and

WHEREAS, as ENO describes in detail in the Final 2024 IRP, ENO, the Advisors and the Intervenors agreed on three Planning Scenarios representing a range of market drivers and possible futures, and came to consensus on four Planning Strategies (one of which included a sensitivity analysis) that informed or constrained the optimized portfolio development process consistent with

¹⁰ IRP Rules Section 1.

¹¹ Final 2024 IRP at Appendix A.

¹² Advisors’ Report at 15.

defined objectives or policies.¹³ Then, using the AURORA Capacity Expansion Model (“AURORA”),¹⁴ twelve optimized portfolios were developed based on a combination of each Planning Scenario and each Planning Strategy.¹⁵ Additionally, two additional manual portfolios were developed under Strategy 1, but with two different earlier deactivation dates for UPS PB1,¹⁶ and

WHEREAS, the three Planning Scenarios were agreed to by the parties for inclusion in the IRP.¹⁷ Planning Scenario 1 was the reference case (*i.e.* continuation of the status quo) defined by reference load growth and gas prices, DSM additions and CO₂ reductions targets.¹⁸ Scenario 2 was the Clean Air Act Section 111 Compliance Scenario defined by reference load growth and gas prices, high DSM additions, and moderately accelerated coal and legacy gas retirements.¹⁹ Scenario 3 was the Stakeholder Scenario (defined by the Intervenors), characterized by high load growth, gas prices, and DSM additions, as well as low renewable capital cost assumptions,²⁰ and

WHEREAS, the Planning Strategies were developed to support a range of potential planning objectives, Council policies, and clean energy priorities.²¹ Strategy 1 was the least cost planning strategy and selected demand and supply-side alternatives based solely on need and cost.²² Modeling this Strategy allows the Council to understand the impacts of Council policies

¹³ Final 2024 IRP at 50.

¹⁴ AURORA is forecasting and analysis software commonly used in the electricity industry for planning purposes.

¹⁵ *Id.*

¹⁶ Final 2024 IRP at 7, 50, 53.

¹⁷ Final 2024 IRP at 50. The Council notes that the purpose of the three Scenarios is not to predict the future with precision, rather the purpose is to ensure that the IRP considers the full range of reasonably possible future outcomes so that the analysis can give an indication of what resources are likely to be the most economic resources in multiple possible future scenarios.

¹⁸ Final 2024 IRP at 50.

¹⁹ Final 2024 IRP at 50.

²⁰ Final 2024 IRP at 50.

²¹ Final 2024 IRP at 51.

²² Final 2024 IRP at 52.

on long-term planning. Strategy 2 was the “But for RCPS” Strategy and was intended to represent the resource plan that would comply with regulatory policies in New Orleans that existed before the Council’s adoption of the RCPS.²³ Modeling this strategy as an RCPS cost baseline allows the Council to determine the cost of RCPS compliance. Strategy 3 was designed to meet the requirements of the Council’s RCPS policy and 2% DSM savings goal, and it excludes any resources that would not be compliant with the RCPS, such as fossil-fueled resources.²⁴ Strategy 4 is the Stakeholder Strategy defined by the Intervenors, which uses lower renewables costs and forces the selection of all energy efficiency and demand response programs, as well as amounts of different renewables as specified by the Intervenors;²⁵ and

WHEREAS, the three Planning Scenarios and four Planning Strategies resulted in twelve different optimized portfolios, each of which reflects the least cost portfolio of resources under its particular combination of Planning Scenario and Planning Strategy, set forth in Figures 36, 37 and 38 of the Final 2024 IRP; and²⁶

WHEREAS, the Council also observes that battery storage resources appear 10 of the 14 optimized portfolios from which they were not specifically excluded in the modeling parameters.²⁷ and

WHEREAS, the IRP Report indicates that the long-term planning horizon will likely include additions of both renewable and energy storage technologies, there may be increased value in additional flexible peaking and quick-response technologies, and that ENO remains committed

²³ Final 2024 IRP at 52.

²⁴ Final 2024 IRP at 53.

²⁵ Final 2024 IRP at 53.

²⁶ Final 2024 IRP at 58-60.

²⁷ Final 2024 IRP Report at 59-60.

to exploring clean, alternative technologies to ensure the adaptability and longevity of these resources;²⁸ and

WHEREAS, DSM plays a significant role in every portfolio, ranging from 183 to 518 MW by 2044, which supports continued growth and expansion of the Energy Smart program.²⁹ The aggregate effects of ENO-sponsored DER, naturally occurring or organic energy efficiency, as well as customer-owned solar installations are included in the load forecast as a reduction in ENO's load;³⁰ and

WHEREAS, as a result of stakeholder discussions, ENO developed three additional manual portfolios to further analyze two issues: (1) the impact of deactivating Union Power Block 1 ("Union") in 2025 rather than its estimated retirement date of 2033, and (2) the impact of acquiring smaller amounts renewable capacity before the retirement of Union in 2033 in order to comply with the RCPS annual requirements solely through capacity additions; and

WHEREAS, both Manual Portfolio 1a and Manual Portfolio 1b were informed by the optimized portfolio developed under Strategy 1/Scenario 1, but Manual Portfolio 1a accelerated the deactivation of Union 1 to 2032 and Manual Portfolio 1b accelerated it to 2035;³¹ and

WHEREAS, the Advisors found that the DSM Potential Study had substantially met the Council's requirements, and noted the merit of the following suggestions from the IRP DSM team for further consideration: (i) review and update the New Orleans TRM for high impact measures; (ii) consider including dynamic pricing DR options; (iii) analyze the merits of time-of-day usage

²⁸ Final 2024 IRP Report at 21.

²⁹ Final 2024 IRP Report at 59-60.

³⁰ Final 2024 IRP Report at 32-34.

³¹ Final 2024 IRP at 53.

as it aligns to grid-based energy resources (*e.g.* DERs) and their associated costs; (iv) explore cost-effective opportunities, pricing structures, and research on additional benefits to behind-the-meter (“BTM”), including battery storage. The Advisors also noted that there was no stakeholder participation in the concurrent development of the DSM Potential Study;³² and

WHEREAS, the Advisors identified certain shortcomings of ENO’s treatment of DERs, but stated that the IRP Report is complete and substantially complies with the IRP Rules and Initiating Resolution;³³ and

WHEREAS, the Advisors also noted that other ongoing Council dockets, such as UD-18-03 regarding Community Solar and UD-24-02 regarding DERs are likely to implement changes to Council policies around DERs that will impact IRP analyses, and that technological and market changes regarding DERs have occurred since the Council’s current IRP Rules were adopted.³⁴ The Advisors identified several areas where the current IRP Rules need to be revised to better reflect these changes, and recommended that the Council consider opening a proceeding to evaluate revising the IRP Rules with respect to how DERs are included in both the DSM potential study and the IRP analyses to reflect these recent developments;³⁵ and

WHEREAS, the Council finds that all parties should have the opportunity to comment upon the Advisors’ recommendations in advance of the next IRP cycle; and

WHEREAS, the Advisors recommend that the Council approve ENO’s 2024 IRP Action Plan subject to the following caveats: (1) approval of the Action Plan does not constitute Council

³² Advisors’ Report at 36.

³³ Advisors Report at 37.

³⁴ Advisors’ Report at 37.

³⁵ Advisors’ Report at 37-38.

approval of any specific asset or resource acquisition, any such acquisition must still be submitted for Council approval consistent with the Council's rules and regulations; and (2) Council acceptance of the 2024 IRP and approval of the Action Plan does not preclude the Council from considering and/or ordering further actions by ENO relative to resource planning and acquisition; in particular, acceptance of the Final 2024 IRP shall have no precedential impact upon the Council's considerations in the RCPS rulemaking docket (UD-19-01) or any other related docket;³⁶ and

WHEREAS, the Council finds that ENO's Final 2024 IRP should be accepted as consistent with the Council's IRP Rules and general policies and goals, and that the Action Plan should be approved subject to the modifications set forth by the Advisors; **NOW THEREFORE**

BE IT RESOLVED BY THE COUNCIL OF THE CITY OF NEW ORLEANS THAT:

1. The Final 2024 IRP is accepted as in compliance with the substantive and procedural requirements of the Council's IRP Rules and its Initiating Resolution.
2. The Final 2024 IRP and its Action Plan is approved, noting that (a) consistent with Section 1.D of the IRP Rules, approval of the Action Plan does not constitute Council approval of any specific asset or resource acquisition, any such acquisition must still be submitted for Council approval consistent with the Council's rules and regulations; and (b) the Council approval of the 2024 IRP does not preclude the Council from considering and/or ordering further actions by ENO relative to resource planning and acquisition; in particular, approval of the Final 2024 IRP shall have no precedential impact upon the Council's considerations in any other related or future docket.

³⁶ Advisors' Report at 38.

- Parties who wish to comment on the recommendations made by the Advisors for future IRP proceedings may file such comments within 90 days of the adoption of this Resolution, and the Council will take such comments into consideration when issuing its Initiating Resolution for the next IRP cycle.

THE FOREGOING RESOLUTION WAS READ IN FULL, THE ROLL WAS CALLED ON THE ADOPTION THEREOF, AND RESULTED AS FOLLOWS:

YEAS: Giarrusso, Green, Harris, King, Moreno, Morrell, Thomas - 7

NAYS: 0

ABSENT: 0

AND THE RESOLUTION WAS ADOPTED.

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THE FOREGOING IS CERTIFIED
TO BE A TRUE AND CORRECT COPY

Lara W. Johnson
CLERK OF COUNCIL