

MEMORANDUM

TO: City Council Members, Docket Participants, and Citizens of New Orleans

FROM: Together New Orleans

DATE: March 2, 2026

RE: What to Look For in Entergy New Orleans' DER Program Implementation Plan (Docket UD-24-02)

City Council Resolution No. R-25-669 requires Entergy New Orleans to file an implementation plan for the Council-approved three-year Distributed Energy Resources ("DER") Program by March 1, 2026, which, because that date fell on a Sunday, is expected to be filed today.

As the Council reviews that filing, this memorandum highlights what to look for.

In adopting the Resolution, the Council recognized both the increasing frequency and intensity of severe weather events and the growing strain on the electric grid, and determined that expanding distributed energy resources is necessary to respond to these conditions. The DER Program is intended to deploy battery storage and related facilities that reduce grid stress during peak demand and maintain critical loads during outages. The question now is whether the implementation plan translates that direction into timely, measurable deployment.

Two elements are central.

1) A defined three-year deployment schedule tied to measurable targets

Look for quantified deployment targets for the full three-year program term, expressed as the number of projects and aggregate kW of battery capacity deployed by year and by customer category. The plan should connect those targets to a clear rollout schedule that results in full and timely use of the Council's not-to-exceed \$28,000,000 customer upfront incentive budget over the initial three-year term.

The timeline should make clear when systems will be installed, interconnected and enrolled, and how those installations will contribute to peak demand reduction and outage resilience within the program term.

2) Incentives structured to produce participation, with a defined adjustment mechanism

Look for incentive levels and structures that are calibrated to produce sustained enrollment across residential non-LMI, residential LMI and commercial/community segments, consistent with the Council's findings that upfront incentives are necessary to increase DER availability.

The Resolution requires quarterly and annual reporting and contemplates evaluation and adjustment based on program demand and results. The implementation plan should therefore include a defined mechanism to review participation data at least quarterly and, if enrollment or performance is not aligned with deployment benchmarks, to bring forward timely adjustments within that program year. The program should not wait for a full annual cycle to correct insufficient incentive levels or structural barriers to participation.

Participation standards, event requirements and claw back provisions should be clearly defined so that ratepayer-funded incentives produce measurable grid services and resilience performance.

The Council has established the framework for a measured but consequential expansion of DERs. We look forward to reviewing Entergy's submission and working with the Council, Advisors and all participants to ensure the program delivers meaningful grid relief and outage protection at the scale and pace required.