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March 18, 2026

VIA Electronic Delivery

Clerk of Council
City Hall, Room 1E09
1300 Perdido Street
New Orleans, Louisiana 70112

RE: Entergy New Orleans, LLC’s Comments on Advisor Recommendations For Future IRPs

Dear Clerk of Council:

Entergy New Orleans, LLC (“ENO” or “the Company”) submits these comments as requested by the Council in Resolution No. R-25-629 in response to the recommendations made by the Advisors in their Report on ENO’s 2024 Integrated Resource Plan (“IRP”).

Thanks,

A handwritten signature in blue ink that reads 'Keith Wood'.

Keith Wood

Enclosure

cc: Official Service List UD-23-01 (via electronic mail)

**BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS**

| | | |
|------------------------------------|---|----------------------------|
| IN RE: 2024 TRIENNIAL |) | |
| INTEGRATED RESOURCE PLAN OF |) | DOCKET NO. UD-23-01 |
| ENTERGY NEW ORLEANS, LLC. |) | |
| |) | |

**COMMENTS OF ENTERGY NEW ORLEANS, LLC ON
ADVISOR RECOMMENDATIONS FOR FUTURE IRPS**

Entergy New Orleans, LLC (“ENO” or “the Company”) submits these comments as requested by the Council in Resolution No. R-25-629 in response to the recommendations made by the Advisors in their Report on ENO’s 2024 Integrated Resource Plan (“IRP”).¹

COMMENTS

The Advisors noted in their Report that the characteristics and uses of Distributed Energy Resources (“DERs”) have evolved since the Council’s IRP Rules were last amended in 2017. Accordingly, they made two recommendations for the Council to consider regarding the Rules: 1) the definition of “DER” should be updated to adequately describe the range of DER types in the market today; and 2) provisions regarding the inclusion of DERs in the IRP analyses should be updated to reflect the modified definition. ENO offers the following comments regarding changes to the definition of “DER” and the manner in which DERs are considered in the IRP analyses.

1. The definition of “DER” should reflect the full range of available resource options.

The Company agrees with the Advisors’ assessment that the definition of “DER” in Section 2.A.6. of the IRP rules requires revision to reflect the range of DERs currently deployed and planned for development in New Orleans.² The 2017 definition focuses on customer-owned,

¹ Advisors’ Report Regarding the Entergy New Orleans, LLC 2024 Integrated Resource Plan, dated June 2, 2025.
² Id., at p.37.

behind the meter (“BTM”) resources, but resource options today can also include DERs that are owned by the utility or by a third party (that may or may not be a customer of the utility), and that are interconnected either behind or in front of a customer’s meter. To reflect the full range of available DERs, ENO proposes for consideration the following revisions to the definition in Section 2.A.6.:

"Distributed Energy Resources" (DERs) - refers to generation or energy storage facilities owned or leased by retail customers, **third parties, or the Utility** that are ~~located on the customer side of the meter, that are primarily for the use and consumption of energy by the retail customer, and that are~~ interconnected to **the distribution grid** and capable of delivering energy to the **distribution grid**. Distributed Energy Resources may include renewable/non-renewable generators, combined heat and power, ~~and~~ storage technology (including electric vehicles), and any other technology that may similarly serve or dispatch energy **to the distribution grid from the customer side of the meter.**

2. Characteristics of DERs dictate how they are included in the IRP analyses.

Table 1, below, shows the different types of distributed resources that are either currently deployed in New Orleans or planned for deployment in the future. Some of these, such as demand-side management (“DSM”) and demand response (“DR”) programs, are evaluated through the DSM potential study and all of them are incorporated into the IRP analysis in different ways based on how ENO relies on them to help serve its customers’ electric needs. Table 1 shows how Entergy’s System Planning & Operations (“SPO”) group treats each of these distributed resources in developing portfolios through the IRP analyses:

Table 1

| Distributed Resource | Ownership | Proposed Treatment in 2027 IRP | MISO Registration |
|--------------------------------|------------------|---------------------------------------|---------------------------------|
| EE/DSM Programs (Energy Smart) | Utility | Decrement to Load Forecast | N/A |
| BTM/NEM Solar | Third Party | Decrement to Load Forecast | N/A |
| New Orleans Solar Station | Utility | Supply Side--Load Modifying Resource | Plan to register for 2026/27 PY |
| Paterson Solar | Utility | Supply Side--Load Modifying Resource | Plan to register for 2026/27 PY |
| Commercial Rooftop Solar | Utility | Supply Side--Load Modifying Resource | Plan to register for 2026/27 PY |
| Smart Thermostat DR | Third Party | Supply Side--Load Modifying Resource | Plan to register for 2026/27 PY |
| Commercial Customer DR | Third Party | Supply Side--Load Modifying Resource | Plan to register for 2026/27 PY |
| Sherwood Forest GRIP Battery | Utility | Supply Side--Load Modifying Resource | Plan to register for 2027/28 PY |
| Community Solar | Third Party | Supply Side--Load Modifying Resource | Plan to register for 2027/28 PY |
| Dispatchable Battery VPP | Third Party | Supply Side--Load Modifying Resource | Plan to register for 2027/28 PY |

Section 5.A. of the Rules contemplates evaluation of existing resources and identification of incremental resources. The Company agrees with the Advisors' conclusion that Section 5.A. may need to be revised to align with the updated definition of DER incorporated in Section 2.A.6., and to reflect the manner in which the different types of demand side management programs and DERs shown above are included by SPO in the IRP analyses.³ For example, Section 5.A.1., which contemplates supply-side resources, may require revisions to recognize that MISO-registered load modifying resources ("LMRs") based on Energy Smart demand response programs are treated by SPO as supply side resources in ENO's load and capability tables and in Aurora modeling.

Given the range of resource characteristics shown in Table 1, above, the Company suggests it could be helpful to add a clarifying definition in Section 2.A.6. of the IRP Rules to be able to refer collectively to these resource types that are both defined under the Rules. ENO offers the following proposed definition for consideration: "Distributed Resources' - shall include both Demand Side Management and Distributed Energy Resources."

The Advisors noted that ENO complied with the requirements of Section 6.E. of the IRP Rules through the inclusion in the 2024 IRP Report of various sections that explained steps being undertaken to implement foundational systems, software, and processes necessary for ENO to further evaluate locational and reliability benefits and impacts of DERs in the future.⁴ ENO continues to make investments and improvements in these areas and expects to be able to share additional information regarding its capabilities with the Advisors and stakeholders through the 2027 IRP cycle.

³ Id.

⁴ Id.

CONCLUSION

ENO agrees with the Advisors' recommendations to update the IRP Rules to account for developments in the types and characteristics of DERs since 2017 and appreciates the opportunity to provide these comments regarding the definition and treatment of DERs in the IRP process. The Company looks forward to working with the Advisors and stakeholders on any necessary changes to the IRP Rules in advance of the 2027 IRP cycle.

CERTIFICATE OF SERVICE

Docket No. UD-23-01

I hereby certify that I have served the required number of copies of the foregoing report upon all other known parties of this proceeding, by the following: electronic mail, facsimile, overnight mail, hand delivery, and/or United States Postal Service, postage prepaid.

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New Orleans, Louisiana, this 18th day of March 2026.



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