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June 8, 2026

Via Email Only (espears@nola.gov)

Erin Spears, Chief of Staff
Council Utilities Regulatory Office
City Hall – Room 6E07
1300 Perdido Street
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In Re: A Rulemaking Proceeding to Establish Rules for Community Solar
Projects, Docket UD-18-03
KM File No. 7717.42

Dear Ms. Spears:

I am writing on behalf of my client, Air Products and Chemicals, Inc. (“Air Products”).

Air Products intends to participate as a Subscriber¹ in the Community Solar Program (“Program”) established by the Council of the City of New Orleans (“Council”). Air Products understands the Program can help Air Products with achieving its global sustainability goals, may generate bill savings for its operations in New Orleans, and that Air Products’ participation will help support the development of CSG Facilities in New Orleans.

To that end, Air Products seeks clarity from the Council and/or the Council’s Utility Regulatory Office (“CURO”) on the process for Air Products to register and establish its position in any queue or waiting list for Subscribers under the Council’s Program.

The Program is open to all customer rate classes. Air Products is eligible to subscribe, at least in some amount, to each of the CSG Facilities currently in the Application Queue.² Air Products’ Baseline Annual Usage, together with the Limitations on Subscription established by the Rules, means that Air Products is eligible to subscribe to up to approximately 20 megawatts (“MW”) of Output from CSG Facilities, provided that Air Products cannot subscribe to more than 40% of any individual CSG Facility.³

¹ Unless noted otherwise, capitalized terms used herein shall have the same meaning as the definitions contained in Section II of the Council’s Community Solar Rules (“Rules”).

² While the Rules provide that half of the CSG Facilities in the Application Queue shall be designated as Low-Income CSG Facilities, only 30% of the Output of such a Facility must be reserved for Low-Income Customers. As such Air Products is eligible to subscribe to both categories of Facilities contemplated in the Rules.

³ Under the Rules, the maximum participation for a single non-Low-Income Customer is 34% of the Program’s total available capacity, which is presently approximately 20MW. This derives from 50% of the capacity from the Program being reserved

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Air Products desires to participate to the maximum extent possible, including up to a 40% subscription interest in CSG Facility #CSG-24-04 (currently the only Facility in the CSG Construction Queue).

The Rules prohibit Subscriber Organizations from discriminating against or refusing to provide service to Customers. Yet, at this time, the Council's Community Solar Rules do not contain clear instructions on how Customers, like Air Products, that wish to become Subscribers can register for participation.

Therefore, Air Products respectfully requests that the Council begin a process for amending its Rules to establish a transparent, non-discriminatory, first-come-first-served process for Customers that desire to become Subscribers to register for the Program. In order to ensure fair, non-discriminatory access to the Program, it is critical that such rules be in place before Subscriber Organizations can be allowed to solicit or register Subscribers. As such, Air Products respectfully requests that this action be taken expeditiously.

In the alternative, if the Council is not inclined to amend its Rules to establish a transparent, first-come-first-served registration process, Air Products requests that this correspondence serve as notification to Subscriber Organizations (including the Subscriber Organizations developing CSG Facility #CSG-24-04) establishing Air Products' standing in any queue or waiting list that the Council, CURO, or individual Subscriber Organizations may establish for Customers who seek to become Subscribers.

Thank you for your attention to this matter and consideration of Air Products' request.

Very truly yours,



Carrie Tournillion
Randy Young

JRY:tp

cc: Councilmembers; UD-18-03 Official Service List (via electronic mail)

for Low-Income Category CSG Facilities and 30% of the capacity from those Facilities being reserved for Low Income Customers. As such, up to 85% of total Program capacity is available to any type of Customer, with a limit imposed that one individual Customer may not participate in more than 40% of any Facility. 40% of the 85% of eligible capacity yields a value of 34% total Program capacity – again, roughly 20MW.

May 11, 2026

**A RULEMAKING PROCEEDING
TO ESTABLISH RULES FOR COMMUNITY SOLAR PROJECTS**

UD-18-03

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