



June 18, 2026

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

**IN RE: RESOLUTION AND ORDER ESTABLISHING RULEMAKING
TO CONSIDER REVISING THE INTEGRATED RESOURCE PLAN RULES
WITH RESPECT TO DISTRIBUTED ENERGY RESOURCES (DOCKET UD-26-01)**

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 fluid and cursive, with the first letters of each word being capitalized and prominent.

Logan Atkinson Burke
Executive Director
Alliance for Affordable Energy

Before
The Council of the City of New Orleans

**IN RE: RESOLUTION AND ORDER
ESTABLISHING RULEMAKING
TO CONSIDER REVISING
THE INTEGRATED RESOURCE PLAN RULES
WITH RESPECT TO DISTRIBUTED ENERGY
RESOURCES**

DOCKET UD-26-01

JUNE 18, 2026

RECOMMENDATIONS OF THE ALLIANCE FOR AFFORDABLE ENERGY

I. INTRODUCTION

On May 21, 2026 the New Orleans City Council approved Resolution R-26-220, establishing the instant docket to consider revising the rules governing integrated resource planning (“IRP”) with respect to how distributed energy resources (“DERs”) are included in both the Demand-Side Management (“DSM”) Potential Study and the IRP analyses for Entergy New Orleans, LLC (“ENO”). The Alliance for Affordable Energy (“AAE”) hereby submits the following recommendations.

II. ALLIANCE’S RECOMMENDATIONS

A. DERs should be modeled as distinct technologies

- DERs should be modeled by technology rather than lumped together as an aggregate resource, so that the effect of each DER type can be observed.
- DER assumptions should not just be for a fixed amount – there should be an opportunity to adjust assumptions for different scenarios and sensitivities.
- Notably, Council rules¹ require evaluation of "the extent to which reliability of the distribution system can be improved through the strategic location of DERs or other resources." This is not an economic question that is typically looked at in an IRP, so ENO would need to perform additional analysis.

¹ IRP Rules § 6E

B. DERS in the DSM Potential Study

- DER assumptions should be disaggregated by technology.
- Assumptions about “naturally occurring” DERs – the amount that customers will adopt in the absence of utility programs – should be distinct from utility-sponsored DER adoption, and should be clearly described and estimated. Unfortunately, the naturally occurring amount of DERs is often just embedded in the load forecast without transparency, which does not allow a clear understanding of the assumptions. The IRP rules state that DSM "refers to energy efficiency and Demand Response program administered by the Utility" and logically this should also apply to DERs – so there shouldn't be any ambiguity about this on ENO's part.
- The potential study(ies) should include sensitivities for naturally occurring DSM for each DER type – at least high, medium, and low, depending on policy changes and market forces that could reasonably occur.
- DERs that are supported by utility programs should also be disaggregated by technology rather than lumped together, and assessed in at least high, medium, and low scenarios, depending on the level of incentives and outreach effort that the programs put into their adoption as well as technology improvements that would increase adoption
- The Council should use the National Standard Practice Manual principles² for Distributed Energy Resources to ensure best-practices are used so that that all relevant and material impacts are considered.

C. DERs and the distribution grid

- The Council should consider requiring a non-wires alternatives (“NWA”) analysis to reveal the full benefits of DERs to the distribution grid. NWA identified projects can then be added to the IRP model where they can also potentially further offset supply-side.
- The IRP should include a range of scenarios or sensitivities that consider high and low cost assumptions
- DSM potential studies should include specific DERs into the modeling even if they are not cost-effective according to TRC tests – at least for a “high DER” scenario, in order to provide insight to stakeholders.

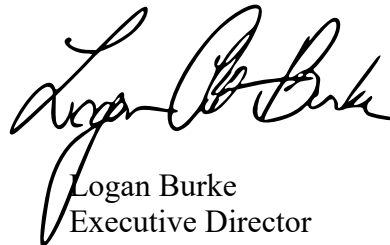
² National Standard Practice Manual: For Benefit-Cost Analysis of Distributed Energy Resources, 2026. Retrieved from <https://naseo.org/nesp/nspm>

- Estimated useful lives of the DERs should be fully reflected, and assumptions about what happens at the end of a DER measure life. For example, is the DER replaced without utility intervention, with utility intervention, or does it disappear?
- Reductions in transmission and distributions losses resulting from DERs should be reflected in modeling.
- Specific locational impacts should also be assessed – for example, DERs might be much more valuable in constrained or vulnerable areas than they would be as generalized resources, especially in the context of improving reliability or resilience.

III. CONCLUSION

AAE appreciates this opportunity to provide recommendations on how these important technologies will be factored into utility planning.

Submitted respectfully,

A handwritten signature in black ink, appearing to read "Logan Burke". The signature is fluid and cursive, with the first name "Logan" and last name "Burke" clearly distinguishable.

Logan Burke
Executive Director
Alliance for Affordable Energy

Before
The Council of the City of New Orleans

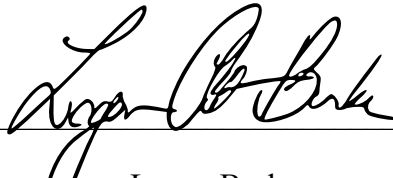
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CERTIFICATE OF SERVICE

I hereby certify that I have this 18th day of June 2026, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



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