



July 17, 2026

Via Electronic Mail

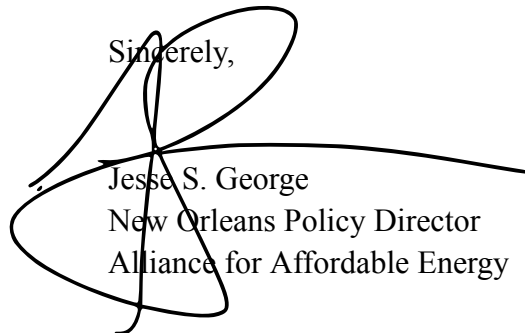
Clerk of Council
Room 1E09, City Hall
1300 Perdido Street
New Orleans, LA 70112

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

Dear Clerk,

Please find the attached Comments of the Alliance for Affordable Energy on Party Proposals for filing under the docket referenced above. We will submit physical copies at your instruction. Thank you for your attention to this matter.

Sincerely,



Jesse S. George
New Orleans Policy 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

JULY 17, 2026

**COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY ON PARTY
PROPOSALS**

On June 18, 2026, parties to this proceeding, including the Alliance for Affordable Energy (“AAE”), Entergy New Orleans, LLC (“ENO”) and the New Orleans City Council’s (“Council”) Utility Advisors (“the Advisors”), filed proposed changes to the Council’s rules governing integrated resource planning (“IRP”) regarding the inclusion of distributed energy resources (“DERs”) in future Demand-Side Management (“DSM”) Potential Studies and IRP analyses. AAE hereby submits the following comments on the parties’ proposal:

In particular, AAE supports the Advisors’ recommendation to integrate distribution and transmission planning into the IRP process,¹ as well as their recommendation to include the mitigation of outage risk among the IRP’s objectives.²

AAE would object to ENO’s proposed revision to the definition of “Distributed Energy Resources” under the IRP Rules inasmuch as it includes non-renewable generation.³ The Council’s Renewable and Clean Portfolio Standard has an explicit goal of achieving carbon-free generation by 2050.⁴ New distributed fossil generation should be excluded from future IRP modeling scenarios.

¹ *Advisors’ Proposed Edits to the Integrated Resource Plan Rules*, June 18, 2026, p. 3; pp. 9-10.

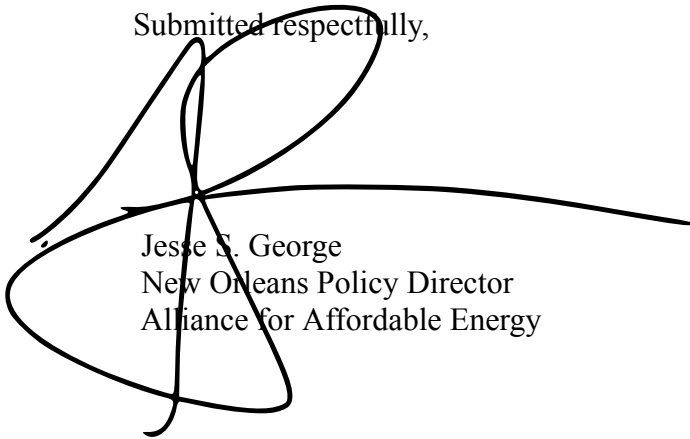
² *Id.* at p. 5.

³ *Comments of Entergy New Orleans, LLC on Proposed Changes to the Integrated Resource Planning Rules*, June 18, 2026, p. 2.

⁴ Renewable and Clean Portfolio Standard § 1(a)(1).

AAE appreciates this opportunity to provide these comments on the parties' proposals, and would reiterate the changes proposed in our own filing of June 18, 2026, including the disaggregation of the DERs by type for the purposes of modeling and evaluation and requiring additional analysis specific to DERs, such as a non-wires alternatives ("NWA") analysis to reveal the full benefits of DERs to the grid.

Submitted respectfully,



Jesse S. George
New Orleans Policy Director
Alliance for Affordable Energy

Before
The Council of the City of New Orleans

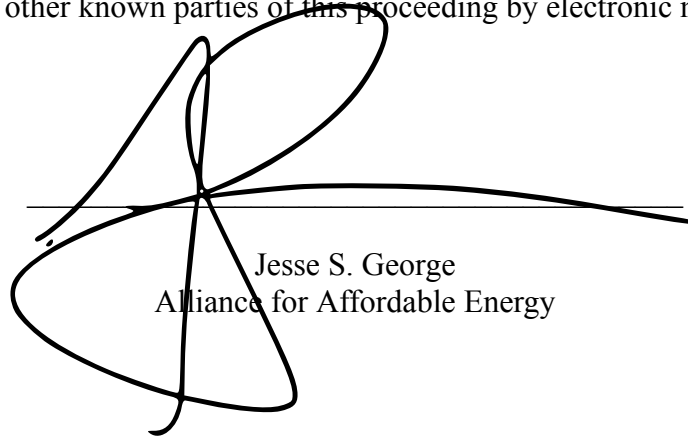
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CERTIFICATE OF SERVICE

I hereby certify that I have this 17th day of July 2026, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



Jesse S. George
Alliance for Affordable Energy

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