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July 31, 2026

BY E-MAIL

Ms. Aisha Collier
Clerk of Council
City Hall – Room 1E09
1300 Perdido Street
New Orleans, LA 70112

Re: Integrated Resource Plan Rulemaking with Respect to Distributed Energy Resources; NOCC Docket UD-26-01

Dear Ms. Collier:

Attached please find the *Advisors' Reply Comments to the Parties' Comments on July 17, 2026* in the above-referenced matter for filing along with this letter.

Thank you.

Sincerely,

Jay Beatmann

/jb
Attachment
cc: Official Service List for UD-26-01

BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

IN RE: RULEMAKING TO CONSIDER REVISIONS TO THE INTEGRATED RESOURCE PLANNING RULES WITH RESPECT TO DISTRIBUTED ENERGY RESOURCES	)))))	**DOCKET NO. UD-26-01**

Advisors' Reply Comments to the Parties' Comments on July 17, 2026
Pursuant to Council Resolution R-26-220

This filing includes the Advisors' Reply Comments to the Parties' Comments on July 17, 2026 which addressed the Advisors' proposed edits to the Integrated Resource Plan Rules ("IRP Rules"). The Advisors have recommended specific changes to the current IRP Rules with respect to how distributed energy resources ("DER") are included in both the demand-side management potential study and the integrated resource plan analyses to reflect recent DER developments in New Orleans.

Advisors' Reply Comments to Entergy New Orleans, LLC's ("ENO" or "Company") Comments July 17, 2026

The Company suggests that the Advisors' proposed edits to Section 2.A.10, Integrated Resource Planning should not attempt to incorporate (i) holistic transmission and distribution planning, and (ii) the optimized selection of DERs in portfolios into the IRP process, since that "would present numerous issues."[1] The Advisors acknowledge that there are current IRP process constraints including modeling limitations and lacking detailed analyses, but feel that integrating transmission and distribution planning into the overall resource planning process, and including all distributed resources, should nonetheless be identified as objectives in the definition of Integrated Resource Planning.

The Company proposes that Section 7.G be edited to include that manual portfolios can be used to evaluate specific types and amounts of DERs as a method of portfolio development.[2] The Advisors agree with this ENO comment that Section 7.G should include this edit.

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[1] ENO's current capacity expansion modeling does not contain a detailed representation of the transmission or distribution systems, but distribution-connected resources can still be included in the optimization. However, the current IRP modeling does not evaluate the possible benefits of deferring or avoiding transmission or distribution projects related to distribution connected resources. Those avoided T&D project benefits could be netted against the DERs gross costs to compete with supply side alternatives in creating optimized IRP portfolios. When such distribution systemwide DER studies are conducted, the IRP process can include the optimized selection of DERs in resource portfolios.

[2] ENO Comments dated July 17, 2026, p.2.

In Section 3.A.3, IRP Objectives, ENO states that it is unclear what the addition of the word “outages” is attempting to address, adding that “ENO cannot anticipate and mitigate the risk of outages on the distribution or transmission grid in the IRP planning process.”[3] The Advisors acknowledge that until further detailed grid-related analyses and systems are implemented to provide the capability to evaluate the extent to which reliability of the distribution system can be improved (under Section 6.E), that listing outages as an IRP objective may be premature, but not incorrect.

Regarding Section 4.A.2, Load Forecast, the Advisors agree with ENO’s comment that the load forecast reflects as decrements to load, the organic adoption of customer-controlled DERs such as net metered solar. That comment should be added as an edit to Section 4.A.2.

Regarding Section 4.A.6, to identify the specific decrements to the load forecast, ENO states that separating the reductions due to organic energy efficiency or company-run DSM programs is difficult since they are combined as input variables. In acknowledgement of that difficulty, the Advisors agree that the phrase “… recognizing the availability of modeling input variables”[4] should be added to Section 4.A.6 as an edit.

Regarding Section 5.A.4.c., ENO expressed concern that the four benefit-cost analysis (BCA) tests based on the 2001 California standard practice manual are eliminated as a requirement of the DSM Potential Study. However, the Advisors note that Section 5.A.4.c. does include the phrase “BCA tests addressed herein,” which relates to the four aforementioned BCA tests. In addition to these four BCA tests, other BCA tests listed in the IRP Initiating Resolution will be calculated for the DSM Potential Study.

ENO requested clarification regarding the proposed use of the term “DER expansion” in Section 7.J (IRP scorecard) and Section 9.A (IRP Process Requirements).[5] For clarification, the term “DER expansion” should be replaced in both Sections with the phrase “those resource portfolios that include DERs.”

Advisors’ Reply Comments to AEE Comments July 17, 2026

AAE recommends integrating distribution and transmission planning into the IRP process, and including the mitigation of outage risk among the IRP’s objectives. These two recommendations have been addressed above in the Advisors’ Reply Comments to ENO’s Comments. These two recommendations should be considered as objectives that can be achieved in the IRP process when the detailed grid-related studies and systems are completed and the related capabilities are available to the IRP evaluation.

[3] *Id*. at 3.
[4] *Id*.
[5] *Id*. at 4.

AAE objects to new distributed fossil generation being included in future IRP modeling scenarios and in the definition of distributed energy resources, based on the Renewable and Clean Portfolio Standard ("RCPS") goal of carbon free generation by 2050. While ENO is required to meet the RCPS goal, it is not reasonable to impose that constraint on the integrated resource planning process at this time. In fact, the recent IRP optimized resource portfolios have focused on renewable resources.

In its June 18, 2026 Comments, AAE recommended the disaggregation of the DERs by type for the purposes of modeling and evaluation, and requiring additional analysis specific to DERs to determine DER benefits. In the DSM Potential Study, the potential of DERs would need to be studied as an additional component beyond the energy and demand response potential that has been evaluated in previous studies. ENO has commented on adding this additional scope to the potential study for the 2027 IRP, and the Advisors' recommend that additional scope to the DSM Potential Study be included in the Council's IRP Initiating Resolution for the 2027 IRP.

Advisors' Reply Comments to GSREIA Comments July 17, 2026

GSREIA recommends that DERs should be evaluated as full planning resources, on a technology-neutral basis, in both the DSM Potential Study and the IRP analysis. GSREIA argues that since demand-side and distributed resources enter the IRP process through the DSM Potential Study, the technical, economic, and achievable potential of the full range of DERs must be assessed using current technology-cost and performance assumptions in the DSM Potential study. The Advisors concur with this recommendation, and recommend that it should be included in the Council's Initiating Resolution for the 2027 IRP.

GSREIA also recommends that the IRP analysis should evaluate DER resources on equal footing with conventional supply-side options, under identical reliability assumptions and production-cost modeling. The Advisors are in general agreement with this recommendation, adding that there should be further discussions with ENO regarding its implementation in the IRP process.

GSREIA also recommends to evaluate storage across durations and operational strategies, and to capture locational and avoided cost value. The Advisors believe those recommendations may have to be deferred, based on the present analysis capabilities to carry out such evaluations. In particular, the DERs included in the BESS program will be evaluated consistent with the objectives of that program.

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Respectfully submitted,

DENTONS US LLP,

/s/ J. A. Beatmann, Jr.

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Attorneys for the Council of the City of New Orleans

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Advisors' Reply Comments to the Parties' Comments on July 17, 2026 pursuant to Council Resolution R-26-220 has been served upon the "Official Service List" via electronic mail and/or U.S. Mail, postage properly affixed, this 31st day of July, 2026.

/s/ J. A. Beatmann, Jr.

J. A. Beatmann, Jr.