GULF STATES
Renewable Energy Industries Association

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

August 14, 2026

Re: A Rulemaking Proceeding to Establish Rules for Community Solar Projects, CNO Docket UD-18-03

Dear Ms. Collier:

The Gulf States Renewable Energy Industries Association ("GSREIA") appreciates the opportunity to comment on the proposed redlines to Resolution R-26-275. GSREIA supports the proposed redlines and respectfully urges the Council to adopt them promptly.

GSREIA is a regional trade association of companies in all parts of the renewable energy supply chain, and part of a network of state affiliates of the national Solar Energy Industries Association (SEIA). Counterpart associations in other states note that most community solar providers use consolidated billing if the initial infrastructure was designed to meet consumer needs. Generally, utilities that still use dual billing are those that built initial infrastructure for dual billing, making it more expensive and cumbersome to switch to consolidated billing after dual billing infrastructure has already been implemented.

The proposed redlines therefore represent a reasonable resolution of issues that have been under consideration for a substantial period of time. They also provide something the community solar market urgently needs: regulatory certainty. Developers and investors cannot make long-term commitments against a moving regulatory target. With the principal issues now resolved through substantial stakeholder negotiations, the Council should bring this phase of the proceeding to a close and allow implementation to begin.

GSREIA supports the revised approach to recovering the costs of consolidated billing. The proposed redlines separate upfront implementation costs from ongoing administrative expenses and provide for those costs to be recovered primarily from subscriber organizations. This appropriately places responsibility for the program's administrative costs on the entities participating in the program.

At the same time, the rules must account for the small possibility that actual program participation falls substantially short of the capacity for which the billing system is being developed. A cost-allocation mechanism that causes participating projects to bear an increasingly disproportionate share of fixed, program-wide implementation costs as participation declines would create precisely the wrong incentive. It could make otherwise viable projects uneconomic, further reduce participation, and compound the cost-recovery problem. The proposed three-year backstop reasonably addresses that unlikely circumstance while preserving the fundamental principle that participating projects should bear these costs if the program develops as intended.

GSREIA also supports the proposed redlines addressing subscriber nonpayment. The revised approach appropriately protects non-participating customers while avoiding the significant project-finance risk that would arise if a subscriber's failure to pay their utility bill allowed Entergy New Orleans (ENO) to withhold payment to the Subscriber Organization for energy already generated and delivered. Under the proposed framework, the subscriber's account remains subject to appropriate consequences for nonpayment, while payments to the Subscriber Organization continue. This is a sensible allocation of risk that protects customers without making community solar projects responsible for collecting ENO's utility charges.

Ultimately, the Council has made a policy decision to establish a viable community solar program. That requires some confidence that, once workable rules are established, projects will follow. Regulatory uncertainty and repeated delay are themselves significant barriers to investment and program success.

Timing matters. The proposed resolution requires ENO to implement consolidated billing no later than March 30, 2027. Further delay only compresses the implementation period and prolongs uncertainty for developers, investors, and other market participants.

New Orleans has spent years developing and refining its community solar program. We appreciate the Council's leadership to expeditiously move from program design to implementation. GSREIA respectfully urges the Council to adopt the proposed redlines without further delay and maintain the March 30, 2027 implementation deadline.

Sincerely,

Monika Gerhart
Executive Director
Gulf States Renewable Energy Industries Association