

**Before  
The Council of the City of New Orleans**

**In Re: ENTERGY NEW ORLEANS LLC’S  
2023 ELECTRIC AND GAS FORMULA RATE  
PLAN FILINGS**

**DOCKET NO. UD-18-07**

**AUGUST 28, 2026**

**COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY ON ENTERGY  
NEW ORLEANS, LLC’S MOTION FOR EXTENSION OF ELECTRIC FORMULA  
RATE PLAN RIDER AND FOR WAIVER OF CERTAIN RATE CASE FILING  
REQUIREMENTS**

**I. INTRODUCTION**

On July 20, 2026, Entergy New Orleans, LLC (“ENO”) filed with the New Orleans City Council (“the Council”) a motion to extend for an additional four years the current electric formula rate plan (“FRP”), initially approved in Resolution R-19-457 and extended in R-20-213 and R-23-491. On August 6, 2026, the Council adopted Resolution R-26-310 providing a comment deadline of August 28, 2026 for parties to docket UD-18-07. For the reasons discussed below, the Alliance for Affordable Energy (“AAE”) does not object to ENO’s request for an extension of the current FRP, but does object to the four-year term.

**II. AAE AGREES THAT COMPELLING REASONS EXIST TO EXTEND THE  
CURRENT FRP**

As ENO discusses in its motion, “a base rate case is typically appropriate when the Test Year being analyzed will be representative of a utility’s operations, costs, and expenses for the next few years following the rate case. At present, and in the near future, ENO’s operations are undergoing, or will undergo, many significant changes, including: the divestiture of ENO’s gas business, additional significant load from Sewerage and Water Board (the amount of which is yet unknown), as well as the initiation of the Council’s Community Solar and Virtual Power

Plant programs.”<sup>1</sup>

AAE agrees that these are compelling reasons to extend the current FRP. Proceeding with a full rate case at present with so many variables unknown could be to the detriment of ratepayers, and caution is warranted.

## **II. THE COUNCIL SHOULD GRANT ONLY A TWO YEAR EXTENSION OF THE CURRENT FRP**

While AAE agrees that allowing time for data collection is prudent, four years is excessive. **First**, an extension of the current FRP through 2030, as ENO has requested, would mean that the current FRP, which was adopted in 2019, would have been in place for more than a decade. This means more than a decade would have elapsed without a complete examination of ENO’s rates. The Council cannot meet its regulatory obligation to ensure ENO is recovering only for prudently-incurred costs without regular and thorough rate proceedings.

**Second**, delaying a full rate case until 2030 would mean that the task of conducting the next full rate case would fall to the next Council. Rather than shunting off regulatory responsibility to a future body, the Council should provide adequate time for information gathering while still providing time to rely on the regulatory experience and expertise of the current Council in the next rate case.

To that end, AAE would propose an alternative **two-year extension** of the current FRP. This would provide time to collect data on issues such as new load from the electrification of the New Orleans Sewerage & Water Board and the effects of the community solar and battery storage programs that would provide the information necessary to develop a Test Year.

## **III. AS A CONDITION OF THE EXTENSION, THE COUNCIL SHOULD REQUIRE ADDITIONAL REPORTING FROM ENO**

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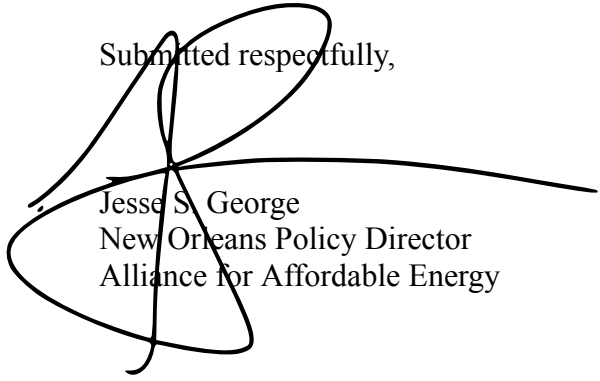
<sup>1</sup> Entergy New Orleans, LLC’s Motion for Extension of Electric Formula Rate Plan Rider and for Waiver of Certain Rate Case Filing Requirements, 7/20/26, at p. 2

As a condition of granting an extension of the current FRP, the Council should require additional reporting from ENO. As ENO has sought yet another increase under the FRP at a time when so many New Orleanians are struggling, the Council should require that ENO submit monthly reports on 1) the total number and percentage of residential customers currently disconnected for inability to pay, 2) year-to-date figures on residential disconnections, 3) current total number and percentage of residential accounts in arrears, and 4) current total amount of residential arrearages owed. By requiring adequate information from ENO, the Council will be better able to address affordability concerns and the disconnection crisis in New Orleans.

#### **IV. CONCLUSION**

AAE thanks the Council for the opportunity to comment on ENO's motion. We trust that the Council will act in the best interest of ratepayers by balancing the interests of information gathering and maintaining strict regulatory oversight.

Submitted respectfully,



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

**Before  
The Council of the City of New Orleans**

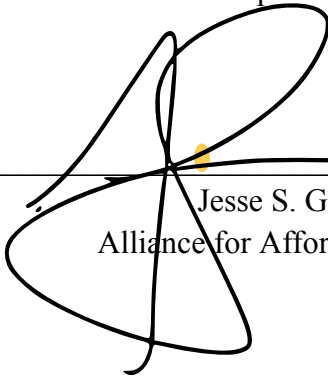
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**CERTIFICATE OF SERVICE**

I do hereby certify that I have, this 28th day of August 2026, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



A handwritten signature in black ink, consisting of a large, stylized 'J' and 'G' that loops around each other. A small yellow highlight is visible on the signature.

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August 28, 2026

Via Electronic Mail

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RE: ENTERGY NEW ORLEANS LLC'S 2023 ELECTRIC AND GAS FORMULA RATE  
PLAN FILINGS (UD-18-07)

Dear Clerk,

Please find the attached Comments of the Alliance for Affordable Energy on Entergy New Orleans LLC's Motion for Extension of Electric Formula Rate Plan Rider and for Waiver of Certain Rate Case Filing Requirements pursuant to New Orleans City Council Resolution R-26-310 under the docket referenced above. We will submit physical copies at your instruction. If you have any questions, please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely,

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