



December 23, 2015

Via Hand Delivery

Ms. Lora W. Johnson, CMC
Clerk of Council
Room 1E09, City Hall
1300 Perdido Street
New Orleans, LA 70112

Re: BSI Motion regarding Council Docket No: UD-08-02, Integrated Resource Planning

Dear Ms. Johnson:

Enclosed please find an original and three copies of an Opposition of the Alliance for Affordable Energy to the Motion by Building Science Innovators, LLC. Please file the attached Opposition and this letter in the record of the proceeding in accordance with normal procedure.

Thank you for your time and attention.

Sincerely,

A handwritten signature in black ink that reads "Casey DeMoss". The signature is written in a cursive style with a long horizontal flourish at the end.

Casey DeMoss
Alliance for Affordable Energy

Cc: Official Service List

**BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS**

**IN RE: RESOLUTION REGARDING)
PROPOSED RULEMAKING TO)
ESTABLISH INTEGRATED)
RESOURCE PLANNING) DOCKET NO UD-08-02
COMPONENTS AND REPORTING)
REQUIREMENTS FOR ENTERGY)
NEW ORLEANS, INC.)**

**OPPOSITION OF THE ALLIANCE FOR AFFORDABLE ENERGY
TO THE MOTION BY BUILDING SCIENCE INNOVATORS, LLC**

The Alliance for Affordable Energy (hereinafter “the Alliance”) is deeply concerned about the motion filed by Building Science Innovators, LLC (hereinafter “BSI”) and regrets that BSI acted unilaterally without concern for the process or other parties. The Alliance is alarmed by BSI’s proposals as set forth in its motion.

The first proposal is to delay the IRP filing by 6 months. Delaying the IRP filing will not solve BSI’s concerns. The delay will jeopardize Energy Smart’s funding for year 2017. While the Alliance shares BSI’s concern that ENO will fail to file an IRP appropriate to New Orleans we differ markedly on the efforts being made by Council. The Alliance is confident that ENO will take direction from their regulators regarding the final IRP, and it is our understanding that every effort is being made by Council members, CURO office staff and council advisors to ensure that ENO understands the intent and requirements for the 2015 IRP. ENO filed an Action Plan on December 15th and the Alliance is currently reviewing it and will provide feedback to the parties if we deem it necessary.

The Alliance is disheartened by the tone of BSI’s motion. It appears to the Alliance that the only solution that would be acceptable to BSI would be an IRP that justifies a large deployment of batteries and solar pv supplied by BSI to replace all other generation resources. The Alliance is interested in batteries but we need to see this technology proven on a commercial scale before recommending the use of ratepayer dollars on the idea. To be very clear, there is no way that the Alliance would support utility scale deployment of a technology that is great in theory. It must be demonstrably great. Ratepayer dollars are too valuable and the Council and ENO have a duty to manage those dollars responsibly. For this very reason, the IRP process was created. ENO is studying batteries with solar on a small utility scale (1 MW). The Alliance believes it would be appropriate to study battery and pv use on the residential side as a small pilot program. In addition, it may be useful to add a battery component to the demand response programs as a trial. This pilot could be developed through the Energy Smart implementation planning process for years 2017 and 2018.

BSI’s complaints about Energy Smart are inappropriate for the IRP and totally ignore the significant praise that the program has garnered. These comments should have been directed to the Request for Proposals for the Third Party Administrator intervenor comment process.

Feedback regarding the Energy Smart program and its effectiveness is welcome, that said, filing a vitriolic motion in the IRP docket is not the best way to provide this feedback.

The Alliance believes that BSI has made some compelling points about enhancing the definition of DSM to include solar/batteries and encourages the Council to modify the definition of DSM for the 2018 IRP. This would allow ENO to study the effect of solar and batteries as a DSM measure and compare its performance against other DSM measures.

The Alliance believes that BSI has a fundamental misunderstanding of rate-making. Changes in rates for residential customers are set during rate cases. The Alliance supports looking at time of use rates and this pricing will soon be possible as Entergy companies move to smarter meters. The Alliance recommends considering dynamic pricing during the upcoming rate case in 2018. The Alliance believes that the Customer Lowered Electricity Price proposal is more appropriate under the Net-metering docket as a place to study alternatives to solar net-metering.

Finally, the Alliance is encouraged by the Council's resolution to grow energy efficiency and setting targets for this purpose. The Council has received high praise from the Natural Resource Defense Council and the American Council for an Energy Efficient Economy, two very prominent organizations with expertise in the topic.

The Alliance encourages the Council to reject all five proposals made by BSI at this time.

Respectfully submitted,

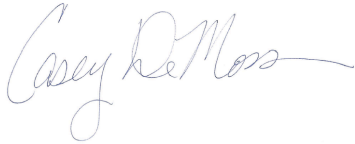
A handwritten signature in cursive script that reads "Casey DeMoss". The signature is written in black ink and is positioned above a horizontal line.

Casey DeMoss

CERTIFICATE OF SERVICE

I hereby certify that I have this 23rd day of December, 2015, served the required number of Copies of the foregoing pleading upon all other known parties, of this proceeding, as listed below, by electronic mail.

Respectfully submitted,



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