



advanced
energy
management
alliance

PO Box 65491
Washington, DC 20035
p 202.580.8284
e info@aem-alliance.org
aem-alliance.org

By Hand Delivery

March 22, 2018

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

In Re: Response to Letter from Entergy New Orleans regarding Petition for Intervention Out of Time and Inclusion on Service List in 2018 Triennial Integrated Resource Plan of Entergy New Orleans, Inc. (Docket No. UD-17-03)

Dear Ms. Johnson:

Attached please find the letter that Advanced Energy Management Alliance ("AEMA") sent in response to correspondence dated March 19 from Entergy New Orleans ("ENO") regarding the above-referenced docket. We sent this letter to ENO and the entire Service List via electronic mail on March 20, but wanted to make sure that it was also entered into the record for the docket.

Please contact me at 202-524-8832 or Katherine@aem-alliance.org should you have any questions regarding this letter.

Thank you very much for your assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "Katherine Hamilton".

Katherine Hamilton
Executive Director
Advanced Energy Management Alliance

Mar 24 2018

RECEIVED
MAR 22 2018
BY: A blue ink stamp with the word "RECEIVED" in large letters, the date "MAR 22 2018" in smaller letters, and a line for a signature with a handwritten mark.



PO Box 65491
Washington, DC 20035

p 202.580.8284
e info@aem-alliance.org
aem-alliance.org

By Hand Delivery and Electronic Mail

March 20, 2018

Mr. Harry M. Barton
Senior Counsel
Entergy Services, Inc.
639 Loyola Avenue
P.O. Box 61000
New Orleans, Louisiana 70161-100

**In Re: Ex Parte 2018 TRIENNIAL INTEGRATED RESOURCE PLAN OF
ENTERGY OF NEW ORLEANS, INC. (Docket No. UD-17-03)**

Dear Mr. Barton:

Thank you for your letter dated March 19, 2018, regarding Advanced Energy Management Alliance's ("AEMA") Petition for Intervention Out of Time and Inclusion on Service List in the above-referenced docket. Following, we address the questions Entergy New Orleans ("ENO") has raised in your correspondence to the best of our understanding with corresponding context and background to answer what appear to be ENO's concerns with AEMA standing and the status of the New Orleans Integrated Resource Plan ("IRP") proceeding.

We will below offer details on the AEMA members providing services and demand side resources within the ENO service territory; when those members joined AEMA (in parentheses); examples of similar proceedings in which AEMA participated as an expert party of record; and information about AEMA's incorporation. Occupational Licenses should be a matter of public record within Orleans Parish.

As to the overarching question of whether AEMA has interest in the above-captioned Docket, AEMA has filed for and received intervenor status in federal and state proceedings throughout the U.S. and Canada as an expert contributor in distributed energy resources, including demand response. Our interventions have consistently made

the case for resilience,¹ reduced customer cost,² emissions reduction,³ and non-wires alternatives⁴ to traditional generation. In these cases, we have contributed unique and contemporary data that enhanced the accuracy and completeness of the corresponding proceedings, while aiming to aid in development of positive solutions within the regulatory processes.

In February of 2018, AEMA released a white paper and model tariff, titled “Advancing Demand Response in the Midwest.”⁵ This paper provided examples from states that have implemented demand response programs that could be used as models in other untapped utility service territories. Utilities and regulators have welcomed these ideas, even if the programs cited have not been deployed in their service territories. In the same way, AEMA can bring new ideas and solutions—for example, by providing analysis, modeling resources, and sharing best practices from other markets and programs — to the ENO proceeding that have not yet been implemented in New Orleans parish. These ideas and solutions could inform new programs that would level the playing field for all energy resources, further the New Orleans City Council goal to increase clean energy, and have a positive impact on all consumers in the parish.

As to the issue of AEMA’s presence in New Orleans, AEMA was incorporated on May 30, 2013⁶ as a 501(c)(6)⁷ under the District of Columbia’s Nonprofit Corporation Act of 2010. Our headquarters office is located in Washington, DC. We do not incorporate in individual states as an organization, but, rather, intervene on behalf of our members collectively, no matter the state or region.

Our members—which include both providers and consumers of distributed energy resources⁸--are located in virtually every state and have a stake in utility proceedings as a result. Examples of AEMA members with products, activities, and interests in New Orleans include, but are not limited to, NEST (2015)⁹ and Tesla (2016). One of our

¹ Two examples of such filings include AEMA comments filed at the federal level on resilience, <http://aem-alliance.org/aema-files-reply-comments-doe-nopr/>, as well as in state proceedings, such as the microgrid rulemaking in Puerto Rico <http://aem-alliance.org/aema-makes-resilience-recommendations-puerto-rico-commission/>

² As an example, see AEMA Chairman comments regarding consumer savings in Texas: <http://aem-alliance.org/mysa-strategic-reduction-in-electricity-demand-means-big-savings/>

³ See AEMA comments to U.S. Environmental Protection Agency with greenhouse gas reduction study: <http://aem-alliance.org/aema-file-comments-epa-greenhouse-gas-proceeding/>

⁴ As an example, see AEMA Indian Point testimony: <http://aem-alliance.org/policy/legislation-regulation/>

⁵ See white paper and model tariff here: <http://aem-alliance.org/advanced-energy-management-alliance-releases-options-develop-untapped-resource-engage-consumers/>

⁶ AEMA was originally incorporated as Demand Resource Alliance, and then changed its name to Advanced Energy Management Alliance effective September 24, 2013.

⁷ AEMA’s Employer Identification Number with the IRS is: 80-0929813

⁸ For full list of AEMA members, see website: <http://aem-alliance.org/about/members/>

⁹ NEST conducted a pilot program with Entergy New Orleans with smart thermostats: <http://www.entergynewsroom.com/latest-news/smart-thermostats-help-low-income-renters-save-energy-money/>

founding Board members (2013) is Walmart, of which three are located in Orleans Parish. Other distributed energy resource providers who are members of AEMA are not incorporated in New Orleans but provide products and services that are widely recognized as relevant to IRP analyses and are applicable to the interests of Orleans Parish electric customers. These providers serve national accounts that include businesses with locations in New Orleans.

AEMA, with its unique voice and wide experience, is able to provide productive solutions and alternatives that allow utilities, providers, and consumers to benefit from the inclusion of programs that incentivize distributed energy resources, including demand response and advanced energy management solutions. As such AEMA has valuable information to contribute to the evaluation of resource options to meet future energy needs in New Orleans. Moreover, with the rapid evolution of technology and economics of advanced energy resources, we are uniquely positioned to provide the most up to date data needed to evaluate the energy resources offered by advanced energy providers – including those that serve commercial, industrial, and residential customers.

AEMA's mission is to advocate for policies that empower and compensate customers appropriately in a manner that contributes to a more efficient, cost-effective, resilient, reliable, and environmentally sustainable grid. We believe New Orleans electric customers will benefit from AEMA's contribution to the IRP process and could benefit from increased choice of distributed energy services and resources.

In addition, AEMA petitioned for and was granted intervenor status in multiple Louisiana Public Service Commission IRP proceedings currently underway in Louisiana. While those requests were also submitted after the initially prescribed intervention request period, no objections were filed from any party, including Entergy Louisiana, and AEMA was granted full intervenor status. While AEMA has applied out of time to intervene in this proceeding, we do so with the understanding that no formal decisions have been made in the Docket and that the overall schedule for the proceeding may well be extended several additional months. Thus, we believe our intervention remains timely within the IRP process.

AEMA trusts that we have answered your questions to your satisfaction and look forward to continuing to collaborate as the IRP progresses. Do not hesitate to contact me at 202-524-8832 or Katherine@aem-alliance.org should you have any questions regarding this response.

Sincerely,

A handwritten signature in black ink, appearing to read "Katherine", written in a cursive style.

Katherine Hamilton
Executive Director
Advanced Energy Management Alliance

cc: Official Service List, Docket UD-17-03