



Entergy New Orleans, LLC
1600 Perdido Street
New Orleans, LA 70112
Tel 504 670 3633
Fax 504 670 3603
kwood@entergy.com

Keith D. Wood
Senior Manager, Resource Planning

August 18, 2021

Via Electronic Delivery and U.S. Mail

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

**Re: Rulemaking Proceeding to Establish Renewable Portfolio Standards
Council Docket No. UD-19-01**

Dear Ms. Johnson:

Entergy New Orleans, LLC ("ENO") respectfully submits its Initial RCPS Compliance Plan Covering Compliance Year 2022 in the above-referenced docket. ENO submits this filing electronically and will submit an original and two hard copies to the Clerk of Council via U.S. Mail. Please file the original and two copies into the record and return a date-stamped copy via the stamped self-addressed envelope enclosed.

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Keith D. Wood".

Keith D. Wood

KDW/jw
Enclosures

cc: Official Service List via email

ENTERGY NEW ORLEANS
INITIAL RCPS COMPLIANCE PLAN COVERING COMPLIANCE YEAR 2022

1. BACKGROUND

a. Requirement for an Initial RCPS Compliance Plan

Under the Renewable and Clean Portfolio Standard (“RCPS”) adopted by the City Council of New Orleans in Resolution R-21-182 on the May 20, 2021, Entergy New Orleans (“ENO”) is required to submit a prospective compliance plan for the 2022 compliance year within 90 days.

Section 4.e of the RCPS rules set out the reporting requirements for ENO’s prospective compliance plan as follows:

Upon the Utility’s submission of its final Integrated Resource Plan (“IRP”) Report for each triennial IRP cycle, the utility shall develop a three-year prospective RCPS Compliance Plan, including a three-year Banking and Compliance Reserve provision for RECs, and the Utility’s calculation of the ACP. The RCPS Compliance Plan shall be filed at the Council and served upon both the parties to the relevant IRP docket and the parties to Docket No. UD-19-01, with the opportunity for stakeholder comment prior to the Council’s review and approval. Within 90 days of the adoption of this RCPS, the Utility shall file at the Council and serve on the parties to Docket No. UD-19-01, with opportunity for stakeholder comment, a proposed Initial RCPS Compliance Plan for the interim prior to the conclusion of the next triennial IRP cycle. Once the Council has approved an RCPS Compliance Plan for a particular time period, if the Utility wishes to add any resources for compliance that are not contemplated in the RCPS Compliance Plan, the Utility should file at the Council and serve upon the parties to the relevant IRP Docket and Docket No. UD-19-01, with opportunity for stakeholder comment, a request to include such resource for RCPS Compliance prior to executing plans to implement such resource.

[emphasis added]

This document provides ENO’s Initial RCPS Compliance Plan for the 2022 compliance period. ENO anticipates that the ongoing 2021 IRP process in Docket No. UD-20-02 will be completed in time to inform a three-year compliance plan for the years 2023-2025.

b. Unique Considerations for 2022 Compliance Plan

Planning for RCPS compliance in 2022 presents some challenges that ENO may not face, or may face to a lesser extent, in developing future compliance plans. First, the ongoing Covid-19 pandemic has altered the level of electricity consumption in New Orleans, and there is significant uncertainty surrounding when, and to what extent, electric demand will rebound. In turn, this creates uncertainty surrounding ENO’s compliance obligation for 2022, which is tied to

retail sales. Second, because this plan covers the first year of compliance, ENO does not have the ability to draw on a preestablished compliance reserve. This is also the first opportunity ENO has to supply its compliance reserve – i.e., “build a bank” – to be used in subsequent years for unexpected contingencies.

2. PROJECTED COMPLIANCE POSITION

a. Projected Clean Energy Credits from Existing Portfolio

ENO projects it will receive the following Clean Energy Credits in 2022 from its existing and expected resources, based on the electric system modeling performed for its 2021 Business Plan (BP21):

Table 1: Projected 2022 CECs from Existing ENO Portfolio, BP21

Resource Name	Type	Expected MWh	RCPS Multiplier	Expected CECs
Grand Gulf	Nuclear	1,873,531	1.00	1,873,531
River Bend	Nuclear	834,853	1.00	834,853
ANO Unit 2	Nuclear	233,566	1.00	233,566
ANO Unit 1	Nuclear	177,693	1.00	177,693
Waterford Unit 3	Nuclear	161,511	1.00	161,511
Energy Efficiency ¹ (implemented after 1/2021)	EE	119,554	1.25	149,443
Iris Solar	Solar	124,952	1.00	124,952
St James Solar	Solar	52,721	1.00	52,721
New Orleans Solar Station	Solar	41,457	1.25	51,821
Vidalia	Hydro	17,459	1.00	17,459
Commercial Rooftop Solar	Solar	10,978	1.25	13,723
Paterson Solar	Solar	2,349	1.25	2,936
Total:				3,694,208

The actual number of CECs received from these resources may differ from the projected figures for a variety of reasons, including variations in weather patterns, unexpected maintenance requirements, or constraints that hinder ENO’s ability to fully implement its EnergySmart program, among others. For resources that have entered service recently, ENO has only a short history of performance data available to use when setting its generation projections.

¹ Energy Efficiency MWh reflect total estimated MWh of reductions delivered in 2022 from measures installed after January 1, 2021. This figure will differ from the annualized figures in which EnergySmart Plan Year targets are denominated, as measures installed after January 1, 2022 will provide only a portion of their expected annualized reductions in 2022.

Further, the projected number of credits received from these resources may differ in future years due to the timing of nuclear refueling outages, degradation of solar or energy efficiency performance as installed equipment ages, or other factors.

An issue that should be considered as part of ENO's RCPS compliance planning and reporting is the interaction between RCPS requirements and ENO's Green Power Option (GPO). The Council's RCPS Resolution and the preceding discussion in written comments and technical conferences did not explicitly address the extent to which the renewable energy provided to GPO customers satisfies the RCPS obligations ENO has on behalf of those customers. To account for GPO customers that have chosen to match solar energy to 100% of their consumption, ENO proposes to exclude from the 2022 RCPS compliance calculation all RECs used to match consumption beyond 64%² of the customers' consumption. For example, if a customer with 100 MWh of consumption enrolls in the 100% GPO, 36 MWh (i.e., 100 MWh minus 64%*100 MWh) of solar output will not be counted as CECs toward RCPS compliance. This will avoid having GPO customers who choose to support clean energy in excess of RCPS requirements provide credits to be used on behalf of other customers.³ At current subscription levels, Green Power Option enrollment would affect less than 100 MWh of output from ENO's solar facilities.

b. Projected Retail Compliance Load

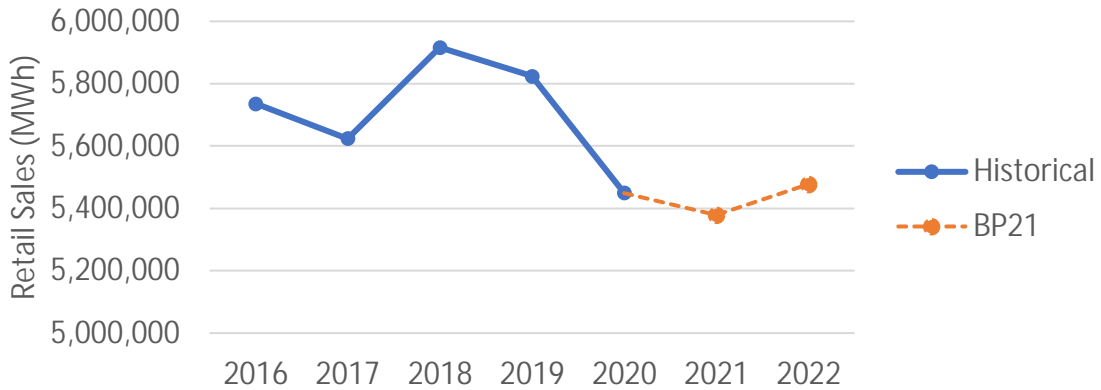
Per Section 4.a of the RCPS rules, "Retail Compliance Load is the reported annual MWh sales for each compliance year, increased by the cumulative MWh savings of DSM programs installed after January 1, 2021."

ENO's retail sales in 2020 were lower than previous years. While ENO projects some increase in consumption by 2022, retail sales are projected in BP21 to be below 2016-2019 levels. The figure below shows the Company's most recent business plan along with previous years' retail sales figures for context.

² This figure is correlated to ENO's compliance obligation for 2022, which requires that ENO serve 64% of its Retail Compliance Load with approved clean energy resources.

³ The Company still needs to discuss this proposed approach with the Center for Resource Solutions ("CRS") to understand possible implications for the GPO program's Green-E certification. The Council could also consider the more straightforward approach of modifying the RCPS rules such that all RECs retired under GPO are excluded from compliance and the retail compliance load is reduced by the same amount.

Figure 1: Historical and Projected Retail Sales



The table below shows ENO's projected Retail Compliance Load:

Table 2: Projected 2022 Retail Compliance Load

	BP21
Retail Sales MWh	5,477,637
DSM Post-1/21 MWh	119,554
Retail Compliance Load	5,597,191

c. Projected Compliance Position with Existing Portfolio

Compliance with the annual RCPS requirements is measured through the calculation described in Section 4.c: "RCPS Compliance Credits (MWh) are divided by Retail Compliance Load (MWh), and expressed as a percentage." Section 3.a.1 specifies that for 2022, ENO must meet "64% of Retail Compliance Load ... with a combination of Tier 1, 2 and 3 resources ... with not more than 25% compliance through RECs purchased without the associated energy."

The table below shows the number of Clean Energy Credits needed to achieve a 64% compliance position given the projection of Retail Compliance Load shown above.

Table 3: Projected 2022 Compliance Position

	BP21
Retail Compliance Load	5,597,191
2022 RCPS Requirement (64% of Retail Compliance Load)	3,582,202
Projected CECs from Existing Portfolio	3,694,208
Projected CEC Surplus / (Shortfall)	+112,006

Despite these projections, there is no guarantee that ENO will achieve a CEC surplus in 2022 due to the previously discussed uncertainties surrounding the number of CECs created and

the actual Retail Compliance Load. The actual 2022 compliance position will be assessed in the Compliance Demonstration Report filed in 2023.

d. CEC Supply Target

For this Initial Compliance Plan, ENO believes the plan should meet several objectives. First, it should provide a sufficient level of CECs to protect against unforeseen supply-side contingencies. Second, it should be a robust strategy that permits compliance even if forecasted retail sales are higher than expected, especially given the uncertainties surrounding economic activity as New Orleans rebounds from the Covid-19 pandemic. Third, it should create a compliance reserve that can provide ENO flexibility in future years and help limit customer costs.

In order to address these supply- and demand-side uncertainties and to develop a compliance reserve, ENO proposes to pursue a level of CECs that would provide a 5% contingency under expected resource performance if the BP21 retail sales forecast materializes. Table 4 below shows the derivation of this CEC supply target and number of additional CECs that ENO proposes to pursue.

Table 4: 2022 Initial Compliance Plan CEC Target

(1)	Retail Compliance Load, BP21	5,597,191
(2) = 64%*[1]	2022 RCPS Requirement (64% of Retail Compliance Load)	3,582,202
(3) = 5%*[2]	5% Contingency	179,110
(4) = [2]+[3]	Target CEC Supply w/ 5% Contingency	3,761,313
(5)	Projected CECs from Existing Portfolio	3,694,208
(6) =[4]-[5]	Additional CECs to Pursue	67,104

3. ADDITIONAL RESOURCES

a. Sources of Additional Clean Energy Credits

Consistent with the above discussion, ENO proposes to further increase its clean energy position for 2022 by procuring additional CECs beyond its existing and planned portfolio. As mentioned above, ENO considers it reasonable to pursue 67,104 additional CECs from the following sources in order to provide a 5% contingency:

Table 5: Sources of Additional CECs

Source	Number of CECs Targeted
Public EV Chargers	564
Purchased RECs	66,540
Total	67,104

Note that many resources that ENO will consider in future compliance plans, such as new solar facilities or some Qualified Measure projects, are not expected to be available to ENO in 2022 given the short timeframe between the expected approval of this plan in the second half of 2021 and the 2022 compliance year.⁴

b. Public Electric Vehicle Chargers

Through funding approved by the Council in the 2018 Rate Case, ENO is actively working to install 30-50 public Level 2 Electric Vehicle chargers throughout New Orleans. In this Initial Compliance Plan, ENO does not contemplate spending beyond the Council's already-approved funding level, although it may propose to do so in future plans. This plan does, however, provide support for these chargers as Tier 3 Resources.

The definition of a Tier 3 Resource includes "electric vehicle charging infrastructure directly connected to the Utility's transmission or distribution system" and requires "a certified engineering calculation demonstrating the net reduction in carbon emissions or data demonstrating measured emissions reductions. The Utility must also propose the annual amount of CECs in MWh associated with each proposed Tier 3 Resource for Council consideration." The data demonstrating the per megawatt-hour emissions reductions and the applicable CEC credit rate are detailed in Appendix A, and the actual number of CECs created would be tied to the metered electricity delivered by the chargers. Based on the current schedule, ENO is planning for the public Level 2 EV chargers to be installed in early 2022.

c. Purchased RECs

ENO expects to purchase "unbundled" RECs – i.e., those purchased without the associated energy. Per Section 2, ENO will acquire Renewable Energy Certificates such that "(1) they were generated from a Renewable Energy Resource in MISO, the Electric Reliability Council of Texas, or elsewhere that are deliverable into the MISO region; (2) they are Green-e certified at the time of their creation and are subsequently tracked with M-RETS or an equivalent; and (3) they are retired against the compliance requirements in the compliance year in which they were utilized for compliance."

To this point, the term "deliverable into the MISO region" has not been defined. In order to purchase RECs for customers at the lowest reasonable cost, ENO must know which available RECs it can and cannot purchase. ENO proposes that the term "deliverable into the MISO region" apply to any facilities located in an electrically interconnected balancing authority that neighbors the MISO balancing authority. This would include SPP, TVA, PJM, and the Southern Company

⁴ The Energy Smart team looked at opportunities to install Energy Efficiency measures beyond the Energy Smart Plan Year 12 targets for 2022. The team estimated that the costs per incremental kWh saved would be greater than the costs of DSM savings already included in the Energy Smart PY12 implementation plan. Given the existing Energy Smart PY12 goals and budgets, ENO is not proposing to pursue incremental EE in this initial compliance year.

Services transmission system. ENO seeks confirmation from the Council of this proposed definition.

As ENO purchases unbundled RECs, it will gain valuable information about the REC market. To ENO's knowledge, there is limited publicly available data on the price of RECs originating from the MISO region.⁵ Based on discussions with REC brokers, it appears that Green-e certified RECs may trade at a premium to other RECs from the same region. Further, ENO anticipates that some REC purchases will only be available in fixed quantities or configurations. While ENO may not be able to execute REC purchases that precisely total the targeted figure above, it will procure a number of RECs that is as close to that figure as is practicable.

If, at some point in 2022, ENO projects that its compliance position (after the procurement of these RECs) will be below 64% of Retail Compliance Load, whether due to higher-than-expected retail compliance load or lower-than-expected CECs generated by its portfolio, or both, it will supplement this plan with additional purchases of unbundled RECs, if available at a cost below the ACP provided by the Council.

4. THE ENO PLAN COMPLIES WITH RCPS PROVISIONS

a. Projected Contribution towards RCPS Customer Protection Cost Cap

Section 6 of the RCPS rules establishes a Customer Protection Cost Cap "that the Utility shall not exceed to acquire RCPS Compliance Credits. The Customer Protection Cost Cap in any RCPS plan year is one percent (1%) of plan year total utility retail sales revenues, beginning in 2022." Section 4.d of the RCPS rules describes the calculation of RCPS compliance costs that are subject to this Cost Cap as follows:

- 1) The RCPS Cost of Compliance is calculated as all incremental costs prudently incurred by the Utility in complying with RCPS Section 3, including, but not limited to, the incremental costs of new resources for compliance, the Incremental DSM costs, and other costs related to RCPS compliance. The cost of RECs as allowed through the Banking and Compliance Reserve provision that are applied in the compliance year shall be included in the RCPS Cost of Compliance for that year. The cost of RECs acquired for the Banking and Compliance Reserve provision but not applied in that year shall be treated as working capital and shall not be included in the RCPS Compliance Cost for the compliance year.

⁵ Most publicly quoted REC prices are tied to the RPS program for which the REC is used rather than the region from which the REC originates. Quoted REC or environmental prices are often centered in the Northeast or California. For example, S&P Global's Platts Megawatt Daily publishes REC market prices for RECs that can be used in CA, CT, MA, MD, NJ, OH, PA, and TX. Similarly, the Intercontinental Exchange lists 18 tradeable environmental products for use in California, 11 products in PJM states, and five in New England, but none originating from the MISO region.

2) Incremental costs are the total electric utility revenue requirements associated with the Utility’s operations in compliance with the RCPS, less the total electric utility revenue requirements associated with the optimized resource portfolio that may have been in place absent the requirements of the RCPS. The Utility’s most recently filed Integrated Resource Plan shall inform the calculation of incremental costs as to the optimized resource portfolio that may have been in place absent the requirements of the RCPS.

Given this description above, ENO calculates the incremental costs of the elements of its proposed additional resources as follows:

- Public EV Chargers: The Council has previously approved \$500,000 in funding for ENO to install public Level 2 EV chargers. This compliance plan does not propose to install any chargers beyond this level in 2022, therefore there are no incremental costs.
- Unbundled RECs: The incremental cost of unbundled RECs acquired in 2022 and used for RCPS compliance in 2022 is equal to their market purchase price. For any purchased unbundled RECs that are placed in the Compliance Reserve, their costs will not be applied against the Customer Protection Cost Cap in 2022, per Section 4.d.1 of the RCPS rules.

In its 2021 Business Plan, ENO projects its 2022 utility retail sales revenues to be \$612 million. As a result, the Customer Protection Cost Cap is estimated to be \$6.12 million. Though the incremental cost of ENO’s proposed Initial Compliance Plan is at this time uncertain, Table 6 illustrates that, using rough assumptions of the incremental cost of purchased RECs, the cost would remain well below the Customer Protection Cost Cap.

Table 6: Potential 2022 RCPS Incremental Costs

Source	Number of CECs Targeted	Illustrative 2022 Incremental Cost (\$000)
Public EV Chargers	564	N/A
Purchased RECs	66,540	\$67 to \$333 ⁶
Total	67,104	\$67 to \$333

The actual incremental costs may differ from these figures, depending on the availability and prevailing prices in the market for unbundled RECs.

If any purchased RECs are placed in the Compliance Reserve, the 2022 incremental costs will be lower, as the costs of banked RECs will not be applied against the Customer Protection Cost Cap in 2022, per Section 4.d.1 of the RCPS rules. The costs of these RECs will be treated as working capital and recovered in the year the RECs are retired for RCPS compliance.

⁶ Range using an illustrative \$1.00 to \$5.00 cost per REC assumption.

b. Alternative Compliance Payment

As stated in Section 5.a, "In the event that the Utility is unable to comply with the RCPS standard using reasonable measures for the applicable calendar year, the Utility shall make an Alternative Compliance Payment ("ACP") into a CleanNOLA Fund established by the Council."

At this time, ENO has not been provided with the level of the ACP. Per Section 5.a.1, "The ACP (\$ per MWh) will be determined by the Council in the Council's Resolution approving the Utility's RCPS Compliance Plan, and the ACP will be applicable for the prospective three calendar years." Due to the unique nature of this one-year plan, ENO seeks clarification that the Council will provide ENO with its calculation of the ACP applicable for the Initial Compliance Plan period.

Section 5.a.2 provides guidance that the "ACP shall be based on the highest market value of RECs in MISO over the prior three years, multiplied by a 1.15 multiplier." If prices for unbundled RECs remain within their historical range from the previous three years, ENO will be able to purchase RECs at a price below the ACP; however, ENO will not purchase unbundled RECs whose costs exceed the ACP.

c. Compliance Reserve

Section 4.h of the RCPS rules describes the Banking and Compliance Reserve Provision as follows:

The utility may use RECs produced and Green-e certified in one compliance year for compliance in either of the two subsequent compliance years, subject to a review of the accounting for the banking and compliance reserve, and provided that the utility was in compliance for the compliance year in which the RECs were created. In addition, the utility shall demonstrate to the satisfaction of the Council that such Compliance Credits:

- 1) were in excess of the Compliance Credits needed for compliance in the compliance year in which they were generated;
- 2) do not exceed the REC limitation specified in Section 3 for compliance with the RCPS in the year they were used for compliance and retired; and
- 3) have not otherwise been, nor will be, sold, retired, claimed or represented as part of clean energy output or sales, or used to satisfy obligations in other jurisdictions.

If, at the end of the 2022 compliance period, ENO has created and procured a number of CECs that exceeds 64% of its Retail Compliance Load, it will utilize the Banking and Compliance Reserve Provision in order to utilize excess RECs that meet the requirements of the rules within the next two compliance years. In addition to purchased, unbundled RECs, ENO is pursuing Green-e certification for RECs created from its solar resources, which would make credits generated at these resources eligible for placement in the Compliance Reserve.

d. Limitation on Use of Unbundled RECs

As stated in Section 3.a.1, in 2022 “not more than 25% compliance [shall be] through RECs purchased without the associated energy.” Based on the company’s projection of Retail Compliance Load, ENO would not be permitted to use more than approximately 900,000 unbundled RECs. This plan contemplates using far fewer unbundled RECs than that level.

Table 7: Projected 2022 Limit on Unbundled RECs

	BP21
Retail Compliance Load MWh	5,597,637
RCPS Requirement	64%
Projected CECs Required	3,582,202
Maximum Compliance Through Unbundled RECs	25%
Maximum Number of Unbundled RECs	895,551

5. CONCLUSION

ENO requests that the Council review this Initial RCPS Compliance Plan Covering Compliance Year 2022, and:

- a. Approve the proposed definition of the term “deliverable into the MISO region” applied to RECs as discussed in Section 3(d);
- b. Clarify whether the Council will provide a calculation of the ACP for the Initial Compliance Plan period as discussed in Section 4(b);
- c. Approve the proposed treatment of GPO throughput discussed in Section 2(a);
- d. Approve the EV credit calculation as described in Appendix A; and
- e. Approve the proposed purchase of RECs to establish a 5% contingency and compliance reserve as discussed in Sections 2(c) and 2(d).

APPENDIX A

PROPOSED CEC CREDIT RATE FOR ELECTRIC VEHICLE CHARGING INFRASTRUCTURE

The following tables show ENO's proposed method of quantifying the net emissions reductions and corresponding CECs related to its public electric vehicle charging infrastructure deployment.

Each EV charger, which, depending on design, may include up to two ports making it capable of charging two vehicles at the same time, would be eligible to receive CECs based on the net emissions reductions that were created by the electric vehicles that are assumed to use the charger. Table A-1 calculates the net CO₂ emissions reduction produced for each megawatt-hour of electric vehicle charging. To the extent that any of the underlying parameters of the calculation change over time (e.g., the average efficiency of an EV or an internal combustion engine (ICE) vehicle), ENO can update the input assumptions of the calculations in future compliance plans.

Table A-1: Net CO₂ Emissions Reductions per MWh of Electric Vehicle Charging

<u>Electric Emissions from 1 MWh of EV Charging</u>			
(1)	Average Electric Vehicle Efficiency	0.30 ⁷	kWh/mi
(2) =1,000/[1]	Miles of Gasoline-Powered Travel Avoided per MWh of EV Charging	3,333	mi/MWh
(3)	Approximate MISO South Marginal Emission Rate	1,200	lbs/MWh
(4)	2022 RCPS Requirement	64%	%
(5) =(100%-[4]) * [3]	Approximate 2022 Electric Sector Emissions Increase per 3,333 miles, or 1 MWh of EV Charging	432	lbs/MWh

⁷ "What if One of your Cars was Electric?" U.S. EPA, <https://www.epa.gov/greenvehicles/what-if-one-your-cars-was-electric>. See also "Electric Vehicle Supply Equipment Standards Standardized Regulatory Impact Assessment," California Air Resources Board, <https://ww2.arb.ca.gov/sites/default/files/classic/regact/2019/evse2019/appc.pdf>

Non-Electric Emissions Avoided with 1 MWh of EV Charging			
(6)	Average Fuel Economy of U.S. Passenger Cars ⁸	24.2	mi/gal
(7)	CO ₂ Content of Gasoline ⁹	19.55	lbs/gal
(8) =[7] / [6]	Per mile CO ₂ Content of Gasoline	0.808	lbs/mi
(9) =[8]* [2]	CO ₂ Emissions Avoided from Gasoline Vehicle per 3,333 miles (or 1 MWh of EV Charging)	2,693	lbs/MWh

Net CO ₂ Emissions Avoided per MWh of EV Charging			
(10) =[9]-[5]	Net CO ₂ Emissions Reduction per MWh of EV Charging	2,261	lbs/MWh

Because EV charging will modestly increase total ENO retail sales, which would in turn increase Retail Compliance Load, each megawatt-hour of EV charging would be accompanied by an obligation for ENO to procure incremental clean energy matching a portion of that megawatt-hour. As a result, 64% of the additional electricity used to meet EV charging usage will be clean energy in 2022, and the remaining portion will be met by resources assumed to create emissions at the MISO South marginal emission rate. Line 5 of Table A-1 captures this impact.

Table A-2 below converts the net emissions reduction from Table A-1 into a CEC per MWh conversion rate, which varies slightly by year. The credit rate is tied to the approximate MISO South marginal emission rate since Council-recognized Tier 1 and Tier 2 resources (such as renewable and zero-carbon generating resources or energy efficiency) displace the marginal generating resource in MISO South when they operate.

⁸ "Average Fuel Economy by Major Vehicle Category," U.S. Department of Energy's Alternative Fuels Data Center, <https://afdc.energy.gov/data/10310>

⁹ "Greenhouse Gas Emissions from a Typical Passenger Vehicle," U.S. EPA, <https://www.epa.gov/greenvehicles/greenhouse-gas-emissions-typical-passenger-vehicle>

Table A-2: Proposed CEC Credit Rate for EV Charging, 2022-2026

		2022	2023	2024	2025	2026
(11)	CO ₂ Emissions Avoided from Gasoline Vehicle (lbs/MWh-equiv.)	2,693	2,693	2,693	2,693	2,693
(12)	RCPS Requirement	64%	66%	68%	70%	72%
(13)	Approximate MISO South Marginal Emission Rate (lbs/MWh)	1,200	1,200	1,200	1,200	1,200
(14) = (100%– [12]) * [13]	Approximate Electric Sector Emissions Increase from Incremental Electric Demand (lbs/MWh)	432	408	384	360	336
(15) =([11]–[14])	Net Emissions Reduction from EV Charging (lbs/MWh)	2,261	2,237	2,213	2,189	2,165
(16) = [13]	Expected CO ₂ Emissions Reduction per CEC	1,200	1,200	1,200	1,200	1,200
(17) = [15]/[16]	EV Charging CECs per MWh Electrified	1.88	1.90	1.92	1.94	1.96

In 2022, ENO would receive 1.88 CECs for every megawatt-hour of metered electric vehicle charging usage at its public EV charging stations. The total number of CECs created would be tied to the actual metered consumption at the EV charging stations. Table A-3 below shows a sample of the data that ENO would submit for its public Level 2 chargers. In its end-of-year compliance report, ENO will replace the sample charger data in Table A-3 with the actual metered data at the chargers for the year and update the calculations accordingly to determine a final number of CECs created by the EV chargers.

Table A-3: SAMPLE Electric Vehicle Charging Demand and CECs

Charger ID	Location	Date in Service	2022 Metered kWh
ENO Charger #1	1234 Poydras St	1/1/2022	10,000
...
ENO Charger #40	567 Loyola Ave	7/1/2022	5,000
Total kWh			300,000
Total MWh			300
CECs per MWh, 2022			1.88
Total 2022 CECs			564