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**Courtney R. Nicholson**  
Vice-President – Regulatory and Public Affairs

July 21, 2022

**VIA Electronic Delivery**

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

**Re: *Entergy New Orleans, LLC's 2021 Electric And Gas Formula Rate Plan Filings,  
Council Docket No. UD-18-07***

Dear Ms. Johnson:

Enclosed please find the Request of Entergy New Orleans, LLC (“ENO”) for Approval of Public Direct Current Fast Charging Station Project to Expand Access to Electric Vehicle Charging Infrastructure and Request to Modify its Electric Rate Schedules. Herein, ENO is requesting Council approval to invest up to \$3.0 million to construct and own five direct current fast-charging (“DCFC”) locations, which will be situated across the City, and approval of the related Fast Charging for Electric Vehicles Schedule. As a result of the remote operations of the Council’s office related to COVID-19, ENO submits this filing electronically and will submit the requisite original and number of hard copies once the Council resumes normal operations or as you direct. ENO requests that you file this submission in accordance with Council regulations as modified for the present circumstances.

Should you have any questions regarding the above/attached, please do not hesitate to contact me.

Sincerely,

Courtney R. Nicholson

Enclosures

cc: Official Service List (UD-18-07 via electronic mail)

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

<b>APPLICATION OF ENTERGY NEW</b>	)	
<b>ORLEANS, LLC FOR A CHANGE IN</b>	)	
<b>ELECTRIC AND GAS RATES</b>	)	
<b>PURSUANT TO COUNCIL</b>	)	<b>DOCKET NO. UD-18-07</b>
<b>RESOLUTIONS R-15-194 AND R-17-504</b>	)	
<b>AND FOR RELATED RELIEF</b>	)	

**REQUEST OF ENTERGY NEW ORLEANS, LLC FOR APPROVAL OF  
PUBLIC DIRECT CURRENT FAST CHARGING STATION PROJECT  
TO EXPAND ACCESS TO ELECTRIC VEHICLE CHARGING INFRASTRUCTURE  
AND REQUEST TO MODIFY ITS ELECTRIC RATE SCHEDULES**

NOW BEFORE THIS COUNCIL, through its undersigned counsel, comes Entergy New Orleans, LLC (“Entergy New Orleans,” “ENO,” or the “Company”) and represents as follows:

ENO is continuing its efforts to expand public access to Electric Vehicle (“EV”) charging infrastructure in the City of New Orleans. Public access to EV charging infrastructure (“EVCI”) will facilitate and encourage the expansion of EVCI and encourage the adoption of EVs with their environmental benefits – a goal shared by the Council of the City of New Orleans (“Council”) and ENO.

Herein, ENO is requesting Council approval to invest up to \$3.0 million to construct and own five direct current fast-charging (“DCFC”) locations, which will be situated across the City. DCFC is the fastest charging method currently available, and DCFC chargers can fully charge an EV in less than thirty minutes. Currently, no publicly available DCFC stations exist in the City. A proposed location for a DCFC station is the Walmart Supercenter on Bullard Avenue in New Orleans East, which ENO hopes may become eligible for Infrastructure and Investment Jobs Act funding.

ENO further requests that the Council approve the proposed Fast Charging for Electric Vehicles Schedule (“FCEV Schedule”) pursuant to which ENO will sell the energy delivered by the DCFC stations at an initial rate of \$0.35 per kWh plus applicable taxes. This rate is not a cost-based rate and is not calculated to recover the costs of the DCFC stations. Rather, ENO is proposing that the FCEV Schedule have an initial rate intended to encourage use of public DCFC stations and adoption of EVs and that ENO have the ability to periodically adjust the rate with due notice to the Council. Nevertheless, during this early point in the EV adoption cycle, the revenue from the FCEV Schedule is likely to offset a large portion of the DCFC stations’ revenue requirement, and any minimal burden to customers is offset by the anticipated environmental benefits from EV adoption.

## **BACKGROUND**

### I.

Entergy New Orleans is an electric and gas utility with its general office and principal place of business at 1600 Perdido Street, Building 505, New Orleans, Louisiana 70112. The Company is engaged in the manufacture, production, transmission, distribution, and sale of electricity to residential, commercial, industrial, and governmental consumers throughout the City of New Orleans. As of December 31, 2021, Entergy New Orleans furnishes electric service to approximately 209,000 retail electric customers. Entergy New Orleans also is engaged in the provision of natural gas service throughout the City of New Orleans and, as of December 31, 2021, serves approximately 110,000 retail gas customers.

### II.

On November 7, 2019, the Council adopted Resolution R-19-457, its final decision regarding the Revised Application of Entergy New Orleans, LLC for a Change in Electric and

Gas Rates Pursuant to Council Resolutions R-15-194 and R-17-504 and for Related Relief, Council Docket No. UD-18-07, which is commonly referred to as the “2018 Rate Case.” Therein, the Council approved the Electric Vehicle Charging Infrastructure Rider (“EVCI Rider”). Pursuant to this rider, ENO would construct, own, and operate EVCI on a non-residential customer’s property, and ENO would recover the investment in EVCI over ten years. For example, an apartment building owner could offer EV charging to tenants with EV chargers provided by ENO pursuant to the EVCI Rider. The Council further authorized ENO to invest up to \$500,000 in free-to-use EV chargers located on public property.

### III.

On January 14, 2022, ENO filed its Request to Modify its Electric Rate Schedules to Expand Access to Electric Vehicle Charging Infrastructure in the City of New Orleans (“January EVCI Request”). In the January EVCI Request, ENO requested three changes to ENO’s electric rate schedules to better accommodate parties interested in providing public access to EV chargers, on the parties’ property (*e.g.*, apartment complex offering EV charging in its parking lot). ENO also updated the Council on the installation of free-to-use EV chargers located on public property.

## **NEED FOR PUBLIC DCFC CHARGING IN THE CITY OF NEW ORLEANS**

### IV.

ENO requests authority to bring the fastest EV charging technology to sites across the City and do so in manner that does not unduly burden customers during this early point in the EV adoption cycle. DCFC is the fastest charging method currently available and approaches the refueling experience for internal combustion vehicles. Depending on the EV model, a DCFC charging equipment can fully charge an EV in less than 30 minutes. DCFC charging equipment

has the capacity to deliver at least 50 kilowatts (“kW”) of direct current and can have significant electric loads up to hundreds of kW. Tesla operates a network of DCFC charging sites to support its own EVs but does not make the chargers available to owners of other types of EVs as a separate business. Currently, the City does not have a single public DCFC site. This is a serious gap in New Orleans EV infrastructure that could, if left unaddressed, limit opportunities for ENO’s customers to benefit from the rapidly developing EV market.

#### V.

DCFC charging access is likely to promote EV adoption. “Range anxiety” is one of the primary reasons people do not consider an EV and opt for an internal combustion engine (“ICE”) vehicle. Range anxiety is the fear of running out of energy along the side of the road, creating uncertainty and adding stress to any driving trip in an EV. Unlike an ICE vehicle where finding a gas station is easy, an EV with near-depleted battery does not have an analogous solution. DCFC charging access for an EV is the closest analogue to a gas station for an ICE vehicle.

#### VI.

DCFC stations should enhance economic development and tourism in New Orleans. Availability of public DCFC stations will help keep New Orleans as a desirable destination for EV drivers who want to shop, dine, stay, and explore the City. Making DCFC stations available in convenient locations should offer EV drivers confidence and encourage them to visit more attractions and local businesses when traveling to or through New Orleans.

#### VII.

Another consideration is that many New Orleans EV drivers will not have access to home charging. For those who live in multi-unit buildings or do not have access to a driveway or garage, lack of access to EV charging equipment is an additional barrier to adoption. This segment of EV drivers is likely to rely on available public charging options. As such, the

Company's proposed project will help alleviate range anxiety and reduce another barrier to adoption.

#### VIII.

Another benefit of ENO providing DCFC stations is that such stations will provide the Company and the Council valuable information about the costs, benefits, and operational information associated with DCFC stations. ENO will have access to data on customer charging behaviors (*e.g.*, time of day and duration of charging). As the data becomes available, ENO will be able to evaluate the effect of DCFC stations on system load and energy usage and transmission and distribution infrastructure. Other potential benefits include identification of utility improvements required to support growing demand for EV charging, additional public EV charging infrastructure needs, and opportunities for managed charging and demand response offerings.

#### IX.

Finally, the cost of the DCFC Station Project will be offset in large part by the revenues expected from the proposed FCEV Schedule over the life of the project, assuming low utilization consistent with the early point in the EV adoption cycle and conservative utilization growth. IJJA funding could reduce the cost of the DCFC Station Project. Taking into consideration the environmental benefits of EV adoption and the factors discussed above, the DCFC Station Project would not unduly burden customers, if approved.

### **DCFC STATION PROJECT**

#### X.

ENO is proposing to construct, own, operate, and maintain up to five public DCFC stations for EVs. DCFC charging equipment has the capacity to deliver at least 50 kW of direct

current electricity to charge an EV battery. Currently available DCFC chargers can have electric loads from 50 kW up to hundreds of kW and, depending on the EV model, can fully charge an EV in less than 30 minutes.

#### XI.

In total, the cost to install DCFC stations at five locations in the City is estimated at approximately \$3.0 million, including total equipment and installation investment, other capital overhead costs. ENO expects that minimal, if any, upgrades to the distribution system will be necessary to install DCFC equipment because ENO is targeting host site locations close to existing distribution infrastructure with suitable capacity. ENO expects to obtain rights-of-way at no cost to ENO to install the charging stations and parking spaces on the host site's property. ENO plans to contract with licensed local third-party installers to construct the public DCFC stations. ENO will select one or more third-party installers through a competitive bidding process.

#### XII.

ENO intends to use an experienced charging network operator to support station design, to purchase the DCFC charging equipment, to support its installation, to operate and maintain the DCFC stations, and provide customer service support. ENO will have access to the charging network operator's real-time online dashboard with utilization data, as well as monthly sales reports, that will include details of each charging session and sales of energy (kWh) at each charging station.

#### XIII.

The DCFC charging equipment at the stations will be compatible with the vast majority of EVs in the market. The stations will be equipped with connectors compliant with the SAE Combo (also known as the Combined Charging System or CCS) connection standards. These

connectors are compatible with vehicles sold by the majority of EV manufacturers. EVs which utilize their own proprietary connection standard, such as Tesla, will also be able to connect to the DCFC charging equipment with an adapter.

XIV.

Over the next five years, Louisiana is scheduled to receive approximately \$73 million to be used towards public EV charging infrastructure through the Infrastructure and Investment Jobs Act (“IIJA”). These funds will become available through the National Electric Vehicle Infrastructure Formula program. ENO is actively monitoring this program, and projects meeting certain criteria will be eligible for these funds.

XV.

ENO has identified the Walmart Supercenter on Bullard Avenue in New Orleans East as a potential location. This site meets the criteria for designation as an Alternative Fuels Corridor, which is a requirement for IIJA funding. The proposed site would accommodate four (4) 150 kW DCFC chargers, which meets another important requirement for IIJA funding. ENO has received a letter from Walmart expressing its interest and intent to collaborate on EV infrastructure deployment at the Bullard Avenue location to help foster increased EV adoption in the City. Potentially, IIJA funds may reimburse up to 80% of the cost of that DCFC station. Once the State of Louisiana has established an application process and eligibility criteria, ENO intends to pursue funding for this site which, if successful, would help lower costs while also helping to contribute to the build out of Louisiana’s Alternative Fuels Corridor.

**PROPOSED FAST CHARGING FOR ELECTRIC VEHICLE SERVICE SCHEDULE**

XVI.

The proposed FCEV Schedule would be unlike ENO’s other base rate schedules. Schedule FCEV-1 would not involve a cost-based rate. Rather, Schedule FCEV-1 would include



an initial rate intended to encourage use of the DCFC stations and to encourage customer adoption of EVs without discouraging the use of alternative EV charging means and other entities from offering public DCFC stations. Schedule FCEV-1 would further provide ENO the ability to make reasonable changes to the rate to support those objectives with due notice to the Council.

#### XVII.

ENO proposes that the FCEV Schedule initially have a \$0.35 per kilowatt-hour rate for charging. ENO also proposes that the FCEV Schedule include an idling fee. Idling fees encourage an EV driver to remove the vehicle from the charger parking space after charging is completed so that the equipment can be made available for other EV drivers. ENO proposes that the idling fee be \$0.30 per minute after a ten-minute grace period but not to exceed \$30.00 in total.

#### XVIII.

ENO proposes an initial charging rate of \$0.35 per kWh, which translates to a per-kilowatt-hour customer cost of \$0.387 with taxes. This rate encourages EV adoption because it compares favorably to the current cost of 87 octane gas used by internal-combustion-engine vehicles. The rate also compares favorably with the current price for DCFC outside the City of New Orleans.

#### XIX.

Idling fees are commonly used among all charging networks that provide public access to DCFC chargers and are especially important in this instance where obstructing charging parking spaces will reduce the potential offset to the DCFC Station Project's costs. The network operator's mobile application will allow the EV driver to monitor the vehicle's charging status and to alert the driver when the charge is nearly complete and again when complete.

XX.

Because FCEV Schedule is not a cost-based rate, ENO requests that the FCEV Schedule not be subject to any riders, such as the Electric Formula Rate Plan Rider Schedule (“EFRP Rider”) and the Fuel Adjustment Clause, except Retail Rate Rider Schedule R-3.

**OTHER ACCOUNTING AND RATEMAKING REQUESTS**

XXI.

In future ratemaking proceedings, ENO intends that the costs associated with the DCFC Station Project included in ENO’s revenue requirement and the FCEV Schedule revenue be included in ENO’s operating revenues. As a result, although customers will bear the costs of the DCFC Station Project, customers will receive the benefits of the FCEV Schedule revenue. The following requests facilitate this outcome.

XXII.

ENO proposes that revenues received under the FCEV Schedule would be recorded to Federal Energy Regulatory Commission’s (“FERC”) account 456 (Other electric revenues) and treated the same way that miscellaneous revenues are currently treated for ratemaking purposes. ENO proposes that the DCFC charging infrastructure investment, which will be recorded to electric plant account 371 (Installations on customers’ premises), have an annual depreciation rate of 10%, given the expected 10-year life of the infrastructure. Currently, ENO applies a 3.612% annual depreciation rate to electric plant account 371, which implies an average useful equipment life of roughly 28 years. DCFC charging infrastructure is expected to have a much shorter useful life of 10 years.

## **DCFC REPORTING PLAN**

### XXIII.

ENO proposes to file with the Council an annual report on DCFC usage in the City New Orleans. The monitoring report would be due each year on or before March 31 beginning the year after ENO completes construction of its first public DCFC station. Such report shall include data regarding the utilization of charging equipment including length of charging session and kWh sold and actual FCEV Schedule revenue.

## **INTRODUCTION OF AFFIANTS**

### XXIV.

With this Application, ENO submits two affidavits supporting the proposed DCFC Station Project and the proposed FCEV Schedule. The names of the affiants and the subject matter of their affidavits are as follows:

- Gregory S. Crisler – Mr. Crisler is employed as the Product Manager, Tech Innovation for ENO. In his affidavit, Mr. Crisler describes the DCFC Station Project and provides information on the value and benefits of the project to the City.
- Samantha F. Hill – Ms. Hill is employed as the Manager, Regulatory Rate Strategy for Entergy Services, LLC. In her affidavit, she explains why the FCEV Schedule is just and reasonable and the net effect on customers of the DCFC Station Project and the FCEV Schedule.

## **TIMING OF IMPLEMENTATION**

### XXV.

When the Council authorizes the DCFC Station Project and the FCEV Schedule, ENO would endeavor to commence the DCFC Station Project as soon as practical. Implementation of

the FCEV Schedule in ENO's billing system would be complete prior to the completion of the first DCFC Station.

### **WAIVER OF REQUIREMENTS**

#### XXVI.

ENO's request for these modifications to its rate schedules does not implicate the requirements for applications to change rates or service set forth in Chapter 158 of the City Code due to the request's limited scope.

#### XXVII.

Furthermore, the Council has the power to suspend the requirements applicable to applications to change rates or service set forth in Chapter 158 of the City Code pursuant to Section 158-49. In an abundance of caution and without waiving and reserving any and all rights regarding the necessity of this request, ENO requests a waiver of all requirements pertaining to applications to change rates or service set forth in Chapter 158 of the City Code because of the request's relationship to the Council's goals of expanding access to EV charging infrastructure and encouraging the adoption of EVs.

**WHEREFORE**, Entergy New Orleans prays as follows:

- A. That the Council:
  - 1. Confirm that the requirements applicable to applications to change rates or service set forth in Chapter 158 of the City Code do not apply to the above requested modifications to ENO's rate schedules or
  - 2. Grant the requested waiver of requirements;
- B. That the Council find that the DCFC Station Project serves the public convenience and necessity, is in the public interest, and is therefore prudent; that

such investment is presumed eligible for recovery from customers; and that the Company will have a full and fair opportunity to recover all prudently-incurred costs of the project;

- C. That the Council find that the Fast Charging for Electric Vehicle Schedule is just and reasonable and that the revenue from the schedule be treated the same way that miscellaneous revenues are currently treated for ratemaking purposes;
- D. That the Council authorize an annual depreciation rate for DCFC charging infrastructure investment of 10%;
- E. That the Council approve the proposed DCFC Monitoring Plan; and
- F. That the Council grant all general and equitable relief that the law and the nature of this request may permit.

Respectfully submitted,



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**ATTORNEYS FOR ENTERGY NEW ORLEANS, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 21st day of July, 2022, served the required number of copies of the foregoing pleading upon all other known parties of this proceeding individually and/or through their attorney of record or other duly designated individual, by:  electronic mail,  facsimile,  hand delivery, and/or by depositing same with  overnight mail carrier, or  the United States Postal Service, postage prepaid.

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Stephen T. Perrien



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

**APPLICATION OF ENTERGY NEW )  
ORLEANS, LLC FOR A CHANGE IN )  
ELECTRIC AND GAS RATES )  
PURSUANT TO COUNCIL ) DOCKET NO. UD-18-07  
RESOLUTIONS R-15-194 AND R-17-504 )  
AND FOR RELATED RELIEF )**

**AFFIDAVIT OF GREGORY S. CRISLER  
ON BEHALF OF ENTERGY NEW ORLEANS, LLC**

**STATE OF LOUISIANA**

**PARISH OF ORLEANS**

**BEFORE ME**, the undersigned Notary Public, personally came and appeared:

**GREGORY S. CRISLER**

who, after being duly sworn, did depose and state:

1. My name is Gregory S. Crisler. My business address is 1600 Perdido Street, Building #505, New Orleans, Louisiana 70112. My title is Product Manager, Tech Innovation, and I am employed by Entergy New Orleans, LLC. I am testifying on behalf of Entergy New Orleans, LLC (“Entergy New Orleans,” “ENO,” or the “Company”).
2. I have a bachelor’s degree in Business Administration with a minor in Management from the University of New Orleans.
3. In 2008, I began my professional career in construction material sales. From 2010 to 2019, I worked in the renewable energy and energy efficiency industries. During this time, I was responsible for managing operations which consisted of procurement, estimating, project development, safety oversight, and on-site construction management.

4. In July 2019, I joined ENO in my current role as Product Manager of Tech Innovation. Over the past three years, I have worked closely with local contractors to install over five megawatts of ENO-owned distributed-scale solar energy projects, including the commercial rooftop solar projects approved by the Council in Docket No. UD-17-05. Currently, I am working to initiate construction and complete the Council-approved project to deploy publicly accessible Level 2 Electric Vehicle (“EV”) chargers in New Orleans under the public EV charging pilot, approved by the Council in Docket No. UD-18-07. I am also working with various ENO customers that have expressed interest in either directly installing EV charging equipment on their property, or having ENO install, own, and operate EV charging equipment for their use via the Council-approved Electric Vehicle Charging Infrastructure (“EVCI”) Rider.
5. In January 2022, ENO submitted a request to the Council to modify its existing rider schedule EVCI, add a new rider schedule (Electric Vehicle Charging Demand Adjustment or “EVCDA”), and enhance its Extension of Electric Service Policy. Accompanying that pending request was an affidavit that I provided, which discussed the Company’s various EV-related efforts and the rationale for ENO’s proposal. That request is still pending before the Council.
6. The purpose of my Affidavit here is to support the requested approval of the Direct Current Fast Charger (“DCFC”) Station Program through which ENO would construct, own, operate and maintain a modest number of DCFC stations that would be available to the public. Direct current fast charging for EVs consists of charging equipment with a capacity to deliver at least 50 kilowatts (“kW”) of direct current electricity to charge the battery inside an electric vehicle. DCFC is the fastest charging currently available

compared to the modes of charging referred to as Level 1 and Level 2.<sup>1</sup> Currently available DCFC chargers can have significant electric loads from 50 kW up to hundreds of kW and, depending on the EV model, can fully charge an EV in less than 30 minutes. I discuss potential locations, equipment to be used, estimated costs, eligibility for federal funding, and additional factors and expected benefits for the Council to consider.

### **Need for DCFC Charging**

7. Currently, no publicly available DCFC station is available to drivers in New Orleans. The current situation is a serious gap in the New Orleans EV infrastructure that could, if left unaddressed, limit opportunities for ENO's customers to benefit from the rapidly developing EV market.
8. DCFC charging access is likely to promote EV adoption. According to J.D. Power,<sup>2</sup> "range anxiety" is one of the primary reasons people do not consider an EV when buying a new vehicle. Range anxiety is the fear of running out of energy along the side of the road, creating uncertainty and added stress to any driving trip. Range anxiety can occur during a longer road trip or even when an EV driver alters their daily routine and does not have an adequate battery charge to get home. And unlike an Internal Combustion Engine ("ICE") vehicle where a few gallons of gasoline can resolve the issue at a corner gas station, an EV with a near-depleted battery does not have a similar solution.
9. DCFC stations should enhance economic development and tourism in New Orleans. Availability of public DCFC stations will help keep New Orleans as a desirable

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<sup>1</sup> Level 1 charging operates at 120V AC, supplying between 1.2 – 1.8 kW. This is the level provided by a standard household outlet and can provide approximately 40–50 miles of range if charging overnight. Level 2 charging operates at 240V AC, supplying between 3.6 – 22 kW and includes charging stations that are commonly installed in homes, workplaces, and public locations and can provide approximately 25 miles of range per hour of charging.

<sup>2</sup> Christian Wardlaw, "What is Range Anxiety with Electric Vehicles?" JD Power, November 03, 2020 (online).

destination for EV drivers who want to shop, dine, stay, and explore the City. By supporting public charging, ENO can strengthen local businesses and reduce “range anxiety” to help EV drivers feel more comfortable getting to their desired destination. Making more charging stations available in convenient locations should offer EV drivers confidence and encourage them to visit more attractions and local businesses when traveling to or through New Orleans.

10. Another consideration, as passenger EV sales are set to increase sharply in the next few years,<sup>3</sup> is that many drivers in New Orleans will not have access to home charging. For those who live in multi-unit buildings or do not have access to a driveway or garage, lack of access to EV charging equipment is an additional barrier to adoption. This segment of EV drivers is likely to rely on available public charging options. As such, the Company’s proposed project should help alleviate range anxiety and mitigate another barrier to EV adoption.
11. Another benefit of ENO providing DCFC stations is that such stations will provide the Company and the Council valuable information about the costs, benefits, and operational information associated with DCFC stations. ENO will have access to data on customer charging behaviors (*e.g.*, time of day and duration of charging). As the data becomes available, ENO will be able to evaluate the effect of DCFC stations on system load and energy usage and transmission and distribution infrastructure. Other potential benefits include identification of utility improvements required to support growing demand for EV charging, additional public EV charging infrastructure needs, and opportunities for managed charging and demand response offerings.

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<sup>3</sup> “Electric Vehicle Outlook 2021 Executive Summary”, BloombergNEF (online).

## DCFC Station Project

12. ENO is proposing to construct, own, operate, and maintain up to five public DCFC stations for EVs. The cost to install the DCFC stations is estimated at approximately \$3.0 million, including total equipment and installation investment, other overhead costs, and seven (7) years of warranty and maintenance expenses. ENO expects minimal, if any, upgrades to the distribution system will be necessary to install DCFC equipment because ENO is targeting site locations close to existing distribution infrastructure with suitable capacity.
13. ENO expects to obtain right-of-way from the host sites at no cost to ENO to install the charging stations on the host site's property. ENO expects the host site to provide the parking spaces for the DCFC Station because the host site should benefit from the availability of EV charging on the premises. EV drivers generally stop for periods of time to charge their cars but do not have to supervise their vehicle while it is charging.
14. ENO plans to contract with licensed local third-party installers to construct the DCFC stations. The third-party EV charging station installer(s) will be selected through a competitive bidding process. Such construction should create opportunities for local businesses qualified to perform the work and potentially create new jobs to support the installation and on-going maintenance of this new infrastructure.
15. ENO intends to use an experienced charging network operator to support station design, to purchase the DCFC charging equipment, to support its installation, to operate and maintain the DCFC stations, and provide customer service support. Further, an experienced charging network operator will have the software platforms already developed and operating to facilitate the start-up process. The charging network operator would provide the following types of services: equipment purchases, equipment

installation and set-up (e.g., connection to cellular service), operations and maintenance (“O&M”) management program and customer service support with proactive equipment monitoring, warranty repair and replacement services on hardware and support services, and cloud software services.

16. The DCFC stations will be compatible with the vast majority of electric vehicles in the market. The stations will be equipped with connectors compliant with SAE Combo (also known as the Combined Charging System or CCS) connection standards. These connectors are compatible with vehicles sold by the majority of EV manufacturers, including Audi, BMW, Fiat, Chrysler, Ford, General Motors, Honda, Hyundai, Jaguar, Kia, Mercedes-Benz, Mitsubishi, Nissan, Porsche, Toyota, and Volkswagen, and start-up EV manufacturers like Rivian. Tesla vehicles, which utilize their own proprietary connection standard, will also be able to connect to ENO’s charging stations provided that the Tesla driver has the requisite adapter for their vehicle.
17. Over the next five years,<sup>4</sup> Louisiana is scheduled to receive approximately \$73 million to be used towards public EV charging infrastructure through the Infrastructure and Investment Jobs Act (“IIJA”). ENO expects that these funds would be administered by the Louisiana Department of Transportation and Development (“LA DOTD”) and made available through the National Electric Vehicle Infrastructure (“NEVI”) Formula program. The federal government recently issued guidance, and the LA DOTD is scheduled to file its deployment plan by August 1, 2022, with additional funding and

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<sup>4</sup> See, Louisiana Department of Transportation and Development (LA DOTD) [http://wwwsp.dotd.la.gov/Inside\\_LaDOTD/Divisions/Operations/Electric-Vehicle/Pages/default.aspx](http://wwwsp.dotd.la.gov/Inside_LaDOTD/Divisions/Operations/Electric-Vehicle/Pages/default.aspx)

application guidance to follow. ENO is actively monitoring the LA DOTD's actions, and projects meeting certain criteria will be eligible to apply for these IJAA funds.

18. ENO has identified a site that meets the criteria for designation as an Alternative Fuels Corridor, which is a requirement for IJAA funding eligibility. The proposed site for the DCFC station would be at the Walmart Supercenter on Bullard Avenue in New Orleans East and would be able to accommodate the installation of four (4) 150 kW DC fast chargers, provide total site capacity of 600kW, and be located within a mile of the interstate, all of which are important requirements based on The National Electric Vehicle Infrastructure (NEVI) Formula Program Guidance.<sup>5</sup> ENO has received a letter from Walmart expressing its interest and intent to collaborate on EV infrastructure deployment at the Bullard Avenue location to help foster increased EV adoption in the City. The cost for the station at the Bullard Walmart is estimated to be approximately \$1.0 million. Potentially, IJAA funds could reimburse up to 80% of the Bullard Walmart station's cost. Once the LA DOTD has established an application process and eligibility criteria, ENO intends to pursue funding for this site which, if successful, would help lower costs while also helping to contribute to the build out of Louisiana's designated Alternative Fuel Corridor.

19. In addition to the Bullard Avenue Walmart project, ENO intends to construct DCFC stations across the remaining four council districts to ensure equitable access to DCFC infrastructure. ENO has begun to identify several potential areas within the City that

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<sup>5</sup> Andrew C. Rogers, Chief Council and Gloria M. Shepherd, Associate Administrator for Planning, Environment, and Realty to Division Administrators, February 10, 2022, Federal Highway Administration, National Electric Vehicle Infrastructure Formula Program Bipartisan Infrastructure Law: Program Guidance, [https://www.fhwa.dot.gov/environment/alternative\\_fuel\\_corridors/nominations/90d\\_nevi\\_formula\\_program\\_guidance.pdf](https://www.fhwa.dot.gov/environment/alternative_fuel_corridors/nominations/90d_nevi_formula_program_guidance.pdf)

could host DCFC stations as part of the DCFC Station Project. Rouses, with locations across multiple council districts, has also provided a letter stating their interest to collaborate with ENO on this initiative. The total cost to build out four additional DCFC sites is estimated at approximately \$2.0 million, which should fund at least two (2) DC fast chargers at each of the remaining four sites. If any of these projects are eligible for IJAA funding, ENO intends to pursue such funding to offset costs.

20. ENO's proposed DCFC Station Project will not adversely affect opportunities for other EV charging providers to enter the market. As discussed above, a need exists for increased investment in public DCFC in New Orleans. Also as discussed above, \$73 million in IJAA funding is available to support further the construction of DCFC stations by ENO and others. ENO's DCFC Station Project contemplates a modest number of public DCFC stations to jumpstart public charging EV adoption in New Orleans. As drivers in New Orleans and in neighboring cities shift to EVs in the coming years, there will be ample opportunities for other parties to invest in EV charging infrastructure for public use.

#### **Use of the DCFC Stations**

21. An EV driver will be able to locate ENO's public DCFC stations through identifying signage and/or through a third-party mobile application. The EV driver would use the mobile application to facilitate the charging transactions under the proposed Schedule FCEV discussed by Company witness Samantha Frailey Hill in her Affidavit. The driver either would use the mobile app or would tap a button on the station display to initiate charging. The mobile application would also communicate what is occurring while the EV is charging, when the charging session is ended, the purchase amount charged to the



customer, the quantity of electricity (kWh) delivered, and any applicable idle fees, plus any applicable taxes.


22. Drivers would be able to pay via credit card/debit card readers, near field communications-enabled devices, and through the mobile application. The mobile application will be available at no cost to any EV driver that downloads it and adds their personal information and credit card to facilitate payment. This is a common feature of public EV charging stations.
23. ENO will have access to the charging network operator's real-time online dashboard with utilization data, as well as monthly sales reports, that will include details of each charging session and sales of energy (kWh) at each charging station. Through the online dashboard, ENO will have access to usage data related to the utilization of the charging equipment, such as day, time, and length of each charging session, as well as volume of electricity sold (kWh), and the amount of the payment collected from the EV driver related to that charging session. ENO will not have access to an EV driver's personal identifiable information such as the driver's name, address, or make and model of the vehicle being charged. Each EV driver using the equipment will have a unique customer number assigned to them through the network operator's mobile application, which would not allow ENO access to any personal identifiable information about the user but should provide general information about the level and frequency of repeat users.
24. Dedicated EV customer support access will be available through the mobile application to assist station users with customer service-related issues twenty-four hours a day. The access provided in the ENO-specified mobile application will connect the station user to

a charging network operator's customer service team trained to address and help resolve customer service issues related to ENO's EV chargers.

25. As discussed above, the DCFC Station Project is intended to provide ENO and the Council information regarding EV charging patterns as EV owners utilize the DCFC stations. With approximately 1,300 EVs registered in the Greater New Orleans area at the end of 2021, limited visibility into charging patterns, and currently zero public DC fast chargers, ENO's DCFC Station Project is necessary to better understand the effect of increasing numbers of EVs on ENO's operations and provide increased access to DCFC infrastructure to residents and visitors of New Orleans at a reasonable cost.

26. Further, Affiant sayeth not.

New Orleans, Louisiana, this 20<sup>th</sup> day of July, 2022.

  
\_\_\_\_\_  
Gregory S. Crisler

**SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 20<sup>th</sup> DAY OF  
July, 2022.**

  
\_\_\_\_\_  
**NOTARY PUBLIC  
STEPHEN T. PERRIEN**  
Notary Public  
Parish of Orleans, State of Louisiana  
My Commission is Issued for Life.  
Bar No. 22590  
Notarial No. 49480

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

**APPLICATION OF ENTERGY NEW )  
ORLEANS, LLC FOR A CHANGE IN )  
ELECTRIC AND GAS RATES )  
PURSUANT TO COUNCIL ) DOCKET NO. UD-18-07  
RESOLUTIONS R-15-194 AND R-17-504 )  
AND FOR RELATED RELIEF )**

**AFFIDAVIT OF SAMANTHA FRAILEY HILL  
ON BEHALF OF ENTERGY NEW ORLEANS, LLC**

**STATE OF LOUISIANA**

**PARISH OF ORLEANS**

**BEFORE ME**, the undersigned Notary Public, personally came and appeared:

**SAMANTHA FRAILEY HILL**

who, after being duly sworn, did depose and state:

1. My name is Samantha Frailey Hill. My business address is 639 Loyola Ave., New Orleans, Louisiana 70113. My title is Manager, Regulatory Rate Strategy, and I am employed by Entergy Services, LLC (“ESL”).<sup>1</sup> I am testifying on behalf of Entergy New Orleans, LLC (“Entergy New Orleans,” “ENO,” or the “Company”).
2. I have a Bachelor of Science degree in Marketing and Finance, and a Bachelor of Professional Accountancy from Tulane University. I am a Certified Public Accountant and licensed to practice in Louisiana.
3. I began my career with Deloitte and Touche, LLP in the audit and assurance services group in 2004, serving both public and private companies. In 2012, I joined Assure

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<sup>1</sup> ESL is a subsidiary of Entergy Corporation that provides technical and administrative services to all of the Entergy Operating Companies (“EOCs”). The EOCs include Entergy Arkansas, LLC; Entergy Louisiana, LLC; Entergy Mississippi, LLC; Entergy New Orleans, LLC; and Entergy Texas, Inc.

Underwriting Agency, a managing general agency providing homeowners insurance, as Controller. I joined ESL in 2014 in the Internal Audit Department as a Senior Staff Auditor. In 2019, I transitioned to a Regulatory Project Coordinator role in the Regulatory Research and Strategy group. In 2021, I was named to my current role of Manager, Regulatory Rate Strategy. In my current role, I supervise a team of people that is responsible for providing research, support, and strategy to the EOCs on various regulatory matters and policy issues related to ratemaking and emerging technologies including smart grid, energy efficiency and demand response, distributed generation and distributed energy resources, alternative fuel vehicles, and batteries and other forms of energy storage. I also support the EOCs' efforts to develop regulatory mechanisms needed to implement new customer solution offerings that address the evolving needs and interests of customers.

4. In January 2022, ENO submitted a request to the Council to modify an existing rider schedule (Electric Vehicle Charging Infrastructure or "EVCI"), add a new rider schedule (Electric Vehicle Charging Demand Adjustment or "EVCDA") and enhance its Extension of Electric Service Policy. I provided an affidavit in support of ENO's request.
5. The purpose of my Affidavit in this proceeding is to present ENO's rate-related recommendations in support of ENO's proposed public direct current fast charging ("DCFC") station project ("Public DCFC Project") discussed in the Affidavit of Company witness Gregory S. Crisler. In conjunction with the proposed project, the Company requests approval of the Fast Charging for Electric Vehicles Rate Schedule ("Schedule FCEV"), which is attached to my Affidavit as Exhibit SFH-1. Unlike ENO's other base rate schedules, Schedule FCEV does not involve a cost-based rate. Rather,

ENO is proposing that Schedule FCEV include an initial rate that would encourage use of public DCFC stations without discouraging the use of alternative EV charging options, and thereby encourage broader customer adoption of EVs. Schedule FCEV further provides ENO the ability to make reasonable changes to the rate to support those objectives with due notice to the Council.

6. Although Schedule FCEV is not able by itself to fully recover the cost of the Public DCFC Project, ENO proposes that the revenue generated by Schedule FCEV offset the costs associated with the Public DCFC Project, at least in part, to mitigate potential cost shifting. In future rate proceedings, ENO proposes that the revenue from Schedule FCEV be treated as miscellaneous revenue, that is, not rate schedule revenues; that ENO's investment in the Public DCFC Project be included in rate base; and that the project's associated expenses be included in operating expense. Assuming conservative utilization of the Public DCFC Project, ENO estimates that revenue from Schedule FCEV should offset approximately 65% of the non-fuel revenue requirement and fuel expense associated with the Public DCFC Project. The relatively minor potential cost shift is outweighed by other benefits, such as environmental benefits and providing more EV charging options in New Orleans, as discussed by Mr. Crisler.

#### **Schedule FCEV**

7. Schedule FCEV would apply to the purchase of electricity from ENO at the public DCFC stations by EV drivers to charge their vehicles. ENO proposes that the rate be stated in terms of cents per kilowatt-hours. A per-kilowatt-hour rate structure is a simple and transparent method to charge EV drivers for the quantity of electricity they use at public DCFC stations. In Louisiana outside of the City of New Orleans and in most neighboring

states, EV charging providers use a per-minute price. Predicting the cost of charging an EV under a per-minute pricing structure is difficult because the speed of charge will vary over the course of a charging session depending on multiple factors, including but not limited to the acceptance rate of the vehicle, the state of charge of the battery, the maximum delivery power-level of the charger, and temperature. For this reason, a per-kilowatt-hour rate structure is the most transparent.

8. ENO proposes that the charging rate under Schedule FCEV not be a cost-based rate. Cost-based utility rates require either historical data or sufficient projections regarding cost of service and sales volumes. In this case involving a new technology and evolving user behavior in the City of New Orleans, ENO has neither, and a new cost-based rate would be speculative at this time. Therefore, ENO should use an initial rate to charge EV drivers based on factors other than cost of service and sales volumes.
9. ENO proposes an initial charging rate of \$0.35 per kWh. This rate encourages EV adoption because it compares favorably to the representative cost of 87 octane gas used by internal-combustion-engine (“ICE”) vehicles. With applicable taxes,<sup>2</sup> the per-kilowatt-hour cost would be approximately \$0.387 per kWh. Assuming that an EV driver charges the vehicle’s battery at one of ENO’s DCFC stations and that the volume of the transaction is 50 kWh, the total cost would be \$19.34 (inclusive of applicable taxes). A charge of 50 kWh should provide roughly 150 miles of range to the EV. Based on available government data, the average mileage as of 2020 of light-duty ICE passenger vehicles is approximately 25.7 miles per gallon of gasoline. To provide the equivalent

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<sup>2</sup> As of June 29, 2022, ENO is responsible to collect two different taxes (1) 2% for sales tax collection and (2) 3% for the City of New Orleans tax, plus the Retail Rate Rider Schedule, which is set as one minus the City of New Orleans Street Use Franchise Fee Rate (established as 5% by Ordinance 17962 M.C.S.; thus,  $1 - .05 = .95$  or 2% depending on the EV charger’s location within the City).

150 miles of range to an average ICE vehicle, approximately 5.84 gallons of gasoline would be needed, which based on an illustrative price of \$3.30 per gallon of regular-grade gasoline, would cost the average ICE driver roughly \$19.27 and even more for higher grades of gasoline or diesel. I would note that the current price of regular 87 octane gasoline in New Orleans is in the range of \$4.37 per gallon<sup>3</sup>, which is higher than the illustrative gas price used above.

10. Also, the initial charging rate of \$0.35 per kWh (\$0.387 with taxes included) compares favorably with the current price for DCFC outside the City of New Orleans. Although pricing for DCFC varies by location, Electrify America currently offers charging at many of their nationwide public DCFC stations for a flat \$0.43 per kWh or for a flat \$0.31 per kWh with a \$4.00 per month member fee. ENO does not want to set a rate that discourages EV drivers from using ENO's public DCFC charging stations. The resulting per-kilowatt-hour cost of \$0.385 from ENO's proposed Schedule FCEV rate compares favorably with the current Electrify America price. Although Tesla has several DCFC stations in Louisiana, Tesla's prices are not public and they currently do not have any locations within the City.
11. ENO also believes it is appropriate to include an idle fee in Schedule FCEV. Idling fees encourage an EV driver to remove a vehicle from the charger parking space after charging is complete so that the equipment can be made available for other EV drivers. ENO's proposed Schedule FCEV states that the idling fee will not exceed \$0.30 per minute after a ten-minute grace period with the total fee not exceeding \$30 in total. The fee should provide a reasonable incentive to remove the EV timely while balancing the

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<sup>3</sup> Obtained on July 6, 2022 from AAA Gas Prices at <https://gasprices.aaa.com/?state=LA>

possibility of an emergency or unforeseen circumstances preventing a driver from removing their vehicle from the parking space. The charging network operator's mobile application will allow the EV driver to monitor charging and receive an alert when the charge is nearly complete.

12. For example, an EV driver pulls into an ENO-owned public DCFC parking space in a parking lot of a retail shopping complex. The driver accesses the mobile application, plugs the car in, and begins charging. The EV driver then goes into a retail store and starts shopping. While the driver is waiting in line to check out, the mobile application sends an alert that the charge is nearly complete. However, fifteen additional minutes pass before the driver gets back to the car. In this example, the ten-minute grace period would apply, and only five minutes of the fifteen minutes would incur an idle fee, totaling \$1.50. The EV driver would be charged \$1.50 idle fee in addition to the cost for charging the EV.
13. ENO requests authority to periodically adjust the Schedule FCEV rate, but no more than once per quarter. As I stated above, ENO's customers stand to benefit from the Schedule FCEV revenue as an offset to the Public DCFC Station Project revenue requirement. Having the flexibility to revise Schedule FCEV pricing periodically is necessary to maximize the Schedule FCEV revenue because (1) EV adoption and EV public charging is still in its infancy in New Orleans; (2) market conditions (gasoline prices, natural gas prices, etc.) and EV charging equipment utilization will change over time; and (3) the Company will learn more as time goes on as to what level of pricing is appropriate given changing market conditions as well as feedback from EV drivers. If Schedule FCEV rates are higher than comparable charging options, then ENO runs the risk of its public



DCFC stations being underutilized. If Schedule FCEV rates are lower than comparable charging options, then ENO will not be able to maximize Schedule FCEV revenue to help offset the upfront and on-going costs of the project.

14. To implement a change to Schedule FCEV's rates, ENO would file a revised Schedule FCEV with support for the revised rates. The Company proposes that the Council would have thirty days to review the revised schedule and support. If the Council takes no action within that thirty day-period, ENO would implement the new rates on the thirty-first day after filing. If the Council acts in response to the filing (e.g., requests additional information), ENO would endeavor to comply with such action as soon as practicable.
15. Because Schedule FCEV is not a cost-based rate, ENO proposes that Schedule FCEV not be subject to any riders or the Fuel Adjustment Clause except Retail Rate Rider Schedule R-3.
16. Schedule FCEV is intended to apply only to sales of electricity from ENO's stations constructed as part of the Public DCFC Station Project. ENO will request Council approval for any additional DCFC locations that would allow charging under Schedule FCEV beyond the initial five requested here. The Council already has issued Resolution R-18-100,<sup>4</sup> which addresses the ability of third-party owned and operated EV charging stations to receive compensation from an EV driver for use of that equipment. Nothing in Schedule FCEV affects or in any way constrains the ability of third-parties to install EV charging equipment or develop their own pricing methods and levels.

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<sup>4</sup> Resolution R-18-100, dated April 5, 2018.

### **Public DCFC Station Project Revenue Requirement and Potential Offset**

17. Company Witness Greg Crisler estimates the pilot involving five (5) sites will cost approximately \$3.0 million, including total equipment and installation investment, other capital costs, and seven years of warranty and operations and maintenance (“O&M”) expenses. The total upfront investment, together with the estimated on-going O&M expenses plus fuel expense and the estimated annual property tax expense over the ten-year expected useful life of the equipment, yields a nominal total revenue requirement of approximately \$5.5 million. This amount does not include any potential reimbursement of the proposed investment with Infrastructure Investment and Jobs Act (“IIJA”) funding, which some portion of the project may ultimately qualify to receive, discussed in the Affidavit of Company witness Gregory S. Crisler.
18. A significant portion of the estimated total ten-year nominal revenue requirement should be offset by the Schedule FCEV revenue. Using conservative assumptions regarding the ENO-owned DCFC stations’ utilization over the expected ten-year life of the equipment, the estimated revenue is \$3.7 million. Thus, taking into consideration both the total revenue requirement associated with the Public DCFC Station Project and the estimated Schedule FCEV revenue, customers may only have to be responsible for \$1.8 million of nominal revenue requirement over the expected ten-year life of the Project. If utilization proves to be higher than the conservative projections used for these estimates, the impact on ENO’s other customers will be reduced.
19. ENO proposes that revenues received under the FCEV Schedule would be recorded to Federal Energy Regulatory Commission’s (“FERC”) account 456 (Other electric revenues) and treated the same way that miscellaneous revenues are currently treated for ratemaking purposes. ENO proposes that the DCFC charging infrastructure investment,

which will be recorded to electric plant account 371 (Installations on customers' premises), have an annual depreciation rate of 10%, given the expected 10-year life of the infrastructure. Currently, ENO applies a 3.612% annual depreciation rate to electric plant account 371, which implies an average useful equipment life of roughly 28 years. DCFC charging infrastructure is expected to have a much shorter useful life of ten years.

20. Further Affiant sayeth not.

New Orleans, Louisiana, this 20 day of July, 2022.



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SAMANTHA FRAILEY HILL

**SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 20<sup>th</sup> DAY OF  
JULY, 2022.**



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**NOTARY PUBLIC  
STEPHEN T. PERRIEN**

**Notary Public  
Parish of Orleans, State of Louisiana  
My Commission is Issued for Life.  
Bar No. 22590  
Notarial No. 49480**

Effective:  
Filed:  
Supersedes:  
Schedule Consists of: One Page and  
Attachment A

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**FAST CHARGING FOR ELECTRIC VEHICLES SCHEDULE**

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**I. AVAILABILITY**

This Fast Charging for Electric Vehicles (“FCEV”) Schedule is available to anyone charging an electric vehicle at Entergy New Orleans, LLC (“ENO” or “Company”) owned public EV fast charging stations (“Stations”) with output power of 50 kW or greater.

**II. APPLICATION**

The Stations are available to the public, and EV charging services may be accessed by any person (“user”). The user is not required to reside within the Company’s service territory.

**III. GENERAL PROVISIONS**

The user must register an account with the Company’s specified mobile application and provide required payment information prior to utilizing the Station.

**IV. NET RATE**

Applicable rates are defined in Attachment A to this schedule and may be adjusted as needed but no more than once per calendar quarter. The Company will notify the CCNO at least 30 days before the change by filing an amended Attachment A.

The charging costs applicable to the Station, including the rate per kWh, taxes and charging network provider and idle fees, will be visible to the users via the mobile application and/or a display located at the Station. Users will be notified when the charging session is complete via the Company’s specified mobile application and the display located at the charging dispenser. A detailed receipt of the charge session will be available to the user.

**V. OTHER PROVISIONS**

All other provisions of ENOL’s Service Regulations effective at the time service is provided shall apply and are not modified by this Fast Charging for Electric Vehicles schedule.

**ATTACHMENT A**

**ENERGY NEW ORLEANS, LLC  
Fast Charging Electric Vehicles (“FCEV”) Schedule**

The following fees are applicable to anyone charging an electric vehicle at a Company-owned fast charging EV station according to the provisions of Schedule FCEV-1 effective on and after the effective date of this Attachment A.:

- |    |  |  |
|----|--|--|
| A. | Charging Rate *                                  | \$0.35 per kWh                                       |
| B. | Vehicle idling fee after 10-minute grace period* | \$0.30 per minute but not more than \$30.00 in total |

\*In addition to the fees above, applicable taxes and charging network fees (as determined by the charging station network provider), may apply at Stations.