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October 14, 2022

VIA ELECTRONIC MAIL ONLY


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

Re: Filing of Entergy New Orleans, LLC’s Energy Smart Implementation Plan Reply Comments Regarding the Program Year 13-15 Implementation Plan (Resolution R-22-412; UD-08-02, UD-20-02)

Dear Ms. Johnson,

On September 15, 2022, the Council of the City of New Orleans (“Council”) adopted Resolution R-12-412 allowing stakeholders to provide comments on the July 29, 2022 Entergy New Orleans, LLC’s (“ENO”) Energy Smart Implementation Plan filing. The resolution further allowed for reply comments to be filed through October 14, 2022. Pursuant to Resolution R-22-412, ENO hereby respectfully submits its Reply Comments. 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 original and requisite 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 this filing, please contact my office at (504) 670-3680. Thank you for your assistance with this matter.

Sincerely,

Courtney R. Nicholson

Enclosures

cc: Official Service List UD-08-02 and UD-20-02 (*via electronic mail*)

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

**IN RE: RESOLUTION REGARDING)
PROPOSED RULEMAKING TO)
ESTABLISH INTEGRATED RESOURCE) DOCKET NOS. UD-20-02 and UD-08-02
PLANNING COMPONENTS AND)
REPORTING REQUIREMENTS FOR)
ENTERGY NEW ORLEANS, INC.)**

**REPLY COMMENTS OF ENTERGY NEW ORLEANS, LLC
PURSUANT TO COUNCIL RESOLUTION R-22-412 REGARDING
THE PROGRAM YEAR 13-15 ENERGY SMART IMPLEMENTATION PLAN**

Entergy New Orleans, LLC (“Entergy New Orleans,” “ENO,” or the “Company”) hereby submits its reply comments and Request for Approval of ENO’s Program Year 13-15 (PY13-15) Energy Smart Implementation Plan (“Plan”) filed on July 29, 2022.

I. The Council of the City of New Orleans should approve the Company’s PY13-15 Plan Request.

The PY13-15 Plan seeks to establish the Energy Smart Program (“Program”) third-party administrators, and Program goals and budgets for the period January 1, 2023 – December 31, 2025. The procedural schedule approved in Council of the City of New Orleans (“Council”) Resolution R-22-412 allowed for comments on the Plan from stakeholders until September 30, 2022. No stakeholders filed comments regarding the Plan. Accordingly, ENO respectfully requests that the Council of the City of New Orleans (“Council”) adopt a resolution approving the PY13-15 Plan and its accompanying requests.

Delays in Council approval of the three-year Implementation Plan will likely have significant effects on the Program’s ability to achieve the kWh savings projected in the Plan. If the entire three-year Plan is not approved in a timely manner, the program runs the risk of losing projects that are currently ready for pre-approval to be completed in 2023. In addition, the adverse effects of current worldwide supply chain issues on the Program’s ability to garner kWh savings will be magnified as longer lead times are needed to complete large commercial projects (ex. boiler and chiller replacements). Given that a large portion of the projected savings comes from large commercial projects, this could have significant effects on the ability to hit Program goals in 2023. Further, approval of only one year will similarly affect the Program’s ability to hit goals in 2024 and 2025. For these reasons, ENO respectfully requests that the Council approve the Energy Smart Implementation Plan as filed on July 29, 2022.