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October 31, 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 Comments Regarding Energy Efficiency and Conservation, Demand Response, and Other Demand-Side Management Programs as well as Customer-Owned Distributed Energy Resources and Battery Storage (Resolution R-22-413; UD-22-04)

Dear Ms. Johnson,

On September 15, 2022, the Council of the City of New Orleans ("Council") adopted Resolution R-12-413 allowing stakeholders to provide comments regarding energy efficiency and conservation, demand response, and other demand-side management programs as well as customer-owned distributed energy resources and battery storage. The resolution allows for comments to be filed through October 31, 2022. Pursuant to Resolution R-22-413, Entergy New Orleans, LLC ("ENO") hereby respectfully submits its 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

Courtney R. Nicholson

Enclosures

cc: Official Service List UD-22-04 *(via electronic mail)*

BEFORE THE

COUNCIL OF THE CITY OF NEW ORLEANS

RESOLUTION AND ORDER ESTABLISHING RULEMAKING TO CONSIDER SAVINGS TARGETS AND PROGRAM DESIGN FOR ENERGY EFFICIENCY, CONSERVATION, DEMAND RESPONSE AND OTHER DEMAND-SIDE MANAGEMENT PROGRAMS AS WELL AS CUSTOMER-OWNED DISTRIBUTED ENERGY RESOURCES AND BATTERY STORAGE PURSUANT TO COUNCIL RESOLUTION R-22-413	)	**DOCKET NO. UD-22-04**

ENTERGY NEW ORLEANS, LLC'S COMMENTS ON PROPOSED CHANGES TO THE COUNCIL'S ENERGY EFFICIENCY AND RELATED POLICIES

Entergy New Orleans, LLC ("ENO") respectfully submits these Initial Comments in response to a resolution considering potential changes to the Council's energy efficiency, conservation, demand-side management as well as energy storage policies, adopted by the Council of the City of New Orleans (the "Council") on September 15, 2022 (the "Resolution R-22-413") and providing parties forty-six days from that date to submit Comments on proposed changes to energy efficiency and energy storage policies.

I. INTRODUCTION

Since its inception, the Energy Smart program has distributed more than $39 million in cash incentives and helped customers save more than 325 million kilowatt hours. Helping income qualified customers has always been a vitally important part of Energy Smart. Currently in its twelfth program year, the Energy Smart program ("Energy Smart" or "Program"), is a resource for reducing energy usage for New Orleans' residents and business owners. Over the last three years

alone, the Program has helped 2,334 income-qualified customers by installing energy savings measures in their homes and apartments at no cost to them. In many cases, these customers live in geographic areas of the city that are affected by heat islands or particularly severe energy burdens. As part of the stakeholder process around consideration of the Implementation Plan for Program Year ("PY") 13 and beyond, ENO provides the following comments below and looks forward to input that can help the Program reach other income qualified customers.

II. ENO'S COMMENTS ON SAVINGS TARGETS AND PROGRAM DESIGN FOR ENERGY EFFICIENCY

a. Should the Council's 2% savings goal be maintained, increased, or otherwise altered for PY16 and beyond

The Council has prescribed a goal of having kWh savings goals increase annually by 0.2% with respect to total annual kWh sales until 2.0% is reached. These annual increases had the targets on a projected schedule to hit the 2.0% target by PY14. Separate DSM potential studies performed as part of the ENO 2021 Integrated Resource Plan ("IRP") by Guidehouse and GDS projected the potential to hit the 2.0% target in their "2.0% Case" by 2024, respectively. The Guidehouse potential study further projected that the 2.0% could be maintained (or slightly exceeded) through 2029 before the potential annual savings begins to drop off. Similarly, the GDS potential study projected that there is potential to save greater than 2.0% through 2027 before the savings potential decreases below 2.0%. However, both potential studies were developed prior to the announcement of two upcoming legislative changes that will likely have significant effects on the ability to achieve savings in future years. First, the implementation of the Energy Independence and Security Act ("EISA") legislation announced in April 2022 will drastically change the baselines by which the program savings are calculated. Additionally, new local building code changes will

similarly raise baselines and thereby reduce the calculated savings for many measures. As a result, ENO does not recommend setting targets above the 2% threshold.

EISA Legislation

In an April 2022 decision, the Department of Energy ruled that EISA Phase II legislation will go into effect in 2023. As a result, certain light bulbs will be removed from the market, thereby raising the baseline against which kWh savings are determined. By July 2023, rebates for those LED light bulbs will no longer be offered in several of the Energy Smart programs. The Energy Smart third-party administrator and third-party evaluator, Aptim Environmental and Infrastructure ("Aptim") and ADM Associates ("ADM") respectively have provided more detailed descriptions of the anticipated effects of EISA in Appendices A and B.

Building Code Changes

The second legislative action that will likely have a significant effect on the ability to garner kWh savings is the enactment of new building code ordinances. Louisiana state legislators have adopted the 2021 International Energy Conservation Code ("IECC") and the 2021 International Residential Code ("IRC"). Similar to EISA legislation, these building code adoptions will raise the baselines by which kWh savings are calculated. Please also see Appendix A for a more detailed description of the likely effects of IECC and IRC code changes.

As mentioned above, these two legislative decisions will likely have significant effects on the ability to hit increasing kWh savings targets. As such, ENO recommends not setting kWh savings targets higher than 2.0% of total annual kWh sales.

b. Peak demand reduction target for PY16-18

Through the first 12 years of Energy Smart, the Council has only set targeted savings goals for energy (kWh) reductions, not for demand (kW) reduction. Given the growth in ENO's demand response ("DR") portfolio, ENO is looking forward to working with stakeholders to determine demand reduction goals as well as a performance incentive mechanism that allows a reasonable reward for ENO hitting those goals. ENO recommends that any discussion around setting kW goals should be based upon the kW projections in the PY13-15 Implementation Plan.

c. Programs addressing extreme energy burdens and severe heat island impacts

The Energy Smart program has historically served all geographic and demographic areas of Orleans Parish. A map showing the projects performed in Orleans Parish over the last three years is attached in Appendix C. As is illustrated, Energy Smart has performed projects in all areas of Orleans Parish. In upcoming program years, Energy Smart staff will use geo-mapping to identify areas with higher need of energy efficiency project penetration.

Although Energy Smart has impacted the entire New Orleans area and plans to continue to target the entirety of Orleans Parish, ENO is open to discussing potential programs and initiatives to further reach areas that show extreme energy burden and areas that have severe heat island impacts.

d. Proposed funding mechanism

In response to the Council's request for a proposed funding mechanism for Energy Smart PY16-18, the Company suggests that the Council once again consider the Demand-Side Management Cost Recovery rider ("Rider DSMCR") proposed in the 2018 Rate Case (Docket UD-18-07). While the current Rider EECR allows for the recovery of Energy Smart program costs

and earned performance incentives, Rider DSMCR offers an alternative mechanism with the benefit of placing demand-side resources on an equal financial footing with traditional supply-side resources, which the Council has stated as an objective.[1] As described in testimony in Docket UD-18-07, Rider DSMCR would utilize regulatory asset-based cost recovery and that fairly addresses three distinct elements of cost recovery for DSM offerings: (1) direct and indirect costs of DSM offerings; (2) lost contributions to fixed costs ("LCFC" or "lost revenues"); and (3) incentives for the conduct of the offerings and achievement of energy savings. This model is sometimes referred to as "rate basing" and has been recognized by other regulators as aligning well the interests of the utility and customers in increasing DSM. The return and the determination of the rate of return that ENO would earn on the rate based regulatory asset would function as an incentive mechanism for achieving the savings goals established during the IRP process.

Understanding that approval of Rider DSMCR would require additional regulatory process and review beyond that contemplated by the instant rulemaking docket, ENO would welcome the opportunity to discuss the concept with parties in this proceeding as a possible avenue to help drive DSM investments in the future.

e. <u>Recovery of Lost Contribution to Fixed Cost under Rider EECR</u>

In the event that Rider EECR continues as the approved funding mechanism for Energy Smart, there will need to be some consideration of the collection of Lost Contributions to Fixed Cost ("LCFC") expected to result from Energy Smart (or other demand-side management) efforts. LCFC is currently recovered through ENO's Formula Rate Plan ("FRP"). While ENO does not recommend any change when there is a FRP available, ENO does believe that there should be a mechanism to recover LCFC in the event an FRP is not available. On November 7, 2019, the

[1] *See, e.g.*, Council Resolution No. R-07-600.

Council adopted Resolution R-19-457 in Docket No. UD-18-07 (the "2018 Rate Case"). In Ordering Paragraphs 25 and 26 of Resolution R-19-457, the Council approved the terms of an Electric FRP Rider Schedule and a Gas FRP Rider Schedule. The FRP Rider schedules provided for the filing of FRP evaluation reports in 2020, 2021, and 2022 based on evaluation periods 2019, 2020, and 2021, respectively. On October 15, 2020, the Council adopted Resolution R-20-344 which avoided a rate increase for customers in 2020 and modified the filing schedule of FRP evaluation reports by requiring the initial FRP evaluation reports to be filed in 2021 and the second and third evaluation reports be filed in April 2022 and 2023, based on evaluation periods 2021 and 2022, respectively.

In the event its FRP is not extended, ENO recommends flowing LCFC through Rider EECR. The use of Rider EECR is preferred for a couple of reasons. First, the existing Rider EECR would obviate the need to develop and approve a new mechanism. Secondly, Rider EECR allocates costs to customer classes. Therefore, the Residential, Small Commercial, and Large Commercial customer classes would pay their respective portions of LCFC.

III. ENO'S COMMENTS ON DEMAND-SIDE MANAGEMENT AND DEMAND RESPONSE

a. Discount rate for evaluating DSM programs other than WACC

Both DSM potential studies developed for the 2021 IRP used ENO's then-current weighted average cost of capital ("WACC") of 7.09% as the discount rate to evaluate the overall cost-effectiveness of potential DSM programs. While the Alliance has suggested that it would be more appropriate to use a discount rate of 2%-3% to evaluate cost-effectiveness, this is not correct. It is ENO's established practice to use the utility's WACC as the discount rate to evaluate the cost-effectiveness of supply-side and demand-side resources. Because ENO is investing its own funds

to implement Energy Smart programs, it is reasonable to evaluate cost effectiveness of those programs using ENO's WACC, not some other arbitrary rate that fails to reflect the cost of the investments to ENO.

b. Potential cost-effective savings through improved building efficiency standards

The Energy Smart program has consistently provided cost-effective kWh savings through energy efficiency programming throughout its first 12 years. Improved building efficiency standards can enhance kWh savings of energy efficiency programs, but many examples illustrate that the best scenario exists when energy efficiency programs support the enforcement of building efficiency standards. As such, ENO recommends using the energy efficiency programs to support enforcement of building efficiency standards.

c. Rate design proposals to make programs more effective, such as TOU rates

Resolution R-22-413 states that the Council is "interested in proposals to make Energy Smart programs more effective and more accessible to New Orleans customers as well as rate design proposals, such as time-of-use rates designed to encourage demand response."[2] On July 29, 2022, ENO submitted to the Council its Application for Approval of the Energy Smart Implementation Plan for Program Years 13-15 (i.e., 2023 through 2025). In that Application, ENO proposed two new innovative options both of which address residential demand response ("DR"). The two proposed options build on ENO's success with its Bring Your Own Thermostat ("BYOT") DR program.

Under the first option, ENO proposes a new voluntary Peak Time Rebate ("PTR") Pilot, which is "designed to flexibly manage demand including reducing total peak usage, shifting load

[2] Resolution R-22-413 at 3.

off-peak, and optimizing grid load and demand."[3] The opt-in PTR Pilot will allow enrolled customers to adjust their energy usage during a handful of peak demand and reliability events in return for the ability to earn a paid incentive up to $25 each year. Importantly, the Company can call no more than eight (8) events total per year with a maximum duration of four (4) hours for each event (32 hours total). The advantage of using a PTR model versus a whole house time-of-use ("TOU") rate is that a participating customer is able to earn an incentive for changing their behavior for no more than 32 hours a year without the price risk and disruption that comes with having to worry about modifying their behavior during the significantly greater number of hours each year that a typical TOU rate would entail. The Company's Application provides more details on plans for customer education and enrollment, as well as how analytics (e.g., disaggregation of advanced meter data to determine appliance use) will facilitate customer engagement and measuring performance.

The second proposal is for a new Bring Your Own Charger® ("BYOC") Pilot program that will leverage investments in advanced meters to incentivize electric vehicle ("EV") drivers to shift their vehicle charging to off-peak hours.[4] The new program will be open to any ENO customer that charges their EV at home with a Level 2 charger. Adoption of EVs is growing in the City of New Orleans and is expected to rapidly increase as more models become available and federal tax incentives enacted under the Inflation Reduction Act of 2022 are put in place. This innovative pilot will allow ENO to incentivize EV drivers to shift EV charging away from peak hours (e.g., 2 – 8 p.m. during summer hours). Depending on the number of miles driven and the amount of

[3] ENO Application; see January 1, 2023 - December 31, 2025 Program Years 13-15 Energy Smart Residential Demand Response Plan prepared by APTIM Environmental and Infrastructure at pp. 4-9.
[4] ENO Application; see Implementation Plan Bring Your Own Charger® (BYOC) Pilot Program developed by Sagewell.

vehicle charging done at home versus at other locations, the increase in annual energy usage can be 3,000 kWh annually representing a sizeable increase for a typical ENO residential customer.

As with the Company's proposed PTR pilot, the BYOC pilot program is voluntary and will reward customers for shifting their usage without penalizing them if they choose not to shift EV charging timing (although they would forfeit their incentive amount for that particular month). Similarly, the Company believes the BYOC pilot program is a better alternative than a whole house TOU rate because the pilot specifically targets EV charging timing, which is easily programmed at the vehicle level and the customer is able to avoid the price risk and disruption that a whole house TOU rate entails. The Company's BYOC pilot proposal also provides a similar financial outcome to the customer when considering the incentive that can be earned each month versus the relative economics that might have been achieved charging a vehicle at a lower, off-peak rate.

The BYOC proposal builds on the Company's separate efforts via its eTech initiative to incentivize customer-sided beneficial electrification projects including $250 for a residential customer who installs a Level 2 EV charger. The BYOC proposal also provides another avenue beyond eTech rebates to identify residential customers who are charging one or more EVs at home and where the Company can potentially avoid or defer having to upgrade distribution infrastructure to maintain reliability, thus saving all customers money.

In aggregate, the Company's three residential DR proposals described in the Energy Smart Implementation Plan for PY 13-15, two of which would be new innovative options for customers that leverage advanced metering and new technology, are consistent with the Councils' objectives outlined in Resolution R-22-413.

IV. CONCLUSION

ENO appreciates the opportunity to submit these comments for Council and stakeholder review. Additionally, ENO looks forward to discussing these topics more thoroughly in the upcoming virtual technical conference.

Respectfully submitted,

Courtney R. Nicholson

CERTIFICATE OF SERVICE
Docket No. UD-22-04

I hereby certify that I have served the required number of copies of the foregoing report upon all other known parties of this proceeding, by the following: electronic mail, facsimile, overnight mail, hand delivery, and/or United States Postal Service, postage prepaid.

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New Orleans, Louisiana, this 31st day of October 2022.

Courtney R. Nicholson

Courtney R. Nicholson

Appendix A

Energy Smart Energy Efficiency Demand Side Management

10/21/2022

PREPARED BY

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Executive Summary

The proposed PY13-PY15 Energy Smart Implementation Plan includes energy savings and budget forecasts that seek to align with the Council's recommendation in Resolution R-17-30 that ENO provide a scenario that would increase kWh savings by 0.2% annually until a goal of 2% annual kWh savings is achieved (the 2% Goal Framework or the Framework). However, multiple regulatory changes during the PY13-15 cycle will have significant impacts on the portfolio's potential in that cycle and beyond PY15. The impacts discussed below were not included in pervious potential studies.

The Framework must be reassessed in the market as it exists with these regulatory changes: Energy Independence & Security Act Phase II standards and the 2021 International Energy Conservation Code. Drastic changes would need to be made to how Demand Side Management (DSM) programs are regulated, valued, evaluated, and budgeted to continue to pursue targets at the pace established by the Framework. For these reasons, we believe the 2% Goal Framework will no longer provide a functional target for programs to pursue.

Energy Independence & Security Act

On April 26, 2022, the Department of Energy issued an Enforcement Policy Statement indicating an accelerated timeline for implementation of the new General Service Lamps (GSLs) efficiency standards. The enforcement timeline pertains to two rules issued by the DOE including expanded definition of GSL to include majority of screw-based lighting products and imposing a 45 lumen per watt minimum efficiency requirement for all GSLs.

Combined, these rules will eliminate nearly all A-line, reflector, and specialty incandescent and halogen products from the market, and in turn change the baseline equipment for Energy Smart savings calculations. APTIM has confirmed with the Program Evaluator this precludes savings from being claimed in most circumstances for Retail Lighting, New Construction, and kit distribution channels. Reduced savings will still be realized (and claimed) in the program through early replacement and direct installation where existing incandescent, halogen and CFL bulbs can be recorded.

The PY13-PY15 proposed program design aims to incorporate impacts from the Energy Independence & Security Act (EISA) Phase II standards, which will be fully enforced in PY13. However, the full impacts of EISA cannot be adequately modeled and do create significant risk to DSM portfolios nationwide.

The EISA ruling has substantial direct impacts on the Energy Smart Program. All measures addressing GSLs are affected by the ruling with reduced savings in PY13-14 and elimination from the portfolio in PY15. Beginning July 1, 2023, the Retail Lighting & Appliances program will no longer provide rebates to offset the cost of LED bulbs in retail stores. Lighting savings accounted for 13.5 M kWh (87%) of the Retail Lighting and Appliances program in PY11. Instead, the program will focus on ENERGY STAR appliances, smart thermostats and other equipment offered on the Online Marketplace at a significantly higher cost per kWh than Retail Lighting has historically performed.

There will also be substantial indirect impacts from the EISA ruling. The Energy Smart team anticipates that the reduction and elimination of measures involving GSLs will reduce contact points between the Energy Smart Program, trade allies and Entergy customers. LED retrofit projects often serve as customers' first exposure to the Energy Smart program. The cost savings customers realize can often fund and otherwise lead to additional non-lighting efficiency projects. Reducing or eliminating lighting projects therefore reduce program participation generally. The loss of relatively low cost and high impact of LED retrofit projects also impacts program- and portfolio-level cost effectiveness, which leads to unfavorable impacts metrics such as Total Resource Cost.

2021 International Energy Conservation Code (IECC) and the 2021 International Residential Code (IRC)

Following the 2022 Louisiana Legislative session ACT No 635 was signed into law requiring the statewide adoption of the 2021 International Energy Conservation Code (IECC) and the 2021 International Residential Code (IRC) Chapter 11 Energy Efficiency. This represents unprecedented advancement in energy code statewide. The statewide effective date for the code changes will be July 1, 2023. The APTIM team anticipates the code changes will greatly reduce the energy savings that can be attributed to Energy Smart program interventions. A full evaluation of the code change impact to Energy Smart savings potential will be needed during PY13-14.

Our Assessment

Neither potential study accounts for the impacts of the advanced EISA enforcement schedule ruling issued by the US DOE in April 2022 or the statewide adoption of the 2021 International Energy Conservation Code effective July 1, 2023. However, the Energy Smart team acknowledges these challenges in growing the impact of the Energy Smart program. Both create significant risk, uncertainty and difficultly for the PY13-15 portfolio. Those impacts will extend beyond into future program years as well. For these reasons, we submit that the 2% Goal Framework will no longer provide a functional target for programs to pursue.

If the Goal Framework were to be pursued, we believe drastic changes and higher levels of investment would be necessary before the goal could be considered attainable. This would include changes made to how DSM programs are regulated, valued, and evaluated. In addition, other programmatic, technical and policy driven steps would need to be taken well in advance of PY 16 to increase program savings attainment potential. For example:

1. Cost-effectiveness norms will need to be adjusted with the expectation that programs may provide customer and trade ally incentives that consistently buy down the majority of the cost of projects. This will likely move TRM values as they are currently calculated under 1.0, the industry standard threshold for cost-effectiveness.
2. Code-driven baselines would need to be reconsidered in the context of the realistic level of code enforcement by customer type.
3. Energy savings from the program's influence on driving code-compliance would need to be accounted for in annual savings claims, as is practice in some jurisdictions.
4. Federal, State and Local Government funding and programs broadly related to energy savings would need to be closely linked to or integrated with the utility energy efficiency programs to increase the reach and impact of all concerned programs.

5. Significant investment will need to be made in the supporting contractor/trade-ally network to train, equip, and motivate a workforce with the scale, inventory, skills, and the throughput capacity necessary to identify opportunities, sell projects and install more and more advanced energy efficiency projects each year.
6. Numerous program types would need to be developed and scaled up, including Retrocommissioning, New Building Commissioning and Strategic Energy Management and AMI-driven programming such as Virtual Commissioning, Behavioral Programs.
7. Midstream and upstream programs will need to be implemented into portfolios in order to maximize the uptake of efficient products in the market.

The above does not represent an exhaustive or fully researched list of needs. However, it does illustrate the level of change and investment that we believe to be required in order to maintain or increase the “2% Goal Framework” trajectory into the future.

Appendix B

To: Derek Mills, Entergy New Orleans

From: Adam Thomas, ADM Associates

Date: October 26, 2022

Re: Energy Smart kWh Savings Target Comments: Adjustments Due to Code Advancements

Introduction

ADM Associates, Inc. (ADM) is the current Third Party Evaluator (TPE) for Entergy New Orleans (ENO) Energy Smart Programs. At the request of ENO, the TPE has authored these comments regarding the impact of advancing codes and standards on realistically achievable energy savings for Energy Smart programs.

Overview

ENO has to meet a savings target of 2% of total sales. The ability to meet this target is to some extent hampered due to two code advancements:

1. **Adoption of the Energy Independence and Security Act (EISA) Phase II Backstop (referred to in this document as the "Backstop".** This code essentially establishes LEDs as the minimum standard for most general service lamps (GSLs). This will take full effect on sales as of July 1, 2023.
2. **Pending adoption of IECC 2021.** Beginning January 1, 2024, Louisiana will shift from IECC 2009 to IECC 2021. This constitutes a significant advancement in new construction, entailing a 30% reduction in energy intensity of residential new construction compared to 2009. This largely manifests in increased requirements for insulation, fenestration, duct sealing, and air sealing, with additional compliance paths that may manifest in the efficiency of HVAC and water heating systems.

New Orleans Potential IRP Projections

To determine the impact of the codes on achievable energy savings, ADM refers to the "*Entergy New Orleans 2021 Integrated Resource Plan DSM Potential Study*," performed by Guidehouse, Inc. (herein referred to as the "Guidehouse Potential Study").

The Guidehouse Potential Study does not distinguish between retrofit and new construction savings for measures affected by IECC 2021, and historically the savings from measures affected by this code have been for retrofits (which are unaffected by this code change). As a result, this analysis will only include the impacts of EISA.

The study indicates that total base-year (2019) consumption for the residential sector is 2,353 GWH[1], with 22% from lighting[2]. The resulting total lighting energy consumption is 517.66 GWH. ENO's 2019 sales totaled 58,231.385 GWH[3]. With EISA removing the savings potential from lighting in most instances, the negation of these savings would entail an 8.8% reduction in the savings goal if the total consumption of lighting were removed from the 2% basis sales value.

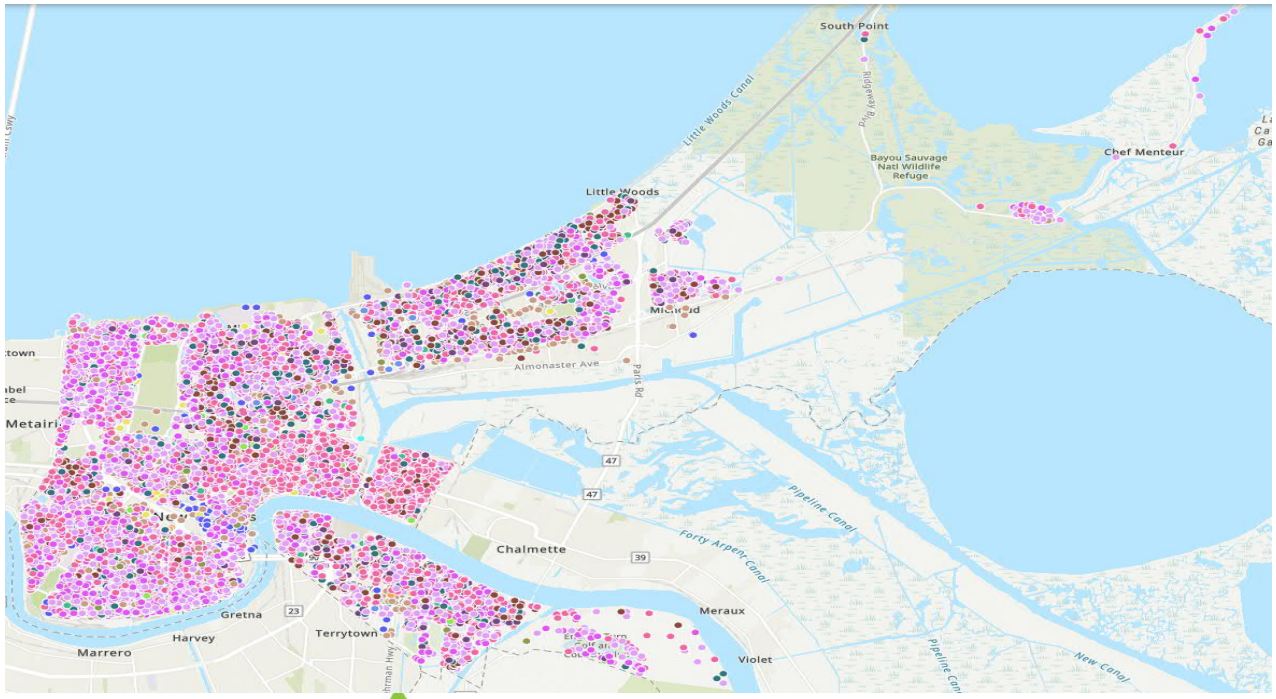
[1] *Entergy New Orleans 2021 Integrated Resource Plan DSM Potential Study, Table 2-7, Pg. 11*
[2] *Entergy New Orleans 2021 Integrated Resource Plan DSM Potential Study, Figure 2-5, Pg. 12*
[3] https://www.eia.gov/electricity/data/eia861m/

This may be overstating the impacts, in that there is remaining potential from non-EISA affected lamps (though these are very small in market share) and for early retirement of the remaining incandescent lamps (via direct install). To provide a conservative estimate of this, we assume 20% of the lighting potential is still achievable through these two means. Under this conservative assumption, the total sales that can be affected by Energy Smart is reduced by 7.1%, and it is our suggestion that the Energy Smart kWh savings goal be adjusted in a corresponding fashion to reflect that interventions in this market segment are no longer viable or necessary.

ADM notes that while this reduces the savings goal, this does not necessarily indicate that a reduction in budget is appropriate. LEDs have historically been the most cost-effective measure in Energy Smart programs. To achieve the savings goal without their availability requires new interventions and potentially costlier measures. Until there is sufficient post-EISA data to indicate the new cost of energy savings without high prevalence of LEDs, ADM recommends retaining existing funding levels to allow ENO and their TPA the opportunity to innovate and develop new means to achieve the Energy Smart savings goal.

APPENDIX C

CUSTOMER PROJECT MAP (2020-2022)



- A/C Solutions
- Appliance Recycling & Replacement Pilot
- Commercial & Industrial Construction Solutions
- DR - Large Commercial/Industrial
- DR - Residential BYOT
- DR - Residential DLC
- DR - Small Commercial
- Home Performance with ENERGY STAR
- Income-Qualified Weatherization
- Large Commercial & Industrial Solutions
- Multifamily Solutions
- Publicly Funded Institutions
- Retail Lighting & Appliances
- Rewards
- School Kits & Community Outreach
- Small Commercial & Industrial Solutions

EnergySmart
A New Orleans Program

entergy