



January 9, 2023

By Hand Delivery and U.S. Mail

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

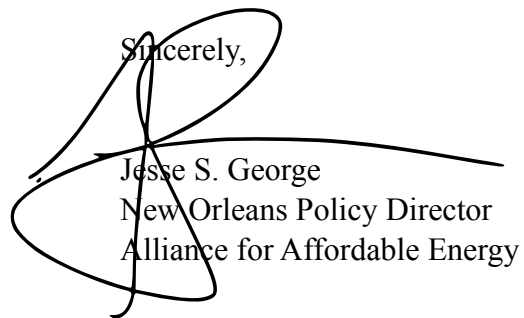
**In Re: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND PROCEDURAL SCHEDULE
WITH RESPECT TO ACHIEVING 100% RENEWABLE AND CLEAN ENERGY FOR THE CITY OF
NEW ORLEANS (Docket No. UD-22-02)**

Dear Ms. Johnson:

Please find the enclosed Reply Comments of the Alliance for Affordable Energy in the above mentioned docket. Please file the attached communication and this letter in the record of the proceeding. We will submit physical copies at your instruction. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention.

Sincerely,



Jesse S. George
New Orleans Policy Director
Alliance for Affordable Energy

**Before
The Council of the City of New Orleans**

**In Re: RESOLUTION AND ORDER
ESTABLISHING A DOCKET AND
PROCEDURAL SCHEDULE WITH RESPECT
TO ACHIEVING 100% RENEWABLE AND CLEAN
ENERGY FOR THE CITY OF NEW ORLEANS**

DOCKET NO. UD-22-02

JANUARY 9, 2023

REPLY COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY

I. INTRODUCTION

On June 9, 2022, the New Orleans City Council (“the Council”) adopted Resolution R-22-265 establishing the instant docket. That resolution makes explicit reference to the Council’s goal – established in Resolution R-22-11 on January 6, 2022 – of powering “all municipal operations with 100% renewable energy by January 2025.” Pursuant to the procedural schedule established in R-22-26, the Alliance for Affordable Energy (“the Alliance”) and Entergy New Orleans, LLC (“ENO”) filed comments on December 2, 2022. The Alliance hereby submits the following reply comments in response to ENO’s filing:

II. THE USE OF THE ENO GREEN POWER OPTION RIDER SHOULD BE ONLY A SHORT-TERM MECHANISM FOR THE COUNCIL TO ACHIEVE ITS GOAL

ENO proposes that the City of New Orleans could opt into the ENO Green Power Option (“GPO”) approved through the 2018 ENO rate case in order to achieve its goal of 100% renewable energy for municipal operations. While this could help the Council to meet its goal on paper relatively quickly, the reliance on purchased renewable energy credits (“RECs”) from outside markets would not provide the City with the full benefits of a transition to renewable energy – including local economic and workforce development, air quality and other

environmental benefits, as well as the true resilience that local renewable energy resources can provide in the face of extreme heat and cold, climate disaster, and routine fair-weather outages.

The mechanism the Council elects to pursue its goal can either pay for the development of renewable energy projects in faraway places or create investment in the local community. As with the difference between renting and buying a home, the Council's decision will mean the difference between meeting a basic need and gaining equity in a tangible asset. In our initial comments, the Alliance discussed options such as community choice aggregation, power purchase agreements with local renewables developers, and municipally-owned on-site renewable generation resources, as more direct – and potentially more cost-effective – mechanisms for achieving the Council's goal that would also provide the other benefits associated with a transition to renewable energy. The Council should explore these options first.

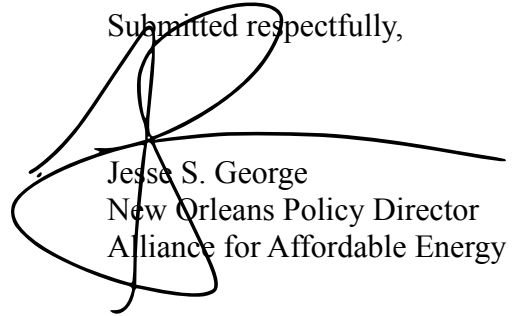
III. THE COUNCIL SHOULD APPROACH A GREEN TARIFF WITH CAUTION

ENO also suggests the adoption of a green tariff to further the Council's goal of 100% renewable energy. As the Alliance noted in our initial comments, however, this option is the least desirable, as it likely would lead to heavy reliance on RECs purchased from other markets, thus depriving the city of the economic and environmental benefits of local renewable energy, or on expensive, utility-owned renewables projects, neither of which is in the best interest of ratepayers. The Alliance's testimony against such a tariff in ENO's 2019 rate case (Docket No. UD-18-07), which was attached to our initial comments as Appendix A, elucidates a variety of reasons why the Council should approach the adoption of a green tariff with caution.

IV. CONCLUSION

We thank the Council for the opportunity to provide these reply comments, and we look forward to continuing to work together, along with ENO, the Mayor's Office, and other stakeholders, to achieve this important goal.

Submitted respectfully,



Jesse S. George
New Orleans Policy Director
Alliance for Affordable Energy

**Before
The Council of the City of New Orleans**

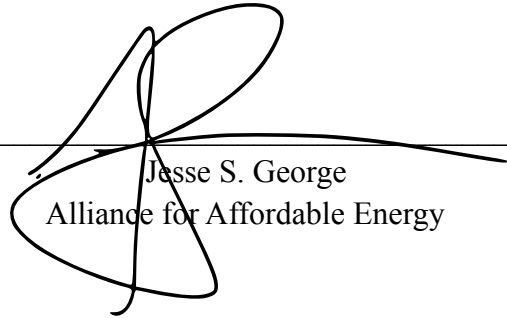
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JANUARY 9, 2023

CERTIFICATE OF SERVICE

I do hereby certify that I have, this 9th day of January 2023, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



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