



Keith D. Wood

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January 9, 2023

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: 100% Renewable and Clean Energy For The City of New Orleans
CNO Docket No. UD-22-02**

Dear Ms. Johnson,

Pursuant to Resolution R-22-265, Entergy New Orleans, LLC (“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) 670-3633. Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Keith D. Wood'. Below the signature, the name 'Keith D. Wood' is printed in a black, sans-serif font.

Keith D. Wood

KDW/bkd

Enclosures

cc: Official Service List UD-22-02 (*via electronic mail*)

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

IN RE: 100% RENEWABLE AND)
CLEAN ENERGY FOR THE CITY OF) **DOCKET NO. UD-22-02**
NEW ORLEANS)

ENTERGY NEW ORLEANS, LLC REPLY COMMENTS

Entergy New Orleans, LLC (“ENO” or “the Company”) submits these brief Reply Comments in response to Comments filed by the Alliance for Affordable Energy (“AAE”) on December 2, 2022.

While AAE suggests that the Council explore Community Choice Aggregation (“CCA”),¹ it should be noted that CCA has only been authorized in states that have restructured (i.e., deregulated) their electric utility markets and passed enabling legislation, neither of which is the case in Louisiana or New Orleans. Further, the Council’s directive in this case relates solely to City and Sewerage & Water Board (“SWB”) operations, not “residential and commercial accounts” as AAE suggests.² Facilitating CCA in Orleans Parish would represent a profound change in the nature of utility regulation in New Orleans. Because such a change would be incredibly complex and would take years to complete, a study of CCA by the Council relative to this initiative to secure renewable energy for the City and SWB operations is not warranted at this time.

AAE then asserts that the Council should consider allowing the City and/or SWB to enter into a power purchase agreement (“PPA”) with a project developer, which would presumably

¹ AAE Comments, at p. 4.

² *Ibid.*

entail actual physical delivery of electricity to one or more electric meters at City and/or SWB locations. The City’s Home Rule Charter³ addresses the myriad requirements associated with utilities including ENO, which is the sole provider of electric service in Orleans Parish. As with AAE’s proposal that the Council consider CCA, the shift to allow alternative suppliers to sell electricity (renewable or otherwise) to customers exclusively served by ENO would be a profound change to the regulatory construct, would necessarily involve many of the same issues that allowing CCA would involve and likely take years to fully sort through.

Finally, AAE attached a piece of testimony from the ENO 2018 Combined Rate Case proceeding as Appendix A to its comments with a statement that the testimony, “elucidates a variety of reasons why the Council should approach the adoption of a green tariff with caution.”⁴ This statement included no citation to a particular portion of the Appendix, so it is not clear what elucidated reasons AAE intended to note. In fact, the term “green tariff” does not actually appear anywhere in the 60+ pages, so it is unclear why the Appendix was included at all. It is important to note that ENO’s 2018 Combined Rate Case included a proposed green pricing option that was suggested by the Council and eventually approved in late 2019. That green pricing option (today branded as “Entergy Green Select”) is in place and has customers taking service under it.⁵ As ENO made clear in its initial comments, it has not yet proposed a green tariff, but is very open to exploring that possibility with the Council and stakeholders, including AAE.

³ Chapter 158.

⁴ AAE Comments, at p. 5.

⁵ See <https://renew.entergy.com/new-orleans>.

To reiterate the Company's initial comments, ENO looks forward to discussing possible structures including Green Tariffs, a large volume purchasing option for Entergy Green Select, and other customized agreements with parties at the appropriate time in this proceeding.

Respectfully submitted,

By:

A handwritten signature in blue ink, appearing to read "Heathwood", is written over a horizontal line.

CERTIFICATE OF SERVICE

Docket No. UD-22-02

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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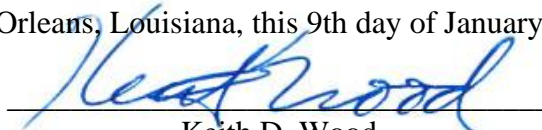
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New Orleans, Louisiana, this 9th day of January, 2023.


Keith D. Wood