

**Final comments of Together New Orleans in System Resilience and Storm Hardening
Docket No. UD-21-03**

July 21, 2023

By Electronic Mail

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

Re: SYSTEM RESILIENCE AND STORM HARDENING, DOCKET NO. UD-21-03

Dear Ms. Johnson:

Attached please find the Final Comments of Together New Orleans (“TNO”) for filing in Council Docket No. UD-21-03, submitted pursuant to City Council Resolution No. R-23-74 issued by the New Orleans City Council.

TNO is submitting this filing electronically and will submit printed copies as you request.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Broderick A Bagert, Jr.
Organizer
Together New Orleans

CC: Official Service List (UD 21-03)

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

**In Re: FINAL COMMENTS REGARDING SYSTEM) DOCKET NO. UD-21-03
RESILIENCE AND STORM HARDENING)**

FINAL COMMENTS OF TOGETHER NEW ORLEANS

Together New Orleans (“TNO”), pursuant to New Orleans City Council Resolution No. R-23-74, respectfully submits its Final Comments in response to the grid hardening and system resilience proposals. TNO appreciates the opportunity to participate in this deliberative process to address what TNO believes is one of the most important challenges facing our community.

TNO final comments consist of eight observations on the challenge we face and its proposed contribution to help address that challenge.

#1) Long-duration power outages represent a major threat to the residents, the economy and the social fabric of the New Orleans community. Fueled by climate change, exacerbated by prior underinvestment, rendered deadlier by new extremes of heat and cold, outages are now the leading cause of death from disaster in New Orleans and across the Gulf Coast. Long-duration outages cost untold trauma among families and uncounted millions in economic damages, when they occur. And they will occur.

#2) It is not a responsible or viable option, in the face of this threat, to do nothing or take only cosmetic steps.

#3) Action to address the threat of outages should include investments in grid hardening, to make outages less likely to occur, and in grid resilience, to make outages less deadly and disruptive when they do occur. ENO and TNO’s proposal, respectively, address those two objectives of

reliability and resilience, without duplication or overlap. Components of both proposals should be approved.

#4) New Orleans residents face one of the highest energy cost burdens in the nation, and Council must also prioritize affordability in its actions. This inevitably will mean trade-offs. Any aspects of proposals, including TNO's own, found to have a low benefit to ratepayers, found to duplicate already-funded responsibilities or found to serve private more than public interests cannot be afforded and should not be funded. Proposals that make our community safer in important ways, create significant value for ratepayers and leverage external funding should be prioritized and funded.

#5) Two recent developments in federal energy policy, the Infrastructure Bill and Inflation Reduction Act, create a new opportunity for local utility systems to attract federal funding by providing a local match for federal funding programs that require it. The Infrastructure Bill, especially its Grid Resilience components, create opportunities for federal funding worth hundreds of millions of dollars in potential subsidies for precisely the sorts of projects under consideration in this Docket. The Inflation Reduction Act, similarly, includes provisions under which the Federal government will cover 30% to 50% of the project costs of resilience investments that rely on renewable generation, such as solar + storage resilience hubs. Both of these opportunities require a local match or "cost share." New Orleans should use utility system funding to attract and leverage this federal funding by helping to provide that local match.

#6) TNO's Community Lighthouse proposal, to build eighty-six solar + storage resilience hubs serving every neighborhood in New Orleans, prioritizing the most vulnerable communities, will be funded predominantly from funds raised independently by TNO. Sixty-eight percent of the project's total costs will come from sources other than utility system funds. Council should

approve TNO's proposal to take advantage of this unparalleled opportunity for leveraging system resources.

#7) TNO's Community Lighthouse proposal will bring significant value to the grid as an energy resource. Its network of distributed solar and battery storage powering the resilience hubs can function as a demand response asset, discharging behind the meter to reduce customer load during peak load periods; as a resource adequacy asset in MISO's capacity market via FERC 2222; as a frequency regulation asset; a voltage regulation asset; a congestion relief asset and as a source of carbon free renewable energy, displacing more carbon intensive fuel sources. The value these resources bring to the grid strengthen the value of approving the Community Lighthouse proposal.

#8) Any project that includes public funding, including TNO's proposal, should embrace the highest standards of transparency and public accountability. TNO supports Council adopting formal performance metrics to track performance and endorses regular public reporting, preferably including a public-facing, real-time dashboard. TNO further endorses measures to assure resilience hubs serve the public.

CONCLUSION

TNO appreciates the opportunity to provide these further comments in support of its proposal and looks forward to taking this extraordinary enterprise of collaboration and analysis to fruition and implementation.

CERTIFICATE OF SERVICE

UD-21-03

I hereby certify that a copy of the foregoing TNO Responses to Alliance For Affordable Energy's First Set of Data Requests has been served upon "The Official Service List" via electronic mail and/or U.S. Mail, postage properly affixed, this 21st day of July 2023.

Lora W. Johnson, lwjohnson@nola.gov Clerk of Council

City Hall - Room 1E09

1300 Perdido Street

New Orleans, LA 70112

Tel: (504) 658-1085

Fax: (504) 658-1140

Service of Discovery not required

Erin Spears, espears@nola.gov

Chief of Staff, Council Utilities Regulatory Office

Bobbie Mason, bfmason1@nola.gov

Christopher Roberts, cwroberts@nola.gov

Byron Minor, Byron.minor@nola.gov

Shannon A. Oldfield-Blanks,

Shannon.Oldfield-Blanks@nola.gov

City Hall - Room 6E07

1300 Perdido Street

New Orleans, LA 70112

Tel: (504) 658-1110

Fax: (504) 658-1117

Krystal D. Hendon, CM Morrell Chief-of Staff, Krystal.hendon@nola.gov

1300 Perdido St. Rm. 2W50

New Orleans, LA. 70112

Andrew Tuozzolo, CM Moreno Chief-of Staff, avtuozzolo@nola.gov

1300 Perdido St. Rm. 2W40

New Orleans, LA. 70112

Paul Harang, 504-658-1101 / (504) 250- 6837, Paul.harang@nola.gov

Interim Chief of Staff

City Hall - Room 1E06

1300 Perdido Street

New Orleans, LA 70112

Donesia D. Turner,

Donesia.Turner@nola.gov

Ashley Spears, Ashley.Spears@nola.gov

Law Department

City Hall - 5th Floor

New Orleans, LA 70112

Tel: (504) 658-9800

Fax: (504) 658-9869

Service of Discovery not required

Norman White, Norman.White@nola.gov

Department of Finance

City Hall - Room 3E06

1300 Perdido Street

New Orleans, LA 70112

Tel: (504) 658-1502

Fax: (504) 658-1705

Greg Nichols, grnichols@nola.gov

Deputy Chief Resilience Officer Office of Resilience & Sustainability

1300 Perdido Street, Suite 8E08 New Orleans, LA 70112

Tel: 504-658-4958

Cell: 504-253-1626

ADMINISTRATIVE HEARING OFFICER

Hon. Jeffrey S. Gulin,

judgegulin@gmail.com

3203 Bridle Ridge Lane

Lutherville, MD 2109

Tel: (410) 627-5357

CITY COUNCIL CONSULTANTS and SUPPORT STAFF

Clinton A. Vince,

clinton.vince@dentons.com

Presley Reed, presley.reedjr@dentons.com

Emma F. Hand, emma.hand@dentons.com

Adriana Velez-Leon, adriana.velez_leon@dentons.com

Dee McGill, dee.mcgill@dentons.com Denton Law Firm,

1900 K Street NW

Washington, DC 20006

Tel: (202) 408-6400

Fax: (202) 408-6399

Basile J. Uddo (504) 583-8604 cell, buddo@earthlink.net

J. A. "Jay Beatmann, Jr. (504) 256-6142 Office, (504) 524-5446 jay.beatmann@dentons.com

c/o DENTONS US LLP

650 Poydras Street

Suite 2850

New Orleans, LA 70130

Joseph W. Rogers, jrogers@legendcgl.com

Victor M. Prep, vprep@legendcgl.com

Byron S. Watson, bwatson@legendcgl.com

Legend Consulting Group

6041 South Syracuse Way, Suite 105 Greenwood Village, CO 80111

Tel: (303) 843-0351

Fax: (303) 843-0529

ENTERGY NEW ORLEANS, LLC

Courtney R. Nicholson (504) 670- 3680, cnicho2@entergy.com

Entergy New Orleans, LLC

Vice-President, Regulatory and Public Affairs

Polly Rosemond, prosemo@entergy.com

Kevin T. Boleware, (504) 670- 3673, kbolewa@entergy.com

Brittany Dennis, bdenni1@entergy.com

Keith Wood, (504) 670-3633, kwood@entergy.com

Derek Mills, (504) 670- 3527, dmills3@entergy.com

Ross Thevenot, (504) 670-3556, rtheven@entergy.com

1600 Perdido Street, L-MAG 505B New Orleans, LA 70112

Vincent Avocato, (281) 297-

3508, yavocat@entergy.com

Entergy New Orleans, LLC

2107 Research Forest Drive, T-LFN-4 The Woodlands, TX 77380

Brian L. Guillot, (504) 576-

6523, bguill1@entergy.com

Leslie M. LaCoste (504) 576-

4102, llacost@entergy.com

Lacresha D. Wilkerson, (504) 576- 6571, lwilke1@entergy.com

Ed Wicker, (504) 576-3101, ewicker@entergy.com

Linda Prisuta, (504) 576-4137, lprisut@entergy.com

Entergy Services, LLC

Mail Unit L-ENT-26E

639 Loyola Avenue

New Orleans, LA 70113

Fax: 504-576-5579

Joe Romano, III (504) 576-4764, jroman1@entergy.com

Tim Rapier, (504) 576-4740, trapier@entergy.com

Farah Webre, (504) 576-6038, fwebre@entergy.com

Entergy Services, LLC

Mail Unit L-ENT-3K

639 Loyola Avenue

New Orleans, LA 70113

Fax: (504) 576-6029

INTERVENORS

AIR PRODUCTS AND CHEMICALS, INC.

Randy Young, randy.young@keanmiller.com; katherine.king@keanmiller.com

Kean Miller, LLP
400 Convention St. Suite 700
Baton Rouge, LA. 70821
Or
P.O. Box 3513
Baton Rouge, LA 70821-3513
Tel: (225) 387-0999
Fax: (225) 388-9133

Carrie R. Tournillon,
carrie.tournillon@keanmiller.com
Kean Miller, LLP
900 Poydras St., Suite 3600
New Orleans, LA 70112

Maurice Brubaker,
mbrubaker@consultbai.com
Brubaker & Associates, Inc.
16690 Swigly Ridge Rd., Suite 140
Chesterfield, MO 63017
Or
P.O. Box 412000
Chesterfield, MO. 63141-2000

ALLIANCE FOR AFFORDABLE ENERGY

Jesse George, Jesse@all4energy.org **Logan Atkinson Burke,**
Logan@all4energy.org
Sophie Zaken, Regulatory@all4energy.org 4505 S. Claiborne Ave.
New Orleans, LA. 70125
Tel: (504) 208-9761

SEWERAGE AND WATER BOARD OF NEW ORLEANS

Yolanda Y. Grinstead, Esq.,
ygrinstead@swbno.org

Theron Levi., tlevi@swbno.org
Sewerage and Water Board
New Orleans – Legal Dept.
625 St. Joseph Street, Room 201
New Orleans, Louisiana 70165

GREATER NEW ORLEANS INTERFAITH CLIMATE COALITION, INC (“GNOICC”)

Pastor Gregory Manning,
gmanning1973@yahoo.com

President, Board of Directors of GNOICC 2021 S. Dupre Street
New Orleans, Louisiana 70125
Tel: (913) 940-5713

Jonathan Sebastian Leo,

Jonathan.s.leo@gmail.com

Member, Board of Directors, GNOICC 10942 Neale Fraser Drive
Baton Rouge, Louisiana 70810
Tel: (423) 763-8808

BUILDING SCIENCE INNOVATORS

Myron Katz, PhD,

Myron.Bernard.Katz@gmail.com 302 Walnut Street

New Orleans, Louisiana 70118
Tel: (504) 343-1243

PRORATE ENERGY, INC

Myron Katz, PhD,

Myron.Bernard.Katz@gmail.com 302 Walnut Street

New Orleans, Louisiana 70118 Tel: (504) 343-1243

TOGETHER NEW ORLEANS

Broderick Bagert,

broderick@togethernola.org

2721 S. Broad Street
New Orleans, Louisiana 70125 Tel: (225) 803-5876

Abel Thompson, abel@togethernola.org

2721 S. Broad Street
New Orleans, Louisiana 70125
Tel: (225) 978-1667

Pierre Moses, pmoses@127energy.com 2721 S. Broad Street

New Orleans, Louisiana 70125
Tel: (504) 669-8552

Cynthia Coleman, cynthia@togetherla.org 2721 S. Broad Street

New Orleans, Louisiana, 70125
Tel: (504) 421-2994

New Orleans, Louisiana, this 21st day of July, 2023



Broderick Bagert, Jr.