



March 10, 2025

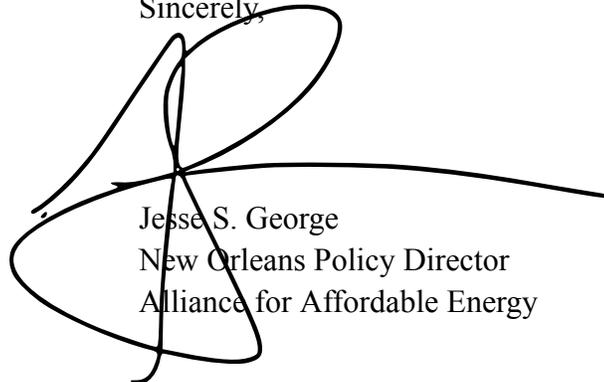
Via Electronic Mail  
Clerk of Council  
Room 1E09, City Hall  
1300 Perdido Street  
New Orleans, LA 70112

RE: 2024 TRIENNIAL INTEGRATED RESOURCE PLAN OF ENTERGY NEW ORLEANS,  
LLC (UD-23-01)

Dear Clerk,

Please find the attached Joint Comments of the Alliance for Affordable Energy and the Office of Resilience & Sustainability for filing under the docket referenced above. We will submit physical copies at your instruction. If you have any questions, please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely,



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

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

**In Re: 2024 TRIENNIAL INTEGRATED  
RESOURCE PLAN OF ENTERGY  
NEW ORLEANS, LLC**

**DOCKET NO. UD-23-01**

**MARCH 10, 2025**

**JOINT COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY AND THE  
OFFICE OF RESILIENCE & SUSTAINABILITY**

**I. INTRODUCTION**

On December 13, 2024, Entergy New Orleans, LLC (“Entergy” or “ENO”) filed with the Council of the City of New Orleans (“the Council”) its 2024 Integrated Resource Plan (“the IRP” or “the Plan”). The Alliance for Affordable Energy (“the Alliance”) hereby submits the following comments in response to Entergy’s filing:

**II. IRP MODELING INDICATES THAT ENO’S COMPLIANCE WITH THE  
RENEWABLE AND CLEAN PORTFOLIO STANDARD IS THE LEAST-COST  
OPTION FOR ELECTRIC GENERATION AND THE COUNCIL SHOULD  
CONSIDER STRENGTHENING THE POLICY**

As the cost of solar and wind energy and battery storage continue to decrease, ENO’s modeling indicates that its compliance with the city’s Renewable and Clean Portfolio Standard is the least-cost option for generation planning.

The table below, taken from ENO’s Presentation for Public Meeting #2 (with highlight added), illustrates that under all three planning scenarios, the RCPS compliance strategy produced the lowest total relevant supply costs.

## Total Relevant Supply Costs

	Scenario 1	Scenario 2	Scenario 3
Strategy 1/Scenario 1 (Least Cost Planning)	\$1,227	\$1,552	\$1,951
Strategy 1/Scenario 1 (Manual Portfolio 1b)	\$1,207	\$1,232	\$1,645
Strategy 2/Scenario 1 (But For RCPS)	\$1,347	\$1,703	\$2,034
Strategy 4/Scenario 2 (Stakeholder Strategy)	\$1,793	\$2,175	\$2,362
Strategy 3/Scenario 3 (RCPS Compliance)	\$988	\$1,316	\$808

**Note:** Shading indicates Scenario under which portfolio was originally optimized/developed.

As the Alliance has advocated since the Council first adopted the RCPS, the policy could be strengthened by the inclusion of a carveout of 10% for locally-generated renewable energy, which would help to spur the deployment of distributed generation and community solar, create a thriving local labor force in renewable energy services, improve local air quality, and reduce greenhouse gas emissions. Additionally, the Council should assert its regulatory authority to end ENO’s stonewalling implementation of consolidated billing under docket UD-18-03 pertaining to community solar, which it has opposed on the basis that consolidated billing would make community solar too successful.

### **III. THE COUNCIL MUST REQUIRE ROBUST DEMAND-SIDE MANAGEMENT PROGRAMMING THAT GIVES PROVIDERS THE CERTAINTY NECESSARY TO SUSTAIN SERVICES**

The Council must require robust demand-side management (“DSM”) options, including expanding access to residential and commercial battery storage and accelerating neighborhood-targeted programming. Crucially, the Council must create an environment where demand-side management services and providers can thrive, by approving programming with sufficient lead times to guarantee completion of projects. Cost-effective DSM saves money for ratepayers in the short-term by helping them manage their energy costs, and in the long-term by

avoiding unnecessary capital investments in distribution, transmission, and generation. For DSM to be successful the Council must send a clear signal to the utility and to local service providers that it is committed to robust and ongoing DSM programming. To this end, we urge Entergy to take steps to file a three year implementation plan for such DSM programs that is in line with Council's historic policies to ramp up energy and demand savings that reach all New Orleanians. We hope a strong implementation plan filed in June can set a path for Council action in time for a full three years of programming to launch in January 2026.

To strengthen DSM services in New Orleans, the Council should:

1. Establish performance metrics for ENO requiring 15% of total portfolio savings to benefit income-qualified ("IQ") customers;
2. Establish new data collection and reporting protocols to ensure that program benefits are being targeted to and impacting those most in need, including the adoption of a citywide benchmarking ordinance for large commercial buildings;
3. Require ENO to develop and implement program enhancements for low-to-moderate income ("LMI") customer programs that leverage what remains of the historic opportunity provided by the Inflation Reduction Act ("IRA") rebates and tax credits to further benefit LMI households while maximizing federal IRA EE spending in New Orleans, and;
4. Implement a Demand-Side Management ("DSM") Working Group.

Additionally, as it has done in past IRP cycles, in future cycles the Council should commission its own demand-side management potential study to provide a contrast to ENO's and help to identify additional opportunities for energy savings.

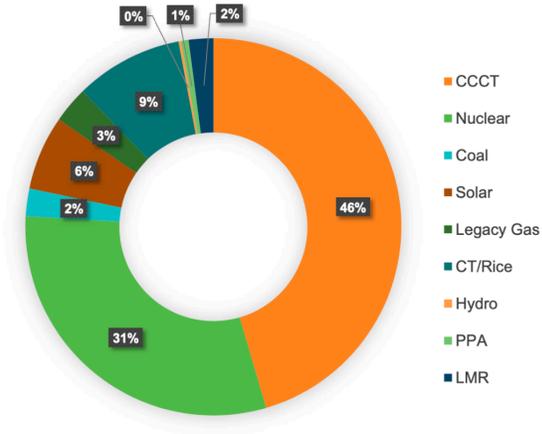
#### **IV. THE COUNCIL MUST DIRECT ENO TO SHIFT RAPIDLY AWAY FROM FOSSIL GAS GENERATION**

Though the graph below, taken from ENO's Presentation for Public Meeting #2, does not make it plain, it illustrates that ENO relies on fossil gas for approximately 58% of its generating capacity.. "CCCT" ("CCCT" is an acronym for "Combined Cycle Combustion Turbine") and

“CT-RICE” (“CT” is an acronym for “Combustion Turbine; “RICE” is an acronym for “Reciprocating Internal Combustion Engine”-- an inefficient form of gas-fired generation) are not fuel types--they are generation types that burn fossil methane gas.

## Existing Fleet Capability

Fuel Type	Summer Rating MW
CCCT	632.9
Nuclear	423.1
Coal	32.9
Solar	88.9
Legacy Gas	43.0
CT/Rice	129.1
Hydro	3.3
PPA	8.8
LMR	29.4
<b>Total</b>	<b>1391.4</b>



While the obscuring of this point is a major flaw in a presentation intended purportedly to increase public understanding of utility planning, ENO’s continuing dependence on fossil gas generation is an even greater detriment to ratepayers. Because ENO’s fuel costs are a direct passthrough to ratepayers, it is ratepayers who bear the effects of the volatility of gas markets and will continue to bear the burden of a consistent upward trend in fossil gas prices driven by dwindling supply and increased demand for exports.

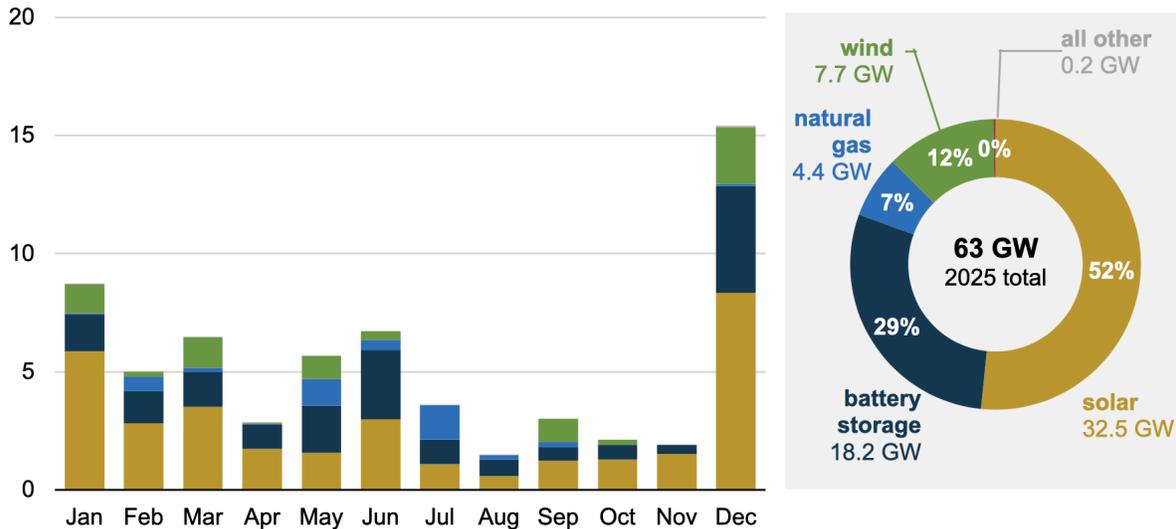
Indeed, as the Energy Information Administration reported on February 24, 2025<sup>1</sup>, solar energy projects dominate the field of planned utility-scale generating capacity additions for 2025 at 52%, with battery storage in second place at 29%, because increasingly utilities are recognizing the cost-effectiveness, flexibility, and environmental benefits of these resources, and the Council should require a plan from ENO that comports with evolving industry standards.

<sup>1</sup> <https://www.eia.gov/todayinenergy/detail.php?id=64586>

FEBRUARY 24, 2025

## Solar, battery storage to lead new U.S. generating capacity additions in 2025

**U.S. planned utility-scale electric-generating capacity additions (2025)**  
gigawatts (GW)



Data source: U.S. Energy Information Administration, *Preliminary Monthly Electric Generator Inventory*, December 2024

### V. THE COUNCIL SHOULD BE WARY OF ENO'S CLAIMS ABOUT HYDROGEN GENERATION AND CO-FIRING

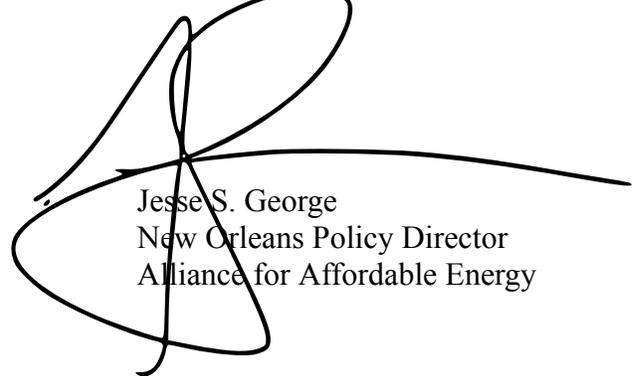
ENO's modeling exhibits an optimistic outlook for hydrogen co-firing and even 100% hydrogen generation. However, ENO provides no data on hydrogen fuel costs or sources. Both costs and the environmental and climate benefits of hydrogen vary greatly between different sources, e.g. "blue" versus "green" hydrogen. Instead of providing any hydrogen-specific assumptions or cost-adders to acknowledge the additional expense, ENO simply substitutes its assumptions for Henry Hub gas costs, likely obscuring the actual Total Relevant Supply Costs for portfolios that include generation with hydrogen co-firing. Again, because fuel costs are a passthrough to ratepayers, this is of little concern to ENO, but it matters a great deal to ratepayers. The Council should be wary of attempts by ENO to pursue construction of new fossil

gas-fired power plants with the promise of hydrogen co-firing when more affordable options for ratepayers exist, including solar, battery storage, and wind energy.<sup>2</sup>

## VI. CONCLUSION

The Council must exercise its power to ensure that this IRP process produces results in line with the Council's goals for climate changing emissions and resilience, and which address the crisis of utility affordability in New Orleans. We thank you for your consideration, and we look forward to continuing engagement in this process.

Submitted respectfully,

A large, stylized handwritten signature in black ink, appearing to be 'Jesse S. George', is written over the typed name and title.

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

*Greg Nichols*

Greg Nichols  
Deputy Chief Resilience Officer  
Office of Resilience & Sustainability  
City of New Orleans

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<sup>2</sup> <https://energyinnovation.org/wp-content/uploads/2022/03/Assessing-the-Viability-of-Hydrogen-Proposals.pdf>

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

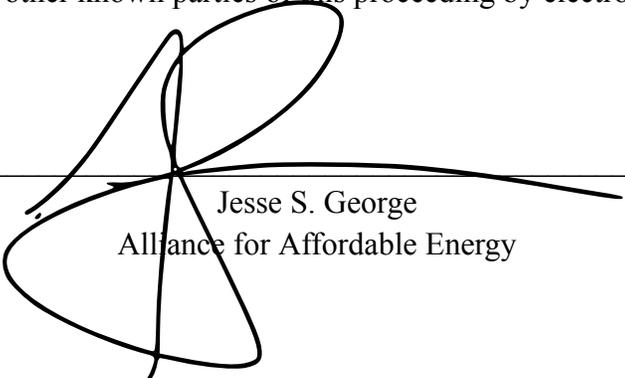
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RESOURCE PLAN OF ENTERGY  
NEW ORLEANS, LLC**

**DOCKET NO. UD-23-01**

**MARCH 10, 2025**

**CERTIFICATE OF SERVICE**

I do hereby certify that I have, this 10th day of March 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

  
\_\_\_\_\_  
Jesse S. George  
Alliance for Affordable Energy

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