

April 28, 2025

**Via Electronic Delivery**

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

Re: **In Re: 2024 Triennial Integrated Resource Plan of Entergy New Orleans, LLC**  
**Docket No. UD-23-01**

Dear Clerk of Council:

Entergy New Orleans, LLC (“ENO” or “the Company”) respectfully submits Reply Comments in compliance with the requirements of Resolution No. R-23-254 (“Resolution”) which was adopted by the Council of the City of New Orleans (the “Council”) on June 8, 2023 for filing in the above-referenced docket.

ENO submits this filing electronically and will submit the requisite original and 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 matter, please do not hesitate to contact me.

Sincerely,



Lacresha Wilkerson

LDW/rh

Enclosures

cc: Official Service List (Public Version *via email*)

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

<b>In Re: 2024 TRIENNIAL</b>	)	
<b>INTEGRATED RESOURCE PLAN OF</b>	)	
<b>ENERGY NEW ORLEANS, LLC</b>	)	<b>DOCKET NO. UD-23-01</b>
	)	
	)	

**ENERGY NEW ORLEANS, LLC’S RESPONSE TO COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY AND THE OFFICE OF RESILIENCE & SUSTAINABILITY REGARDING ENO’S 2024 INTEGRATED RESOURCE PLAN**

Energy New Orleans, LLC (“ENO” or “the Company”) respectfully submits Reply Comments in compliance with the requirements of Resolution No. R-23-254 (“Resolution”) which was adopted by the Council of the City of New Orleans (the “Council”) on June 8, 2023.

**INTRODUCTION**

The Alliance for Affordable Energy and City Office of Resilience & Sustainability (“AAE/ORS”) jointly filed the only set of Intervenor Comments regarding the 2024 Integrated Resource Plan (“2024 IRP”) (“Joint Comments”). ENO appreciates the opportunity to provide these Reply Comments to points raised regarding the Total Relevant Supply Cost Analysis, Energy Smart implementation, and Hydrogen co-firing.

**RESPONSE TO INTERVENOR COMMENTS**

**I. Total Relevant Supply Cost of RCPS Compliance Portfolio**

In Section II of the Joint Comments, AAE/ORS states erroneously that, “under all three planning scenarios, the RCPS compliance strategy produced the lowest total relevant supply

costs.”<sup>1</sup> In fact, as shown on the table included in the Joint Comments, the designated RCPS Compliance portfolio created under the combination of Strategy 3 and Scenario 3 typically has the lowest Total Relevant Supply Cost (“TRSC”) – except in Planning Scenario 2, where it is the second lowest after the Manual Portfolio 1b.

As discussed in the IRP Report, the key conclusion from the TRSC analysis is that the costs and rankings of the portfolios depend heavily on the underlying assumptions used in their development. The RCPS Compliance portfolio was optimized under Scenario 3, the Stakeholder Scenario, which assumed high load growth, sustained high gas and CO<sub>2</sub> prices, and early MISO market thermal deactivations. This portfolio was constrained to exclude non-RCPS compliant resources and was the only downselected one developed using High load forecast sensitivity, which supported the selection of larger quantities of renewable resources.

If the Scenario 3 assumptions prove inaccurate, ENO customers would be exposed to considerable energy market price risk with this portfolio, especially since the reserve margin targets are exceeded by 57%. This risk is further detailed in the Stochastic Assessment of Risks in in Section 3.7 of the 2024 IRP Report. Additionally, the Strategy 3/Scenario 3 portfolio has the largest TRSC distribution and is highly sensitive to extreme gas and CO<sub>2</sub> prices. While its base TRSC is the lowest among the downselected portfolios (i.e., the TRSC calculated under the Scenario for which it was originally optimized), when stochastic price curves based on historical gas prices are applied, it has the second-highest TRSC due to reduced energy revenue from lower Locational Marginal Prices (LMPs).

These results highlight that the optimal resource mix for ENO will ultimately depend on capacity needs, market forces, and regulatory conditions at the time of implementation. It is not

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<sup>1</sup> Joint Comments, at p. 2.

appropriate for AAE/ORS to selectively cite two TRSC values to suggest they support a modification to the Council's RCPS policy.

## **II. Energy Smart Implementation Plan**

AAE/ORS makes several suggestions regarding the Energy Smart Program Year 16-18 Implementation Plan that is due to be filed by June 16 in this Docket.<sup>2</sup>

### **a. Require 15% of total portfolio savings to benefit income-qualified customers**

AAE/ORS suggest that 15% of total portfolio savings be dedicated to programs specifically designed for income-qualified customers, a request that was initially raised in Docket UD-22-04. One of the outcomes of that docket was for ENO to revise its Program Year ("PY") 15 implementation plan to recognize the suggestions that had been made during those proceedings. ENO's Revised PY15 Implementation Plan was filed in Docket UD-20-02 on April 5, 2024, and was approved by Resolution R-24-570 on October 10, 2024, includes income-qualified programs representing approximately 18.5% of the kWh savings goal, not including income-qualified participants in the Behavioral and Schoolkits Programs.<sup>3</sup> ENO expects the PY16-18 plan to include similar levels of savings for income-qualified participants.

### **b. Establish new data collection and reporting protocols**

AAE/ORS suggests establishing new data collection and reporting protocols for program benefits. Regarding data collection, the Energy Smart team has already begun including many of the data collection suggestions from Docket UD-22-04, such as tracking projects by zip code and

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<sup>2</sup> See, Joint Comments, p. 4.

<sup>3</sup> Income-qualified participants are not tracked as discrete groups in these two programs. However, since some number of the participants are income-qualified, the actual percentage of savings going to projected income-qualified participants is likely higher than 18.5%.

census tract, as well as deferrals, which presumably address the need suggested by AAE/ORS. ENO is also in the testing stages of an automated process that will provide aggregated whole-building data to building owners upon request through Portfolio Manager, the EPA's whole building benchmarking software. ENO expects these protocols to be included in the PY16-18 plan.

**c. Implement program enhancements that leverage Inflation Reduction Act (“IRA”) rebates and tax credits**

ENO supports the Energy Smart program working in coordination with entities that manage the distribution of Inflation Reduction Act (“IRA”) funding. ENO has been in regular contact with various state and local entities that have been tasked with implementing the IRA Home Energy Rebate program in order to foster a relationship in which Energy Smart funds and IRA funds are used in concert to provide maximum benefit to ENO customers. While continued availability of IRA funding is uncertain, ENO would expect to coordinate with appropriate parties to pursue funding to the extent available to support PY16-18 implementation.

**d. Implement a Demand-Side Management (“DSM”) Working Group**

In Reply Comments in Docket UD-22-04, ENO stated that it, “supports the creation of a DSM Working Group to the extent that the DSM Working Group’s efforts do not inhibit or in any way become a hindrance to implementation of the program.”<sup>4</sup> ENO recommended that if the Council creates a DSM Working Group, it should meet semi-annually. However, there is already significant interaction and coordination among the Council and its Advisors, ENO, and other stakeholders through existing processes such as IRP comments and meetings, semiannual

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<sup>4</sup> Entergy New Orleans, LLC’s Reply Comments, UD-22-04, January 12, 2023.

Technical Resource Manual update meetings, and DER docket (UD-22-04 and UD-24-02), so the value of a working group is unclear.

### **III. Hydrogen Co-Firing**

The Joint Comments misrepresent ENO's IRP language and previous public presentations regarding hydrogen utilization in power generation. AAE/ORS suggests that "ENO's modeling exhibits an optimistic outlook for hydrogen co-firing and even 100% hydrogen generation." As discussed in the IRP report, ENO did not model hydrogen utilization in the production cost models or capacity expansion models. Rather, the technology assessment discussion notes the current state of turbine technology and notes the items that need to be addressed to achieve the potential for higher utilization percentages.<sup>5</sup> Further, ENO's Technical Meeting #2 presentation also discussed the Company's near-term approach and the long-term challenges for large scale consumption of hydrogen in the power generation space.<sup>6</sup> ENO sees hydrogen as a potential decarbonization pathway but has been clear about the current market state and the signposts it is monitoring for possible future use.

### **IV. CONCLUSION**

ENO's 2024 IRP Report has numerous ongoing and planned activities that align with and support the Council's goals and initiatives. These include near-term implementations such as filing the Energy Smart Program Year 16-18 Implementation Plan for 2026-2028, which includes income-qualified programs representing approximately 18.5% of the kWh savings goal, as well as the RCPS Compliance Plan for 2026-2028, identifying and pursuing available sources of federal

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<sup>5</sup> See, 2024 IRP Report at pp. 40-41.

<sup>6</sup> See, Technical Meeting #2 Presentation, slide 23.

funding in connection with infrastructure projects, and the system resiliency and storm hardening plan.

ENO appreciates the opportunity to file these Reply Comments and the continued, collaborative efforts of the Council, its Advisors, Intervenors, and other stakeholders that resulted in this 2024 IRP Report.

Respectfully submitted,

By:



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**ATTORNEYS FOR  
ENERGY NEW ORLEANS, LLC**

**CERTIFICATE OF SERVICE**  
**UD-23-01**

I hereby certify that I have served the required number of copies of the foregoing pleading upon all other known parties of this proceeding individually and/or through their attorney of record or other duly designated individual.

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New Orleans, Louisiana, this 28<sup>th</sup> day of April 2025



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