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September 12, 2025

VIA ELECTRONIC MAIL

Clerk of Council
Clerkofcouncil@la.gov
City Hall - Room 1E09
1300 Perdido Street
New Orleans, LA 70112

Re: Entergy New Orleans, LLC’s Reply Comments Regarding the Energy Smart Program Years 16 – 18 Implementation Plan (CNO Docket No. UD-23-01; Resolution R-25-406)

Dear Clerk of Council:

Attached please find Entergy New Orleans, LLC’s (“ENO”) Reply Comments Regarding the Energy Smart Program Years 16-18 Implementation Plan pursuant to Resolution No. R-25-406 issued by the Council of the City of New Orleans (“Council”) 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.

Thank you for your assistance in this matter, and please let me know if you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads 'Leslie LaCoste'.

Leslie M. LaCoste

LML/rjh

Enclosures

cc: Official Service List UD-23-01 (*via electronic mail*)

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

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

**ENERGY NEW ORLEANS, LLC’S RESPONSE TO COMMENTS OF THE
ALLIANCE FOR AFFORDABLE ENERGY REGARDING THE ENERGY SMART
PROGRAM YEAR 16-18 IMPLEMENTATION PLAN**

Energy New Orleans, LLC (“ENO” or “the Company”) respectfully submits Reply Comments in compliance with the requirements of Resolution No. R-25-406 (“Resolution”) which was adopted by the Council of the City of New Orleans (the “Council”) on July 24, 2025. The Alliance for Affordable Energy (the “Alliance”) filed the only set of Intervenor Comments regarding the Energy Smart Program Year 16-18 Implementation Plan (the “Plan”). ENO appreciates the opportunity to provide these Reply Comments.

BACKGROUND

On June 16, 2025, ENO submitted the Plan for review and approval by the Council. The Council subsequently approved the Resolution setting forth a procedural schedule that allowed for comments on the Plan to be submitted by August 26, 2025, and for Reply Comments to be submitted by September 12, 2025. Per the Resolution, the Alliance submitted comments on the Plan, and ENO now responds to those comments.

RESPONSE TO INTERVENOR COMMENTS

I. Scenario Selection

In its comments, the Alliance recommends that “the Council select and approve the 2% energy savings scenario for the PY16 to PY18 program cycle.”¹ Further, the Alliance asserts, “the 2% scenario is more cost-effective than the Reduced Savings scenario using both the societal and WACC discount rates, provides greater aggregate benefits to customers, and will provide greater opportunities for customers to manage unaffordable energy bills.”² While this assertion is valid, the Alliance neglects to mention that the 2% scenario comes at a significantly higher cost. Over the three-year period, the Reduced Savings scenario saves over \$20 million in program costs compared to the 2% scenario, while still garnering nearly 280 million kWh in energy savings and addressing Council priorities such as increased focus on programs for low-income customers and demand response. The projected kWh savings in PY18 under the Reduced Savings scenario is still 1.7% of total annual sales, a target that is significantly higher than most states in the region.

II. Approval of Proposed Programs

Regarding approval of the proposed Energy Smart programs, the Alliance recommends that the Council approve all of the programs proposed by ENO for all years of the PY16-PY18 plan with adjustments, as noted below followed by ENO’s responses.

¹ Comments of the Alliance for Affordable Energy on the Advisors’ Report Regarding the Entergy New Orleans, LLC 2024 Integrated Resource Plan and Entergy New Orleans, LLC’s Application for Approval of the Implementation Plan for Program Years 16 Through 18 of the Energy Smart Program at pg. 6, Docket No. UD-23-01, August 26, 2025.

² *Id.*

a. The Alliance proposes that the Council reject the Company’s proposed Battery Storage Pilot program pending its determinations in Docket No. UD-24-02.

ENO recommends approving the proposed Battery Energy Storage System (“BESS”) Pilot program under Energy Smart. The proposed BESS program is a continuation of the pilot program that has been part of the Energy Smart program for three years. During those three years, ENO has learned about running battery energy storage system programs that will prove invaluable as the program continues to grow. The current phase of the BESS program has 121 participants; ENO estimates that number represents approximately 30% of the population that owns batteries in the New Orleans area. The proposed program is a natural progression that adds upfront incentives for the purchase of batteries to the incentives for ongoing participation as a demand response resource. ENO has discussed potentially growing the BESS pilot to a third phase for several years, dating back to its *Report Regarding Phase One of the Battery Storage Demand Response Pilot Program and Application for Approval of Phase Two*³. ENO stated, “[b]ased on the experience from Phase One and feedback from EnergyHub described above, the Company anticipates that upfront utility incentives may be necessary to spur broader adoption of battery systems among residential customers (including low-to-moderate (“LMI”) customers) and small commercial customers.”⁴ Additionally, “[t]he Company will further consider ways to expand the BESS program to multi-family and LMI housing customers in a subsequent Phase Three.”⁵ ENO believes that the time is ripe to begin Phase Three in PY16, appropriately under the Energy Smart umbrella. Further, ENO believes that removing the BESS program approval from the consideration of Energy Smart as a whole could lead to delays in program approval which could

³ *Report Regarding Phase One of the Battery Storage Demand Response Pilot Program and Application for Approval of Phase Two*, Docket No. UD-22-03, December 1, 2023.

⁴ *Id.* at pg. 8

⁵ *Id.*

cause delays in program implementation in 2026.

Since ENO filed its Plan on June 16, 2025, federal legislative changes that will likely affect participation in the BESS program have been approved. The sunset provisions for federal tax credits for solar photovoltaic (“PV”) systems contained in the Big Beautiful Bill are expected to substantively reduce the number of new residential solar PV systems added to the New Orleans area annually, while providing a greater near-term opportunity in the commercial customer class. As a result, ENO anticipates that the projected number of battery systems that will be connected to new solar PV systems will be lower than originally projected in the Plan filing. In direct response to the federal tax credit reductions, ENO has increased incentive levels for the residential customer class while reducing the expected number of installations. ENO believes the new incentive levels are high enough to encourage adoption without being excessive. ENO has also incorporated meaningful incentives for small commercial customers to help support the adoption of BESS while full solar and storage federal tax credits remain available through 2027. As a result, ENO’s modified plan represents an overall reduction in the BESS program budget versus what was previously filed in the Plan while still offering incentives expected to drive meaningful uptake among residential and commercial customers. Please find the amended plan attached in Appendix 1.

b. The Alliance suggests that “ENO should modestly increase its BYOT participation, savings, and budget projections for PY16-PY18 to reflect steady year-over-year growth from the PY15 plan forecast.”

ENO and EnergyHub reviewed the BYOT program proposal and have determined that raising the incentive level in the BYOT program should have the effect of increasing participation. As such, ENO has revised the projected participation and cost estimates as illustrated in Appendix 2.

In addition, ENO and EnergyHub anticipate that new Electric Vehicle (“EV”) OEM integrations and advancements in EV OEMs’ ability to support partner marketing will enable the Energy Smart team to acquire higher participation levels in the Electric Vehicle Charging program. Revised estimates are also included in Appendix 2. Revised summation tables for both scenarios are also included as Appendices 3a-3f.

- c. The Alliance suggests that “ENO should continue and expand its workforce development efforts as needed to achieve its increased low-income weatherization participation projections. If not already embedded in program budgets, ENO should include additional budget to support this effort.”**

The Plan already contains funding for continued workforce development under Energy Smart.

III. Approval Timeline

ENO agrees with the Alliance’s assertion that “[t]he Council should take action quickly (before the end of October 2025) in order to ensure workforce and momentum is retained, in order to alleviate challenges from prior years that have hindered success in C&I and residential programs.”

IV. Incorporation of Benchmarking Ordinance Compliance

In their comments about the Implementation Plan, the Alliance recommends that ENO expand C&I incentives to encourage adoption of, and compliance with, benchmarking. The current Implementation Plan proposal includes funding for C&I initiatives that will encourage and support projects that may result from benchmarking compliance. The Energy Smart staff plans to collaborate with the Office of Resilience and Sustainability (“ORS”) and other stakeholders to support implementation of the requirements set forth in the Benchmarking Ordinance.

V. **CONCLUSION**

In summary, ENO finds the following with respect to the Alliance's comments:

- ENO recommends that the Council approve the "Reduced Savings" scenario which targets significant savings at a reduced cost;
- ENO recommends that the Council approve all of the programs proposed in the reduced Savings scenario with the adjustments herein, including the BESS program proposal;
- ENO requests that the Council approve the Plan prior to the end of October 2025 for the above-stated reasons; and
- ENO will work with ORS and other stakeholders to support the Benchmarking Ordinance.

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 PY16-18 Energy Smart Implementation Plan.

Respectfully submitted,

By: _____



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**ATTORNEYS FOR
ENERGY NEW ORLEANS, LLC**

APPENDIX 1

	Incentive per Installed kWh	Maximum Installed kWh (per account/customer)	Maximum Upfront Incentive (per account/customer)	Expected Annual No. Battery Installations	Total Upfront Incentives (\$/Year)	Total Installed		
						kWh	Total kW*	Total MW*
BESS Retrofit/New - Residential (LMI)	\$ 600.00	13.5	\$ 8,100	50	\$ 405,000	675	337.50	0.34
BESS Retrofit/New - Residential	\$ 300.00	13.5	\$ 4,050	100	\$ 405,000	1,350	675.00	0.68
BESS Small Commercial (2026 &2027)	\$ 600.00	135	\$ 81,000	30	\$ 2,430,000	4,050	2,025.00	2.025
Year 1 Upfront Total					\$ 3,240,000	6,075	3,037.50	3.04
Year 2 Upfront Total					\$ 3,240,000	6,075	3,037.50	3.04
Year 3 Upfront Total					\$ 810,000	2,025	1,012.50	1.01
Program Total					\$ 7,290,000	14,175	7,087.50	7.09

* The capacity figures in this table assume a two-hour duration battery. MISO capacity accreditation rules would result in a different amount.

** "Upfront" incentive intended for the purchase of batteries

Year 1 (2026) Participation Incentive Total	Total
Resi (\$600/Year)	\$ 90,000
Small Commercial (\$1,800/Year)	\$ 54,000
Existing Participants	\$ 100,000
	\$ 244,000
Year 2 (2027) Participation Incentive Total	
Resi	\$ 180,000
Small Commercial	\$ 108,000
Existing Participants	\$ 100,000
	\$ 388,000
Year 3 (2028) Participation Incentive Total	
Resi	\$ 270,000
Small Commercial	\$ 108,000
Existing Participants	\$ 100,000
	\$ 478,000
Administration (3 Year Estimate)	\$ 979,400
Revised Proposal (9/12/2025) Total	\$ 9,379,400
Energy Smart Filed (06/16/2025) BESS Budget 26-28	\$10.2M

APPENDIX 2

June 16, 2025 Implementation Plan				
Program		Participants	Estimated Gross Demand Savings (MW)	Program Cost (excl. EM&V)
BYOT	Program Year 16	10,700	10.7	\$ 869,500
	Program Year 17	12,100	12.1	\$ 971,100
	Program Year 18	13,600	13.6	\$ 1,081,700
EV Charging	Program Year 16	161	0.08	\$ 167,710
	Program Year 17	229	0.11	\$ 167,140
	Program Year 18	317	0.16	\$ 173,420

September 12, 2025 Adjustments				
Program		Participants	Estimated Gross Demand Savings (MW)	Program Cost (excl. EM&V)
BYOT	Program Year 16	11,800	11.8	\$ 1,018,000
	Program Year 17	13,700	13.7	\$ 1,106,200
	Program Year 18	15,400	15.4	\$ 1,208,300
EV Charging	Program Year 16	279	0.14	\$ 180,690
	Program Year 17	369	0.18	\$ 176,640
	Program Year 18	481	0.24	\$ 184,460

APPENDIX 3a

Program Year 16 - Reduced Savings			
Energy Efficiency Program	Program Cost	kWh	kW
Small Commercial Solutions	\$2,960,812	8,663,401	364
Large C&I Solutions	\$6,287,803	27,688,655	1,926
Schools and Universities	\$1,587,319	5,333,795	195
CoolSaver	\$856,629	4,549,095	1,403
Home Performance with Energy Star ("HPwES")	\$2,823,972	4,163,898	1,669
Retail Appliances	\$871,831	1,312,343	11
Multifamily Solutions	\$1,297,316	2,956,756	39
Income Qualified Weatherization	\$3,730,545	5,076,114	37
A/C Solutions	\$1,436,551	2,755,859	1,887
Residential HVAC Midstream	\$1,636,937	2,047,121	-
School Kits & Education and Community Outreach	\$384,134	523,012	-
Behavioral	\$757,981	13,048,000	-
Multifamily Solutions - Income Qualified	\$1,093,438	3,002,393	44
Neighborhood-Based Delivery Pilot	\$3,432,519	4,422,565	32
A/C Solutions - Income Qualified	\$808,840	2,699,687	1,864
Energy Efficiency Subtotal	\$29,966,627	88,242,694	9,470
Demand Response Program	Program Cost	kWh	kW
Battery Energy Storage System ("BESS")	\$3,969,363	-	3,638
Residential - BYOT	\$1,060,451	-	11,800
Large C&I DR	\$2,571,707	-	18,000
Bring Your Own Charger (BYOC) Pilot	\$188,225	-	140
Demand Response Subtotal	\$7,789,746		
TOTAL	\$37,756,373	88,242,694	33,578

	Cost	kWh	UPI @ 100% of Goal	LCFC
Income-Qualified Total	\$9,065,342	15,200,759	\$634,574	\$ 1,256,951
Non-income Qualified Total	\$20,901,285	73,041,935	\$1,463,090	\$ 6,039,838

	Cost	kW
Demand Response Total	\$7,789,746	33,578

APPENDIX 3b

Program Year 17 - Reduced Savings			
Energy Efficiency Program	Program Cost	kWh	kW
Small Commercial Solutions	\$2,931,236	8,901,994	374
Large C&I Solutions	\$6,298,468	28,503,027	1,983
Schools and Universities	\$1,649,305	5,490,671	200
CoolSaver	\$944,429	4,682,892	1,444
Home Performance with Energy Star ("HPwES")	\$3,153,636	4,664,318	1,870
Retail Appliances	\$876,544	1,312,343	11
Multifamily Solutions	\$1,622,387	4,086,718	39
Income Qualified Weatherization	\$4,657,573	6,402,990	46
A/C Solutions	\$1,384,724	2,840,840	1,967
Residential HVAC Midstream	\$1,636,937	2,047,121	-
School Kits & Education and Community Outreach	\$384,134	523,012	-
Behavioral	\$597,107	13,041,000	-
Multifamily Solutions - Income Qualified	\$1,311,007	3,347,165	49
Neighborhood-Based Delivery Pilot	\$3,816,975	4,909,048	35
A/C Solutions - Income Qualified	\$865,624	2,812,513	1,940
Energy Efficiency Subtotal	\$32,130,086	93,565,652	9,959
Demand Response Program	Program Cost	kWh	kW
Battery Energy Storage System ("BESS")	\$4,119,368	-	6,675
Residential - BYOT	\$1,152,329	-	13,700
Large C&I DR	\$3,104,420	-	21,500
Bring Your Own Charger (BYOC) Pilot	\$184,006	-	180
Demand Response Subtotal	\$8,560,123		
TOTAL	\$40,690,209	93,565,652	42,055

	Cost	kWh	UPI @ 100% of Goal	LCFC
Income-Qualified Total	\$10,651,179	17,471,716	\$745,583	\$ 1,444,736
Non-income Qualified Total	\$21,478,907	76,093,936	\$1,503,523	\$ 6,292,208

	Cost	kW
Demand Response Total	\$8,560,123	42,055

APPENDIX 3c

Program Year 18 - Reduced Savings			
Energy Efficiency Program	Program Cost	kWh	kW
Small Commercial Solutions	\$3,081,952	9,184,075	385
Large C&I Solutions	\$6,731,205	29,317,400	2,040
Schools and Universities	\$1,716,948	5,647,547	206
CoolSaver	\$1,046,049	4,816,689	1,485
Home Performance with Energy Star ("HPwES")	\$3,574,194	5,313,524	2,130
Retail Appliances	\$983,793	1,541,342	11
Multifamily Solutions	\$1,769,782	4,530,509	44
Income Qualified Weatherization	\$5,135,509	7,062,616	51
A/C Solutions	\$1,492,198	3,472,960	2,334
Residential HVAC Midstream	\$1,636,937	2,047,121	-
School Kits & Education and Community Outreach	\$384,134	523,012	-
Behavioral	\$590,111	11,997,000	-
Multifamily Solutions - Income Qualified	\$1,530,620	3,785,915	54
Neighborhood-Based Delivery Pilot	\$4,353,873	5,439,756	39
A/C Solutions - Income Qualified	\$981,965	3,178,145	2,166
Energy Efficiency Subtotal	\$35,009,270	97,857,611	10,946
Demand Response Program	Program Cost	kWh	kW
Battery Energy Storage System ("BESS")	\$1,681,790	-	7,688
Residential - BYOT	\$1,258,686	-	15,400
Large C&I DR	\$3,425,902	-	25,000
Bring Your Own Charger (BYOC) Pilot	\$192,152	-	240
Demand Response Subtotal	\$6,558,530		
TOTAL	\$41,567,800	97,857,611	48,328

	Cost	kWh	UPI @ 100% of Goal	LCFC
Income-Qualified Total	\$12,001,967	19,466,432	\$840,138	\$ 1,609,679
Non-income Qualified Total	\$23,007,303	78,391,179	\$1,610,511	\$ 6,482,167

	Cost	kW
Demand Response Total	\$6,558,530	48,328

APPENDIX 3d

Program Year 16 - 2% Savings Scenario			
Energy Efficiency Program	Program Cost	kWh	kW
Small Commercial Solutions	\$4,271,000	15,035,485	631
Large C&I Solutions	\$8,499,618	41,671,426	2,899
Schools and Universities	\$2,036,305	8,027,361	293
CoolSaver	\$975,319	6,846,389	2,111
Home Performance with Energy Star ("HPwES")	\$3,048,082	4,730,188	1,896
Retail Appliances	\$936,234	1,490,821	12
Multifamily Solutions	\$1,388,617	3,358,875	44
Income Qualified Weatherization	\$5,757,780	8,038,455	58
A/C Solutions	\$1,502,959	3,130,656	2,144
Residential HVAC Midstream	\$1,762,626	2,325,529	-
School Kits & Education and Community Outreach	\$384,134	523,012	-
Behavioral	\$757,981	13,048,000	-
Multifamily Solutions - Income Qualified	\$1,187,133	3,410,718	50
Neighborhood-Based Delivery Pilot	\$3,820,754	5,024,034	36
A/C Solutions - Income Qualified	\$877,486	3,066,845	2,118
Energy Efficiency Subtotal	\$37,206,027	119,727,794	12,292
Demand Response Program	Program Cost	kWh	kW
Battery Energy Storage System ("BESS")	\$3,969,363	-	3,638
Residential - BYOT	\$1,060,451	-	11,800
Large C&I DR	\$2,571,707	-	18,000
Bring Your Own Charger (BYOC) Pilot	\$188,225	-	140
Demand Response Subtotal	\$7,789,746		
TOTAL	\$44,995,773	119,727,794	33,578

	Cost	kWh	UPI @ 100% of Goal	LCFC
Income-Qualified Total	\$11,643,153	19,540,053	\$815,021	\$ 1,615,767
Non-income Qualified Total	\$25,562,873	100,187,742	\$1,789,401	\$ 8,284,524

	Cost	kW
Demand Response Total	\$7,789,746	33,578

APPENDIX 3e

Program Year 17 - 2% Savings Scenario			
Energy Efficiency Program	Program Cost	kWh	kW
Small Commercial Solutions	\$3,961,587	13,904,224	584
Large C&I Solutions	\$7,812,072	38,536,093	2,681
Schools and Universities	\$1,970,552	7,423,387	271
CoolSaver	\$1,029,329	6,331,270	1,952
Home Performance with Energy Star ("HPwES")	\$3,476,862	5,457,252	2,188
Retail Appliances	\$957,047	1,535,441	12
Multifamily Solutions	\$1,785,986	4,781,460	45
Income Qualified Weatherization	\$6,933,009	9,831,363	71
A/C Solutions	\$1,470,413	3,323,783	2,301
Residential HVAC Midstream	\$1,794,048	2,395,131	-
School Kits & Education and Community Outreach	\$384,134	523,012	-
Behavioral	\$597,107	13,041,000	-
Multifamily Solutions - Income Qualified	\$1,445,733	3,916,183	58
Neighborhood-Based Delivery Pilot	\$4,359,125	5,743,586	41
A/C Solutions - Income Qualified	\$953,857	3,290,640	2,270
Energy Efficiency Subtotal	38,930,860	120,033,825	12,475
Demand Response Program	Program Cost	kWh	kW
Battery Energy Storage System ("BESS")	\$4,119,368	-	6,675
Residential - BYOT	\$1,152,329	-	13,700
Large C&I DR	\$3,104,420	-	21,500
Bring Your Own Charger (BYOC) Pilot	\$184,006	-	180
Demand Response Subtotal	\$8,560,123		
TOTAL	\$47,490,983	120,033,825	42,055

	Cost	kWh	UPI @ 100% of Goal	LCFC
Income-Qualified Total	\$13,691,724	22,781,772	\$958,421	\$ 1,883,825
Non-income Qualified Total	\$25,239,137	97,252,054	\$1,766,740	\$ 8,041,772

	Cost	kW
Demand Response Total	\$8,560,123	42,055

APPENDIX 3f

Program Year 18 - 2% Savings Scenario			
Energy Efficiency Program	Program Cost	kWh	kW
Small Commercial Solutions	\$4,015,506	13,635,072	572
Large C&I Solutions	\$8,071,434	37,790,128	2,629
Schools and Universities	\$1,989,006	7,279,689	266
CoolSaver	\$1,117,968	6,208,712	1,914
Home Performance with Energy Star ("HPWES")	\$3,942,112	6,190,256	2,481
Retail Appliances	\$1,080,835	1,795,664	12
Multifamily Solutions	\$1,950,077	5,278,043	52
Income Qualified Weatherization	\$7,429,772	10,562,192	76
A/C Solutions	\$1,593,495	4,045,998	2,719
Residential HVAC Midstream	\$1,789,427	2,384,896	-
School Kits & Education and Community Outreach	\$384,134	523,012	-
Behavioral	\$590,111	11,997,000	-
Multifamily Solutions - Income Qualified	\$1,684,395	4,410,590	63
Neighborhood-Based Delivery Pilot	\$4,957,651	6,337,315	46
A/C Solutions - Income Qualified	\$1,078,562	3,702,538	2,524
Energy Efficiency Subtotal	\$41,674,485	122,141,105	13,355
Demand Response Program	Program Cost	kWh	kW
Battery Energy Storage System ("BESS")	\$1,681,790	-	7,688
Residential - BYOT	\$1,258,686	-	15,400
Large C&I DR	\$3,425,902	-	25,000
Bring Your Own Charger (BYOC) Pilot	\$192,152	-	240
Demand Response Subtotal	\$6,558,530		
TOTAL	\$48,233,015	122,141,105	48,328

	Cost	kWh	UPI @ 100% of Goal	LCFC
Income-Qualified Total	\$15,150,380	25,012,636	\$1,060,527	\$ 2,068,295
Non-income Qualified Total	\$26,524,105	97,128,470	\$1,856,687	\$ 8,031,553

	Cost	kW
Demand Response Total	\$6,558,530	48,328

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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