



Edward R. Wicker, Jr.
Assistant General Counsel
Entergy Services, LLC
504-576-3101 | ewicker@entergy.com
639 Loyola Avenue, New Orleans, LA 70113

May 26, 2026

VIA ELECTRONIC MAIL

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

Re: Establishment of DER Program and Implementation (CNO Docket No. UD-24-02)

Dear Clerk of Council:

Attached please find Entergy New Orleans, LLC's ("ENO") Energy Smart Battery Energy Storage System (BESS) Pilot Phase 3 Supplemental Implementation Plan for filing in the above-referenced docket pursuant to Resolution No. R-26-150. 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, appearing to read 'Edward R. Wicker, Jr.', with a long horizontal flourish extending to the right.

Edward R. Wicker, Jr.

ERW/jlc
Enclosures
cc: Official Service List UD-24-02 (*via electronic mail*)

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

RESOLUTION AND ORDER R-24-624)	
ESTABLISHING A DOCKET AND)	
PROCEDURAL SCHEDULE TO)	DOCKET NO. UD-24-02
ENHANCE DISTRIBUTED ENERGY)	
RESOURCE PROGRAMS)	

**ENERGY SMART BATTERY ENERGY STORAGE SYSTEM
PILOT PHASE 3 SUPPLEMENTAL IMPLEMENTATION PLAN**

Entergy New Orleans, LLC (“ENO” or “Company”) respectfully submits this Energy Smart Battery Energy Storage System Pilot Phase 3 Supplemental Implementation Plan (“Supplemental Plan”) for the Distributed Energy Resource (“DER”) Program (“Program”), as requested by the Council of the City of New Orleans (“Council”) through Resolution No. R-26-150 (“Resolution”), dated April 23, 2026.

I. Procedural Background

Resolution No. R-25-669 dated December 18, 2025 (“Initial Resolution”), established the DER Program that would be administered as Phase 3 of the existing Battery Energy Storage System (“BESS”) Pilot under Energy Smart for Program Years 16-18 (2026-28).¹ In so doing, the prior Council directed \$30 million in System Energy Resources, Inc. (“SERI”) settlement credits to be used for the Program, a concept championed extensively by TNO and the Alliance, who petitioned to allocate these credits to incentivize and subsidize their Virtual Power Plant (“VPP”) endeavors – instead of allowing those credits to be used to offset and potentially eliminate bill impacts for all customers resulting from the Company’s ongoing utility investments.

¹ Initial Resolution, Ordering Paragraph 1.

In compliance with the Initial Resolution, ENO engaged in months of collaborative discussions and technical meetings between ENO, the Council’s Advisors, and the DER Program implementation advisors, as required by the Initial Resolution. ENO timely submitted its DER Implementation Plan (“Plan”),² and that Plan fully complied with the Initial Resolution and reflected substantial Company resources devoted toward developing a practical and implementable compliance framework that balanced multiple competing objectives. Specifically, the Plan sought to advance the prior Council’s goal of establishing a robust BESS VPP program in New Orleans while also protecting customers from future rate impacts by structuring the Program to be fully funded through SERI credits rather than requiring incremental customer funding through Energy Smart or another future recovery mechanism.³

Although not expressly permitted or requested by the then-current procedural process established by the Council, TNO submitted comments on ENO’s Plan, which, among other things, complained about ENO’s use of the Council-mandated customer incentive levels established in the Initial Resolution and asked that the Council increase the levels it previously set. In addition to undermining the Council’s prior directives, TNO further argued that the SERI credits should only be used for customer incentives, not the administrative costs associated with the Program, which would effectively result in a funding gap for the Program that would need to be recovered in rates from customers.⁴

² Unless specifically modified herein, ENO incorporates the Plan previously submitted into this filing.

³ ENO’s Plan (and the Supplemental Plan) protects customers from *additional* bill impacts associated with the Program. The Program, however, will impact customers’ bills because the prior Council, in the Initial Resolution, allocated *all* remaining SERI credits to fund it. Thus, unless the current Council revisits that decision, the SERI credits will no longer be available to offset bill impacts for all customers from ENO’s utility operations, which occurred with regard to the Company’s Test Year 2024 Formula Rate Plan (“FRP”).

⁴ ENO plans to further discuss TNO’s comments in a subsequent submittal as provided in the Resolution’s procedural schedule.

The Council promptly determined that an additional procedural schedule was appropriate and directed ENO in the Resolution to submit supplemental information by May 26, 2026. The supplemental information requested relates primarily to reporting and participation metrics, revisions to budgets and timelines, clarification regarding the role of the Third-Party Incentive Administrator, and additional detail concerning ENO’s distribution planning considerations associated with BESS Phase 3. The Resolution also determined that \$29.2 million in SERI credits, rather than \$30.0 million as specified in the Initial Resolution, is available to fund the Program. The Company now submits its Supplemental Plan pursuant to the Resolution.⁵

II. Energy Smart BESS Pilot Phase 3—Program Implementation Plan

A. Phase 3 Program Implementer

In the Energy Smart PY16-18 Implementation Plan filed on June 16, 2025, ENO proposed EnergyHub to be Program Implementer of its BESS Pilot program. The filing discussed that EnergyHub has experience in implementing DER programs and with current Energy Smart programs, and that EnergyHub’s DERMS platform already is integrated with most of the leading battery manufacturers; in addition, the filing discussed the benefits of consolidating the Energy Smart demand response (“DR”) programs under the EnergyHub DERMS. For these reasons, EnergyHub should continue as the Program Implementer of the Energy Smart BESS Phase 3 Pilot program during the current program cycle. EnergyHub’s proposed role is discussed further in Attachment 1. ENO requests Council approval of EnergyHub as the Program Implementer.

⁵ The Advisors previously submitted data requests to ENO which were largely duplicative of the request for additional details in the Resolution. ENO timely submitted responses to the data requests. In the interest of administrative efficiency, ENO incorporates herein those responses by reference. Moreover, on May 21, 2026, the Advisors submitted additional data requests to ENO. Due to the timing of those requests, ENO is unable to address them before or in this filing, but will respond in due course.

B. Phase 3 Third-Party Incentive Administrator (“TPIA”)

In the Initial Resolution, the Council expressed the desire for a third-party administrator to be retained to “implement, deliver, administer and conduct quality control/quality assurance for existing Energy Smart programs”.⁶ ENO has selected ICF International (“ICF”) to carry out such tasks through discussions with the Advisors and DER Program implementation advisors. ICF was one of the firms identified by the Council as meeting the requirements of its 2025 RFP for DER Consultants and having the qualifications to provide services in this docket.⁷ A description of ICF’s scope of services as the TPIA for the Program is contained in Attachment 2. ENO requests Council approval of the selection of ICF as the TPIA.

C. Phase 3 Revised Program Budget

The DER Program is structured to distribute upfront battery incentives over a three-year period.⁸ To achieve reasonable benefits from the batteries installed under the DER Program, the Council stated in the Resolution that customers receiving upfront incentives should be required to participate in the Energy Smart demand response program for a minimum of seven years.⁹ As noted above, the Resolution, among other things, reduced the total SERI credits available for the Program from \$30 million to \$29.2 million, and requested that ENO submit a revised budget as part of its Supplemental Plan.¹⁰

Table 1, below, details the revised budget for estimated upfront incentives over the three years of the DER Program. ENO reiterates its request for approval to allow flexibility in allotting

⁶ Initial Resolution, p. 7.

⁷ See Council Motion No. M-25-511, dated September 25, 2025.

⁸ Initial Resolution, Ordering Paragraph 3.

⁹ Resolution, p. 9.

¹⁰ A native Excel file containing the revised budget is attached hereto as Attachment 3.

budget amounts between customer groups to meet market demand for batteries and maximize deployments.

Table 1—Estimated Upfront Incentives (REVISED)

	Incentive per Installed kWh	Installed kWh (per account/customer)	Upfront Incentive (per account/customer)	Estimated Annual No. Battery Installations	Total Upfront Incentives (\$/Year)	Total Installed kWh	Total kW*	Total MW*
BESS Residential (LMI)	\$ 480	13.5	\$ 6,480	169	\$ 1,095,120	2,282	1,141	1.1
BESS Residential	\$ 400	13.5	\$ 5,400	204	\$ 1,101,600	2,754	1,377	1.4
BESS Commercial	\$ 400	162	\$ 64,800	35	\$ 2,268,000	5,670	2,835	2.8
Year 1 Upfront Total					\$ 4,464,720	10,706	5,353	5.4
Year 2 Upfront Total					\$ 4,464,720	10,706	5,353	5.4
Year 3 Upfront Total					\$ 4,464,720	10,706	5,353	5.4
			Program Total		\$ 13,394,160	32,117	16,058	16.1

In the Plan, ENO utilized the incentive rates per installed kWh that were prescribed in the Initial Resolution. Keeping those incentive levels consistent, the budget estimates in Table 1 assume 408 battery system installations per year for the three-year period. This estimate was developed using the requirements of the Initial Resolution that upfront incentives should be split evenly between residential and commercial participants, and that 40% of the residential incentives should be earmarked for Low-to-Moderate-Income (“LMI”) customers.¹¹ For residential customers, the budget estimates adding 373 new battery systems per year, including 204 non-LMI and 169 LMI customers. The budget also lays out \$2.27 million in annual incentives for an estimated 35 new commercial projects per year, although the project count could vary depending on system size.

Table 2, below, shows the revised budget for ongoing DR participation incentives over the full ten years to account for customers receiving upfront incentives over the first three years. In ENO’s discussions with potential Third-Party Owners (“TPOs”) who would provide financing to support ENO customers’ installation of batteries in exchange for owning the assets and collecting lease payments over time, it became apparent that Council approval of long-term DR participation

¹¹ Initial Resolution, p. 8.

incentive funding is necessary so that TPOs can include the ongoing revenue stream into their lease buy down, ultimately lowering the cost for BESS for ENO customers. Thus, the revised BESS Phase 3 budget accounts for ongoing DR participation incentives for all customers receiving upfront incentives in years one, two, and three of the Program. Similar to the budget revision relating to upfront incentives in Table 1, there is a corresponding revision to the ongoing DR participation incentives in Table 2.

Table 2—Estimated Ongoing DR Participation Incentives (REVISED)

	Residential	Commercial	Existing Participants	Total
Year 1 Participation Incentive Total	\$ 223,800	\$ 63,000	\$ 100,000	\$ 386,800
Year 2 Participation Incentive Total	\$ 447,600	\$ 126,000	\$ 100,000	\$ 673,600
Year 3 Participation Incentive Total	\$ 671,400	\$ 189,000	\$ 100,000	\$ 960,400
Year 1-3 Total				\$ 2,020,800
Year 4 Participation Incentive Total				\$ 960,400
Year 5 Participation Incentive Total				\$ 960,400
Year 6 Participation Incentive Total				\$ 960,400
Year 7 Participation Incentive Total				\$ 960,400
Year 8 Participation Incentive Total				\$ 960,400
Year 9 Participation Incentive Total				\$ 960,400
Year 10 Participation Incentive Total				\$ 960,400
Year 4-10 Total				\$ 6,722,800
Total Ongoing DR Participation Incentives				\$ 8,743,600

Table 3, below, is revised from the Plan to the extent it reflects ICF as the selected TPIA. Otherwise, the breakdown of administrative costs over the first three years remains as previously filed in the Plan.

Table 3—Estimated Administrative and Non-Incentive Costs (REVISED)

Administrative and Other Non-Incentive Costs	Total
Energy Hub Fee (3 Years)	\$ 797,840
ICF International Fee (3 Years)	\$ 2,000,000
EM&V	\$ 250,000
System Study and Upgrade Budget	\$ 2,000,000
Total	\$ 5,047,840

Table 4, below, summarizes ENO’s total revised Program budget for the full ten year period, including three years of upfront and ongoing DR participation incentives and administrative costs, as well as seven additional years of ongoing DR incentives.

Table 4—Phase 3 Total Estimated Budget (REVISED)

Upfront Incentives (Years 1-3)	\$	13,394,160
Ongoing DR Participation Incentives (Years 1-3)	\$	2,020,800
Admin and Non-Incentive Costs (Years 1-3)	\$	5,047,840
Ongoing DR Participation Incentives (Years 4-10)	\$	6,722,800
Total Phase 3 Budget	\$	27,185,600

Because the Program costs would not exceed \$10 million annually, ENO anticipates that SERI credits will fully mitigate the cost of the DER Program on Energy Smart – and thus there should be no incremental rate impacts from costs flowing through the Energy Efficiency Cost Recovery (“EECR”) Rider.

D. Phase 3 Updated Cost Benefit Analysis

ENO conducted a Ratepayer Impact Measure (“RIM”) and Utility Cost Test (“UCT”) to consider the cost-effectiveness of the Program. The results of the tests are:

	RIM Test	UCT Test
ENO Phase 3 BESS Proposal	0.31	0.32

The analysis indicates that the Program does not pass the RIM or UCT threshold cost-effectiveness of 1.0. Given that the Program is not cost-effective at this level of spending, it is important to recognize that ENO’s Plan (and the Supplemental Plan) does not contemplate any further cost increase to customers, beyond what is described in footnote 3 above and the cost shift inherent in all programs that fail to pass cost-effectiveness tests.

This cost-effectiveness analysis is provided as Attachment 4 and contains information designated as Highly Sensitive Protected Materials (“HSPM”).

III. Conclusion and Prayer for Relief

ENO respectfully requests that this Council issue a resolution:

1. Approving the Company's Energy Smart BESS Phase 3 Pilot Supplemental Implementation Plan, with ICF International as the Program Third-Party Incentive Administrator and EnergyHub as the Program Implementer, for implementation during the appropriate Energy Smart Program Years;
2. Approving the Company's proposed Program budget, including upfront incentives and the flexibility to allot budget amounts between customer groups to meet market demand for batteries and maximize deployments, ongoing Energy Smart DR participation incentives, and administrative and other non-incentive costs;
3. Approving recovery of the entirety of the Program costs through the use of the \$29.2 million in SERI settlement credits identified in the Resolution; and
4. Granting all other general and equitable relief that the law and the nature of this proceeding may permit.

Respectfully submitted,

By:



Courtney R. Nicholson, La. Bar #32618
Edward R. Wicker, Jr., La. Bar #27138
Entergy Services, LLC
639 Loyola Avenue, Mail Unit L-ENT-26E
New Orleans, Louisiana 70113
Telephone: (504) 576-3101
Facsimile: (504) 576-5579
cnicho2@entergy.com
ewicker@entergy.com

**ATTORNEYS FOR
ENERGY NEW ORLEANS, LLC**

Attachment 1

Additional Information for ENO's Supplemental Implementation Plan Filing

The following information supplements ENO's March 2, 2026, DER Implementation Plan filing and seeks to address questions and issues identified in Council Resolution R-26-150.

I. EnergyHub Company Background

The EnergyHub Edge DERMS delivers flexibility at scale, helping utilities quickly expand VPPs to manage load growth and renewables, and deliver reliable flexibility at every level of the grid. EnergyHub pioneered the BYOD approach with smart thermostats in 2012. Today, EnergyHub has administered **230+ flexibility programs** across North America, representing over **3.5 GW** of grid-responsive capacity, with over **2.5 million DERs** under management - the largest in the industry. With over **74 directly integrated OEM** and vendor partners, our solution can build the largest possible flexibility resource by offering the widest customer choice.



Figure x - EnergyHub's largest BYOD clients

EnergyHub has been a leader in delivering demand flexibility program solutions. We built North America's largest behind-the-meter VPP in under six months, led grid innovation with AI-driven predictive analytics, scaled novel EV programs, and enhanced BYOT program design to engage customers.

Over the last two years, the list of industry recognition includes:

- 2026 Brattle Report: Demonstrating the Full Value of Managed Electric Vehicle Charging
- 2025 #1 Ranked DERMS Deployment in WoodMac’s VPP report
- 2025 PLMA Award of Excellence
- 2024 Guidehouse Insights DERMS Leaderboard
- 2024 GridForward Grid Innovator of the Year
- 2024 PLMA Award – Pacesetter Program
- 2024 Wood McKenzie VPP Market Report – Dominant VPP DERMS
- 2023 AESP Energy Award for Innovation in Demand Flexibility
- 2023 PLMA 20th Annual PLMA Awards (2): Pacesetter & Thought Leader

Participating OEMs:

Manufacturer	Energy Storage System Model
Cadenza Innovation	CI48400-I-2P, CI48500-I-2P, CI48600-I-2P, CI48700-I-2P, CI48800-I-2P, CI481600-O-2P, CI481600-O-3P
Canadian Solar	EP Cube (9.9, 13.3, 16.6, 19.9 kWh)
Eguana Technologies	Evolve LFP (14.2 kWh)

<p>EG4 Electronics</p>	<p>FlexBOSS18 (13 kW), FlexBOSS21 (16 kW) inverter with WallMount 280 Ah Indoor (14.3 kWh), WallMount 280 Ah All Weather (14.3 kWh), and select Briggs & Stratton and Discover Energy Systems batteries</p>
<p>Enphase Energy</p>	<p>IQ Battery 3T, 10T, 5P, 10C</p>
<p>Fortress Power</p>	<p>Avalon High Voltage Energy Storage System, eBoost 16 (16 kWh), eBoost 32 (32 kWh), eBoost 48 (48 kWh), eVault Max (18.5 kWh); eFlex (5.4 kWh); eForce (9.6 kWh), Avalon HV – 3 Modules (14.7 kWh), Avalon HV – 4 Modules (19.6 kWh), Avalon HV – 5 Modules (24.5 kWh), Avalon HV – 6 Modules (29.4 kWh) batteries with select Fortress Power, Sol-Ark and Solis inverters</p>
<p>FranklinWH</p>	<p>aPower X (13.6 kWh), aPower 2 (15 kWh), aPower S (15 kWh)</p>

Generac PWRcell	PWRcell M3, M4, M5, M6
GM Energy	PowerBank e1.10 (10.6 kWh), PowerBank e1.17 (17.7 kWh) with Inverter e1.11 (11.52 kW) inverter
Qcells	Q.Home CORE (10, 15, 20 kWh)
SolarEdge	BAT-10KIP with SE3000H-US / SE3800H-US / SE6000H-US / SE7600H-US / SE10000H-US / SE11400H-US
Sol-Ark	Sol-Ark 12K (9 kW) & Sol-Ark 15K (12 kW) inverters with select Briggs & Stratton, EndurEnergy Systems, Fortress, Homegrid Energy, Pylontech, StackRack, and Discover Energy Systems batteries

Tesla ⁴	Powerwall 3 (Passive and Active Dispatch); Powerwall 2, Powerwall+ (Active Dispatch Only)
Tigo Energy	GO (5 kWh) and EI (10 kWh) batteries with EI inverters (3.8, 7.6, 11.4 kW)

II. EnergyHub partner integration process and ongoing validation/monitoring of API integration with OEM partners

a. Integration Testing & Validation

- Every new partner integration is validated in a dedicated sandbox environment before going live
- Partners complete a defined set of self-test cases covering enrollment, dispatch, and data reporting
- EnergyHub engineers independently verify all test cases before approving production deployment
- Automated test suites (unit, integration, and regression) run continuously via EnergyHub data pipelines on every code change and release

b. Ongoing Monitoring & Observability

- EnergyHub managed dashboards provide real-time monitoring of integration health – dispatch success/failure, enrollment status, message processing, and system resource utilization
- Automated alerts notify engineering teams of anomalies such as data gaps, latency spikes, or processing failures

- Data completeness monitors track device reporting rates during events by partner and flag issues as they occur
- Nightly automated builds and test runs ensure ongoing code stability across all integration services

c. Data Quality & Remediation

- Proactive monitoring detects missing, delayed, or inaccurate telemetry data at the source
- When gaps are identified, EnergyHub initiates backfill requests to partners and reprocesses affected data pipelines
- Analytics and reporting are refreshed to reflect corrected data, ensuring accurate event performance and incentive calculations
- A defined data specification sets clear expectations for partners on format, cadence, and accuracy

d. Continuous Improvement

- Integration services receive regular dependency and security updates
- Quarterly planning cycles prioritize enhancements, bug fixes, and observability improvements
- Per-partner integration overviews are maintained as living documentation capturing known deviations and open work
- Cross-team collaboration between engineering, Partner Solutions, Data Engineering, and Analytics ensures efficient issue triage and resolution

III. Tech Specs & Protocols for new partners

EnergyHub's integration is OADR-based, a proprietary API. We make this spec available to potential partners after an NDA has been signed. The partner must have the ability to enroll a device, dispatch that device, and share 15-minute telemetry reporting. EnergyHub has a Partner Integration team ready to support integrations and onboarding of new partners, as well as a Partner

Solutions team dedicated to all contracting, program launch, and ongoing operational support.

IV. Battery Program Incentive Processing and Payment

a. Upfront Incentives

- Once the battery is installed and EnergyHub/TPIA confirms the device is enrolled on the platform and connected to the internet before the customer is eligible for payout
- ENO and TPIA use EnergyHub's enrollment and connectivity reports to validate that the customer's device is online and operating before releasing the upfront incentive

b. Pay-for-Performance Reporting & Sign-Off

- After each dispatch season, EnergyHub calculates per-device performance based on telemetry data from partners – specifically the average kW discharged across all events in the season
- EnergyHub platform produces a performance report that breaks down each customer's average performance and earned incentive
- Partner data is validated with each battery partner prior to finalizing – partners review and provide written approval of their data
- The finalized report is sent to the utility for review and written sign-off before any payments are issued
- Once the utility signs off, the approved results drive invoicing and customer payouts

V. Experience with TPO's (Third-Party Owners)

a. Partner Contracting & Onboarding

- TPO partners sign an Integration Agreement with EnergyHub, followed by program-specific Statements of Work ("SOW's") that define participation terms and incentive structures

- TPO partners do not need to build their own technical integration with EnergyHub – they leverage existing OEM integrations to participate in the utility program
- This significantly lowers the technical barrier, enabling TPO partners who are often non-technical companies to participate quickly

b. Identifying Ownership for Program Administration

- A dedicated field on each enrollment record distinguishes TPO-owned devices from customer-owned devices
- When a device is customer-owned, the OEM is displayed as the partner; when a device is TPO-owned, the TPO is displayed as the partner
- This field flows through to reporting, analytics dashboards, and the Device-level Event Performance Report so utilities can see all devices under a single TPO partner regardless of the underlying OEM or integration path

c. Participation Incentive Allocation & Reporting

- Incentive percentages are configurable per partner in the Device-level Event Performance Report
- When a TPO is identified, the incentive allocation is calculated based on the TPO – not the OEM – ensuring the correct entity is credited for program participation
- ENO can filter dashboards by TPO partner to see consolidated enrollment, event performance, and incentive data across all devices that partner owns



May 26, 2026

→ **Entergy New Orleans, LLC**
DER Program Support Scope Outline

Submitted to:
Entergy New Orleans, LLC

Submitted by:
Amy Blume
Senior Director, Commercial Energy
ICF
amy.blume@icf.com



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Project Overview

ICF will support ENO in implementing the BESS Phase 3 Pilot DER Program as a vendor-neutral, customer-sited battery energy storage program under Energy Smart. ICF will serve as the Third Party Incentive Administrator (“TPIA”) and will administer the operational processes required to support customer participation, fund reservation, incentive processing, customer support, installer support, virtual QA/QC, reporting, budget tracking, and annual program performance review.

ICF will configure and operate its Sightline platform as the primary program administration system of record. Sightline will track applications, eligibility determinations, customer classification, fund reservations, interconnection status, installation documentation, QA/QC results, EnergyHub enrollment status, incentive approvals, payments, clawback triggers, customer support activity, budget utilization, and reporting metrics.

EnergyHub will serve as the DERMS / device enrollment and dispatch platform. EnergyHub will provide device connectivity, telemetry, dispatch capability, event data, device status, and performance data necessary for ENO to administer ongoing participation incentives and program performance reporting. EnergyHub will also issue ongoing demand response participation incentives to enrolled customers.

ENO will remain the program owner, regulatory filing entity, budget owner, and final decision-maker for program rules, customer eligibility, technology eligibility, customer terms and conditions, program modifications, and filings with the Council.

Scope of Services

Task 1: Program Governance, Startup, and Management

ICF will establish a formal implementation governance structure to manage program startup, launch, ongoing operations, reporting, and issue resolution.

ICF Scope

ICF will:

1. Establish a program management structure with clear roles for program operations, incentive administration, customer care, installer support, IT/reporting, QA/QC, budget tracking, and EnergyHub coordination.
2. Conduct a program kickoff meeting with ENO, Energy Smart, and EnergyHub.
3. Develop a program implementation schedule identifying major milestones, dependencies, deliverables, responsible parties, and decision points.
4. Maintain an implementation tracker for open decisions, risks, assumptions, dependencies, and required approvals.

5. Coordinate with EnergyHub on enrollment workflow, data transfer, event reporting, device status, telemetry requirements, and performance data.
6. Coordinate with Energy Smart on customer-facing materials, program alignment, website content, call center routing, and participant conflict screening.
7. Maintain a controlled document repository for program procedures, customer materials, installer materials, reporting templates, budget trackers, QA/QC protocols, and approved program rules.
8. Support ENO with materials needed for regulatory filings.

TPIA Interface Responsibilities

ICF will serve as the operational TPIA interface among ENO, Energy Smart, EnergyHub, customers, installers, and OEMs. ICF will coordinate implementation activities, data needs, reporting inputs, issue resolution, and program documentation across these parties.

Interface	ICF Responsibilities	Non-ICF Responsibilities
ENO	Administer program processes, provide reporting, track budgets, support filings, escalate policy decisions, prepare incentive files.	ENO approves program rules, budgets, filings, cost recovery, customer terms, and final policy decisions.
Energy Smart	Coordinate customer messaging, conflict screening, website content, customer routing, and program alignment.	Energy Smart supports approved customer channels and existing program coordination.
EnergyHub	Coordinate enrollment fields, telemetry, device status, dispatch performance data, and troubleshooting workflows.	EnergyHub provides DERMS functions, device connectivity, telemetry, dispatch support, and event data.
Installers/OEMs	Train, support, qualify, monitor and hold installers accountable to program rules. Training covers the application process, support is provided via the program email, and monitoring is conducted through virtual desk QA/QC.	Installers/OEMs sell, install, document, and support eligible systems.

Task 2: Program Design, Operational Goals, and Implementation Timeline

ICF will provide program rule implementation support. ICF will translate Council-approved incentive structures, eligibility criteria, and participation requirements into operational procedures, application requirements, Sightline workflows, reporting fields, customer/installer documentation, and QA/QC protocols.

ICF Scope

ICF will develop and maintain a program goal tracker for internal and external reporting that includes some or all of the following:

Goal Category	ICF Will Track
Participation	Applications received, eligible applications, ineligible applications, reservations issued, installations completed, batteries enrolled, active participants, unenrollment's.
Customer segment	LMI, non-LMI, commercial, residential, multifamily if applicable, and other ENO-approved participant classifications.
DER capacity	Enrolled kW, enrolled kWh, dispatchable kW, average battery size, solar-paired systems, non-solar-paired systems.
Budget	Funds reserved, committed, paid, cancelled, expired, remaining, forecasted, and pending.
Incentives	Upfront incentives, ongoing incentives, participant caps, payment timing, and clawbacks.
Interconnection	Submitted, pending, approved, denied.
Dispatch	Events called, devices dispatched, devices responding, event kW, event kWh, opt-outs, offline devices, and event performance by segment.
Customer experience	Calls, emails, complaints, escalations, resolution time, application cycle time, customer surveys.
Installer performance	Application quality, QA/QC pass rate, corrective actions, documentation defects, installation closeout timing.

Participant Classification and Identification Protocol

ICF will configure Sightline to identify, classify, and report each participant as LMI, non-LMI, commercial, or another ENO-approved participant category. ICF will maintain the participant category as a required reporting field for each application, reservation, completed installation, enrolled device, incentive payment, and ongoing participation record.

ICF will classify participants using ENO-approved criteria, which may include customer account type, rate class, premise type, income-qualification documentation, census tract qualification, participation in income-qualified assistance programs, or other ENO-approved eligibility data. ICF will document the classification source, verification date, reviewer, and supporting documentation for each participant.

ICF will report participant identification metrics including:

1. Applications received by LMI, non-LMI, and commercial category.
2. Applications approved, rejected, withdrawn, or pending by category.
3. Reservations issued by category.
4. Funds reserved, committed, paid, cancelled, and remaining by category.
5. Completed installations by category.
6. Active EnergyHub enrollments by category.
7. Dispatchable kW and kWh by category.
8. Event performance by category.
9. Ongoing incentive payments by category.
10. Customer complaints and resolution time by category.
11. Customer acquisition source by category.
12. Geographic distribution by category.

ENO will approve the final classification criteria and provide any customer account, rate class, income qualification, or program participation data required for ICF to classify participants.

Implementation Timeline

ICF will implement the program using the following phased schedule, subject to ENO approval and Council timing:

Phase	Timing	ICF Implementation Activities
Phase 0 – Supplemental filing support	Immediate– May 2026	Prepare detailed implementation plan, compliance matrix, budget support, incentive analysis, customer eligibility criteria, TPIA role definition, and reporting framework.
Phase 1 – Program setup	30–60 days after approval	Configure Sightline, build intake workflow, create reservation logic, draft operating procedures, develop reporting templates, and prepare customer/installer materials.
Phase 2 – EnergyHub integration coordination	60–90 days after approval	Coordinate enrollment fields, data exchange, telemetry requirements, event data, device status, and reporting outputs with EnergyHub.
Phase 3 – Installer/OEM onboarding	45–90 days after approval	Launch installer application and qualification process, provide application training, confirm documentation requirements, and activate installer portal access.
Phase 4 – Testing	60–90 days after approval	Test application intake, test eligibility screening, reservation workflow, virtual desk QA/QC process, EnergyHub enrollment confirmation, and incentive payment process.
Phase 5 – Launch	90–120 days after approval	Open full customer acquisition channels, activate installer referrals, begin routine reporting, and administer reservations and incentive payments.
Phase 6 – Ongoing administration	Years 1–3	Administer applications, incentives, QA/QC, reporting, customer care, installer support, budget tracking, and dispatch performance reporting.
Phase 7 – Long-term administration (TBD)	Years 4–10	Track ongoing incentive obligations, event performance, customer status, and budget impacts.
Phase 8 – Annual review	Annually	Prepare annual program review, incentive evaluation, budget reallocation analysis, and program improvement recommendations.

Task 3: Customer and Technology Eligibility Administration

ICF will administer customer and technology eligibility screening.

ICF Scope

ICF will develop and administer a defined eligibility matrix covering customer eligibility, technology eligibility, installer eligibility, documentation requirements, and disqualification criteria.

ICF will verify that each customer:

1. Has an active ENO electric account.
2. Is located within ENO's electric service territory.
3. Provides required customer information and site information.
4. Is classified as LMI, non-LMI, or commercial.
5. Accepts program terms and conditions.
6. Confirms consent for data sharing, telemetry, device monitoring, and dispatch.
7. Uses approved BESS equipment.
8. Receives required interconnection approval.
9. Uses an approved installer and provides required installation information.
10. Is not participating in a non-ENO sponsored battery program.
11. Provides all documentation required for incentive reservation and payment.

ICF will verify that each BESS system:

1. Is a behind-the-meter, solar-tied battery energy storage system.
2. Meets ENO-approved system size requirements.
3. Uses approved battery and inverter equipment.
4. Is capable of enrollment in EnergyHub.
5. Meets applicable permitting, interconnection, safety, and code requirements.
6. Has complete serial number, specification, commissioning, and installation documentation.
7. Maintains communication capability for ongoing program participation.

Disqualification Criteria

ICF will disqualify or suspend applications when ENO-approved rules indicate that:

1. The account is inactive or outside ENO territory.
2. The customer does not provide required consent.

3. The battery is not compatible or communicating with EnergyHub.
4. Required interconnection approval is missing or denied.
5. The installation fails city (AHJ) electric inspection.Required documentation is missing.
6. The customer is enrolled in a conflicting program.
7. A duplicate or prohibited incentive is identified.
8. The installer violates program rules.
9. Fraud, misrepresentation, or material noncompliance is identified.

Task 4: Customer Acquisition and Outreach Implementation

ICF will develop and execute the customer acquisition plan in coordination with ENO, Energy Smart, EnergyHub, installers, and OEMs.

ICF Scope

ICF will:

1. Identify customer acquisition channels and assign responsible entities.
2. Develop customer-facing program materials, including program overview flyer and welcome brochures with FAQs.
3. Develop program training material for installers.
4. Provide content for Energy Smart website.
5. Coordinate with ENO on customer marketing emails and digital advertising.
6. Coordinate with installers and OEMs on approved program promotion.
7. Track lead source, application conversion, reservation conversion, installation completion, enrollment completion, and customer drop-off points.
8. Report customer acquisition performance monthly.
9. Annually recommend modifications to outreach, installer engagement, and customer education.

Responsibility Matrix

Activity	ICF	ENO	Energy Smart	EnergyHub	Installers/OEMs
Program materials	Lead draft	Approve	Support alignment	Provide technical content	Use approved materials

Activity	ICF	ENO	Energy Smart	EnergyHub	Installers/OEMs
Website content	Draft/support	Approve	Host/support	Provide enrollment language	Link/reference
Marketing email /digital advertising	Develop content / execute	Approve	Support	N/A	N/A

Task 5: Application Intake, Reservation Queue, and Enrollment Workflow

ICF will configure Sightline to administer the full application and reservation workflow.

ICF Scope

ICF will:

1. Create and host the online application intake workflow in Sightline.
2. Configure application statuses, required fields, document upload fields, validation rules, and internal task assignments.
3. Establish the fund reservation queue.
4. Track application status from submission through payment and ongoing participation.
5. Track interconnection status.
6. Track EnergyHub enrollment status.
7. Track incentive payment status.
8. Track application expiration, extensions, cancellations, and waitlist status.
9. Maintain a full audit trail of application statuses.

Application Status Flow

Status	ICF Action
Application Received	ICF logs application and begins completeness review.

Status	ICF Action
Eligibility Review	ICF verifies account, customer segment, territory, consent, technology, and documentation.
Additional Information Required	ICF requests missing or corrected documentation.
Interconnection Pending	ICF tracks interconnection status until approved, denied, or withdrawn.
Reservation Approved	ICF reserves funds according to approved rules.
Installation Pending	ICF monitors installation progress and reservation expiration.
Installer Documentation Submitted	ICF reviews completion package.
EnergyHub Enrollment Confirmed	ICF verifies battery visibility and dispatch capability.
Upfront Incentive Approved	ICF validates payment amount and prepares payment approval file.
Upfront Payment Processed	ICF records payment date, amount, payee, and check/payment details.
Active Participation	ICF tracks ongoing enrollment, events, and ongoing incentive eligibility.
Unenrolled / Suspended / Clawback Review	ICF tracks and reports status changes to ENO.

Task 6: Fund Reservation Administration

ICF will administer the fund reservation process and maintain accountability for budget tracking and reporting.

ICF Scope

ICF will:

1. Configure reservation logic in Sightline.

2. Reserve funds only after required eligibility criteria are met.
3. Assign each reservation to an approved customer category and budget category.
4. Track reservation date, expiration date, reserved amount, incentive type, customer segment, and project status.
5. Issue reservation confirmation notices.
6. Issue reservation expiration notices.
7. Process extension requests.
8. Cancel expired or ineligible reservations.
9. Maintain a waitlist if demand exceeds available budget.
10. Reconcile reserved, committed, paid, cancelled, expired, and remaining funds monthly.
11. Provide ENO with budget accountability reports that can be used for reporting.
12. Document any fund transfer or budget category reallocation for ENO review and approval.

Task 7: Incentive Processing and Payment Administration

ICF will administer upfront and incentive processing through Sightline.

Upfront Incentives

ICF will:

1. Verify customer eligibility.
2. Verify technology eligibility.
3. Verify customer category.
4. Verify fund reservation.
5. Verify interconnection approval.
6. Verify completed installation.
7. Verify required permits, inspections, and documentation.
8. Verify EnergyHub enrollment.
9. Calculate the upfront incentive using Council approved incentive rates.
10. Apply applicable customer or project caps.
11. Identify duplicate payment risks.
12. Prepare incentive approval files.
13. Issue or coordinate customer incentive checks.

14. Record payment details in Sightline.
15. Maintain records for audit and reporting.

Ongoing Incentives

ICF will:

1. Coordinate with ENO and EnergyHub for reporting responsibilities.
2. Track payment history and remaining obligations.
3. Identify nonperformance, unenrollment, or clawback triggers.
4. Report ongoing incentive obligations by year, customer segment, and budget category.

Incentive Timing

ICF will administer payment timing as follows, subject to ENO approval:

Incentive Type	Payment Trigger	ICF Action
Upfront incentive	Installation complete, interconnection approved, QA/QC passed, EnergyHub enrollment confirmed	ICF prepares payment approval file and processes/coordinates payment.
Corrective payment	ENO-approved appeal, payment correction, or administrative adjustment	ICF documents basis and processes/coordinates corrected payment.
Clawback	Fraud, duplicate payment, early unenrollment, noncompliance, or failure to maintain eligibility	ICF initiates clawback review.

Task 8: Clawback Process and Organizational Responsibilities

ICF will develop, document, monitor, and administer the clawback process using Council-approved rules. ICF will be responsible for identifying potential clawback triggers, documenting the basis for review, calculating the proposed recovery amount, communicating with customers or installers using ENO-approved language, and tracking final disposition. ENO will retain final authority to approve clawback actions, waive recovery, escalate disputes, or determine regulatory treatment.

ICF Scope

ICF will:

1. Define clawback triggers based on approved program procedures.
2. Configure clawback flags in Sightline.
3. Track events that may trigger clawback review.
4. Notify ENO of potential clawback events.
5. Document the basis for clawback review.
6. Coordinate customer or installer communication.
7. Calculate proposed clawback amount.
8. Submit clawback recommendation to ENO.
9. Administer the recovery process after ENO approval.
10. Record final disposition in Sightline.
11. Include clawback activity in reporting.

Clawback Triggers

ICF will monitor for:

1. Duplicate incentive payment.
2. Fraud or misrepresentation.
3. Failure to complete EnergyHub enrollment.
4. Early unenrollment before required participation period.
5. Persistent offline or disconnected status.
6. Failure to maintain dispatch capability.
7. Installer documentation misrepresentation.
8. Customer refusal to comply with required program terms.
9. Material violation of customer or installer terms and conditions.

Responsibility Matrix

Function	ICF	ENO	EnergyHub	Installer/OEM
Identify potential clawback	Lead	Support	Provide device/performance data	Provide documentation
Calculate amount	Lead	Approve	Support data	Support if installer-caused

Function	ICF	ENO	EnergyHub	Installer/OEM
Customer notice	Draft/send as approved	Approve	N/A	Support as needed
Recovery decision	Recommend	Final authority	N/A	N/A
Recovery tracking	Lead	Oversight	N/A	Support as needed

Task 9: Installer and OEM Management

ICF will establish and manage the installer qualification process but will not oversee, or be responsible for, installation or maintenance of customer assets.

ICF Scope

ICF will:

1. Develop installer qualification requirements.
2. Create installer application materials.
3. Provide installer training on application process.
4. Provide installer portal access.
5. Maintain approved installer list.
6. Monitor installer application quality, documentation quality, QA/QC outcomes, customer complaints, and corrective actions.
7. Implement corrective action plans.
8. Recommend installer suspension or removal to ENO when warranted.

Installer Requirements

ICF will require installers to:

1. Maintain applicable Louisiana and local licenses.
2. Maintain required insurance.
3. Demonstrate experience with BESS, solar-plus-storage, or comparable DER installations.
4. Demonstrate familiarity with ENO interconnection and permitting requirements.
5. Use approved customer-facing program materials.

6. Submit complete installation documentation.
7. Support EnergyHub enrollment.
8. Cooperate with QA/QC reviews.
9. Comply with consumer protection requirements.
10. Avoid misleading marketing claims.

Task 10: QA/QC and Installation Verification

ICF will implement a QA/QC process that includes a virtual desktop review of 100% of completed enrollments.

ICF Scope

ICF will perform virtual desktop QA/QC to verify:

1. Customer eligibility.
2. Customer category.
3. ENO account status.
4. Equipment eligibility.
5. Battery and inverter serial numbers.
6. Installation documentation.
7. Permit documentation.
8. Interconnection approval.
9. Photo documentation.
10. EnergyHub enrollment.
11. Incentive calculation.
12. Duplicate payment risk.
13. Customer consent and T&C acceptance.

QA/QC Disposition

ICF will classify each project as:

Disposition	Action
Pass	ICF approves project for incentive processing.

Disposition	Action
Conditional Pass	ICF withholds payment until minor documentation or corrective action is complete.
Fail	ICF denies incentive payment until major deficiency is resolved.
Escalated Review	ICF escalates to ENO for decision.

Task 11: Terms and Conditions and Consumer Protections

ICF will support the Council and CURO as necessary to ensure consumer protections. ICF will administer and enforce Council approved terms and conditions through the application, reservation, installation, QA/QC, incentive payment, and ongoing participation processes. ICF will not approve incentive payment unless the customer has accepted the applicable terms and conditions and the project satisfies all program requirements.

ICF will enforce program terms and conditions and consumer protections by:

1. Requiring customer acceptance of program T&Cs.
2. Requiring installer agreement to program participation rules before installer activation.
3. Reviewing customer-facing installer materials for consistency with approved program language.
4. Withholding incentive payment for incomplete documentation, failed QA/QC, or missing EnergyHub enrollment.
5. Tracking customer complaints in Sightline or CRM.
6. Requiring corrective action from installers when customer protection issues arise.
7. Escalating material installer misconduct, misleading claims, fraud, or safety concerns to ENO.
8. Recommending installer suspension or removal for repeated or material violations.
9. Initiating clawback review when customer or installer conduct violates incentive eligibility requirements.
10. Reporting consumer protection issues, corrective actions, and resolutions to ENO.

ENO Responsibilities

ENO will approve the final customer terms and conditions, consumer disclosures, privacy language, data sharing language, and any legal or regulatory language included in customer-facing materials.

Task 12: Customer Care and Complaint Resolution

ICF will provide customer and installer support through a dedicated program email inbox.

ICF Scope

ICF will:

1. Maintain a dedicated program email inbox.
2. Provide email support during approved business hours.
3. Develop email templates.
4. Train support staff on program rules, eligibility, application status, incentive timing, EnergyHub enrollment, interconnection status, and escalation procedures.
5. Track all customer contacts in CRM or Sightline.
6. Resolve routine questions directly.
7. Escalate complex or policy-related issues to ENO.
8. Maintain a complaint log.
9. Track complaint type, date received, customer segment, assigned owner, corrective action, and resolution date.

Escalation Process

Escalation Type	ICF Action	ENO Action
Routine application issue	Resolve directly	N/A
Missing documentation	Contact customer/installer	N/A
Incentive dispute	Review records and recommend resolution	Approve final disposition if needed
Installer complaint	Investigate and document	Approve corrective action if material
Safety concern	Escalate immediately	Lead utility response as needed
Regulatory inquiry	Provide supporting data	Lead formal response

Escalation Type	ICF Action	ENO Action
Interconnection dispute	Provide documentation	Lead resolution

Task 13: EnergyHub Coordination, Event Monitoring, and Performance Reporting

ICF will coordinate with EnergyHub to support device enrollment, event monitoring, dispatch performance reporting, and ongoing incentive administration.

ICF Scope

ICF will:

1. Coordinate with EnergyHub on enrollment workflow.
2. Confirm required data fields for customer, device, and event reporting.
3. Assist with tracking whether each battery is visible and dispatch-capable in EnergyHub.
4. Track device status, offline devices, opt-outs, event participation, and performance.
5. Coordinate with EnergyHub and installers on device troubleshooting.
6. Report event results by customer segment and technology type.
7. In coordination with EnergyHub, identify underperforming devices or customer groups.

Task 14: Budget Tracking and Financial Controls

ICF will track program budgets, incentive commitments, and administrative costs within ICF’s scope.

ICF Scope

ICF will:

1. Track upfront incentive budget by customer segment.
2. Track ongoing incentive obligations by year.
3. Track administrative costs within ICF’s scope.
4. Track non-incentive program delivery costs within ICF’s scope.
5. Track interconnection study cost data provided by ENO.
6. Track reserved, committed, paid, cancelled, expired, and remaining funds.
7. Prepare monthly budget forecasts.

8. Identify oversubscription risk.
9. Provide ENO with budget data needed for reporting.
10. Maintain incentive audit records.

Task 14A: Support for Administrative Budget Detail and TPIA Scope Cost

ICF will develop a detailed budget justification for the estimated \$2 million administrative budget associated with the TPIA scope of services. ICF will break down the administrative budget by workstream, labor category, non-labor cost, system cost, reporting cost, QA/QC cost, customer support cost, installer support cost, and program management cost.

ICF will prepare a budget support workbook and narrative that explains the cost basis for:

1. Program management and governance.
2. Sightline configuration and maintenance.
3. Application intake and eligibility review.
4. Fund reservation administration.
5. Incentive processing.
6. Ongoing incentive administration.
7. Customer care and complaint resolution.
8. Installer onboarding, training, and support.
9. QA/QC administration.
10. EnergyHub coordination.
11. Program reporting development.
12. Budget tracking and forecasting.
13. Council, CURO, and Advisor reporting support.
14. Annual incentive evaluation and adjustment analysis.

Data security, document control, and audit support.

ICF will identify the assumptions used to support the administrative budget, including expected application volume, completed installation volume, QA/QC volume, customer contact volume, reporting cadence, installer participation, EnergyHub coordination needs, and annual review requirements.

ICF will provide ENO with supporting documentation sufficient for ENO to explain the reasonableness of the administrative budget in the supplemental filing and in subsequent Council reporting. ENO will approve final budget treatment, cost recovery positioning, and Council-facing financial presentation.

Task 16: Program Reporting

ICF will develop program reporting packages to meet operational, financial, and regulatory requirements.

ICF Scope

ICF will provide:

Report	Content
Operational reporting	Applications, reservations, installations, enrollments, QA/QC, customer care
Budget report	Reserved, committed, paid, cancelled, expired, remaining, forecasted funds.
Participation report	LMI, non-LMI, commercial, geography, battery size, technology type, installer.
Incentive report	Upfront incentives, ongoing incentives, payment status, caps, clawbacks, payment timing.
Customer acquisition report	Leads, applications, conversion, outreach channel, drop-off points.
Installer report	Pipeline, documentation quality, QA/QC outcomes, corrective actions, complaints.
Event performance report	Device performance, kW, kWh, opt-outs, offline devices, customer segment results.
Complaint report	Complaints, escalations, resolution time, corrective actions.
Council/CURO/Advisor support package	Metrics required for regulatory reporting and stakeholder review.
Annual program review	Incentive evaluation, budget utilization, customer segment performance, recommended adjustments.

Deliverables

#	Deliverable	ICF Responsibility
1	Resolution Compliance Matrix	Prepare and maintain.
3	Program Governance Plan	Prepare and implement.
4	Implementation Schedule	Prepare, update, and manage.
5	Customer Eligibility Matrix	Draft, administer, and update after ENO approval.
6	Technology Eligibility Matrix	Draft, administer, and update after ENO approval.
7	Customer Disqualification Criteria	Draft, administer, and update after ENO approval.
8	Customer Acquisition Plan	Draft and implement with ENO-approved channels.
9	Consumer Protection Framework	Draft and administer after ENO approval.
10	Terms and Conditions Support	Draft and coordinate ENO legal/regulatory review.
11	TPIA Responsibility Matrix	Prepare and maintain.
12	Sightline Application Workflow	Configure and operate.
13	Fund Reservation Procedure	Configure and administer.
14	Incentive Calculation Procedure	Develop and administer.
15	Upfront Incentive Payment Process	Administer.
16	Ongoing Incentive Payment Process	Calculate for EnergyHub to issue.
17	Clawback Procedure	Develop and administer after ENO approval.
18	Installer Participation Package	Draft and administer.
19	Installer Training Materials	Develop and deliver.

#	Deliverable	ICF Responsibility
20	Virtual QA/QC Plan	Develop and implement.
21	EnergyHub Coordination Procedure	Develop and administer with EnergyHub.
22	Energy Smart / DR Conflict Monitoring Procedure	Develop and administer.
23	Monthly Reporting package	Develop and maintain.
24	Quarterly Reporting Package	Prepare.
25	Annual Incentive Evaluation	Prepare.
26	Budget Reallocation Analysis	Prepare annually or as directed.

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**RESOLUTION AND ORDER R-24-624)
ESTABLISHING A DOCKET AND)
PROCEDURAL SCHEDULE TO)
ENHANCE DISTRIBUTED ENERGY)
RESOURCE PROGRAMS)**

DOCKET NO. UD-24-02

ATTACHMENT-3

**PROVIDED ELECTRONICALLY
AS EXCEL SPREADSHEET**

MAY 2026

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**RESOLUTION AND ORDER R-24-624)
ESTABLISHING A DOCKET AND)
PROCEDURAL SCHEDULE TO)
ENHANCE DISTRIBUTED ENERGY)
RESOURCE PROGRAMS)**

DOCKET NO. UD-24-02

ATTACHMENT-4

HIGHLY SENSITIVE PROTECTED MATERIALS

INTENTIONALLY OMITTED

MAY 2026

CERTIFICATE OF SERVICE

UD-24-02

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.

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

Erin Spears, Chief of Staff
Bobbie Mason
Christopher Roberts
Byron Minor
Candace Carmouche
Jared Reese
Tyrienne Varnado
Council Utilities Regulatory Office
City of New Orleans
City Hall, Room 6E07
1300 Perdido Street
New Orleans, LA 70112

Krystal D. Hendon
CM Morrell Chief-of-Staff
1300 Perdido St. Rm. 2W50
New Orleans, LA. 70112

CM Aimee McCarron
Sherae M. Hunter, CM McCarron Chief-of-Staff
Razan Badr, Community Engagement Director
LeeAnn Moss, Policy Director
City Hall, Room 2W80
1300 Perdido Street
New Orleans, LA 70112

Courtney Fleming, CM Willard Chief-of-Staff
Erin Hansen, Policy Director
1300 Perdido St. Rm. 2W40
New Orleans, LA. 70112

Dominique Lang Jackson, CM Harris Director of
Governmental & Legislative Affairs
Matthew C. Schoenberger, Director of
Community Engagement
1300 Perdido St. Rm. 2W10
New Orleans, LA. 70112

Sandra G. Thomas, CM Green Chief-of-Staff
1300 Perdido St. Rm. 2W20
New Orleans, LA. 70112

Justyn Hawkins
Chief of Staff
New Orleans City Council
City Hall, Room 1E06
1300 Perdido Street
New Orleans, LA 70112

Charline K. Gipson
Law Department
Tanya L. Irvin
Chief Deputy City Attorney
City Hall, - 5th Floor
1300 Perdido Street
New Orleans, LA 70112

Meagan Williams
Anna Nguyen
Office of Resilience & Sustainability
1300 Perdido Street, Ste 8E08
New Orleans, LA 70112

Clinton A. Vince, Esq.
Presley R. Reed, Jr., Esq.
Emma F. Hand, Esq.
Dee McGill
Dentons US LLP
1900 K Street NW
Washington, DC 20006

Joseph W. Rogers
Victor M. Prep
Byron S. Watson
Legend Consulting Group
6041 South Syracuse Way, Suite 105
Greenwood Village, CO 80111

Polly Rosemond
Kevin T. Boleware
D'Angela Savoie
Keith Wood
Derek Mills
Ross Thevenot
Greg Crisler
Kimberly Caron
Entergy New Orleans, LLC
1600 Perdido Street
Mail Unit L-MAG-505B
New Orleans, LA 70112

Norman White
Department of Finance
City Hall – Room 3E06
1300 Perdido Street
New Orleans, LA 70112

Hon. Calvin Johnson
Administrative Hearing Officer
fourwakes@gmail.com

Basile J. Uddo
J.A. “Jay” Beatmann, Jr.
c/o Dentons US LLP
650 Poydras Street, Suite 2850
New Orleans, LA 70130

Deanna Rodriguez
President and Chief Executive Officer
Sharonda Williams
Vice-President, Regulatory and Public Affairs
Harry Barton
Director, Regulatory Affairs
Entergy New Orleans, LLC
Mail Unit L-MAG-505B
1600 Perdido Street
New Orleans, LA 70112

Vincent Avocato
Entergy Services, LLC
2107 Research Forest Drive, T-LFN-4
The Woodlands, TX 77380

Joe Romano, III
Tim Rapier
Entergy Services, LLC
Mail Unit L-ENT-3K
639 Loyola Avenue
New Orleans, LA 70113

Courtney Nicholson
Heather Silbernagel
Edward R. Wicker, Jr.
Regina Bartholomew-Woods
Linda Prisuta
Jessica Coolidge
Entergy Services, LLC
Mail Unit L-ENT-26E
639 Loyola Avenue
New Orleans, LA 70113

Logan A. Burke
Jesse S. George
Sophie Zaken
Alliance For Affordable Energy
4505 S. Claiborne Ave.
New Orleans, LA 70125

Broderick Bagert
Abel Thompson
Nathalie Jordi
Together New Orleans
2721 S. Broad St.
New Orleans, LA 70125

Ryan Mattingly
Louisiana Green Corps
26455 Toulouse Street
New Orleans, LA 70119

Annie Clark
Finance New Orleans
201 St. Charles Ave., Ste. 4444
New Orleans, LA 70170

Cole Ashman
Pila Energy Inc.
1362 Hayes Street
San Francisco, CA 94117

Shannon Anderson
Solar United Neighbors
1350 Connecticut Avenue NW, Ste. 412
Washington, DC 20036

Pastor Gregory Manning
Jonathan Leo
Peter Digre
Greater NO Interfaith Climate Coalition
Broadmoor Community Church
2021 S. Dupre St.
New Orleans, LA 70125

Calvin Lawrence
Rodney Wallis
International Brotherhood of Electrical Workers
Local Union 130
3200 Ridgelake Dr., Ste. 300
Metairie, LA 70002

Shawn Martinez
South Louisiana Chapter, Inc. – National
Electrical Contractors Association
501 Commerce Point
New Orleans, LA 70123

Myron Katz
Prorate Energy Inc.
302 Walnut St.
New Orleans, LA 70118

Simon Mahan
Whit Cox
Southern Renewable Energy Association
11610 Pleasant Ridge Road, Ste. 103 #176
Little Rock, AR 72223

Marc Monbouquette
Steve Lasher
Enphase Energy Inc.
47281 Bayside Pkwy
Fremont, CA 94538

Currin Wallis
504 Healthnet, Inc.
1030 Lesseps St.
New Orleans, LA 70122

Casey DeMoss
Resilience New Orleans
4659 Clara St.
New Orleans, LA 70115

Asali DeVan Ecclesiastes
Efforts of Grace, Inc/Ashe Cultural Arts
Center
2236 D'Abadie Street
New Orleans, LA 70119

Patricia Smith
Efforts of Grace, Inc/Ashe Cultural Arts Center
6101 Ransom Street
New Orleans, LA 70126

Kimaya Abreu
Voltus Inc.
2443 Fillmore St.
San Francisco, CA 94115

Harry Apler
Voltus Inc.
1114 Crete St.
New Orleans, LA 70119

Gabriela Olmedo
Energyhub, Inc.
41 Flatbush Avenue, Ste. 400A
Brooklyn, NY 11217
Monika Gerhart
Executive Director
Jeffrey Cantin
Chairman of the Board
Gulf States Renewable Energy Industries
Assn
No Address Given

Todd Reynolds
Groundwork New Orleans
No Address Given

Ted Thomas
Cailee Mangan
Recurve Analytics, Inc.
Energizer Strategies
1910 Navarre School Road
Navarre FL, 32566

Keely Lewis
Citizens Climate Lobby New Orleans
Chapter Leader
701 Loyola Avenue #58542
New Orleans, LA 70113

Michael Goldman
Apex Analytics, LLC
2500 30th Street, Ste 207
Boulder, CO 80301

New Orleans, Louisiana, this 26th day of May, 2026.



Edward R. Wicker, Jr.