



August 12, 2024

New Orleans City Council Members
1300 Perdido Street
Suite 2W50
New Orleans, LA 70112

Re: **RESOLUTION NO. R-24-310, COMMUNITY SOLAR PROGRAM
IMPLEMENTATION (Docket No. UD-18-03)**

Dear Members of the New Orleans City Council,

Gulf States Renewable Energy Industries Association is the leading regional trade association for companies in all parts of the renewable energy generation and storage supply chain. GSREIA welcomes your leadership to bring the community solar program to fruition as one critical venue for constituents to access cheaper, more affordable, clean energy.

Our members have been following this community solar policy with interest. We believe this program could be even more effective in accomplishing its goals with the following changes:

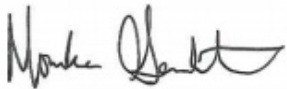
- **NREL standards in credit rate calculations to enhance developer certainty:** ENO should confirm that it will calculate credits according to the same method demonstrated in the NREL study, which was submitted in the community solar docket. Any discrepancies from this methodology should be highlighted so that developers can model their projects accurately. Tiny shifts in methodology translate to huge ramifications in the business model and negatively impact business certainty.
- **Transparency and net crediting on utility bills:** To reduce confusion and improve transparency, customers need to see all of their electricity charges and solar charges on one utility bill. Net crediting on utility bills is the

national best practice for billing; New Orleanians deserve a transparent, predictable process for consumers.

- **Pre-Construction execution of interconnection agreement:** When interconnection agreements are signed after construction, as is currently the case, a risk is borne by the developer that a utility could reject a project after significant private (or even public) investment in a project. For the long-term health of the program, this unnecessary risk should be eliminated. If interconnection agreements are signed pre-construction, developers and installers will have the certainty that investments will reach intended milestones.
- **Deposits during study period:** GSREIA is concerned that requiring a deposit while the study is underway may pose an inappropriate detriment to potential developers; GSREIA partner developers that are in the interconnection queue demonstrate current challenges to successfully ensure a return on the deposit's investment because existing timeframes are too short. This study period is controlled by the Utility. This study period should also be guided by the Council, which should set reasonable timeframes that parties must adhere to.
- **Reduce barriers to development.** GSREIA supports other reasonable improvements to the rules that will encourage developers to participate in the program, such as enhanced transparency to improve visibility of distribution capacity.

Again, GSREIA thanks the Council for all of its incredible leadership. These suggested revisions are critical to ensure program success that positively impacts New Orleanians' access to reliable, clean, and affordable energy.

Sincerely,



Monika Gerhart
Executive Director
Gulf States Renewable Energy Industries Association