

Sept 13, 2024

By Electronic Mail

clerkofcouncil@nola.gov
Clerk of Council
City Hall - Room 1E09
New Orleans, LA 70112

**Re: ENO Compliance Filing for Community Solar Program - CNO Docket
No. UD-18-03**

New Orleans City Council Members and Staff:

Madison Energy Infrastructure (previously Madison Energy Investments “MEI”) respectfully submits the following comments. After the discussion at the technical conference, MEI wishes to echo previously submitted comments.

Interconnection Timeline: MEI respectfully suggests that in order to lower the risk to developers related to project approval, the interconnection agreement be enacted after the study period but before actual construction takes place. This will facilitate a higher level of comfort for developers to move forward with projects.

Net Crediting: Utilizing net crediting for customers in the community solar program provides transparency and understandability to utility bills. This is a proven practice in other markets and should be adopted by this program.

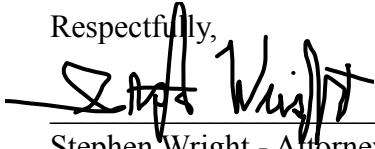
Credit Rate Calculations: Clarification is still needed regarding the calculation of credits. Previous filings indicate the utilization of the method submitted in an NREL study earlier in the docket. The utility, developers and customers will rely on a clear understanding of the implemented methodology in order to have a sustainable community solar program.

Subscription Changes: Program rules currently give ENO authority to refuse additions, deletions or changes to subscriber lists. The addition of a review party such as the Council Utility Regulatory Office (CURO) could create a check and balance to ensure any ENO action regarding subscriber lists are fair and appropriate.

Madison Energy Infrastructure has a long and successful track record of developing and deploying community solar projects across the country. Through that experience, MEI has observed and learned the implications of well-developed policies and procedures around these programs and how they impact access for

ratepayers. MEI urges Council and Staff to make every effort to continue improving this program to open community solar options for all of New Orleans.

Respectfully,

A handwritten signature in black ink, appearing to read "Stephen Wright", is written over a horizontal line.

Stephen Wright - Attorney

On Behalf Of Madison Energy Infrastructure

cc: Official Service List UD-18-03 (*via electronic mail*)