

**RESOLUTION**  
**(AS CORRECTED)**

**NO. R-20-104**

**CITY HALL: April 15, 2020**

**BY: COUNCILMEMBERS MORENO, WILLIAMS, GIARRUSSO, BANKS AND  
BROSSETT**

**RULEMAKING PROCEEDING  
TO ESTABLISH RENEWABLE PORTFOLIO STANDARDS**

**RESOLUTION AND ORDER PROVIDING THE COUNCIL’S GUIDANCE  
REGARDING THE DEVELOPMENT OF RENEWABLE PORTFOLIO STANDARDS  
AND ESTABLISHING A NEW PROCEDURAL SCHEDULE**

**DOCKET NO. UD-19-01**

**WHEREAS**, pursuant to the Constitution of the State of Louisiana and the Home Rule Charter of the City of New Orleans (“Charter”), the Council of the City of New Orleans (“Council”) is the governmental body with the power of supervision, regulation, and control over public utilities providing service within the City of New Orleans; and

**WHEREAS**, pursuant to its powers of supervision, regulation, and control over public utilities, the Council is responsible for fixing and changing rates and charges of public utilities and making all necessary rules and regulations to govern applications for the fixing and changing of rates and charges of public utilities; and

**WHEREAS**, Entergy New Orleans, LLC (“ENO”) is a public utility providing electric and natural gas service to all of New Orleans; and

**WHEREAS**, the Council has repeatedly expressed support for the efficient use of clean sustainable technology to improve the quality of life for our citizens and businesses; and

**WHEREAS**, on March 28, 2019, the Council adopted Resolution No. R-19-109 establishing a docket and opening this rulemaking proceeding to establish renewable portfolio standards for the City of New Orleans; and

**WHEREAS**, in Resolution No. R-19-109, the Council set forth a procedural schedule that provided for the intervention of interested parties, comments and reply comments on the particular questions set forth by the Council, an Advisors' Report responding to those comments and setting forth a recommendation with a draft renewable portfolio standard ("RPS") requirement, and comments and reply comments on the Advisors' Report; and

**WHEREAS**, in Resolution No. R-19-109, the Council welcomed comment from the public and ENO on any aspect of a potential RPS for New Orleans, and specifically requested comments and input on the following questions:

1. What would an appropriate RPS target for New Orleans be, and should it be a requirement or a goal?
  - a. What percentage of ENO's load should be met through renewable resources, and what data or other information exists indicating that the target is achievable in New Orleans?
  - b. In what year should ENO be required to meet this target, and should ENO have specific, incremental targets to meet?
2. How should a New Orleans RPS target be satisfied?

- a. Should ENO be allowed to purchase RECs to satisfy the requirement, and if so what, if any, limitations should be applied to the use of RECs? If RECs are allowed, how should they be certified or verified?
  - b. What resources should be included in the definition of resources that may be used to meet the target (whether through the addition of resources to ENO's system or through the purchase of RECs) -- Solar Water Heat, Solar Space Heat, Geothermal Electric, Solar Thermal Electric, Solar Thermal Process Heat, Solar Photovoltaics, Wind (Large and Small), Biomass, Hydroelectric, Geothermal Heat Pumps, Combined Heat & Power, Landfill Gas, Hydroelectric (Large and Small), Geothermal Direct Use, Anaerobic Digestion, Fuel Cells using Renewable Fuels, other?
  - c. Should there be a requirement that some portion of the RPS must be met through specific types of renewables (or RECs), such as solar or distributed generation?
  - d. Should the Council consider adopting a method of encouraging local renewable resources, such as by providing ENO with greater credit toward meeting the RPS requirement for local resources than for remote resources?
3. How should the RPS standard be enforced, should the Council consider a penalty or Alternative Compliance Payment Structure?
  4. What protections should be put in place to protect ratepayers from unreasonable increases in rates due to the RPS?
    - a. What would be an unacceptable level of rate impact resulting from compliance with an RPS?

- b. If a limit on rate impact is established, how should it be structured -- as a flat cap, as an Alternative Compliance Payment structure, or through some other structure?

**WHEREAS**, the following parties intervened in these proceedings: the Alliance for Affordable Energy (“AAE”),<sup>1</sup> Air Products and Chemicals, Inc. (“Air Products”),<sup>2</sup> Center for Climate and Energy Solutions (“C2ES”),<sup>3</sup> Gulf States Renewable Energy Industries Association (“GSREIA”),<sup>4</sup> National Audubon Society (“Audubon”),<sup>5</sup> Southern Renewable Energy Association (“SREA”),<sup>6</sup> and 350 New Orleans (“350 NO”),<sup>7</sup> New Orleans Chamber<sup>8</sup>, PosiGen Solar (“PosiGen”),<sup>9</sup> Vote Solar<sup>10</sup>, Deep South Center for Environmental Justice (“DSCEJ”)<sup>11</sup> and the Sierra Club;<sup>12</sup> and

**WHEREAS**, many of the parties to the case filed multiple rounds of comments and reply comments regarding an RPS for New Orleans, which are listed and attached hereto in Exhibit 1; and

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<sup>1</sup> The Alliance for Affordable Energy Petition for Intervention and Inclusion on Service List, Docket No. UD-19-01, Apr. 2, 2019.

<sup>2</sup> Air Products and Chemicals, Inc. Motion for Intervention and Inclusion on Service List, Docket No. UD-19-01, Apr. 30, 2019.

<sup>3</sup> Center for Climate and Energy Solutions’ Petition for Intervention and Inclusion on Service List, Docket No. UD-19-01, Apr. 24, 2019.

<sup>4</sup> Gulf States Renewable Energy Industries Association, Motion of Intervention, Docket No. UD-19-01, Apr. 25, 2019.

<sup>5</sup> The National Audubon Society (dba Audubon Louisiana) Petition for Intervention and Inclusion on Service List, Docket No. UD-19-01, May 1, 2019.

<sup>6</sup> Southern Renewable Energy Association Petition for Intervention and inclusion on Service List, Docket NO. UD-19-01, May 1, 2019.

<sup>7</sup> 350 New Orleans Petition for Intervention and Inclusion on Service List, Docket No. UD-19-01, Apr. 10, 2019.

<sup>8</sup> New Orleans Chamber Petition for Intervention and Inclusion on Service List, Docket UD-19-01, April 30, 2019.

<sup>9</sup> PosiGen Solar Motion to Intervene, Docket UD-19-01, April 29, 2019.

<sup>10</sup> Vote Solar Motion to Intervene, Docket UD-19-01, April 26, 2019.

<sup>11</sup> Deep South Petition for Intervention and Inclusion on Service List, Docket UD-19-01, May 1, 2019.

<sup>12</sup> Sierra Club Late-Filed Petition to Intervene and for Inclusion on Service List, Docket NO. UD-19-01, June 3, 2019. Petition was granted by the Hearing Officer by Order issued June 11, 2019.

**WHEREAS**, the comments and reply comments of the parties were wide-ranging and set forth additional models beyond the traditional RPS structure the Council had contemplated in Resolution No. R-19-109; and

**WHEREAS**, ENO proposed a voluntary clean energy standard (“CES”) that would pursue the goal of decarbonization and reducing carbon emissions.<sup>13</sup> The EFNO parties, on the other hand, proposed a Resilient and Renewable Portfolio Standard with stated purposes to (1) strengthen New Orleans through a focus on energy resilience and local energy resources, (2) ensure that the benefits of renewable energy are equitable, accessible, and affordable for all residents; (3) providing new economic opportunities to underserved communities by expanding and diversifying the energy workforce and enabling programs that reduce energy cost burdens on low-income residents; and (4) attract and retain companies and industries that value ready access to renewable energy resources;<sup>14</sup> and

**WHEREAS**, in response to the alternative models submitted by the parties, the Advisors’ Report provided the Council with an example of a traditional RPS standard to consider as well as examples of a more aggressive CES and a resilient and renewable portfolio standard (“R-RPS”) that would be more consistent with both the goal of rapid reductions in emissions with a lower impact on customer bills and more consistent with utility regulatory principles.<sup>15</sup> The Advisors included an Appendix to their Advisors’ Report with three examples of different potential RPS standards designed to elicit comment on the proposed standards and to stimulate dialog in hopes

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<sup>13</sup> Advisors’ Report at 32.

<sup>14</sup> EFNO Reply Comments Appendix A, Section 1. Purpose.

<sup>15</sup> Advisors’ Report at 32.

that parties might be able to develop a consensus model by combining features of the different models and/or introducing potential additional methods of accomplishing a particular goal;<sup>16</sup> and

**WHEREAS**, several of the parties did respond to the Advisors' Report with comments regarding the merits of the various proposals and options set forth in the Report;<sup>17</sup> and

**WHEREAS**, after reviewing the comments submitted by the parties and the Advisors, on the whole, the comments and reply comments of the parties regarding the Advisors' Report indicate that parties appear to be moving farther apart from each other on the design of an appropriate RPS for New Orleans and would benefit from the Council providing guidance to the parties on the Council's preferred design for an RPS for New Orleans; and

#### **Advisors' Proposed Alternative Models**

**WHEREAS**, as discussed above, in response to the Council's Resolution seeking comment on the design of an RPS for New Orleans the parties proposed two alternatives to a traditional RPS, a CES and an R-RPS. The Advisors in their Advisors' Report provided for comment three examples of potentially workable standards for discussion by the parties: Alternative 1: a traditional RPS with a long-term clean energy goal; Alternative 2: a renewable and clean portfolio standard ("RCPS") which is a more aggressive alternative to ENO's proposed CES; and Alternative 3: a Renewable and Resilient Portfolio Standard designed around the same general principles set forth in the EFNO Coalition's R-RPS; and

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<sup>16</sup> Advisor Reply Comments at 3.

<sup>17</sup> Advisor Reply Comments at 4.

Alternative 1: RPS

**WHEREAS**, in Alternative 1 the Advisors set forth targets based on the Advisors' assessment of what would be reasonably achievable under a compliance cap of 1% on total retail revenues using data and assumptions from ENO's renewables resource portfolio cost benefit analysis modeling in Docket No. UD-18-06 (the 90 MW renewables portfolio case) to project costs and rate impacts and using relevant load projections and resource data from ENO's 2018 IRP;<sup>18</sup> and

**WHEREAS**, the Advisors explain that based on their calculations, a renewables goal of 10% by 2025, 15% by 2030, 23% by 2035 and 35% by 2040 should be reasonably achievable under a compliance cap of 1% of total utility retail revenues.<sup>19</sup> If renewables only replace resources that are currently producing carbon emissions, a 35% renewables goal by 2040 would have ENO at approximately 95% carbon-free in 2040;<sup>20</sup> and

Alternative 2: RCPS

**WHEREAS**, in Alternative 2 in the Advisors' Report, the Advisors set forth a RCPS that would aggressively pursue deep decarbonization and emissions reductions, particularly within the City.<sup>21</sup> It would have the goal of rapid decarbonization while ensuring that the City has a safe and reliable power supply at a reasonable cost and with as much flexibility as possible.<sup>22</sup> Rather than requiring ENO to acquire a specific percentage of renewables, it would require ENO to convert its

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<sup>18</sup> Advisors' Report at 33.

<sup>19</sup> Advisors' Report at 33.

<sup>20</sup> Advisors' Report at 33.

<sup>21</sup> Advisors' Report at 36.

<sup>22</sup> Advisors' Report at 36.

entire portfolio to zero-emissions resources.<sup>23</sup> A wide range of currently known and yet to be developed zero-emissions energy technologies would be employed with priority given to measures that reduce emissions within Orleans Parish and measures that are sited within Orleans Parish;<sup>24</sup> and

**WHEREAS**, an RCPS would allow all emissions-free resources, including renewables, to be included in the utility’s resource portfolio.<sup>25</sup> This has the advantage of giving the utility maximum flexibility to acquire the resources most closely matched to the needs of ENO’s load at the lowest reasonable cost. The Advisors state that if, as many parties comment, renewables are truly cost-effective as compared to other resources, they should succeed under a clean energy standard.<sup>26</sup> Under the Alternative 2: RCPS model, in addition to zero-emissions sources of generation, the Advisors have included energy efficiency, demand side management (“DSM”), and Beneficial Electrification as resources;<sup>27</sup> and

**WHEREAS**, in the Alternative 2: RCPS model, the Advisors propose a standard that is more aggressive on carbon emissions reductions and has stricter compliance requirements than ENO’s proposed CES, but which, in the Advisors’ opinion, would still have a reasonable chance of success.<sup>28</sup> This alternative model would require ENO to achieve a 100% net zero-emissions portfolio of resources by 2040, with no more than 20% being met through RECs purchased without the associated energy.<sup>29</sup> The RCPS model included in this Report would then phase out the use of

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<sup>23</sup> Advisors’ Report at 36.

<sup>24</sup> Advisors’ Report at 36.

<sup>25</sup> Advisors’ Report at 36.

<sup>26</sup> Advisors’ Report at 36.

<sup>27</sup> Advisors’ Report at 36-37.

<sup>28</sup> Advisors’ Report at 37.

<sup>29</sup> Advisors’ Report at 37.



RECs between 2040 and 2050, requiring ENO to serve New Orleans with only zero-emissions resources;<sup>30</sup> and

Alternative 3: R-RPS

**WHEREAS**, Alternative 3 presented in the Advisors' Report is a standard prioritizing resiliency and economic development of the renewables industry in New Orleans, consistent with the stated purposes of the EFNO coalition's R-RPS proposal.<sup>31</sup> This model retains the renewables targets of the R-RPS, but significantly simplifies the model.<sup>32</sup> It also retains the three tiers of resources with minor changes.<sup>33</sup> Tier 1 would still be a separately-metered resilient energy resource operating as part of a dispatchable microgrid, Tier 2 would be a renewable distributed generation resource located in Orleans Parish as well as any utility DSM or conservation program, net energy metering, community solar and programs directly benefiting low-income customers, and Tier 3 would be any renewable energy resource not located in Orleans Parish that is located in MISO or deliverable to the MISO region;<sup>34</sup> and

**WHEREAS**, Alternative 3 also incorporates the RPS expenditure cap of 1% of utility total retail sales.<sup>35</sup> There was not sufficient data regarding the anticipated costs of the Tier 1 and Tier 2 resources under this standard to project the likelihood of success of this design in meeting the targets while remaining within the compliance cost cap.<sup>36</sup> As a result, the success of the program may be significantly hampered by the application of this cap;<sup>37</sup> and

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<sup>30</sup> Advisors' Report at 37.

<sup>31</sup> Advisors' Report at 39.

<sup>32</sup> Advisors' Report at 39.

<sup>33</sup> Advisors' Report at 39.

<sup>34</sup> Advisors' Report at 39.

<sup>35</sup> Advisors' Report at 40.

<sup>36</sup> Advisors' Report at 40.

<sup>37</sup> Advisors' Report at 40.

## **Parties' Comments on Proposed Models**

**WHEREAS**, several of the parties responded with comments regarding the merits of the various proposals and options set forth in the Advisors' Report.<sup>38</sup> Six of the eight members of the EFNO coalition, however, continue to maintain that the EFNO coalition's R-RPS proposal should be adopted as it was proposed by them, and acknowledge that implementing the R-RPS would mean that some Council procedures must be changed, and that certain rules that might limit the R-RPS might need to be amended;<sup>39</sup> and

**WHEREAS**, ENO argues that the three alternatives set forth in the Advisors' Report would, as proposed, result in higher customer rates than ENO's proposed CES Target with Alternatives 1 and 2 having notably lower cost impacts than Alternative 3.<sup>40</sup> ENO's analysis shows that the total system average rate impact from 2021-2040 of Alternative 1 would be in the 1%-7% range, of Alternative 2 would be in the 1%-6% range and Alternative 3 in the 4%-16% range;<sup>41</sup> and

**WHEREAS**, EFNO continued to urge the adoption of an R-RPS for New Orleans that would require 55% of ENO's retail sales to be served by resilient and renewable resources by 2033 and 100% by 2040<sup>42</sup> and argues that the EFNO parties offered their R-RPS proposal as an integrated whole, not as a menu from which portions of the proposal would be selected, or deselected, without an opportunity to consider the implications of such decisions.<sup>43</sup> However, EFNO also argued, "The Advisors' proposal of three alternative RPS structures is helpful, but is

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<sup>38</sup> Advisors' Reply Comments at 4.

<sup>39</sup> Intervenor Group Comments on Advisors' Report at 4 and 6.

<sup>40</sup> ENO Comments on Advisors' Report at 18-19.

<sup>41</sup> ENO Comments on Advisors' Report at 19 and Appendix C.

<sup>42</sup> Intervenor Group Comments on Advisors' Report at 4.

<sup>43</sup> Intervenor Group Comments on Advisors' Report at 6.

not at all ready to constitute the sum and substance of choices before the Council. More modeling, analysis, and vetting is absolutely necessary for something as big and important as the RPS for New Orleans. For this reason, we do not offer detailed critiques of the optional RPS approaches offered by the Advisors;<sup>44</sup> and

**WHEREAS**, SREA, having previously participated in the EFNO Coalition, separately stated that it would prefer a version of Alternative 1 as presented in the Advisors' Report, modified to be more aggressive and to simplify the Tier system to a two-tier system, with Tier 1 resources being inside New Orleans and Tier 2 being resources located outside the city.<sup>45</sup> SREA recommends that the Council establish a 20%+ by 2023 RPS, ramping up to 60% by 2030 for renewable energy only, and a longer-term goal of 100% clean (zero carbon) energy, create a competitive bidding process for fulfilling the RPS, allow for modest carve-outs for local generation, and require ENO to move beyond capacity-only planning;<sup>46</sup> and

**WHEREAS**, in its comments, Air Products supported a standard that allows ENO to pursue generation resources (via acquisition or contract) that use clean energy (including renewables and other clean energy resources) when there is a need for additional generation and the proposed resource is the lowest reasonable cost resource to meet the need and provide reliability of service.<sup>47</sup> Based on the alternatives provided in the Advisors' Report, Air Products recommended that if the Council decides to adopt an energy standard for New Orleans, that it adopt Alternative 2, RCPS, with the following modifications: (1) include the Alternative 1 cap for large customers; (2) state the multiplier for Tier 3 resources as 1; (3) separate the compliance and procurement plan annual reports, provide intervention and comment for each; (4) clarify how

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<sup>44</sup> Intervenor Group Comments on Advisors' Report at 15.

<sup>45</sup> SREA Comments on Advisors' Report at 4.

<sup>46</sup> SREA Comments on Advisors' Report at 2.

<sup>47</sup> Air Products Comments on Advisors' Report at 1-2.

compliance costs are to be estimated relative to the cap similar to Alternative 1, Section 5.b; (5) clarify Alternative Compliance Payment language (specific language proposed); (6) clarify how cost recovery and bill impact cap carries forward (language proposed); and (7) add stronger language that the CleanEnergy fund can only be used for RCPS compliance.<sup>48</sup> While ENO replied that the proposed large customer cap would harm the vast majority of ENO's customers for the exclusive benefit of two customers by shifting a portion of the costs above the cap to other customers,<sup>49</sup> the Advisors agreed that Air Products' proposal to add a large customer cap to Alternative 2 is reasonable.<sup>50</sup> The Advisors also agree that under Alternative 2, the multiplier for Tier 3 Resources can be stated as 1;<sup>51</sup> and

**WHEREAS**, as was noted by several of the parties, the three alternatives included in the Advisors report were meant as samples of the potential different forms an RPS could take in order to assist the Council in its consideration of what policy direction it wants to take the RPS, rather than as specific options for the Council to adopt at this time,<sup>52</sup> and once the Council has chosen a policy direction, and given the parties guidance as to the purpose and goals the RPS should meet, further work will be needed to develop a comprehensive set of regulations to implement the Council's chosen RPS model;<sup>53</sup> and

### **Council Guidance**

**WHEREAS**, an extensive number of comments and reply comments were filed by the parties to the case, which the Council has carefully considered. Many of the comments went well beyond the scope of the questions set forth by the Council to assist in its establishment of a resource

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<sup>48</sup> Air Products Comments on Advisors' Report at 2-9.

<sup>49</sup> ENO Comments on Advisors' Report at 26.

<sup>50</sup> Advisors Reply Comments at 32.

<sup>51</sup> Advisors Reply Comments at 32.

<sup>52</sup> Advisors' Reply Comments at 3.

<sup>53</sup> Advisors' Reply Comments at 3.

standard for New Orleans, in some cases venturing far afield into areas of the Council's regulation not at issue in this proceeding. The Council has reviewed all comments and reply comments filed by the parties, and, based upon its review of those comments, is most interested in further exploring the Renewable and Clean Portfolio Standard concept modeled in the Advisors' Alternative 2; and

**WHEREAS**, for the reasons discussed herein, the Council instructs the parties that it is most interested in gaining further information on a Renewable and Clean Portfolio Standard based on Alternative 2 in Appendix A of the Advisors' Report with (1) a mandatory requirement that ENO achieve 100% net zero emissions by 2040; (2) reliance on RECs purchased without the associated energy for compliance with the standard being phased out over the ten-year period from 2040 to 2050; (3) ENO has no carbon-emitting resources in the portfolio of resources it uses to serve New Orleans by 2050; and (4) a mechanism to limit costs in any one plan year to no more than one percent (1%) of plan year total utility retail sales revenues; and

**WHEREAS**, the Council is setting forth herein a further procedural schedule for interested parties to work with the Advisors in developing detailed regulations that, if approved, would implement a Renewable and Clean Portfolio Standard consistent with the guidance set forth herein;

**NOW THEREFORE**

**BE IT RESOLVED BY THE COUNCIL OF THE CITY OF NEW ORLEANS**, That the following procedural schedule is adopted:

1. The Advisors shall convene a public technical conference with the parties to discuss modifications to the Alternative 2 model contained in the Advisors' Report necessary to comply with the Council's directions herein within 60 days of the issuance of this Resolution. CURO shall issue notice of such technical conference not less than 14 days in advance of the conference.
2. Within 30 days of the technical conference, the Advisors shall circulate to the parties a revised version of the draft regulations that would implement a Renewable and

Clean Portfolio Standard, which shall include (1) a mandatory requirement that ENO achieve 100% net zero emissions by 2040; (2) reliance on RECs purchased without the associated energy for compliance with the standard being phased out over the ten-year period from 2040 to 2050; (3) ENO has no carbon-emitting resources in the portfolio of resources it uses to serve New Orleans by 2050; and (4) a mechanism to limit costs in any one plan year to no more than one percent (1%) of plan year total utility retail sales revenues.

3. The Advisors shall convene a second public technical conference among the parties to discuss the draft regulations within 30 days of the circulation of the draft to the parties
4. Within 30 days of the second technical conference, the Advisors shall submit draft regulations implementing the Renewable and Clean Energy Standard to the Council for its consideration.
5. Within 30 days of the submission of draft regulations by the Advisors, the parties shall submit any comments to the Council.
6. Parties may submit any reply comments within 15 days after comments are submitted.

**THE FOREGOING RESOLUTION WAS READ IN FULL, THE ROLL WAS CALLED ON THE ADOPTION THEREOF, AND RESULTED AS FOLLOWS:**

**YEAS: Banks, Brossett, Giarrusso, Gisleson Palmer, Moreno, Nguyen, Williams - 7**

**NAYS: 0**

**ABSENT: 0**

**AND THE RESOLUTION WAS ADOPTED.**

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**RENEWABLES PORTFOLIO STANDARD**  
**ADMINISTRATIVE RECORDS CHART**  
**UD-19-01**

<b><u>Date of Document</u></b>	<b><u>Party</u></b>	<b><u>Document Title</u></b>
3/28/19		R-19-109 Resolution and Order Establishing a Docket and opening a Rulemaking Proceeding to Establish Renewable Portfolio Standards
4/2/19	AAE	Petition for Intervention and Inclusion on Service List
4/10/19	350 NO	Petition for Inclusion on Service List
4/24/19	C2ES	Petition for Intervention and Inclusion on Service List
4/25/19	GSREIA	Motion for Intervention
4/26/19	Vote Solar	Motion to Intervene
4/29/19	PosiGen	Motion to Intervene and for Inclusion on Service List
4/30/19	Air Products	Motion for Intervention and Inclusion on Service List
5/1/19	Audubon	Petition for Intervention and Inclusion on Service List Docket
5/1/19	SREA	Petition for Intervention and Inclusion on Service List
5/1/19	New Orleans Chamber	Petition for Intervention and Inclusion on Service List
5/1/19	DSCEJ	Petition for Intervention and Inclusion on Service List
5/30/19	C2ES	Letter to the Council and Initial Set of Comments regarding the Renewable Portfolio Standard Rulemaking Proceeding
6/3/19	Sierra Club	Late-Filed Petition to Intervene and for Inclusion on Service List (Granted in 6/11/19 Order)
6/3/19	ENO	ENO's Comments in Response to Council Resolution R-19-109 Concerning the Establishment of Renewable Portfolio Standards
6/3/19	Air Products	Air Products and Chemicals, Inc. Response to Request for Comment
6/3/19	AAE	The Alliance for Affordable Energy's Frist Comments Responsive to Resolution R-19-109
6/3/19	Audubon	Comments of Audubon Louisiana
6/3/19	PosiGen	Comments of PosiGen Solar
6/3/19	SREA	Southern Renewable Energy Association Comments Regarding a New Orleans Renewable Portfolio Standard
6/3/19	Vote Solar & 350 NO	Opening Comments of Vote Solar and 350 New Orleans on the Establishment of a Resilient and Renewable Portfolio Standard (R-RPS)
6/11/19		Order

**RENEWABLES PORTFOLIO STANDARD**  
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6/12/19	GSREIA	Gulf States Renewable Energy Industries Association Response to Request for Reply Comments
6/28/19	Air Products	Motion to Extend Deadline for Reply Comments
7/1/19		Order
7/15/19	ENO	ENO's Reply Comments in Response to Council Resolution R-19-109 Concerning the Establishment of Renewable Portfolio Standards
7/15/19	Air Products	Air Products and Chemicals, Inc. Reply Comments
7/15/19	AAE	Alliance for Affordable Energy's Reply Comments
7/15/19	EFNO	Joint Reply of EFNO Proposing a Draft Resilient and Renewable Portfolio Standard for the City of New Orleans
7/15/19	Audubon	Reply Comments of National Audubon Society/Audubon Louisiana
7/15/19	PosiGen	Reply Comments of PosiGen Solar
7/15/19	SREA	Southern Renewable Energy Association Responses to Comments Regarding a New Orleans Renewable Portfolio Standard
7/15/19	350 NO	350 New Orleans Reply Comments
9/3/19	Advisors	Advisors' Report on Renewable Portfolio Standards
9/12/19	ENO	Unopposed Motion to Modify Procedural Schedule
9/13/19		Order
9/23/19	PosiGen	Letter to the City Council Clarifying Position from Joint Statement
10/14/19	350 NO	350 New Orleans Reply Comments
10/15/19	ENO	ENO's Comments in Response to the Advisors' Report and Proposed Alternative Frameworks Concerning Renewable Portfolio Standards
10/15/19	Air Products	Air Products and Chemicals, Inc. Comments on Advisors Report
10/15/19	AAE	Comments of the Alliance for Affordable Energy
10/15/19	Intervenor Group	Comments Supporting Consideration of Issues Raised by PosiGen
10/15/19	Intervenor Group	Comments of Audubon Louisiana, Vote Solar, 350 New Orleans, PosiGen Solar, Sierra Club, and Alliance for Affordable Energy
10/15/19	PosiGen	Reply Comments of PosiGen Solar



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10/15/19	SREA	Southern Renewable Energy Association Responses to Comments Regarding a New Orleans Renewable Portfolio Standard
11/11/19	Advisors	Motion for Extension of Time to File Reply Comments
11/12/19		Order
11/12/19	Advisors	Advisors' Reply Comments on Renewable Portfolio Standards
11/19/19	ENO	ENO's Reply Comments Concerning the October 15, 2019 Filings of Various Parties
11/19/19	Air Products	Air Products and Chemicals, Inc. Reply Comments on Advisors Report
11/19/19	Intervenor Group	Comments of Audubon Louisiana, Vote Solar, 350 New Orleans, and Alliance for Affordable Energy on Replies to Advisors' Report on Renewable Portfolio Standards
11/19/19	AAE & 350 NO	Comments of the Alliance for Affordable Energy and 350 New Orleans
11/19/19	PosiGen	Reply Comments of PosiGen on Advisors' Report on Renewable Portfolio Standards

**LEGEND**

Council Advisors	Advisors
Alliance for Affordable Energy	AAE
Air Products and Chemicals	Air Products
Center for Climate and Energy Solutions	C2ES
Entergy New Orleans, LLC	ENO
Energy Future New Orleans Coalition (collectively, 350 New Orleans, Alliance for Affordable Energy, National Audubon Society, Deep South Center for Environmental Justice, PosiGen Solar, Sierra Club, Southern Renewable Energy Association, and Vote Solar)	EFNO
Gulf States Renewable Energy Industries Association	GSREIA

**RENEWABLES PORTFOLIO STANDARD**  
**ADMINISTRATIVE RECORDS CHART**  
**UD-19-01**

Intervenor Group (collectively, Audubon Louisiana, Vote Solar, 350 New Orleans, PosiGen Solar, Sierra Club, and Alliance for Affordable Energy)	Intervenor Group
National Audubon Society	Audubon
Southern Renewable Energy Association	SREA
350 New Orleans	350 NO
New Orleans Chamber	New Orleans Chamber
Posigen Solar	PosiGen
Vote Solar	Vote Solar
Deep South Center for Environmental Justice	DSCEJ
Sierra Club	Sierra Club

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