

**By Electronic Mail**

Clerk of Council  
Room 1E09, City Hall  
1300 Perdido St  
New Orleans, LA 70112

May 10, 2024

**Re: Motion to Amend Community Solar Rules, Docket UD-18-03**

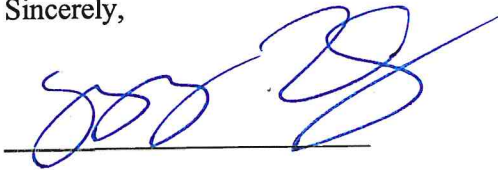
Dear Clerk of the Council,

Attached you will find a letter of support for the revising of the City of New Orleans Community Solar Rules. The conclusions that The Alliance for Affordable Energy and Together New Orleans have made regarding amendments to Community Solar Rules, income verification, and billing have been analyzed by experts at the National Renewable Energy Laboratory and seek to increase participation in Community Solar for low-income households. The expansion of community solar in New Orleans will help the city reach its Climate Action Plan goals of becoming a net-zero carbon city by 2050, increase economic activity locally and regionally, and represent a step forward in reducing energy burden for the city's most vulnerable residents.

The Office of Resilience & Sustainability is submitting this filing electronically and will submit printed copies as requested.

Please contact either Greg Nichols or Sophia Winston for any questions or concerns.

Sincerely,



Greg Nichols  
Deputy Chief Resilience Officer  
Office of Resilience & Sustainability  
1300 Perdido St, Suite 8E08  
New Orleans, LA 70112

## Community Solar Stakeholders and Intervenors,

The Office of Resilience & Sustainability supports the rule changes to New Orleans Community Solar program, which Together New Orleans and the Alliance for Affordable Energy have submitted for your consideration. The Office of Resilience & Sustainability is committed to reaching net-zero emissions by 2050, and in order to reach this goal, there will need to be an increase in the amount of renewable energy generated in our electric supply. Community solar not only increases the amount of renewable energy present in our fuel mix but provides access to clean energy for residents that may not be able to afford a solar photovoltaic system of their own or reside in a home without adequate viability for such a project. The Office of Resilience & Sustainability is also in the pre-development phase of establishing a community solar site at the former Gordon Plaza development which, when completed, will provide 6.4 megawatts of clean energy to residents of New Orleans, 5 MW of which will be community solar.

With regards to the proposed rule changes, we especially would like to highlight the areas that decrease barriers to participation for low-to-moderate income households which often face high to extremely high levels of energy burden:

- **Inclusion of riders in the credit calculation.** Other than the Customer Charge of \$8.06 per month, we feel strongly that all riders should be included in the net metering calculation. ENO should confirm that it will be calculating credits according to the same method as shown in the National Renewable Energy Laboratory (NREL) study.
- **Demand Charges for Commercial Customers.** Entergy New Orleans put forth two options for billing for commercial customers, one that includes demand charges and one that does not. We believe that removing demand charges for commercial customers would financially incentivize more commercial uptake in a program that is designed to provide financial incentives for low-to-moderate income residents and is capped at a total of 55 MW of solar development.
- **Net crediting on utility bills.** Customers need to see all their electricity charges and solar charges on one utility bill. Net crediting on utility bills is the national best practice for billing, and we believe that New Orleans' community solar program would benefit from a clear and consolidated outline of charges and savings.
- **Simple low-income verification.** We support enabling multiple methods of verifying LMI status and believe that customers should only have to prove it once; annual recertification is overly onerous.
- **Reduce barriers to development.** We support reasonable improvements to the rules that will encourage developers to participate in the program, such as:
  - extending the timeline before which deposits are due;
  - charting a future for community solar projects once the initial 20-year PPA term expires
- **Utilize best practices from successful community solar programs.** Where applicable, draw from best practices for time limits and data sharing to minimize the time it takes to establish community solar facilities, such as establishing clear time limits for interconnection studies and sharing of information, such as hosting capacity maps or estimated costs for common utility upgrades, among others.

We have been delighted to see New Orleans' community solar program improve with each rule change and these proposed changes set forth by the Alliance for Affordable Energy and Together New Orleans are essential to a program that promotes equitable solar development, increases New Orleanians' access to affordable, clean energy, and allows New Orleans to lead the way in clean energy policy and generation in the Gulf South.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Greg Nichols', with a stylized flourish extending from the end.

Greg Nichols  
Deputy Chief Resilience Officer  
Office of Resilience & Sustainability  
1300 Perdido St, Suite 8E08  
New Orleans, LA 70112