

May 18, 2026

Via Electronic Mail

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

**JOINT REPLY BRIEF OF THE ALLIANCE FOR AFFORDABLE ENERGY,
TOGETHER NEW ORLEANS, AND SUNCONNECT CORPORATION**

Dear Ms. Collier,

Together New Orleans, the Alliance for Affordable Energy, and SunConnect respectfully submit the attached filing in docket **UD-18-03** pertaining to the City's **Community Solar Program**

Please do not hesitate to reach out with any questions related to this filing.

Sincerely,

Nathalie Jordi
Together New Orleans

**Before
The Council of the City of New Orleans**

**IN RE: A RULEMAKING PROCEEDING
TO ESTABLISH RULES FOR
COMMUNITY SOLAR PROJECTS**

DOCKET NO. UD-18-03

MAY 18, 2026

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The question before the Council is straightforward: whether net crediting serves the public interest and will help ensure the success of the Community Solar Program the Council has already approved. The evidentiary record, now years in the making, clearly demonstrates that it will.

ENO's opposition to consolidated billing and net crediting is largely based on a mischaracterization of how the proposed model actually functions or on comparisons to frameworks that are not being proposed in this proceeding.

As the Council's Utility Advisors explained, community solar is intended to expand access to renewable energy, particularly for renters, low-income households, and customers unable to participate in rooftop solar. Net crediting directly advances those goals by allowing customers to receive clear, predictable savings directly on their utility bill without requiring separate payments to third-party providers.

By contrast, dual billing creates confusion, delays realization of savings, increases subscriber attrition, and disproportionately burdens low-income and unbanked customers. The testimony of Georgina Arreola-Lennox, the only witness in this proceeding with direct operational experience administering community solar programs under both billing structures, established that net crediting produces better customer outcomes, simpler administration, and stronger participation.

ENO repeatedly frames net crediting as creating new collections risk for the utility. But under the proposed structure, participating customers owe less to ENO than they otherwise would absent community solar participation because savings are embedded directly into the bill credit. As Ms. Arreola-Lennox explained, this reduces total customer receivables and therefore reduces overall collections exposure.

Similarly, ENO relies on examples from earlier community solar markets that used materially different billing structures, including models conditioning payments to Subscriber Organizations

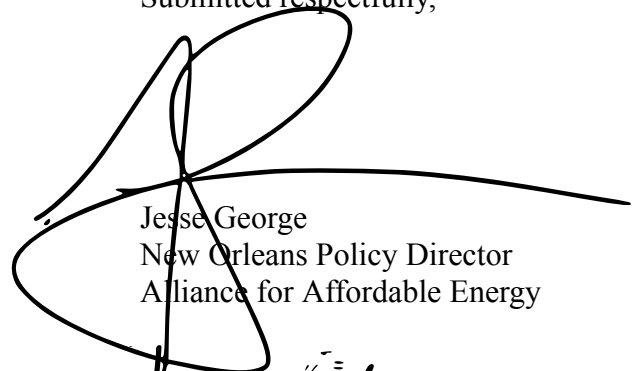
on customer collections. Those are not the frameworks proposed here. In fact, multiple states have transitioned toward net crediting precisely because it provides clearer savings, lower attrition, and stronger low-income participation.

The Advisors themselves concluded that consolidated billing can be implemented “with appropriate safeguards” while protecting non-participating customers and ensuring recovery of ENO’s reasonable administrative costs.

This issue is no longer theoretical. The first community solar projects are expected to come online this fall. If the program launches with a confusing and inferior billing structure, particularly for the low-income customers the Council specifically intended to serve, it risks undermining customer confidence and participation from the outset.

The Council established the Community Solar Program to expand access to local clean energy and deliver meaningful savings to New Orleans residents. Net crediting is the billing structure that best accomplishes those goals. The Council should reject further delay and direct ENO to proceed with implementation as expeditiously as possible.

Submitted respectfully,

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Jesse George
New Orleans Policy Director
Alliance for Affordable Energy

A handwritten signature in black ink, appearing to read 'Nathalie' followed by a stylized surname.

Nathalie Jordi
Community Solar Lead
Together New Orleans

A handwritten signature in black ink, appearing to read 'Erica Z. Buster' followed by a stylized surname.

Erica Buster
Vice President
SunConnect

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CERTIFICATE OF SERVICE

I do hereby certify that I have, this 18th day of May 2026, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



Nathalie Jordi
Alliance for Affordable Energy