

September 26, 2025

Via Electronic Mail

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

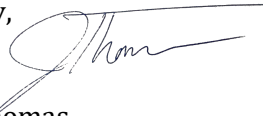
Re: Reply Comments on ENO Consolidated Billing Proposal (Resolution R-25-352)

Dear Ms. Collier,

Carpe Diem Developers respectfully submits the attached filing in docket UD-18-03 regarding the City's Community Solar program.

Please feel free to contact us with any questions related to this filing.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julian Thomas', with a long horizontal line extending to the right.

Julian Thomas
Carpe Diem Developers

Reply Comments of Carpe Diem Developers Regarding Entergy New Orleans' Consolidated Billing Filings, CNO Docket No. UD-18-03

I. Introduction

Carpe Diem Developers ("CDD") submits these reply comments pursuant to Resolution R-25-352. The current stage of this proceeding concerns the details of how consolidated billing will be implemented, not whether it should be adopted. The Council has already resolved that question through multiple directives. Unfortunately, ENO's September 5 filing repeats arguments already rejected, threatens litigation, and seeks delay. These positions stand in contrast to ENO's June 10 proposal, which provided a feasible pathway using the net crediting model—an efficient, widely used approach strongly supported by intervenors.

Our comments:

- Reaffirm that consolidated billing is settled policy and serves the public interest.
- Support ENO's June 10 net crediting framework with technical refinements.
- Reject ENO's continued objections as unfounded, dilatory, and inconsistent with Council authority.

II. Consolidated Billing is an Established Policy and in the Public Interest

ENO asserts that consolidated billing has not been found to be in the public interest. This is incorrect. The Council has already mandated consolidated billing in Resolutions R-24-310 (July 2024) and R-25-352 (June 2025), which set clear filing and implementation deadlines. At the July 30, 2025, technical conference, the Council's Advisors confirmed that consolidated billing is a settled matter.

The Council's 2018 Advisors' White Paper outlined that community solar benefits the public by lowering costs, broadening access, and creating equity for renters and low-income households. Consolidated billing is central to achieving those goals—it simplifies participation, reduces administrative costs, and increases adoption. ENO's claim that the issue remains unsettled is simply an attempt to re-litigate resolved matters.

III. ENO's June 10 Net Crediting Proposal as a Foundation

ENO's June 10 filing laid out a workable implementation framework with cost estimates and an eight-month timeline. The redlined rules reflect models proven in New York, Illinois, and Minnesota.

CDD's comments recommend:

- Customer Access: Past-due customers should not be excluded; this undermines equity goals.
- Administrative Fee: ENO's 3% proposal is excessive; other jurisdictions cap fees at 1%.
- Credit Posting: Credits should be applied within one month, not two.
- Timeline: ENO should be held to the eight-month schedule with milestones.

- Working Group: The Council should establish a stakeholder group (Advisors, CURO, ENO, developers, and advocates) to manage implementation details. See Appendix A.

IV. Response to ENO's September 5 Arguments

ENO's September 5 comments repackage old claims. Each is flawed or contradicted by record evidence:

1. Public Interest: Already determined; consolidated billing delivers lower costs and greater equity.
2. Best Practice: Far from unusual, consolidated billing is standard in leading states and essential for program success.
3. Cost Shifts: Consolidated billing does not cause cost allocation issues; system-wide benefits outweigh modest administrative costs.
4. Franchise Rights: Consolidated billing does not infringe ENO's franchise; ENO remains the sole utility.
5. Administrative Burdens: Costs and IT changes are reasonable and comparable to other states. Details can be managed through rules and oversight.

V. Conclusion

The Council's directive is clear: consolidated billing will be implemented. ENO's June 10 net crediting framework, with refinements, provides a fair and practical roadmap. ENO's September 5 objections should be dismissed.

We urge the Council to:

- Adopt consolidated billing per the June 10 framework with refinements.
- Hold ENO to its eight-month implementation schedule.
- Create a formal working group to finalize details.
- Direct ENO to end obstructionist tactics.

Taking these steps ensures community solar delivers its promised benefits: lower bills, cleaner energy, and equitable access.

Respectfully submitted,

Carpe Diem Developers

September 26, 2025

Attachment A – Proposed Consolidated Billing Working Group

Purpose: Provide a collaborative forum to resolve technical issues, design processes, and oversee ENO's compliance.

Membership:

- Council Advisors
- CURO
- ENO
- Developers and Subscriber Organizations
- Consumer Advocates
- Low-Income and Community Representatives

Scope:

- Implementation milestones and deadlines
- Standardized subscriber reporting and data exchange
- Timely credit application (one-month standard)
- Administrative fee capped at 1%
- Eligibility for all customers, including those with arrears
- Dispute resolution procedures
- Consumer protection standards

Process:

- Kickoff within 30 days of adoption
- Biweekly meetings during design/testing; monthly thereafter
- Progress reports every 60 days
- Advisors and CURO to co-chair

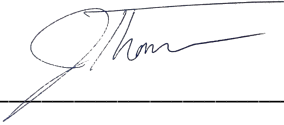
Deliverables:

- Implementation plan with milestones (within 60 days)
- Sample consolidated bills
- Readiness report filed 30 days before launch

Before the Council of the City of New Orleans

Certificate of Service

I hereby certify that on September 26, 2025, I served the foregoing correspondence upon all known parties of this proceeding by electronic mail.

A handwritten signature in blue ink, appearing to read "J Thomas", is written over a horizontal line.

Julian Thomas, Carpe Diem Developers