



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 of Finance New Orleans Re: Consolidated Billing Proposal (per Resolution R-25-352) - UD 18-03

Dear Ms. Collier,

Finance New Orleans respectfully submits the following comments for consolidated billing.

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

Sincerely,

Annie Clark
Finance New Orleans



Finance New Orleans (FNO), the City's Green Bank, respectfully submits these Reply Comments pursuant to Resolution R-25-352. The purpose of this proceeding, as affirmed by the Council, is not to debate the existence of Consolidated Billing, but to finalize a clear, consistent, and urgent implementation plan.

We must use this opportunity to definitively establish a workable framework that ensures the economic viability of the Community Solar program. FNO's ability to act as a public financing partner, deliver low-cost capital, and accelerate the City's clean energy goals is entirely dependent on the immediate implementation of a firm Consolidated Billing solution.

I. Consolidated Billing is Essential to Program Viability

As the city's dedicated financing entity for green infrastructure, FNO's central concern is risk and certainty. The ability to underwrite and finance multi-million dollar Community Solar projects, which will create local jobs and deliver vital bill savings, hinges on having a guaranteed, standardized payment stream. This is true for FNO and for all lenders providing financing for these projects.

- **Financing Mandate:** FNO's ability to secure financing from capital markets or deploy public incentive programs is predicated on the clarity of the revenue model. Without the regulatory certainty provided by Consolidated Billing, the risks associated with customer billing and payment collection are too high to underwrite. FNO cannot deploy capital without this essential collection mechanism.
- **Urgency due to Federal Headwinds:** We concur with other intervenors that current federal incentives and tax credits (including those related to HR 1, tariffs, and Foreign Entities of Concern) are rapidly shifting, threatening to make future projects economically unfeasible. The financing window for current pipeline projects is tight and requires the immediate implementation of Consolidated Billing to lock in capital and maximize clean energy deployment before these financial opportunities diminish.

II. Consolidated Billing is Settled Policy and Proven Best Practice

While we appreciate ENO's participation, we believe the utility's latest comments revisit issues the Council has already resolved, which risks threatening the financial feasibility of the entire Community Solar program.



- **The Public Interest is Already Settled:** ENO's assertion that the Council has not determined consolidated billing is in the public interest is inconsistent with prior Council action. The Council has decided this question through multiple resolutions (R-24-310 and R-25-352) and, most importantly, through the Advisors' unequivocal statement at the July 30, 2025 technical conference that Consolidated Billing is a settled matter that will be implemented. Consolidated Billing delivers lower costs, more equitable access, and a functioning market. Demanding a fresh evidentiary hearing simply serves to delay an overdue program.
- **Consolidated Billing is a Proven Best Practice:** ENO's characterization of Consolidated Billing as "unusual" and risky does not align with national precedent. The states that have adopted net crediting consolidated billing—including New York, Illinois, Minnesota, New Jersey, Maryland, Oregon, and Virginia—are precisely those with the most successful, scalable community solar programs in the nation. It is a tested, market-enabling mechanism, while dual billing routinely suffers from high customer attrition and low participation.
- **Cost Shift Concerns Require Clarification:** ENO's claim of hundreds of millions of dollars in "cost shifts" is highly debatable in this context. Consolidated Billing is only a collection mechanism and is not the driver of cost allocation. Furthermore, Community Solar produces system-wide benefits—such as lowering peak demand, hedging gas prices, and deferring capacity investments—that more than offset any modest administrative costs. Focusing on administrative costs attempts to halt progress by shifting the debate to rate design, which is not the venue of this docket.
- **ENO's Franchise Rights Are Not Threatened:** Consolidated Billing does not embed third-party charges in ENO bills; it simply requires ENO to apply credits on behalf of customer subscriptions and remit payments to developers. This practice is standard across the country and actually strengthens ENO's role as the trusted platform for all customer billing needs, as customers continue to receive one bill directly from ENO.

III. Implementation Must Prioritize Clarity, Simplicity, and Equity

To enable efficient financing, the final Consolidated Billing framework must be simple, standardized, and customer-centric, reducing both administrative costs for the Subscriber Organization and financial risk for FNO and other financiers.



- **Adopt Net Crediting:** FNO strongly supports the utilization of the net crediting model for Consolidated Billing. This model is efficient, widely adopted in other jurisdictions, and provides the clear, streamlined financial mechanism necessary for predictable cash flow forecasting and underwriting.
- **Streamlined Low-Income Participation:** To ensure the equity goals of the program are met efficiently, FNO supports mechanisms that reduce customer acquisition and collection risks for low-income subscribers. A utility-administered auto-enrollment option for 100% low-income offtake provides a cost-effective, streamlined, and equitable pathway to maximize program accessibility and achieve the Council's goals for disadvantaged communities.
- **Administrative Burdens are Manageable:** ENO's cost estimates for IT modifications lack detail but are similar to costs incurred by utilities in other states. The 8-month timeline ENO estimated in its June 10 filing is reasonable. Concerns about nonpayment and dispute resolution are routine matters to be resolved through standardized contracts, indemnification, and Council oversight within a working group—not insurmountable obstacles.

IV. Council Must Mandate a Definitive Implementation Schedule

To prevent further setbacks and ensure the Community Solar projects already under construction can come online with the required financing, the Council must mandate a decisive, short-term implementation plan.

FNO supports the detailed schedule proposed by Together New Orleans and urges the Council to adopt their structure in its final Order.

FNO urges the Council to adopt an Order that explicitly enforces the Consolidated Billing mandate, selects the clear and financeable net crediting model, and immediately mandates the establishment of a stakeholder working group with a definitive schedule and deliverables. This decisive action is paramount to ensuring our ability to finance these projects and fulfill the Council's vision for a resilient, equitable, and clean energy future for New Orleans.

Respectfully submitted,

Annie Clark
Finance New Orleans



Before

The Council of the City of New Orleans

Re: TNO Comments Re ENO's June 10 Proposal for Consolidated Billing - UD 18-03

CERTIFICATE OF SERVICE

I do hereby certify that I have, this September 5, 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

A handwritten signature in blue ink, appearing to read "Annie Clark", is written over a horizontal line. The signature is fluid and cursive.

Annie Clark, Finance New Orleans