



September 22, 2025

Via Electronic Mail

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

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

Dear Ms. Collier, Council Members, Council Staff, CURO, and Advisors:

NOLA Solar Holding Company LLC (“NOLA Solar”) and SunConnect Corporation (“SunConnect”) respectfully submit these reply comments in response to Entergy New Orleans’ (ENO) comments filed September 5, 2025 regarding their consolidated billing proposal. We strongly urge the Council to remain fastidious in their Order requiring ENO to implement consolidated billing for the Community Solar Program. Addressing this issue is essential to ensuring the economic viability of the program.

The passage of the One Big Beautiful Bill will significantly impact solar and green energy development. Federal incentives for solar projects are being reduced, making many future installations economically unfeasible, especially at the Community Solar scale. Additionally, tariffs and Foreign Entities of Concern (FEOC) requirements are shrinking equipment and material availability and driving costs up. Given these headwinds, there is an urgent need to accelerate implementation in order to advance New Orleans’ clean energy goals before these opportunities disappear.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Erica E. Buster".

Erica Buster
Vice President, SunConnect Corporation (on behalf of Nola Solar Holdings Company LLC)

Attachment: *Intervenor Reply Comments – ENO’s Consolidated Billing Program*

Intervenor Reply Comments

DOCKET NO. UD-18-03; Procedural Schedule Outlined in Resolution No. R-25-352

Comments Submitted by SunConnect Corporation on behalf of Nola Solar Holdings Company LLC

September 22, 2025

OVERVIEW

Entergy New Orleans (ENO) 2025-09-05 Consolidated Billing Comments focuses on three main points:

1. Consolidated billing requires careful consideration and safeguards.
2. Program design should prioritize low-income customers.
3. A single waitlist would streamline enrollment and support utility-led administration.

ENO reiterates their sentiments from their December 13, 2024, comments regarding limiting the program to low-income subscribers. While we see the Community Solar Program as more inclusive to all rate classes, we do agree that providing real benefit to low-income customers should be prioritized. As we have presented in our September 5th comments, we believe allowing subscriber organizations to opt-in to a 100% low-income, utility aggregated and managed, consolidated billing system would be a fair way to administer this program; given the mix of subscriber organizations that have targeted offtake.

ENO essentially leans into this concept by advocating for a single waitlist. By proposing this framework, they suggest that they are in the best position to manage enrollment and billing directly, ensuring that low-income customers are prioritized and protected from cost shifts. By centralizing the waitlist and enrollment process, ENO effectively becomes the aggregator and administrator of the billing system, streamlining credit allocation and reducing administrative burdens. The opt-in model we presented in our comments (included hereto as Exhibit A) for subscriber organizations ensures flexibility while maintaining ENO's oversight, aligning with ENO's broader concerns about customer equity, billing system integrity, and legal compliance.

Based on these comments and concerns, it appears ENO would support a consolidated billing program that would allow ENO to auto-enroll and manage 100% low-income customers. A more automated system would create cost efficiencies for all parties. This would create more viable financing options for projects; a welcome respite as they face headwinds from federal policies affecting tax credits as well as material/equipment availability and costs.

Intervenor Reply Comments

DOCKET NO. UD-18-03; Procedural Schedule Outlined in Resolution No. R-25-352

Comments Submitted by SunConnect Corporation on behalf of Nola Solar Holdings Company LLC

September 22, 2025

I. Consolidated Billing Requires Careful Consideration and Safeguards.

Entergy New Orleans (ENO) emphasizes that while consolidated billing may offer operational and customer benefits, its implementation must be approached with careful consideration and robust safeguards; and we agree.

Consolidated Billing is a proven, best practice for Community Solar Programs when properly designed. It simplifies the customer experience by integrating solar credits directly into the utility bill, reducing confusion and administrative burden, especially for low-income households. This model can reduce program attrition, bad debt, and billing inefficiencies, ultimately benefiting the broader rate base.

We agree that for this program to be successful, the rules surrounding consolidated billing must be carefully considered. The process should include transparency and robust stakeholder input, as well as regular check-ins with CURO and all stakeholder groups to ensure the program is being properly implemented. This also ensures that any problems that might arise are quickly addressed and remedied. These measures would allow consolidated billing to function as a transparent, equitable, and scalable solution for community solar in New Orleans.

II. Program Design Should Prioritize Low-Income Customers.

Entergy New Orleans, LLC (ENO), again, emphasizes the importance of prioritizing low-income customers to ensure equitable access. In its December 13, 2024 letter (reiterated in this filing), ENO proposed:

“(a) reducing the program capacity limit (e.g. from 60 MW to 20–30 MW) and limiting participation to low-income customers...”

This repeated idea reflects ENO’s recognition that low-income customers are most vulnerable to cost shifts and should be prioritized in program design. We agree with their sentiment, however given the nature of Community Solar, we don’t believe that limiting the program to low-income subscribers is advisable. Some systems have targeted offtake – like school districts, religious communities, business complexes, etc. Since community solar benefits the entire community, by promoting a more inclusive, resilient, and sustainable energy system, we feel that the Program should have flexibility to include diverse markets. Even non-participating customers gain from reduced peak demand, which can lower grid stress and defer costly infrastructure upgrades.

Intervenor Reply Comments

DOCKET NO. UD-18-03; Procedural Schedule Outlined in Resolution No. R-25-352

Comments Submitted by SunConnect Corporation on behalf of Nola Solar Holdings Company LLC

September 22, 2025

That said, ENO brings up a valid argument that one intention of this program is to broaden access and equity for low-income customers. Utilizing an auto-enrollment feature which allows a Subscriber Organization to opt-in and allocate 100% of the energy produced to low-income subscribers expands the program to the households who can most benefit from energy savings. And, it could provide 3.3 times the reach and accessibility to low-income households. Utility aggregated subscription processes are cleaner and reduce the red-tape/paperwork that can confuse ratepayers. They also offer better customer protections through single entity management (helping to keep predatory companies from abusing the system).

III. A Single Waitlist Would Streamline Enrollment and Support Utility-Led Administration.

In line with our suggestions in Appendix A of our September 5th, 2025, comments, ENO proposed:

“To further reduce the complexity and volume of data transfers from developers and reduce the potential for errors in implementation, the Council could establish a single waitlist for customers interested in participating in community solar that could be administered by CURO or ENO. Customers could be enrolled from that waitlist on a first-come, first-served basis once capacity is available.”

The proposal for a single waitlist, effectively creates a utility-aggregated and managed consolidated billing system, particularly for low-income subscribers. The single waitlist is not just an administrative tool, it is the foundation of a utility-led consolidated billing system. It shifts control of enrollment, crediting, and billing from fragmented third-party operations to a regulated, centralized utility framework.

- 1) Centralized Customer Enrollment.** By placing ENO (or CURO) in charge of the waitlist, the utility (or CURO) becomes the gatekeeper of subscriber enrollment, rather than individual subscriber organizations. This centralization allows ENO to: Ensure equitable access, especially for low-income customers, and avoid duplicative or conflicting enrollment efforts by third parties.
- 2) Streamlined Data Management.** ENO has raised concerns about the complexity and risks of data transfers between multiple subscriber organizations and the utility. A single waitlist reduces the volume and fragmentation of data exchanges, enables ENO to maintain a clean, secure, and accurate subscriber database, and minimizes errors in credit allocation and billing.

Intervenor Reply Comments

DOCKET NO. UD-18-03; Procedural Schedule Outlined in Resolution No. R-25-352

Comments Submitted by SunConnect Corporation on behalf of Nola Solar Holdings Company LLC

September 22, 2025

- 3) Integrated Billing and Credit Allocation.** With ENO managing the waitlist, it can directly link subscriber enrollment to its billing system. This allows: Automatic application of solar credits to enrolled customers, consolidated billing that reflects both ENO charges and community solar benefits, and simplified customer experience, especially for low-income households.
- 4) Reduced Administrative Burden and Cost.** Having each subscriber organization manage its own billing is inefficient both for the subscriber organizations and ENO. Billing costs for Subscriber Organizations vary widely and having each subscriber organization mount its own billing operation is an inefficient way to run a citywide program. A single waitlist administered by ENO consolidates administrative functions, reducing duplication and cost.
- 5) Supports Auto-Enrollment of Low-Income Customers.** A centralized waitlist is the mechanism that enables: Auto-enrollment based on eligibility and prioritization of vulnerable customers.

This approach would ensure equitable access to community solar resources and reduce the risk of data errors and duplication. In their suggestion, we see benefits which are in line with our suggestion of auto-enrollment option for Subscriber Organizations that don't have targeted markets and want to enroll 100% low-income offtakers.

CONCLUSION

While we may not be in full agreement with ENO on every point, given their most recent comments, I think we are closer to developing a consolidated billing program that will work for New Orleans. We respectfully recommend that Council:

- Adopt an opt-in, auto-enrollment system utilizing a single waitlist administered by CURO or ENO for low-income subscribers similar to what we proposed in our Appendix A (Exhibit A).
- Implement a consolidated billing system managed by ENO for all participants.
- Continue monitoring the program with stakeholder input throughout implementation to ensure that problems that might arise are addressed quickly and in the best interest of the program and ratepayers.

These measures could help provide credits to over three times the low-income households all while enhancing program efficiency, protecting vulnerable customers, and ensuring equitable access to community solar benefits. As construction costs increase and the runway for future solar projects shortens, acting promptly (and judiciously) on consolidated billing implementation will

Intervenor Reply Comments

DOCKET NO. UD-18-03; Procedural Schedule Outlined in Resolution No. R-25-352

Comments Submitted by SunConnect Corporation on behalf of Nola Solar Holdings Company LLC

September 22, 2025

enable New Orleans to shape a pivotal program before the current federal policy direction can negatively affect the necessity of the low-income adder. The projects in the queue, and future projects, are in a precarious place due to federal policies. Costs are increasing all around and incentives that once drove investment are being expeditiously phased out. In a market without investment tax credits and facing rising costs, projects will need dramatically higher incentives to be viable.

In conclusion, we appreciate the Council's continued commitment to shaping a Community Solar Program that is equitable, efficient, and resilient. While ENO's proposal reflects progress, we believe that a hybrid model, one that allows opt-in auto-enrollment for low-income subscribers and leverages a centralized waitlist administered by ENO or CURO, offers the most balanced path forward. This approach not only safeguards vulnerable ratepayers but also streamlines operations, reduces administrative costs, and enhances program scalability. As federal incentives wane and market pressures intensify, swift and thoughtful implementation of consolidated billing is not just beneficial, it is imperative. We urge the Council to act decisively to preserve the viability of community solar in New Orleans and ensure that its benefits reach those who need them most.

Intervenor Reply Comments

DOCKET NO. UD-18-03; Procedural Schedule Outlined in Resolution No. R-25-352

Comments Submitted by SunConnect Corporation on behalf of Nola Solar Holdings Company LLC

September 22, 2025

Exhibit A

***Appendix A: Intervenor Comments – ENO’s Consolidated Billing Program
As Submitted September 5, 2025***

(See Following Pages)

Appendix A: Intervenor Comments – ENO’s Consolidated Billing Program

Procedural Schedule Outlined in Resolution No. R-25-352

Comments Submitted by SunConnect Corporation on behalf of Nola Solar Holdings Company LLC

September 5, 2025

Appendix A

Support for Auto-Enrollment of Low-Income Subscribers into Utility-Administered Consolidated Billing Program

As the Council considers implementation pathways for consolidated billing under the Community Solar Program, we respectfully submit this comment in support of a utility-administered, auto-enrollment model for low-income subscribers. This approach is both more cost-effective and more equitable than third-party aggregation and aligns with the Council’s stated goals of protecting ratepayers and expanding access to clean energy.

As we look to the future of the Community Solar Program and the Consolidated Billing implementation hurdles, we still see a large gap that needs bridged – bringing affordable, clean energy to mostly overlooked communities. 30% of a system’s output on a 60MW program is not going to have a far-reaching effect in New Orleans’ overall energy goals. Approximately 40% of Entergy’s 3 million residential customers live below the poverty line⁴. Entergy New Orleans (ENO) speaks to this on their website; we wholeheartedly agree:

We have a moral obligation and a business imperative to help find lasting solutions for our customers in need.

To this vein, many of ENO’s comments since their October 2024 filing concern the protection of disadvantaged, low-income households. And we agree that those communities are often the ones that disproportionately miss out on the opportunities afforded by programs like Community Solar. Especially in dual billing scenarios where the contracts and billing formats are complex. Consolidated Billing management solves the billing complexity, but contracting can still be difficult for consumers to understand and lead to apathy among the customers that would be best served by the program. This is where auto-enrollment is a perfect pairing. In this scenario, the utility both aggregates and manages the low-income subscriptions for a community solar project. They act as a regulated, trusted conduit for bill savings. Other states have successfully implemented similar programs. For example, National Grid in New York implemented a program in 2022⁵.

⁴ Entergy New Orleans: <https://www.entergy.com/communities/low-income/>

⁵ National Grid, NYSEERDA to Launch Innovative Clean Energy Program for Income-Eligible Customers ([Article Link](#))

Appendix A: Intervenor Comments – ENO’s Consolidated Billing Program

Procedural Schedule Outlined in Resolution No. R-25-352

Comments Submitted by SunConnect Corporation on behalf of Nola Solar Holdings Company LLC

September 5, 2025

Reduces Complexity and Risk

Entergy New Orleans (ENO) has expressed concern about the administrative burden and risk of billing errors associated with third-party coordination:

...the magnitude of data expected to be exchanged monthly raises significant concerns for ENO and seems to present the potential for billing errors.⁶

...customer satisfaction issues given the program’s likelihood of causing confusion among subscriber customers as to the respective roles of ENO and subscriber organizations⁷.

Auto-enrollment by the utility would streamline data flows, reduce billing errors, and clarify customer relationships, thereby improving program performance and customer experience.

Ensures Equitable Access for Low-Income Households

ENO acknowledges that low-income customers are disproportionately impacted by cost shifts and may be excluded from participation:

Consolidated billing... will impose unnecessary costs onto ENO’s customers, in particular low-income customers (whether subscribed to community solar or not).⁸

The majority of the costs... will effectively be shifted to non-participating customers, including many low-income customers who will not have the opportunity to participate.⁹

Auto-enrollment ensures that low-income customers receive the benefits intended for them, rather than being left behind due to marketing gaps or third-party enrollment inefficiencies.

⁶ ENO October 2024 Consolidated Billing Comments, Page 14 of 21

⁷ Letter from ENO to Council dated July 15th, 2025; Page 2

⁸ Letter from ENO to Council dated July 15th, 2025; Page 2

⁹ ENO October 2024 Consolidated Billing Comments, Page 11 of 21

Appendix A: Intervenor Comments – ENO’s Consolidated Billing Program

Procedural Schedule Outlined in Resolution No. R-25-352

Comments Submitted by SunConnect Corporation on behalf of Nola Solar Holdings Company LLC

September 5, 2025

More Cost-Effective Than Third-Party Aggregation

ENO outlines the costs of implementing consolidated billing with third-party coordination:

ENO anticipates additional and continuous expenditures would be required to implement and maintain consolidated billing – expenditures that would be shouldered by ENO’s entire customer base, even those who do not participate in community solar, many of whom are most vulnerable to cost pressures.¹⁰

Additional FTEs to administer the program would be needed to support enrollment, enable data transfers between subscriber organizations regarding subscriber lists, to perform reconciliations to ensure that all activity is complete and accurate for any given period, release payments to developers, to review invoices to ensure credits are properly reflected, and possibly other tasks.¹¹

Auto-enrollment simplifies these processes by eliminating the need for third-party coordination, reducing staffing and IT costs, and minimizing ongoing administrative overhead.

Aligns with ENO’s Own Recommendations

ENO itself recommends limiting participation to low-income customers to reduce cost shifts:

... and limit participation to low-income customers.¹²

Auto-enrollment operationalizes this recommendation efficiently, ensuring that the program is both targeted and inclusive.

Enhances Equity and Program Viability

Third-party aggregation risks excluding the very customers the program is meant to serve. ENO estimates:

Only 7,000 to 9,000 customers (representing only 4%–5% of ENO residential customers) might be able to participate.¹³

¹⁰ Letter from ENO to Council dated July 15th, 2025; Page 2

¹¹ Letter from ENO to Council dated December 13th, 2024, Page 2

¹² ENO October 2024 Consolidated Billing Comments, Page 16 of 21

¹³ ENO October 2024 Consolidated Billing Comments, Page 12 of 21

Appendix A: Intervenor Comments – ENO’s Consolidated Billing Program

Procedural Schedule Outlined in Resolution No. R-25-352

Comments Submitted by SunConnect Corporation on behalf of Nola Solar Holdings Company LLC

September 5, 2025

Auto-enrollment can dramatically increase participation among eligible low-income households, improving equity and strengthening the program’s public value.

Recommendations and Conclusion

To quote the ENO representative from the July 31st, 2025 Technical Conference, *Automated is best. Since ENO will be implementing a system to facilitate Consolidated Billing, including an auto-enrollment feature at this time would be a cost-effective way to maximize simplicity in the aggregation and management processes.* Given Consolidated billing is in its infancy stages within the Community Solar Program, we see the auto enrollment feature as a part of the Consolidated Billing conversation. Also, as it has been incorporated into other working Consolidated Billing models (e.g.: National Grid New York’s Low-Income Program) it’s our position that a new docket would not be necessary to consider this as part of Consolidated Billing as a whole.

It would be our recommendation that Subscriber Organizations be given the option to aggregate projects themselves or opt-in to have ENO auto-enroll. If ENO is auto-enrolling, then Subscriber Organizations would be required to allocate 100% of their system’s output to individual low-income customers.

As mentioned before, Entergy has a database of customers that could be used for an auto enrollment process. This would allow for a more streamlined process and added efficiency. Having this option would reduce barriers for customers and provide a simplified process. ENO’s *Power to Care*¹⁴ program showcases their involvement and knowledge of their low-income customers in their current billing systems. And, the Entergy [Green Select](#) program provides a promising framework for the billing platform, which could be readily adapted to support both auto-enrollment and consolidated billing for Community Solar.

Aggregation of low-income subscribers could easily be executed by ENO through an auto-enrollment program that allows Subscriber Organizations to **opt-in if they meet certain qualifications such as 100% low-income subscription levels.** This helps solve the issue of inbounding which creates another layer for ENO to manage and therein making the program more costly to ENO and Ratepayers. It also would result in higher low-income adoption by requiring projects opting to utilize ENO auto-enrollment to subscribe 100% low-income offtake to program, rather than only 30% subscription minimums.

Utilizing an auto-enrollment feature which requires a Subscriber Organization to opt-in and allocate 100% of the energy produced to low-income subscribers expands the program to the households who can most benefit from energy savings. And it could **provide 3.3x the reach and accessibility to low-income households.** Utility aggregated subscription processes are cleaner and

¹⁴ <https://www.entergy.com/care/>

Appendix A: Intervenor Comments – ENO’s Consolidated Billing Program

Procedural Schedule Outlined in Resolution No. R-25-352

Comments Submitted by SunConnect Corporation on behalf of Nola Solar Holdings Company LLC

September 5, 2025

reduce the red-tape/paperwork that can confuse ratepayers. They also offer better customer protections through single entity management (keep predatory companies from abusing the system).

A utility-administered auto-enrollment model for low-income subscribers offers a streamlined, cost-effective, and equitable pathway to achieving the Council’s goals for community solar. I urge the Council to consider this approach as it finalizes implementation plans for consolidated billing.

We ask Council to consider the benefits of simplifying the program using auto-enrollment as they analyze the implementation and facets of consolidated billing.