



August 26, 2025

Via Electronic Mail
Clerk of Council
Room 1E09, City Hall
1300 Perdido Street
New Orleans, LA 70112

RE: 2024 TRIENNIAL INTEGRATED RESOURCE PLAN OF ENTERGY NEW ORLEANS,
LLC (UD-23-01)

Dear Clerk,

Please find the attached Comments of the Alliance for Affordable Energy on the Advisors' Report Regarding the Entergy New Orleans, LLC 2024 Integrated Resource Plan and Entergy New Orleans, LLC's Application for Approval of the Implementation Plan for Program Years 16 Through 18 of the Energy Smart Program for filing under the docket referenced above. We will submit physical copies at your instruction. If you have any questions, please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely,

Jesse S. George
New Orleans Policy Director
Alliance for Affordable Energy

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

**In Re: 2024 TRIENNIAL INTEGRATED
RESOURCE PLAN OF ENTERGY
NEW ORLEANS, LLC**

DOCKET NO. UD-23-01

AUGUST 26, 2025

**COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY ON THE
ADVISORS' REPORT REGARDING THE ENTERGY NEW ORLEANS, LLC 2024
INTEGRATED RESOURCE PLAN AND ENTERGY NEW ORLEANS, LLC'S
APPLICATION FOR APPROVAL OF THE IMPLEMENTATION PLAN FOR
PROGRAM YEARS 16 THROUGH 18 OF THE ENERGY SMART PROGRAM**

I. ADVISORS' REPORT

On June 2, 2025, the New Orleans City Council's ("the Council") Utility Advisors ("the Advisors") filed their Report Regarding the Entergy New Orleans, LLC 2024 Integrated Resource Plan. The 2024 integrated resource plan ("IRP") underrepresents demand-side management ("DSM") potential, fails to model equity outcomes, and ignores key tools like Building Performance Standards ("BPS") and benchmarking that are increasingly relevant for New Orleans. These omissions may limit the ability of Entergy New Orleans ("ENO") — and the Council — to achieve affordable, equitable, and decarbonized energy outcomes. The Advisors' Report highlights many of the IRP's weaknesses but stops short of recommending structural equity metrics or BPS/benchmarking integration.

Equity

Neither the IRP nor the Advisors' Report includes equity as a modeled constraint, scenario factor, or scoring criteria. There is no disaggregation of DSM program delivery by income, geography, or demographic variables. In fact, the Advisors' Report mentions equity only

as a general concern and provides no metrics thresholds, or methods for modeling or monitoring equitable outcomes, nor does it offer comparison to other jurisdictions with stronger equity practices.

AAE would recommend the following metrics for inclusion in future IRP reports:

- Greenhouse gas reductions per dollar invested in environmental justice (“EJ”) or disadvantaged communities
- DSM participation by income classification and census tract, benchmarked against citywide averages
- Average energy burden reduction in low-income neighborhoods, tracked over time
- Distribution of incentives and savings by demographic group (race, income, renter status)

Additionally, AAE offers the following recommendations:

- The Advisors should seek ways to integrate equity as an optimization or constraint in IRP modeling, including requiring portfolio selection to meet minimum equity thresholds
- Amend IRP scorecard to include equity parameters such as greenhouse gas (“GHG”) reductions per dollar invested in environmental justice (“EJ”) neighborhoods, DSM participation by census tract and income group, and energy burden reduction potential for income-qualified households, and require the scorecard results be made public and reported regularly, alongside disaggregated program performance data

Benchmarking and Building Performance Standards

The IRP and Advisors’ report make no reference to building decarbonization policies like Building Performance Standards or benchmarking—despite them being stated under energy priorities in the City of New Orleans’ Net-Zero by 2050: A Priority List for Climate Action in New Orleans report and growing national precedent. New Orleans has now formally adopted the Building Energy Benchmarking Ordinance.¹ This law requires covered commercial and multifamily building owners to annually track and report their energy usage, providing critical data that will shape citywide demand forecasts, load shapes, and potential DSM savings.

¹ City of New Orleans, [Building Energy Benchmarking Ordinance](#), July 2025

The City of New Orleans, like many other cities, is moving towards mandated building performance laws. Buildings that benchmark save an average of 2.4% in energy use per year.² This potential impact on demand suggests the need for future IRPs to consider the impact of benchmarking and BPS policy on demand forecasting and how to meet demand.³ The recommendations below can be added into general comments on how the IRP addresses demand-side management, or mentioned separately.

These policies can impact both total energy demand in the future and change load shapes by shifting more energy use to electricity and potentially impacting peak demand periods. It is vital that City Council's regulatory process and ENO account for these policies in their long-term forecasts to ensure the ability to deliver reliable, efficient, and affordable energy. The Council should encourage better forecasting of the impacts of such policies and integration into demand and load shape models, specifically by:

- Ordering ENO to amend its IRP to include a scenario that models the expected impacts of the Benchmarking Ordinance on load forecasts, savings potential, and peak demand
- Requiring ENO to improve the accuracy and validity of its Energy Benchmarking Portal, including regular third-party audits to verify that aggregated data sets are complete, timely, and reliable for both compliance and resource planning
- Directing ENO to integrate forthcoming benchmarking reporting data into Energy Smart program design, enabling building owners to use whole-building usage reports to plan retrofits, prioritize DSM incentives, and meet performance goals under any future BPS policy

² [Energy Star Portfolio Manager Data Trends Benchmarking and Energy Savings](#)

³ <https://imt.org/news/building-performance-standards-beyond-the-meter/>

- Requiring annual public reporting on the quality and usage of the data portal

Finally, we agree with the Advisors' recommendation to amend the IRP rules to clarify the role of distributed energy resources ("DER").

II. ENERGY SMART IMPLEMENTATION PLAN

The Council directed ENO to file its Program Year 16 through 18 ("PY16-PY18") energy efficiency ("EE") and demand response ("DR") plan no later than June 16, 2025. In response, ENO filed its *Energy Smart Program Application for Approval of the Implementation Plan for Program Years 16-18* ("Plan").

The Plan describes ENO's proposal to implement eleven residential and income-qualified energy efficiency ("EE") programs, four commercial and industrial EE programs, three residential DR programs, and one large commercial DR program. The programs will collectively be identified as ENO's Energy Smart program.

In establishing a procedural schedule for ENO's Energy Smart Implementation Plan for PY16-PY18 the Council requested that parties address the following questions in comments on the Plan:

- a) whether the Implementation Plan should be approved for all subject program years or some subset thereof;
- b) which programs, if any, should be eliminated, reduced, or expanded; and
- c) whether ENO's selections for Third Party Administrators and Third-Party Evaluators for Program Years 16-18 should be approved.⁴

⁴ Council Resolution R-25-406

The Alliance for Affordable Energy (“AAE”) provides these comments for the Council’s consideration. These comments and recommendations do not represent the entirety of the possible modifications and expansions of Energy Smart that AAE supports, and AAE reserves the right to offer further recommendations and support for additional programs, program modifications, and or measures.

Summary of AAE Observations:

1. ENO presents both a 2% savings scenario and a “Reduced Savings”⁵ scenario. As indicated by their names, the 2% savings scenario provides more bill savings and more total resource cost (“TRC”) benefits than the reduced savings scenario. It is also more cost-effective under both the TRC and utility cost test (“UCT”) tests, regardless of whether weighted average cost of capital (“WACC”) or a societal discount rate is used.
2. Both the 2% savings scenario and the Company’s reduced savings scenario include significantly greater savings for income-qualified (“IQ”) customers than has been the case in previous plans – though the 2% savings scenario will benefit these customers far more than would the reduced savings scenario.
3. While commercial and industrial (“C&I”) savings as a percentage of the total portfolio decrease compared with prior plans, the proposed annual average C&I total program savings across the three-year PY16-PY18 Plan is consistent with the average in the PY13-PY15 plan. In other words, C&I savings do not decrease in the 2% scenario compared with prior plans.
4. ENO proposes demand response savings goals that stay at the PY15 level of 36 MW of nominated capacity for PY16 – approximately equal to 3% of the rolling average of the

⁵ ENO alternately refers to the Reduced Savings scenario as the “proposed savings” scenario.

2022-2024 peak load, and increase to roughly 58 MW, or roughly 4.8% of the average peak load in PY18. These savings would be achieved through the combination of several programs, including:

- a. Bring Your Own Thermostat (“BYOT”)
 - b. Electric Vehicle Behavioral Managed Charging
 - c. BESS (“Battery Energy Storage System”) Program
 - d. Large Commercial Automated Demand Response (“ADR”)
5. Energy Smart has experienced some challenges in the last three year cycle in meeting some of its C/I targets, reportedly due to loss of momentum and uncertainty in future program budgets and priorities between Council approvals.

Summary of AAE Recommendations:

AAE recommends the following actions by the Council:

1. The Council should select and approve the 2% energy savings scenario for the PY16 to PY18 program cycle. The 2% scenario is more cost-effective than the reduced savings scenario using both the societal and WACC discount rates, provides greater aggregate benefits to customers, and will provide greater opportunities for customers to manage unaffordable energy bills
2. The Council should approve all of the programs proposed by ENO for all years of the PY16-PY18 plan, with the following adjustments:
 - a. The Council should reject without prejudice the Company’s proposed Battery Storage Pilot program pending its determinations in Docket No. UD-24-02. Approving the pilot in the instant case would circumvent the case record

established in that docket and would negate any evidence provided in that case by parties who have not intervened in this proceeding

- b. ENO should modestly increase its BYOT participation, savings, and budget projections for PY16-PY18 to reflect steady year-over-year growth from the PY15 plan forecast;
 - c. ENO should continue and expand its workforce development efforts as needed to achieve its increased low-income weatherization participation projections. If not already embedded in program budgets ENO should include additional budget to support this effort;
3. AAE appreciates inclusion of ENO's proposed implementation plans from its selected Third Party Administrators and Third-Party Evaluators, however, not having been a party to the solicitation and review of alternate proposals does not offer an opinion on the Company's selections
 4. Expand C&I incentives to encourage adoption of and compliance with benchmarking
 5. Initiate functional improvements to facilitate customer access to the data needed for benchmarking compliance
 6. The Council should take action quickly (before the end of October 2025) in order to ensure workforce and momentum is retained, in order to alleviate challenges from prior years that have hindered success in C&I and residential programs.

The Council should select the 2% energy savings scenario for the PY16 to PY18 program cycle

ENO states "In compliance with Resolution R-23-553, the Plan contains a scenario that projects to generate a kWh savings rate equal to 2% of ENO's total annual kWh sales. The Plan also includes an option for reduced kWh savings and reduced program cost, Scenario 2 the

(“Reduced Savings”) scenario.”⁶ ENO also refers to the “Reduced Savings” scenario as its “Proposed Savings”⁷ scenario. ENO posits that the Proposed Savings scenario “includes aggressive but achievable portfolio goals”⁸ that will reduce “overall program costs over the full three-year cycle by \$20.7 million total vs. the 2% Goal scenario in the 2024 Potential Study.”⁹ However, the Company does not provide evidence that customers would be better off if the Council directs ENO to implement the Reduced Savings scenario rather than the 2% scenario. For example, the C&I programs in the 2% scenario achieve roughly 42% more savings compared with the reduced savings scenario over the PY16-PY18 period and do so at a cost that is only 27% greater than in the reduced savings scenario. In other words, C&I savings are less costly per kWh saved in the 2% scenario than in the reduced savings scenario. This contradicts ENO’s rhetoric, when it says that the 2024 DSM Potential Study “implies that reaching Commercial & Industrial savings to this [2% scenario] level would require an incentive budget ten times what the program is able to provide cost effectively.”¹⁰ AAE believes the premise of a ten-fold budget increase in the study was not well-founded, and it is not borne out in ENO’s plan scenarios.

The Company states that “[t]his plan significantly increases the energy savings targets of the residential portfolio.”¹¹ This is true for both the 2% and reduced savings scenarios when both IQ and non-IQ savings are combined to calculate total residential savings. However, the residential savings increase in aggregate is fully attributable to the significant increases proposed for IQ programs. In fact, non-IQ residential savings would decrease somewhat compared with previous years, though notably this is due to a reduction in behavioral program savings, as would

⁶ Attachment 1 - Implementation Plan Report PY16-18, p. 5.

⁷ Attachment 2 - Aptim PY16-18 Energy Smart EE Plan, p. 17.

⁸ Attachment 2 - Aptim PY16-18 Energy Smart EE Plan, p. 17.

⁹ Attachment 2 - Aptim PY16-18 Energy Smart EE Plan, p. 17.

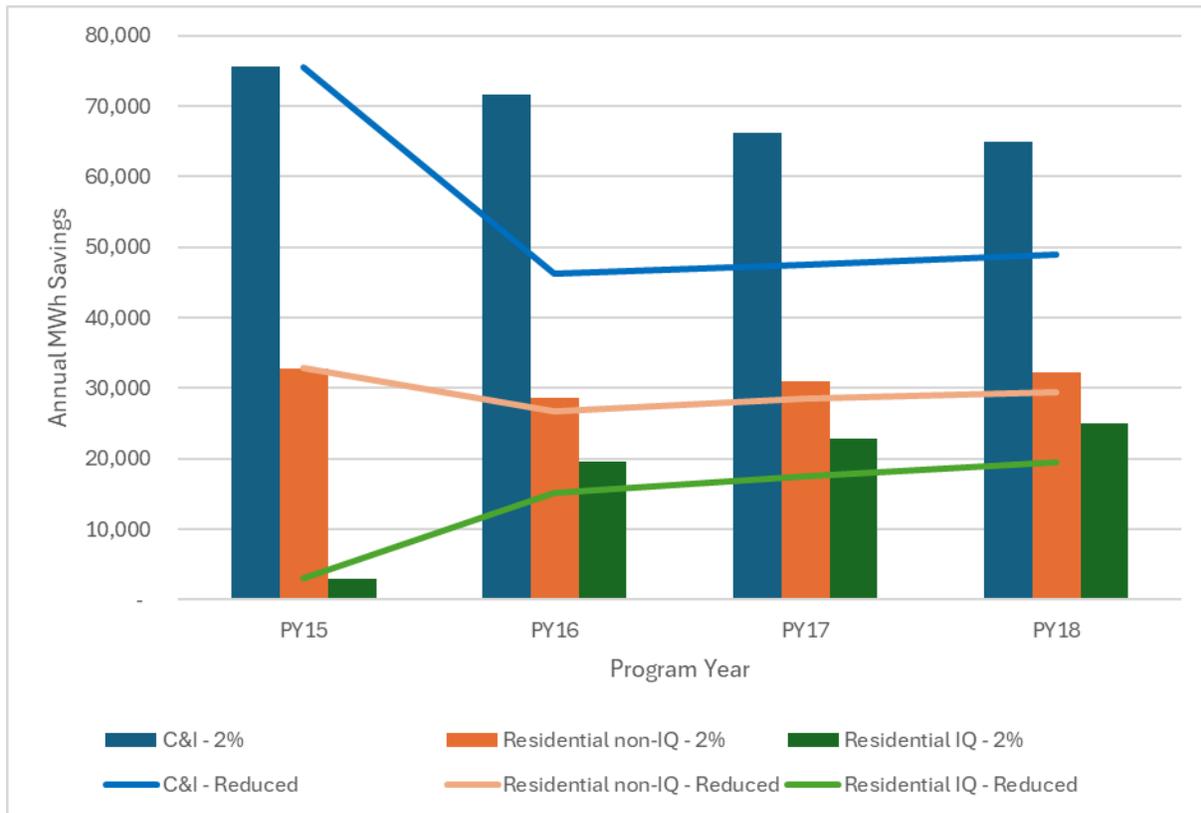
¹⁰ Attachment 2 - Aptim PY16-18 Energy Smart EE Plan, p. 16.

¹¹ Attachment 2 - Aptim PY16-18 Energy Smart EE Plan, p. 3.

C&I savings in aggregate. In AAE's view, this is a reasonable trade-off that provides much more benefit to the Company's most vulnerable and disadvantaged customers – those who have the most to gain from these programs. However, as discussed below, AAE recommends several areas in which C&I investments could be increased to benefit ENO's non-residential customers.

The relative emphasis in the 2% and reduced savings scenarios is compared with ENO's approved PY15 Plan in Figure 1 below. For PY16-PY18 in the figure the columns represent the savings by sector for the 2% scenario while the correspondingly colored lines represent the sector savings in the reduced savings scenario. For PY15 there is only one approved Plan, so those values are represented in both the column and the line. As one can clearly see, the IQ savings as proposed in both the 2% and reduced savings scenarios increase considerably compared with PY15. Non-IQ residential savings are slightly less in both the 2% and reduced savings scenarios compared with PY15, and C&I savings are somewhat less in the 2% scenario and considerably less in the reduced savings scenario.

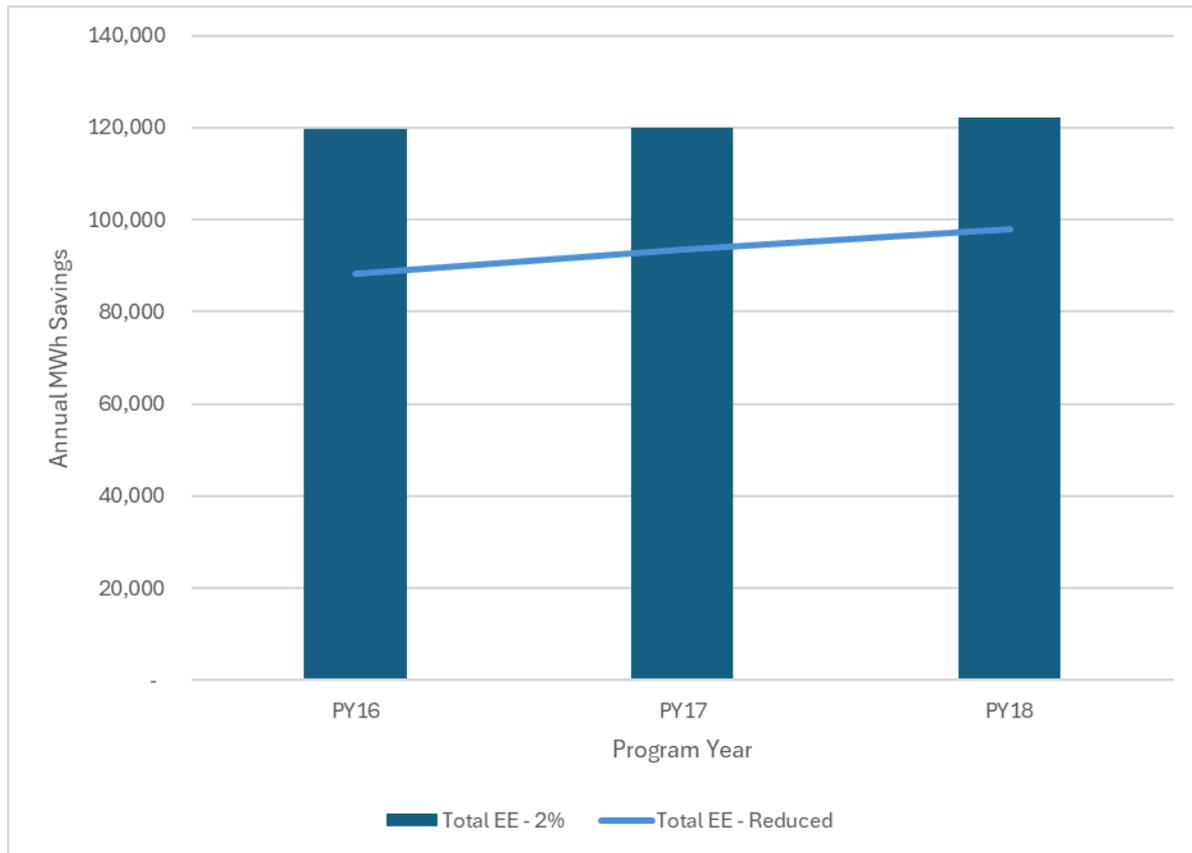
Figure 1: C&I, Non-IQ Residential, and IQ EE Savings¹²



In aggregate over the PY16-PY18 Plan the reduced savings scenario provides roughly a quarter less savings than the 2% scenario. The difference in annual savings projection is illustrated by year in Figure 2.

¹² PY15 Plan savings from Energy Smart Implementation Plan Report for Program Years 13 through 15, Section “F” Table “Program Year 15” on pdf page 20 of *Filing of Entergy New Orleans, LLC’s Energy Smart Program Application for Approval of the Implementation Plan for Program Years 13-15 (Docket Nos. UD-20-02 and UD-08-02), July 29, 2022*. PY16-PY18 Plan savings from Attachment 1 - Implementation Plan Report PY16-18, table “Program Year 16 - Reduced Savings Scenario” on p. 6, table “Program Year 17 - Reduced Savings Scenario” on p. 8, table “Program Year 18 - Reduced Savings Scenario” on p. 10, table “Program Year 16 - 2% Savings Scenario” on p. 12, table “Program Year 17 - 2% Savings Scenario” on p. 13, and table “Program Year 18 - 2% Savings Scenario” on p. 15.

Figure 2: Total EE Savings, 2% and Reduced Savings Scenarios¹³



As might be expected given the higher level of savings in the 2% scenario, the 2% scenario in aggregate also results in significantly increased TRC benefits. This increase is on the order of \$46 million more in the 2% scenario than in the reduced savings scenario. This is illustrated by program for PY16-PY18 in aggregate in Table 1:

¹³ PY16-PY18 Plan savings from Attachment 1 - Implementation Plan Report PY16-18, table “Program Year 16 - Reduced Savings Scenario” on p. 6, table “Program Year 17 - Reduced Savings Scenario” on p. 8, table “Program Year 18 - Reduced Savings Scenario” on p. 10, table “Program Year 16 - 2% Savings Scenario” on p. 12, table “Program Year 17 - 2% Savings Scenario” on p. 13, and table “Program Year 18 - 2% Savings Scenario” on p. 15.

Table 1: Comparison of Program TRC Benefits, 2% vs. Proposed Savings Scenarios¹⁴

Offering	TRC Benefits (\$)	
	2%	Proposed
Small Commercial Solutions	\$16,121,334	\$10,157,046
Large C&I Solutions	\$60,688,874	\$44,062,943
Schools & Universities	\$11,519,825	\$8,365,227
CoolSavers Tune-up	\$18,506,732	\$13,431,107
Home Performance with Energy Star (“HPwES”)	\$24,494,009	\$21,145,371
Income Qualified Weatherization	\$16,154,065	\$10,543,030
Neighborhood-Based Delivery Pilot	\$9,713,402	\$8,385,383
Multifamily Solutions	\$7,070,592	\$6,096,740
Multifamily Solutions Income Qualified	\$6,285,802	\$5,427,302
Residential Marketplace and Appliances	\$1,667,144	\$1,439,938
A/C Solutions	\$8,928,729	\$7,710,154
A/C Solutions Income Qualified	\$7,338,815	\$6,337,885
Residential HVAC Midstream	\$3,507,069	\$3,030,084
School Kits, Education and Community Outreach	\$232,473	\$232,473
TOTAL	\$192,228,864	\$146,364,685

As noted for the C&I programs above, the fact that savings in the 2% scenario increase more than the costs results in programs that are more cost-effective in the 2% scenario, as illustrated by the TRC results in Table 2. For every program, both the TRC and UCT results are higher for

¹⁴Attachment 2 - Aptim PY16-18 Energy Smart EE Plan, pp. 18-21, societal discount rate.

the 2% savings scenario, indicating that customers will receive more in benefits per dollar spent in the 2% scenario than they would in the reduced savings scenario.

Table 2: Comparison of TRC Cost-Effectiveness Ratios, 2% vs. Proposed Savings Scenarios¹⁵

Offering	TRC Ratio	
	2%	Proposed
Small Commercial Solutions	1.6	1.3
Large C&I Solutions	1.9	1.8
Schools & Universities	1.9	1.7
CoolSavers Tune-up	3.5	3.1
Home Performance with Energy Star (“HPwES”)	3.8	3.5
Income Qualified Weatherization	2.2	2.0
Neighborhood-Based Delivery Pilot	2.1	2.0
Multifamily Solutions	2.5	2.2
Multifamily Solutions Income Qualified	2.5	2.3
Residential Marketplace and Appliances	0.7	0.6
A/C Solutions	2.4	2.1
A/C Solutions Income Qualified	6.1	5.3
Residential HVAC Midstream	0.7	0.6
School Kits, Education and Community Outreach	0.1	0.1
TOTAL	2.1	1.9

The UCT results, using WACC as appropriate for utility investments, are shown in Table 3. The UCT results are also equal to or greater in the 2% scenario for every program. In short, the 2% scenario provides opportunities for more customers to participate and receive bill savings, provides greater benefits in aggregate, and is more cost-effective than ENO’s reduced savings scenario. For these reasons AAE urges the Council to direct ENO to implement the programs and budgets as described in the 2% savings scenario.

¹⁵Attachment 2 - Aptim PY16-18 Energy Smart EE Plan, pp. 18-21 – TRC results using societal discount rate shown.

Table 3: Comparison of UCT Cost-Effectiveness Ratios, 2% vs. Proposed Savings Scenarios¹⁶

Offering	UCT RATIO	
	2%	Proposed
Small Commercial Solutions	1.1	0.9
Large C&I Solutions	2.0	1.8
Schools & Universities	1.5	1.3
CoolSavers Tune-up	4.9	3.9
Home Performance with Energy Star (“HPwES”)	1.8	1.7
Income Qualified Weatherization	0.6	0.6
Neighborhood-Based Delivery Pilot	0.6	0.5
Multifamily Solutions	1.1	1.0
Multifamily Solutions Income Qualified	1.1	1.1
Residential Marketplace and Appliances	0.5	0.4
A/C Solutions	1.5	1.4
A/C Solutions Income Qualified	1.9	1.8
Residential HVAC Midstream	0.5	0.5
School Kits, Education and Community Outreach	0.2	0.2
TOTAL	1.3	1.2

Both the 2% savings scenario and the Company’s reduced savings scenario include significantly greater savings for income-qualified (“IQ”) customers than has been the case in previous plans

The Company states

The Plan reflects the Council’s desire to expand Energy Smart’s participation amongst income-qualified participants and within areas of the city that experience high energy burden and heat island effects. Greater than 15% savings projected in the proposed kWh targets come from programs that are

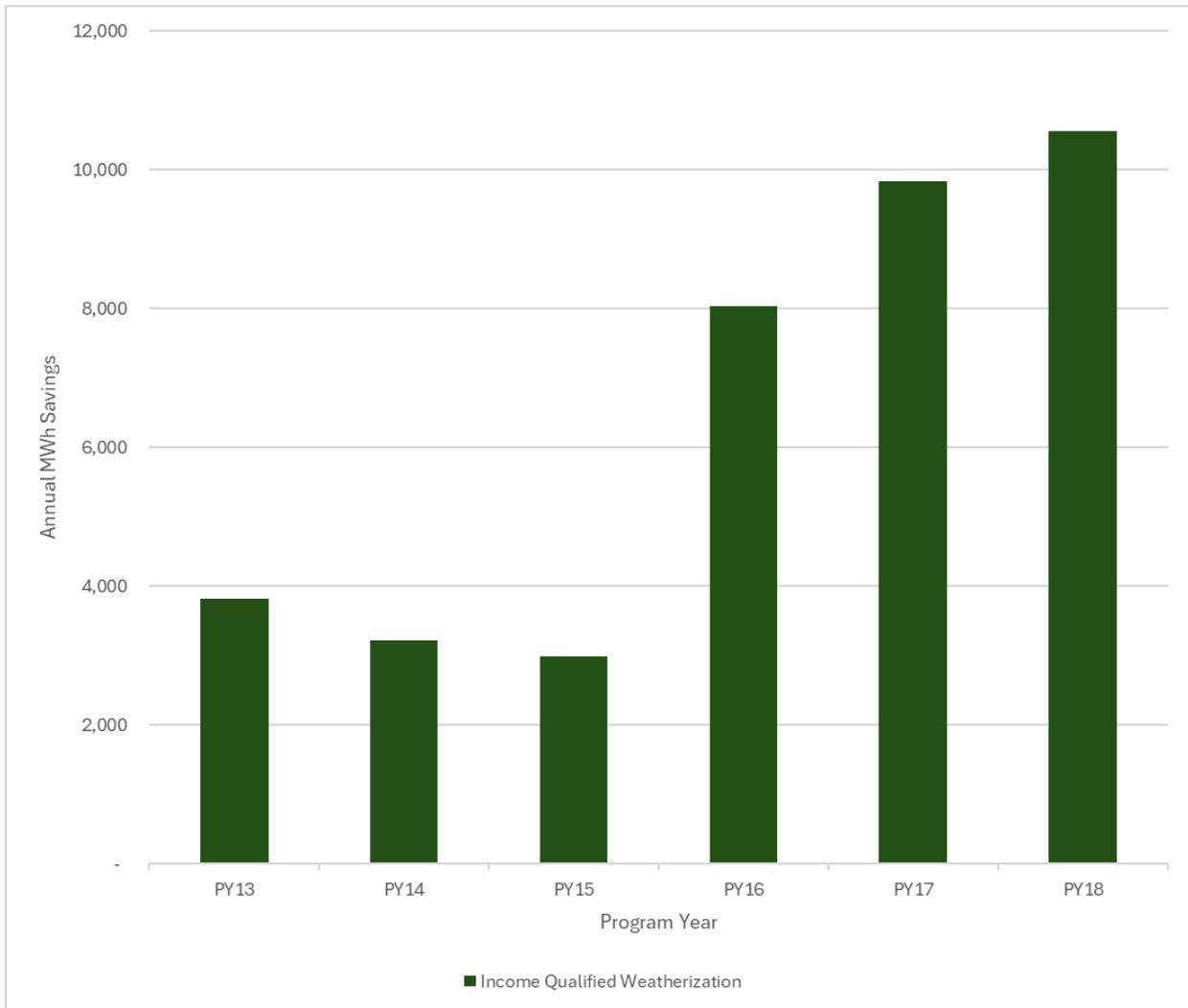
¹⁶Attachment 2 - Aptim PY16-18 Energy Smart EE Plan, pp. 18-21 – UCT results using WACC shown.

exclusively for income qualified customers. In addition, the Plan continues the Neighborhood Delivery Based Program through the next three years.¹⁷

This is borne out in the Company's proposals. ENO notably increases projected savings in the IQ Weatherization program compared with the current PY13-PY15 Plan. The projected annual savings for the program from PY13-PY15 are shown along with the 2% savings scenario's IQ Weatherization savings for PY16-PY18 in Figure 3.

¹⁷ Attachment 1 - Implementation Plan Report PY16-18, p.2.

Figure 3: Planned IQ Weatherization Program Savings, PY13-PY18¹⁸

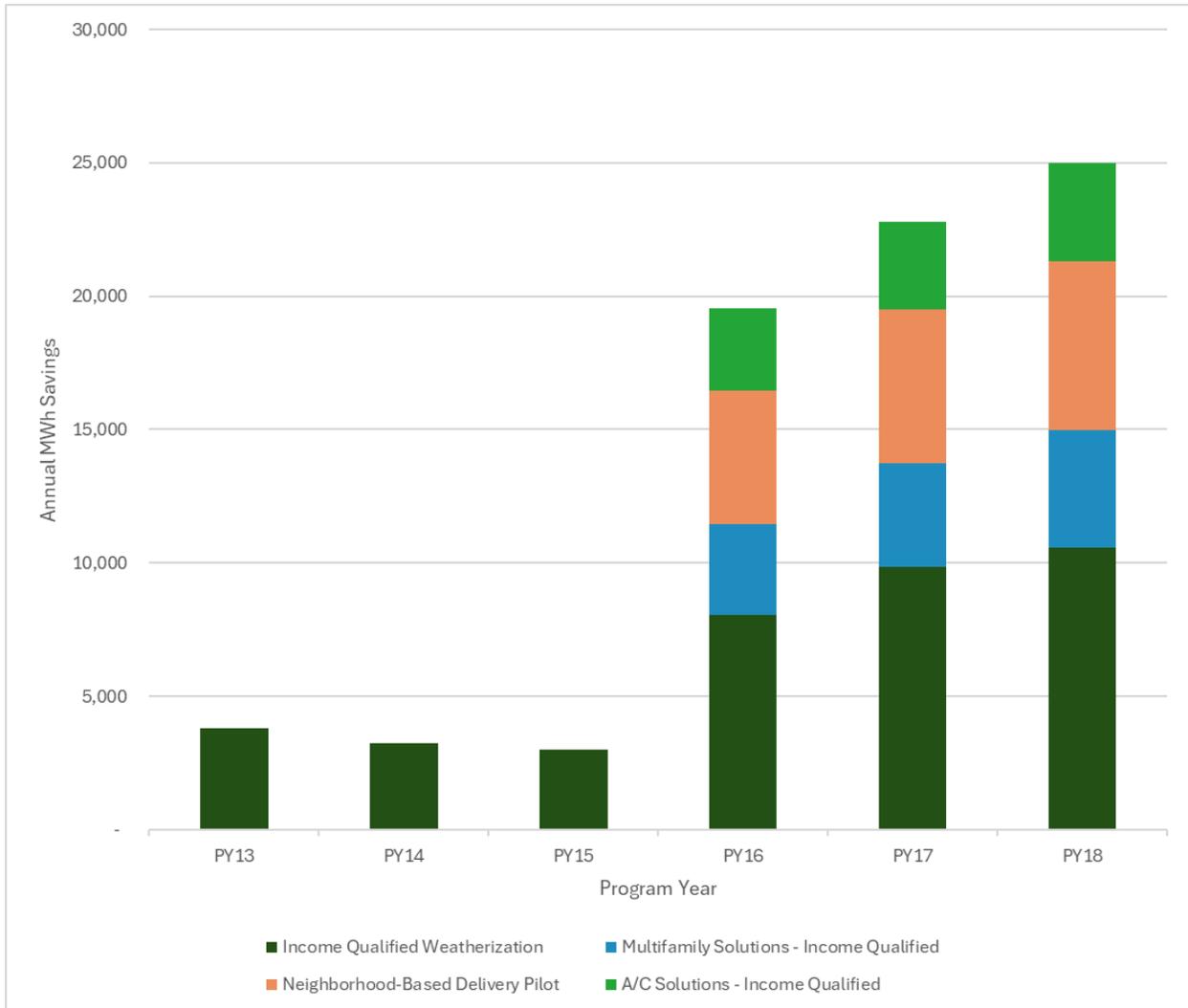


ENO also adds IQ programs that were not included in the PY13-PY15 Plan. Specifically, ENO proposes an IQ targeted Multifamily initiative, and IQ component to the A/C Solutions program,

¹⁸ PY13-15 Plan savings from Energy Smart Implementation Plan Report for Program Years 13 through 15, Section “F” Table “Program Year 13” on pdf page 19, Table “Program Year 14” on pdf pages 19-20 Table “Program Year 15” on pdf page 20 of *Filing of Entergy New Orleans, LLC’s Energy Smart Program Application for Approval of the Implementation Plan for Program Years 13-15 (Docket Nos. UD-20-02 and UD-08-02), July 29, 2022*. PY16-PY18 Plan savings from Attachment 1 - Implementation Plan Report PY16-18, table “Program Year 16 - Reduced Savings Scenario” on p. 6, table “Program Year 17 - Reduced Savings Scenario” on p. 8, table “Program Year 18 - Reduced Savings Scenario” on p. 10, table “Program Year 16 - 2% Savings Scenario” on p. 12, table “Program Year 17 - 2% Savings Scenario” on p. 13, and table “Program Year 18 - 2% Savings Scenario” on p. 15.

and an extension of the [expanded] neighborhood based delivery pilot that it proposed to launch in PY15. The proposed savings from these programs are added to those from the IQ Weatherization Program shown in Figure 3 and illustrated below in Figure 4.

Figure 4: Proposed IQ savings by program PY13-PY18, 2% savings scenario¹⁹



¹⁹ PY13-15 Plan savings from Energy Smart Implementation Plan Report for Program Years 13 through 15, Section “P” Table “Program Year 13” on pdf page 19, Table “Program Year 14” on pdf pages 19-20 Table “Program Year 15” on pdf page 20 of *Filing of Entergy New Orleans, LLC’s Energy Smart Program Application for Approval of the Implementation Plan for Program Years 13-15 (Docket Nos. UD-20-02 and UD-08-02), July 29, 2022*. PY16-PY18 Plan savings from Attachment 1 - Implementation Plan Report PY16-18, table “Program Year 16 - Reduced Savings Scenario” on p. 6, table “Program Year 17 - Reduced Savings Scenario” on p. 8, table “Program Year 18 - Reduced Savings Scenario” on p. 10, table “Program Year 16 - 2% Savings Scenario” on p. 12, table “Program Year 17 - 2% Savings Scenario” on p. 13, and table “Program Year 18 - 2% Savings Scenario” on p. 15.

In total, including the Neighborhood Delivery based program the IQ savings in the 2% scenario are roughly 6½ times greater than the total IQ savings in the PY13-PY15 Plan. By AAE’s math the IQ EE savings in the 2% scenario comprise over 18% of the total annual MWh savings in the Plan. This compares with IQ EE savings in the PY13-PY15 Plan that comprised on average only around 3% of the total EE savings. It is also consistent with AAE’s recommendation in Docket No. UD-22-04 that the Council “[e]stablish additional performance metrics for ENO requiring 15% of total portfolio savings to benefit income-qualified (“IQ”) customers.”²⁰ AAE appreciates the Company’s responsiveness to its long-standing focus on increasing the program benefits for the City’s most vulnerable communities.

Among the proposed programs AAE notes the following highlights.

- ENO indicates that it proposes a “Multifamily Solutions Income-Qualified program in which multifamily property owners and renters who qualify by income will receive enough incentive to cover the entire project cost.”²¹ This is an important improvement that has the potential to meaningfully benefit IQ households living in multifamily homes, including renters.
- ENO similarly proposes that “[t]he A/C Solutions program will have a corresponding AC Solutions Income-Qualified component in which participants who qualify by income will receive enough incentive to cover the entire project cost.”²² It is critical for IQ households that the incentive cover the full measure cost, as these households would simply not have resources to share in the costs of efficiency improvements. AAE supports these new IQ

²⁰ Docket No. UD-22-04, Comments of the Alliance for Affordable Energy, p. 2.

²¹ Application of Entergy New Orleans LLC for approval of the Energy Smart program implementation plan for program years 16 through 18, p. 3.

²² Application of Entergy New Orleans LLC for approval of the Energy Smart program implementation plan for program years 16 through 18, p. 4.

program subcomponents. In particular, AAE supports changes to the A/C solutions program that will increase access to affordable cooling solutions for income-qualified households.

In the U.S., heat is responsible for more fatalities than all other types of weather events.²³ Exposure to high temperatures is associated with increased risks of heatstroke, cardiovascular stress, respiratory complications, elevated mortality rates, and adverse birth outcomes particularly among vulnerable populations such as the elderly, children, and those with chronic illnesses.²⁴ While AC penetration is high in the U.S., for those that lack AC access, which is more commonly the case for low-income individuals, indoor environments can be much hotter than outdoor environments and these indoor environments can also remain hotter for longer periods of time than outdoor environments. These differences in indoor exposure to heat, in part, explain some of the heat health disparities that have been observed across populations, with low-income populations at greater risk for adverse health impacts from heat, including death.

In 2023, Louisiana recorded 91 heat-related fatalities, the highest number ever documented in the state. This number does not include excess deaths from chronic diseases that were exacerbated by heat exposure. More of these deaths occurred in the southeast region (including Orleans Parish) than any other region of the state. A majority of deaths (n=47, 53%) occurred at a residence and almost one-third (n=28, 32%) occurred inside. While information on risk factors contributing to heat exposure was only available for 32 fatalities, no or limited air conditioning was listed as a factor in 12 fatalities.²⁵

²³ <https://www.weather.gov/hazstat>

²⁴ <https://www.cdc.gov/heat-health/hcp/clinical-overview/index.html>

²⁵ <https://ldh.la.gov/assets/docs/lah/Heat-Related-Mortality-Louisiana-2023.pdf>

Residential air conditioning is the most effective measure to mitigate heat-related mortality.²⁶

- The Company indicates that its Plan is intended to reflect “the Council’s desire to expand Energy Smart’s participation amongst income-qualified participants and within areas of the city that experience high energy burden and heat island effects.”²⁷ To that end, among the other IQ programs listed above the Company proposes a Neighborhood-Based Delivery Program that will provide no-cost energy assessments “along with follow-up energy-saving improvements installed at no cost.”²⁸ In Docket No. UD-22-04 AAE discussed the reality that “certain geographic areas within New Orleans face severe energy burdens as a community, in addition to numerous other harmful consequences of historic, systemic discrimination .”²⁹ ENO also recognizes this, having stated previously that “[i]n many cases, these [IQ] customers live in geographic areas of the city that are affected by heat islands or particularly severe energy burdens.”³⁰ AAE previously recommended

the Council direct ENO to obtain these geographic data pertaining to energy burden, urban heat index, and race, and to further correlate it with utility data on arrearages and disconnections. The reporting should also be presented with disconnection, late fee, and arrearage levels in order for the Council and other stakeholders to track how increased and targeted programming improves

²⁶ Barreca A, Clay K, Deschenes O, Greenstone M, Shapiro JS. Adapting to Climate Change: The Remarkable Decline in the US Temperature-Mortality Relationship over the Twentieth Century. *J Polit Econ*. 2016;124(1):105-159. doi:10.1086/684582

²⁷ Attachment 1 - Implementation Plan Report PY16-18, p.2.

²⁸ Application of Entergy New Orleans LLC for approval of the Energy Smart program implementation plan for program years 16 through 18, p. 5.

²⁹ Docket No. UD-22-04, Comments of the Alliance for Affordable Energy, p. 12.

³⁰ Energy Smart Implementation Plan Report for PY13–15 at pdf p. 14.

*energy security over time. ENO should target its increased IQ program investments to the communities that are most in need, as evidenced by analysis of these data. AAE further recommends the Council require ENO to track participation in its IQ programs by census tract, so the Council can determine the extent to which ENO is succeeding in providing services to energy burdened communities that must contend with urban heat islands.*³¹

These recommendations stand. AAE recognizes and appreciates the Company’s proposal for geographic targeting related to energy burden and heat islands, including its proposal that “[t]his new offering will include pilot measures to help address urban heat island effect including cool roofs, covered A/C units, shade techniques and window film. There will also be additional incentive funds for health and safety measures to reduce weatherization barriers.”³²

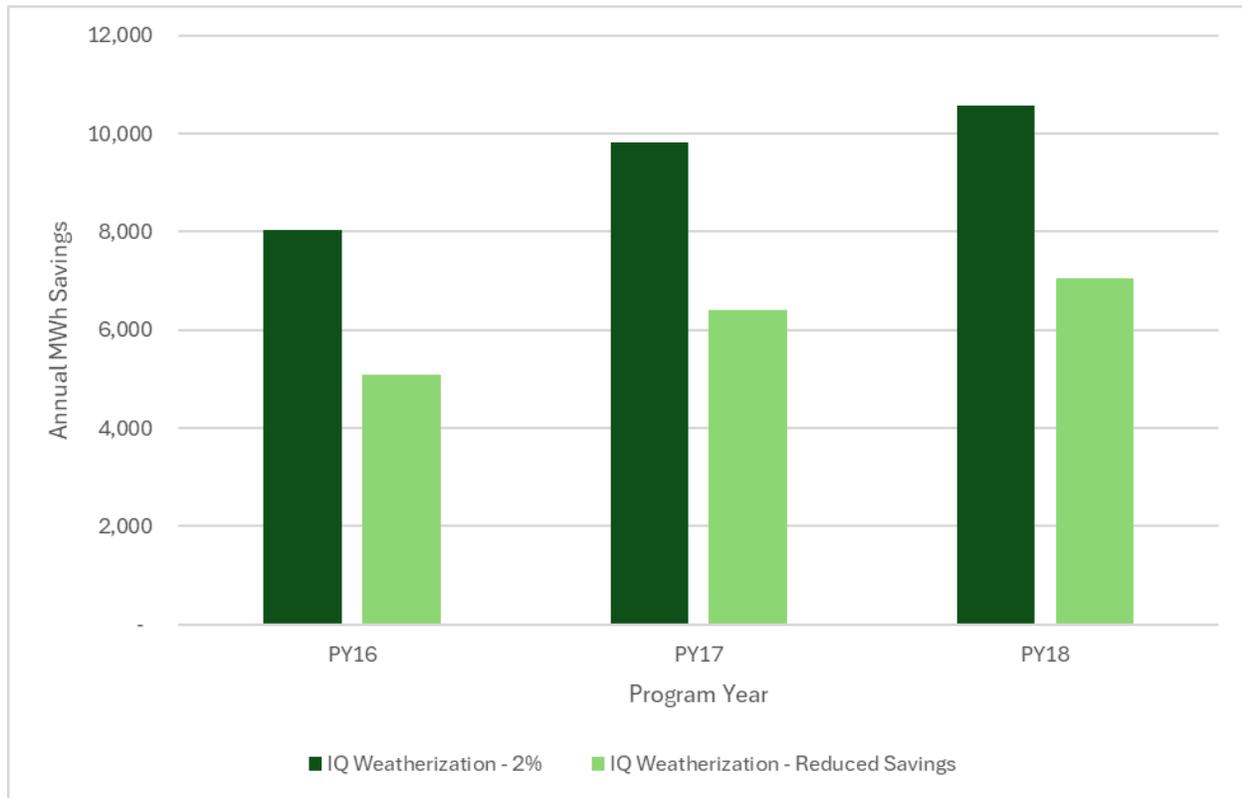
The 2% Savings Scenario provides greater benefits for income-qualified customers

The 2% savings scenario provides significantly more opportunities for IQ customers to save money by reducing their energy bills. While true for all the proposed IQ programs, this is especially notable for the IQ Weatherization program as illustrated in Figure 5. The table shows that savings for this program in the 2% scenario would be around 50% greater than in the reduced savings scenario in aggregate over the three-year plan.

³¹ Docket No. UD-22-04, Comments of the Alliance for Affordable Energy, pp. 13-14.

³² Attachment 1 - Implementation Plan Report PY16-18, p.6.

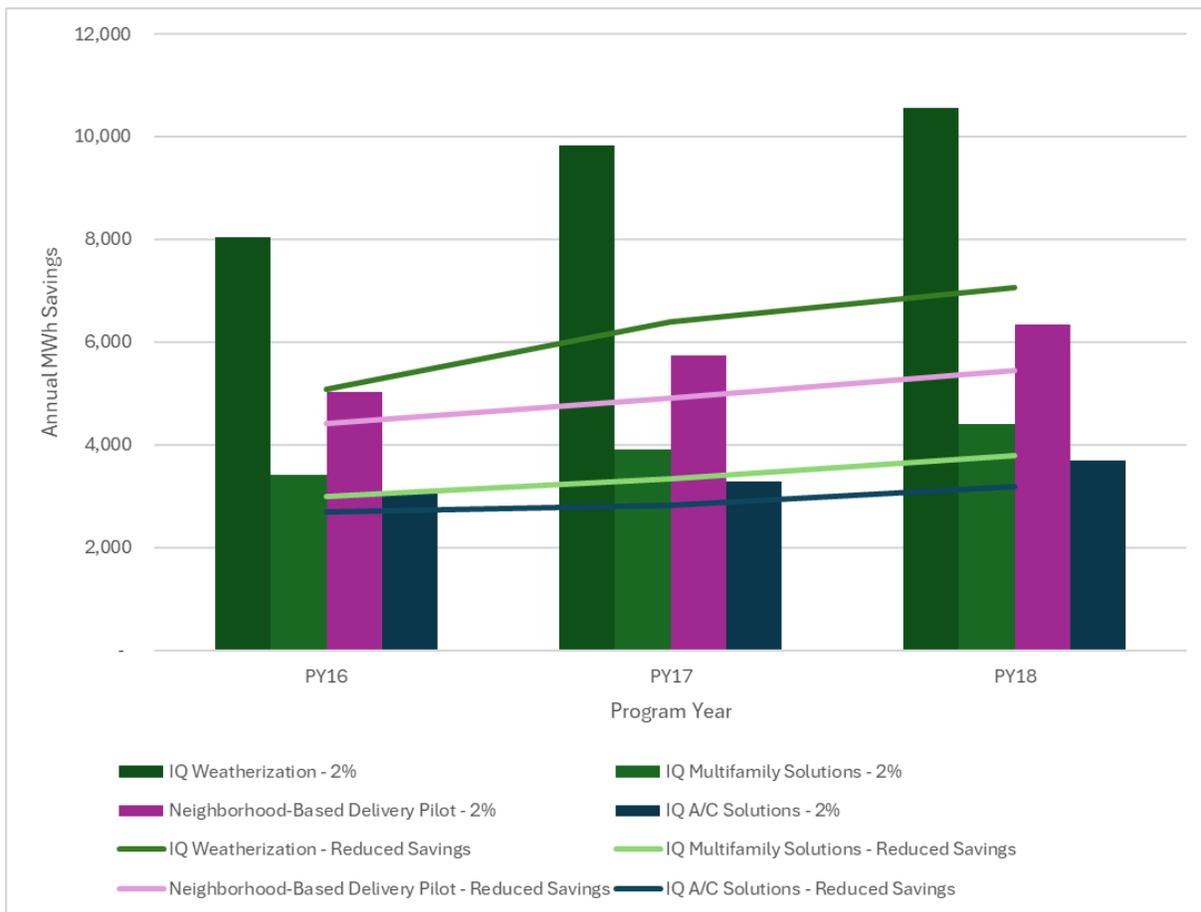
Figure 5: IQ Weatherization Savings in 2% Scenario vs. Reduced Savings Scenario³³



When considering the proposed PY16-PY18 savings for all of the proposed IQ programs, including the Neighborhood based delivery program, the IQ savings in the 2% scenario are all greater than in the reduced savings scenario. This is shown in Figure 6, in which the solid columns represent savings for the 2% scenario, and the lines, with colors that correspond to the columns, show savings for the reduced scenario.

³³ PY16-PY18 Plan savings from Attachment 1 - Implementation Plan Report PY16-18, table “Program Year 16 - Reduced Savings Scenario” on p. 6, table “Program Year 17 - Reduced Savings Scenario” on p. 8, table “Program Year 18 - Reduced Savings Scenario” on p. 10, table “Program Year 16 - 2% Savings Scenario” on p. 12, table “Program Year 17 - 2% Savings Scenario” on p. 13, and table “Program Year 18 - 2% Savings Scenario” on p. 15.

Figure 6: IQ Savings, 2% and Reduced Savings Scenarios³⁴



For the reasons referenced earlier – increased benefits and better cost-effectiveness – in addition to greater participation opportunities for vulnerable customers, AAE strongly urges the Council to approve the 2% scenario proposed by ENO.

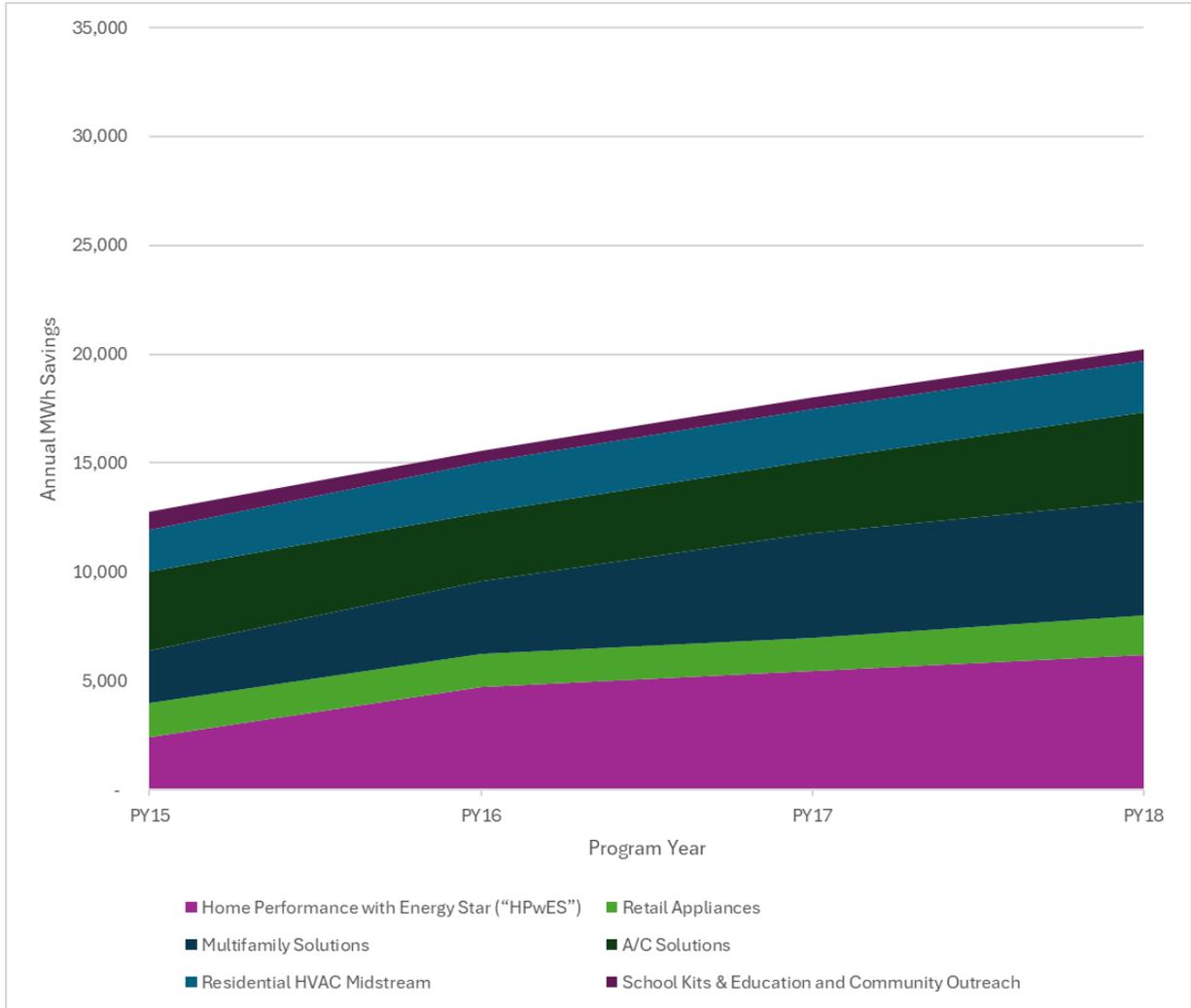
Residential (Non-IQ) Programs

Overall, when forecast behavioral program savings are not considered, residential (non-IQ) program savings in the 2% savings scenario show a gradual increase in the forecast level of

³⁴ PY16-PY18 Plan savings from Attachment 1 - Implementation Plan Report PY16-18, table “Program Year 16 - Reduced Savings Scenario” on p. 6, table “Program Year 17 - Reduced Savings Scenario” on p. 8, table “Program Year 18 - Reduced Savings Scenario” on p. 10, table “Program Year 16 - 2% Savings Scenario” on p. 12, table “Program Year 17 - 2% Savings Scenario” on p. 13, and table “Program Year 18 - 2% Savings Scenario” on p. 15.

savings during the PY16-PY18 period compared with PY15. This is mostly the result of increases in the Home Performance with Energy Star and Multifamily Solutions programs and is illustrated in Figure 7.

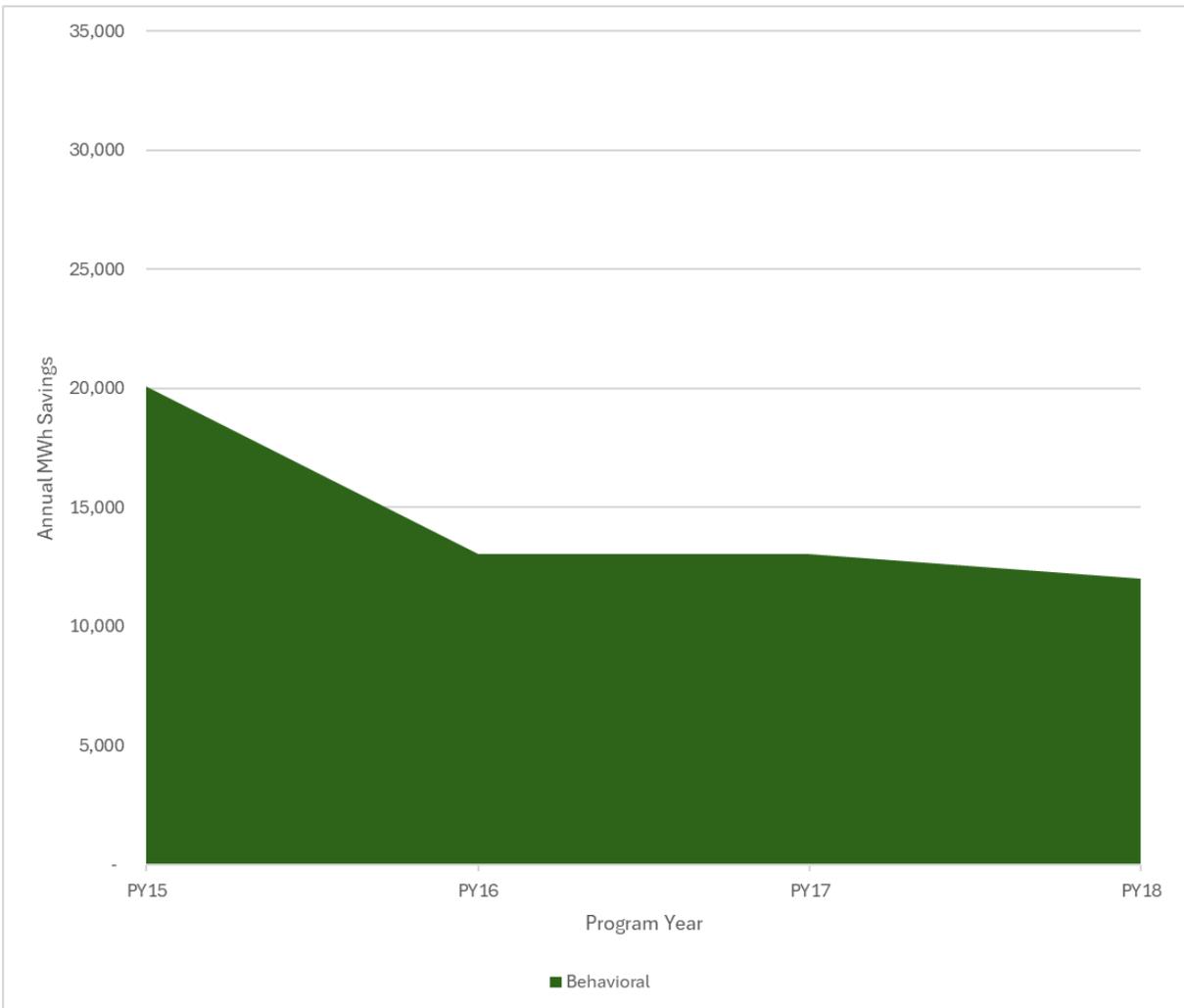
Figure 7: Residential (non-IQ) Program savings forecast, 2% savings scenario, excluding Behavioral program, PY15-PY18³⁵



In contrast, the Behavioral program forecast savings show a steep decline from PY15 to PY16, as illustrated in Figure 8.

³⁵ PY15 Plan savings from Energy Smart Implementation Plan Report for Program Years 13 through 15, Section “F” Table “Program Year 15” on pdf page 20 of *Filing of Entergy New Orleans, LLC’s Energy Smart Program Application for Approval of the Implementation Plan for Program Years 13-15 (Docket Nos. UD-20-02 and UD-08-02), July 29, 2022*. PY16-PY18 Plan savings from Attachment 1 - Implementation Plan Report PY16-18, table “Program Year 16 - Reduced Savings Scenario” on p. 6, table “Program Year 17 - Reduced Savings Scenario” on p. 8, table “Program Year 18 - Reduced Savings Scenario” on p. 10, table “Program Year 16 - 2% Savings Scenario” on p. 12, table “Program Year 17 - 2% Savings Scenario” on p. 13, and table “Program Year 18 - 2% Savings Scenario” on p. 15.

Figure 8: Behavioral program forecast savings PY15-PY18, 2% savings scenario³⁶

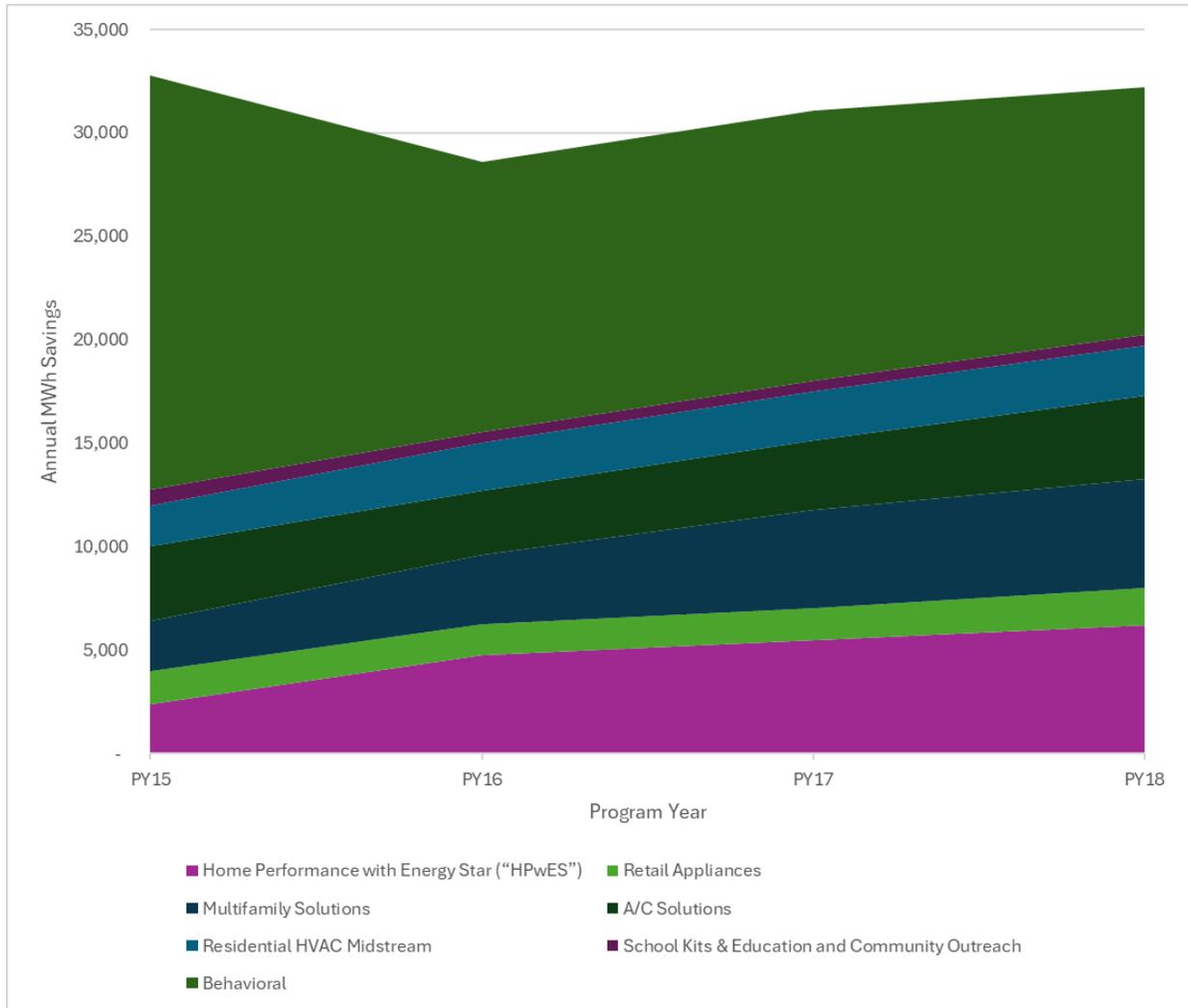


Because the behavioral program remains the largest single contributor to residential (non-IQ) savings, when looked at as a whole the residential (non-IQ) savings portfolio declines from

³⁶ PY15 Plan savings from Energy Smart Implementation Plan Report for Program Years 13 through 15, Section “F” Table “Program Year 15” on pdf page 20 of *Filing of Entergy New Orleans, LLC’s Energy Smart Program Application for Approval of the Implementation Plan for Program Years 13-15 (Docket Nos. UD-20-02 and UD-08-02), July 29, 2022*. PY16-PY18 Plan savings from Attachment 1 - Implementation Plan Report PY16-18, table “Program Year 16 - Reduced Savings Scenario” on p. 6, table “Program Year 17 - Reduced Savings Scenario” on p. 8, table “Program Year 18 - Reduced Savings Scenario” on p. 10, table “Program Year 16 - 2% Savings Scenario” on p. 12, table “Program Year 17 - 2% Savings Scenario” on p. 13, and table “Program Year 18 - 2% Savings Scenario” on p. 15.

PY15 to PY16 before slowly increasing to nearly meet the PY15 savings level in PY18. This is illustrated in Figure 9.

Figure 9: Residential (non-IQ) Program savings forecast, 2% savings scenario, including Behavioral program, PY15-PY18³⁷



³⁷ PY15 Plan savings from Energy Smart Implementation Plan Report for Program Years 13 through 15, Section “F” Table “Program Year 15” on pdf page 20 of *Filing of Entergy New Orleans, LLC’s Energy Smart Program Application for Approval of the Implementation Plan for Program Years 13-15 (Docket Nos. UD-20-02 and UD-08-02), July 29, 2022*. PY16-PY18 Plan savings from Attachment 1 - Implementation Plan Report PY16-18, table “Program Year 16 - Reduced Savings Scenario” on p. 6, table “Program Year 17 - Reduced Savings Scenario” on p. 8, table “Program Year 18 - Reduced Savings Scenario” on p. 10, table “Program Year 16 - 2% Savings Scenario” on p. 12, table “Program Year 17 - 2% Savings Scenario” on p. 13, and table “Program Year 18 - 2% Savings Scenario” on p. 15.

While true that the overall level of savings decreases from PY15 to PY16, there is a positive signal in the PY16-PY18 forecast. Notably, savings in Home Performance with Energy Star and Multifamily solutions are increasing, indicating an increased emphasis on the types of comprehensive programs that provide significant bill savings benefits for customers. Short-lived behavioral program savings are still a significant contributor to the residential portfolio, but where behavioral savings are greater than the sum of all other residential programs in PY15 at 61% of the residential savings that is no longer the case in PY18, where behavioral savings would make up only 37% of the residential savings. AAE supports this shift in focus from short-lived Behavioral program savings to more lasting comprehensive savings, such as those that would be available in the Home Performance program.

Because of the proposed increase in IQ savings the Behavioral program contribution to total residential savings, including both IQ and non-IQ, also decreases over the Plan period. In the PY15 plan Behavioral savings made up 56% of the total residential savings, whereas in PY18 it is forecast to contribute only 21% of the total residential savings. To be fair, this is still a very large portion of the savings, but AAE recognizes the significant change and finds that it suggests that EnergySmart will provide more opportunities for more customers to benefit from significantly reduced energy bills by participating in the expanded and more comprehensive programs proposed here.

Workforce Development

In its recent report of PY14 results ENO stated that “[a] key component of Energy Smart’s delivery model is to continuously improve and elevate trade ally skills and capabilities through training and workforce development initiatives.”³⁸ In this report ENO describes numerous

³⁸ Energy Smart Program Annual Report – Program Year 14, p. 110.

workforce development and trade ally engagement initiatives, including a High Performance HVAC training³⁹ and “training directed toward improving trade ally ability to sell energy services.”⁴⁰ However, the term “workforce” appears only once in the PY16-PY18 Plan with no descriptive detail.⁴¹ Successfully increasing participation in ENO’s IQ programs will almost certainly depend on the availability of a trained labor force. The Council should direct ENO to implement workforce development programs and activities as needed to ensure it is able to achieve its proposed IQ targets.

ENO Proposed Peak Reduction Target

ENO has proposed several demand response programs to provide a range of opportunities for customers. These include a “Bring Your Own Thermostat” (“BYOT”) direct load control program to shift setpoints for residential air conditioning to reduce demand in peak periods; a Peak Time Rebate (“PTR”) pilot program to reward customers for reducing consumption during peak periods; an Electric Vehicle (“EV”) Bring Your Own Charger (“BYOC”) program to shift EV charging to off-peak periods; a Large Commercial Automated Demand Response (“ADR”) program to incentivize large commercial customers to reduce usage during peak events; and a Battery Energy Storage System (“BESS”) program to incentivize customers to “to allow ENO to discharge their solar-paired battery systems during periods of peak demand.”⁴²

In aggregate, ENO proposes that this suite of programs will achieve 36 MW of demand reduction in PY16 – equivalent to its PY15 demand reduction DR goal of “acquiring 3% of system peak in callable MW.”⁴³ In each subsequent year the proposed goals increase in aggregate, to almost 4%

³⁹ Energy Smart Program Annual Report – Program Year 14, p. 107.

⁴⁰ Energy Smart Program Annual Report – Program Year 14, p. 107.

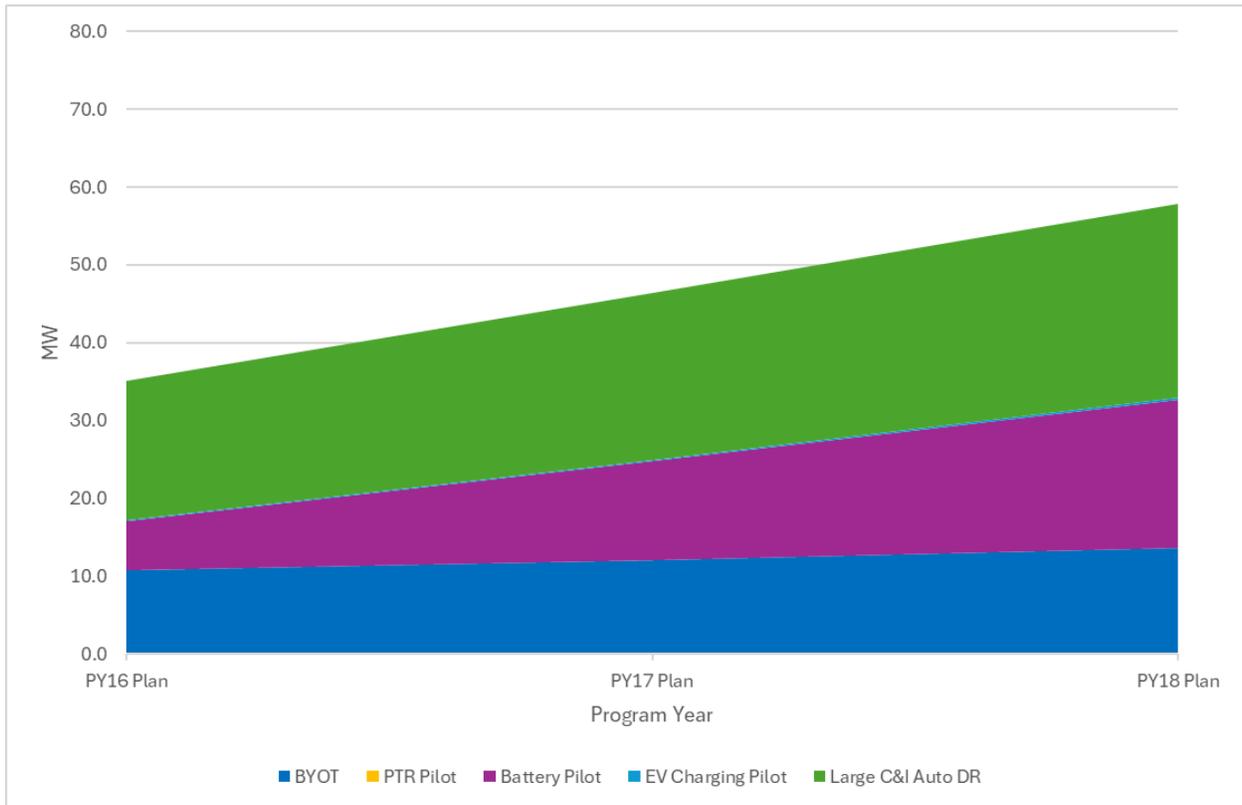
⁴¹ Attachment 2 - Aptim PY16-18 Energy Smart EE Plan, p.15.

⁴² Application p.7.

⁴³ Attachment 1 - Implementation Plan Report PY16-18, p.4.

of system peak in PY17 and close to 5% of peak in PY18. The proposed MW totals for the DR programs are illustrated in Figure 10.

Figure 10: ENO Proposed DR MW Goals by Program⁴⁴



AAE appreciates ENO’s commitment to DR savings, and notes that in aggregate the PY16-PY18 proposed goals show a non-trivial increase compared with the current period. However, AAE recommends the Council reject without prejudice the proposed BESS program in the instant case until it has concluded its evidentiary review and reached a decision in Docket UD-24-02.

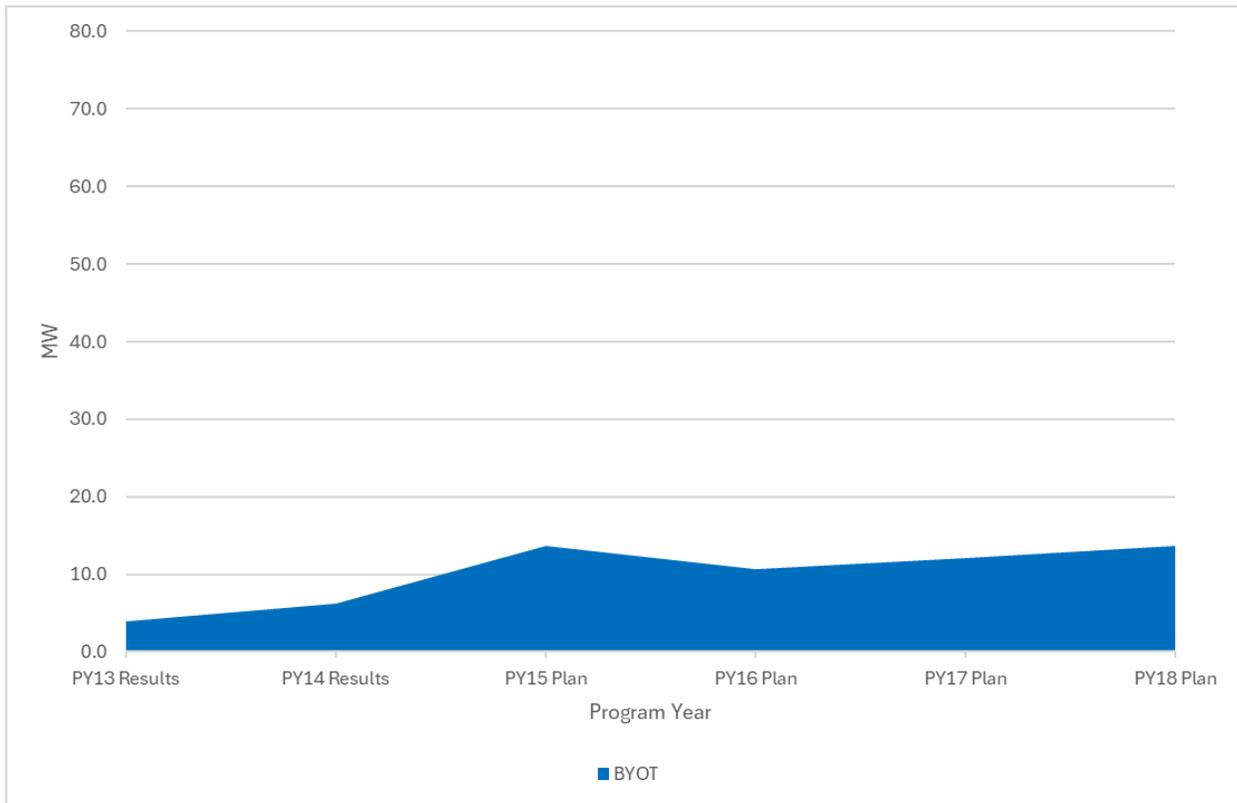
Approving the pilot in the instant case would circumvent the case record established in that

⁴⁴ PY16-PY18 Plan savings from Attachment 1 - Implementation Plan Report PY16-18, table “Program Year 16 - Reduced Savings Scenario” on p. 6, table “Program Year 17 - Reduced Savings Scenario” on p. 8, table “Program Year 18 - Reduced Savings Scenario” on p. 10, table “Program Year 16 - 2% Savings Scenario” on p. 12, table “Program Year 17 - 2% Savings Scenario” on p. 13, and table “Program Year 18 - 2% Savings Scenario” on p. 15.

docket and would negate any evidence provided in that case by parties who have not intervened in this Plan proceeding.

AAE also suggests that ENO may be able to achieve greater participation in the BYOT offering than is currently proposed, where participation increases only fractionally over the period. This suggestion is based on consideration of the ubiquitous promotion of smart, DR-enabled thermostats in ENO's EE programs and the belief that such widespread promotion can and should be leveraged to maximize BYOT participation. Figure 11 shows ENO's reported BYOT savings for PY13 and PY14, planned savings for PY15, and proposed savings for PY16-PY18. As the figure shows, the proposed PY16 savings step down from the PY15 Plan level, and only gradually increase back to roughly the PY15 Plan level by PY18.

Figure 11: BYOT Actual and Plan Savings⁴⁵



If ENO is able to meet the PY15 BYOT target AAE believes it is unreasonable to scale back expectations for this program in PY16. ENO notes a number of EE programs that it will use to promote demand response enabled thermostats, and AAE recommends ENO takes steps to maximize BYOT participation among customers who receive thermostats. For example, regarding HPwES Level 1 assessments ENO says “[t]o generate additional savings, at the time of the audit, demand response enabled smart thermostats have been added as a direct install

⁴⁵ PY13 results from PY13 Energy Smart Annual Report filed July 22, 2024, table “Residential Portfolio Performance, pdf p.16. PY14 results from PY14 Energy Smart Annual Report filed August 11, 2025, table “Residential Portfolio Performance, pdf p.16. PY16-PY18 Plan savings from Attachment 1 - Implementation Plan Report PY16-18, table “Program Year 16 - Reduced Savings Scenario” on p. 6, table “Program Year 17 - Reduced Savings Scenario” on p. 8, table “Program Year 18 - Reduced Savings Scenario” on p. 10, table “Program Year 16 - 2% Savings Scenario” on p. 12, table “Program Year 17 - 2% Savings Scenario” on p. 13, and table “Program Year 18 - 2% Savings Scenario” on p. 15.

measure.”⁴⁶ ENO also states that demand response enabled smart thermostats will be provided in at least the IQ Weatherization program,⁴⁷ the A/C Solutions program,⁴⁸ and Multifamily Solutions.⁴⁹ ENO also states that “EnergyHub will also work with Franklin Energy to enable the pre-enrollment of connected thermostats that are purchased through the Residential Energy Smart Online Marketplace.”⁵⁰ Indeed, ENO notes it will “Cross-promote retail smart thermostat signage with Demand Response (DR) program to increase conversion of smart thermostat purchases into DR enrollments.”⁵¹ This is appropriate – and AAE suggests ENO should thoughtfully pursue this cross promotion to maximize BYOT enrollments.

Success with this approach could reasonably be expected to increase participation in BYOT, though AAE notes that if PY15 results are significantly below forecast it would affect the starting point for increasing savings in PY16-PY18. Figure 12 illustrates AAE’s recommended savings trajectory for the BYOT program in PY16-PY18, from roughly 14 MW in the PY15 plan to just under 20 MW in PY18.

⁴⁶ Application p.2.

⁴⁷ Application p.4.

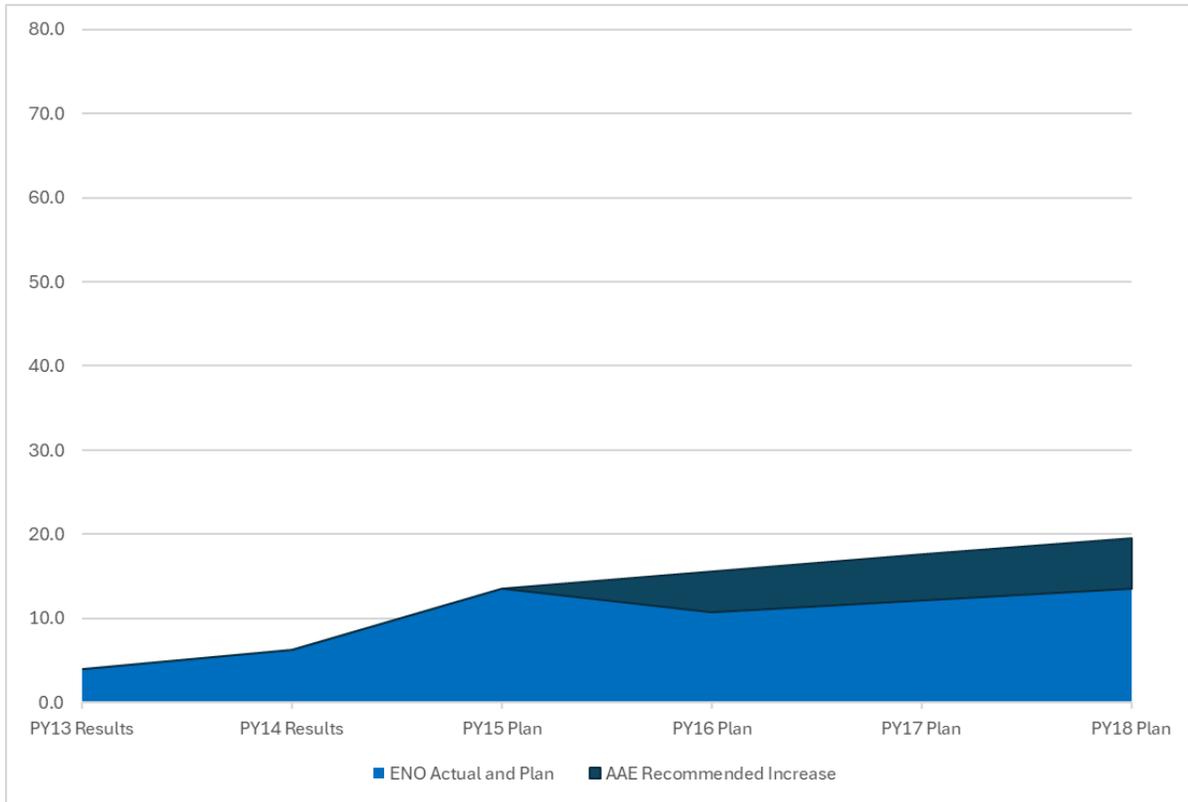
⁴⁸ Application p.4.

⁴⁹ Attachment 2 – Aptim PY16-18 Energy Smart EE Plan, p. 7.

⁵⁰ Attachment 5 - EnergyHub-ENO Implementation Plan 2026 – 2028, p. 1.

⁵¹ Attachment 2 – Aptim PY16-18 Energy Smart EE Plan, p. 8.

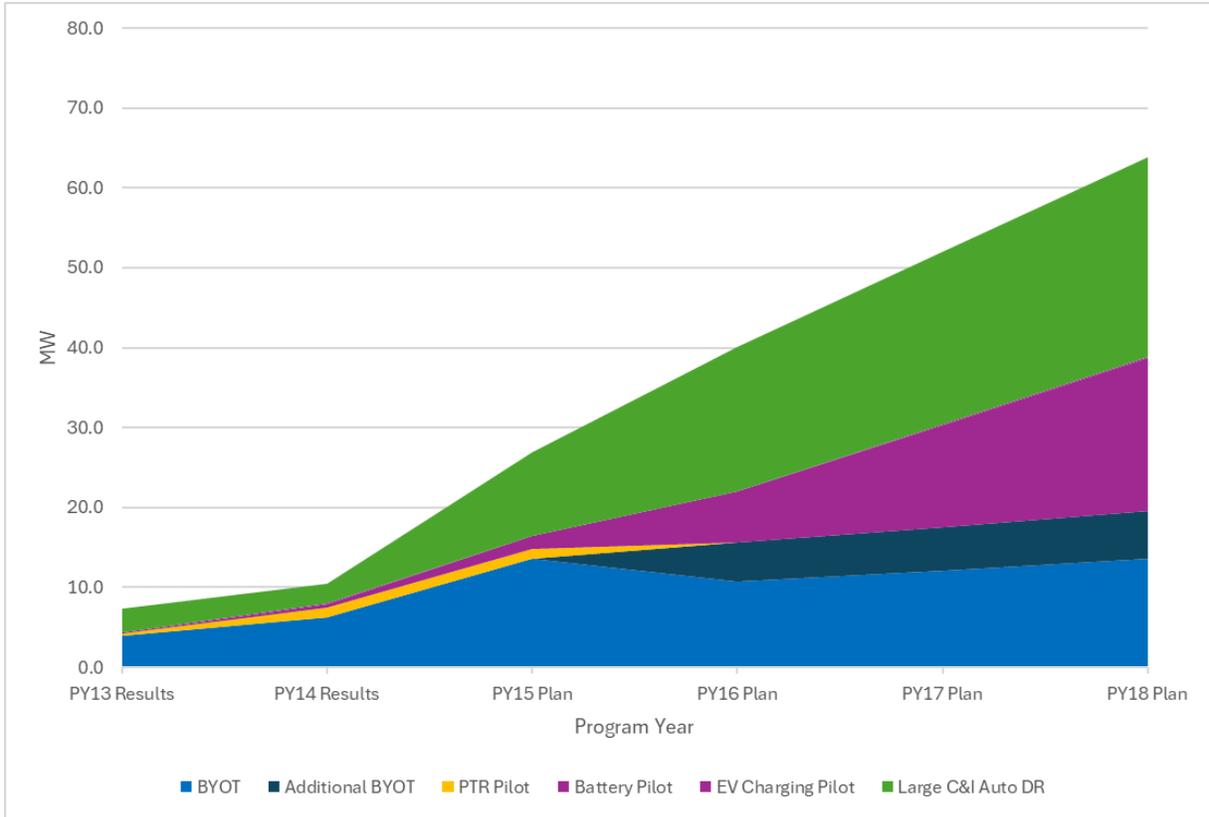
Figure 12: BYOT Actual and Plan Savings including AAE recommended increase for PY16-PY18⁵²



In aggregate, including the AAE proposed BYOT increase, the Company’s DR program savings would grow somewhat more than it has currently proposed, as illustrated in Figure 12.

⁵² PY13 results from PY13 Energy Smart Annual Report filed July 22, 2024, table “Residential Portfolio Performance, pdf p.16. PY14 results from PY14 Energy Smart Annual Report filed August 11, 2025, table “Residential Portfolio Performance, pdf p.16. PY16-PY18 Plan savings from Attachment 1 - Implementation Plan Report PY16-18, table “Program Year 16 - Reduced Savings Scenario” on p. 6, table “Program Year 17 - Reduced Savings Scenario” on p. 8, table “Program Year 18 - Reduced Savings Scenario” on p. 10, table “Program Year 16 - 2% Savings Scenario” on p. 12, table “Program Year 17 - 2% Savings Scenario” on p. 13, and table “Program Year 18 - 2% Savings Scenario” on p. 15.

Figure 13: ENO Reported PY13 and PY 14 and Plan PY15 DR Savings with Proposed PY16-PY18 DR MW and AAE Additional BYOT Savings Goals by Program⁵³



Income Qualified DR Participation

ENO states that the Multifamily Solutions and A/C Solutions offerings will have a “corresponding AC Solutions Income-Qualified component in which participants who qualify by income will receive enough incentive to cover the entire project cost”⁵⁴ and that “[t]he Income-Qualified Weatherization offering is designed to offer qualifying customers free energy

⁵³ PY13 results from PY13 Energy Smart Annual Report filed July 22, 2024, table “Residential Portfolio Performance, pdf p.16. PY14 results from PY14 Energy Smart Annual Report filed August 11, 2025, table “Residential Portfolio Performance, pdf p.16. PY16-PY18 Plan savings from Attachment 1 - Implementation Plan Report PY16-18, table “Program Year 16 - Reduced Savings Scenario” on p. 6, table “Program Year 17 - Reduced Savings Scenario” on p. 8, table “Program Year 18 - Reduced Savings Scenario” on p. 10, table “Program Year 16 - 2% Savings Scenario” on p. 12, table “Program Year 17 - 2% Savings Scenario” on p. 13, and table “Program Year 18 - 2% Savings Scenario” on p. 15.

⁵⁴ Application p.4.

efficiency projects.” AAE assumes this means that these programs will provide DR enabled smart thermostats to participants and will facilitate their enrollment in the BYOT program as appropriate. AAE supports this approach and encourages ENO to ensure that its IQ plans for BYOT include a fulsome approach to inform and educate participants on the participant benefits of BYOT and on how they can be maximized while minimizing participant discomfort or inconvenience.

ENO also states that “[t]o help facilitate low-to-moderate income participation and support different financing options, ENO intends to make the upfront incentive assignable by the customer to the vendors and contractors selling and installing the battery systems.”⁵⁵ AAE appreciates the intention expressed here, but, in the event the Commission approves the BESS program after its review in UD-24-02, AAE requests more information from ENO regarding the size of the anticipated incentive and whether ENO has conducted any research to support the premise that it would be sufficient, with the assignment upfront, to allow low-to-moderate income customers to participate. The Residential Battery DR program has by far the largest budget among the residential DR programs, and AAE is concerned that it will still be too costly for IQ customers to participate.

C&I Incentive Expansions to Support Benchmarking and Building Performance Standards

The C&I incentives offered through the EnergySmart PY16-18 Implementation Plan could be greatly expanded to better support buildings covered under New Orleans Building Energy Benchmarking Ordinance⁵⁶ and any future building performance standards (“BPS”).

⁵⁵ Attachment 5 - EnergyHub-ENO Implementation Plan 2026 – 2028, p.5.

⁵⁶ City of New Orleans, [Building Energy Benchmarking Ordinance](#), July 2025

These incentives could ensure building owners, especially under-resourced owners, have the support necessary to comply and could offer a significant savings attribution opportunity.

Code and standard attribution has been a common part of utility incentive programs in many locations for the last three decades. This includes claiming savings for utility programs that support code adoption and code compliance - which may occur through education, training, or incentives.⁵⁷ Utilities are now starting to take actions to develop attribution models for supporting benchmarking and building performance standards. The potential savings implication from supporting adoption and compliance of these programs is significant, and should encourage early thinking on how to develop a model for attribution and add in incentive programs.

Under code support programs and proposed benchmarking or building performance standard programs, utilities can claim adoption and/or compliance market transformation savings. Savings attributed from adoption are typically measured against a baseline of energy use from minimum code or business as usual if no code or standard exists. Utility programs that support adoption often provide technical support or research to help design the policy or education. Utility programs on code or standard compliance measure the savings by comparing compliance rates without the programs to compliance rates with the programs. Utility activities include incentives targeted for whole building improvements to aid in compliance, training for building community, and general education resources.

Specific incentive program additions are noted in Table 4 with examples on how other locations are implementing the programs.

⁵⁷ See here for more details:
https://www.aceee.org/sites/default/files/pdfs/utility_energy_code_programs_and_their_potential_extension_to_building_performance_standards_2_1.pdf

Table 4: Example Utility Activities for Benchmarking or BPS Attribution

Support	Adoption or Compliance	Description	Examples
Benchmarking data entry support	Compliance	Offer building owners direct assistance to input their utility data into a benchmarking tool for compliance	DC Sustainable Energy Utility offered when benchmarking was first established in DC
Technical research and policy support	Adoption	Help complete building analyses, impact analyses, or grid analyses to inform the design of policies and provide data to increase stakeholder buy-in and odds of adoption.	Massachusetts utilities offer technical analyses and proposals for code updates during the typical code cycle
Information sharing and education	Adoption and compliance	Provide technical resources around how to decarbonize buildings or eventually comply with existing policies	DCSEU offers toolkits and roundtables to support specific building types understand BPS compliance and options for compliance (example for condos and coops)
Incentives to complete energy audits or assessments for long-term plan	Adoption and compliance Supports compliance but existence of programs also encourages adoption.	Provides support to hire a technical consultant to perform an audit or assessment. Provides the building owner with a list of upgrades to make. Some locations specifically offer for buildings with less resources (affordable housing, etc.).	DCSEU offers \$15,000 for commercial buildings over 50,000 square feet to receive an audit. Higher incentive for buildings that are not compliant with BPS in DC.
Early adopter incentives	Adoption and compliance Supports compliance but existence of programs also	Offers incentives to make upgrades to comply with a policy early. Incentives usually cover an amount per square feet of building if a certain condition is met (e.g. energy reduction of a certain percent or in compliance)	Washington State utilities offer early adopter incentives for buildings not in compliance with the state's BPS. Incentives are per square foot and applied once a building shows they are compliant.

	encourages adoption.		
General building upgrade incentives	Adoption and compliance Supports compliance but existence of programs also encourages adoption.	Offer incentives specifically targeted at whole building upgrades to meet compliance. Goes beyond resource acquisition incentives to address whole building Sometimes targeted at under-resourced buildings	Cambridge, MA partnered with their utility Eversource to offer technical assistance and incentives for buildings that need to comply with BPS New York utilities offer specific incentives for affordable housing building upgrades that are needed to comply with the New York City BPS

Recommendations:

1. The Council should direct ENO to work with regulators and evaluators to consider how to claim savings for broader support of adoption and/or compliance with benchmarking, future energy code updates, and BPS. It can take time to develop a robust attribution model and given the significant potential savings, it is recommended to get started on this early.
2. Consider how to expand programs to offer solutions that could count towards BPS attribution. Energy efficiency program incentives are typically not enough to claim more significant savings towards compliance or adoption but adding technical support, education, or incentives geared towards whole building upgrades for BPS could work.
 - a. Target these programs toward priority buildings, such as buildings that are older, located in low-income neighborhoods, serve communities, or have financial constraints

3. If an attribution model is not added, consider how to expand existing resource acquisition incentives to claim savings from early adopters. Buildings may be incentivized to make upgrades early if it becomes likely that a BPS is coming. These savings could be claimed under RA before the BPS is adopted.
4. Coordinate with City's Office of Resilience & Sustainability to ensure that incentive targeting aligns with existing policies to maximize program cost-effectiveness and equity outcomes.

Near-Term Need: Benchmarking Tool Expansions

The City's newly adopted benchmarking ordinance requires accurate, timely, and complete whole-building energy data to ensure compliance and to prepare building owners for a potential BPS. ENO's existing aggregated whole-building usage data tool is the primary mechanism by which covered properties can obtain this data. Improving this tool is a compliance necessity - and one that needs to be done in the near-term. It is the most actionable activity for ENO to demonstrate leadership in supporting these policies and start to establish that a new framework for capturing savings from benchmarking and BPS is needed.

Current Limitations

Our review of ENO's tool indicates key gaps that limit its effectiveness:

- **Data Timeliness** – Delays in monthly usage data uploads could leave owners non-compliant with ordinance deadlines.
- **Data Completeness** – Missing tenant accounts and manual aggregation requirements persist.
- **Format and Integration** – Limited automated upload functionality to ENERGY STAR Portfolio Manager (ESPM).
- **Customer Support** – Lack of dedicated technical assistance for owners struggling with account authorization and data submission.

- **Multilingual Access** – Benchmarking instructions and authorization forms are not yet fully translated for New Orleans’ priority language groups.

Table 5: Current Capabilities vs. Recommended Upgrades

Current Capability	Limitation	Recommended Upgrade
Automated data transfer to ESPM via Portfolio Manager API	Data may still be delivered slowly; authorization needed per application	Commit to sub-5 business-day delivery; enable evergreen authorization
Application-based data submission with limited form items	Incomplete tenant coverage, repeated authorization required Manual process, limited tenant inclusion	Automate meter detection and tenant inclusion in the tool
English-only instructions	Creates barriers for non-English-speaking owners	Translate into Spanish, Vietnamese, and additional prevalent languages

Functional Enhancement Recommendations

1. **Accelerate Data Delivery** – Streamline the backend to deliver usage data within 5 business days of request.
2. **Implement Evergreen Authorizations** – Reduce administrative burden by allowing multi-year, multi-building data access with one-time consent.
3. **Automate Tenant Inclusion** – Use building address input to automatically match and include all relevant meter accounts.
4. **Provide Multilingual Support** – Translate the tool’s UI and application materials, leveraging existing language assets from the Small Commercial Solutions program.
5. **Create a Dedicated Support Desk** – Establish a direct line (phone/email) for benchmarking help, staffed by C&I advisors familiar with ESPM and ordinance specifics.

Demand-Side Management Working Group

The Alliance recommends that the Council direct CURO to maintain a Demand-Side Management Working Group, which should convene on a regular basis, at least twice a year, although more as necessary. This working group is clearly needed to identify and address challenges or barriers with DSM programs as they arise, rather than waiting for a full three year cycle to hear from program implementers or the public. Working Groups have proven to be useful successful in improving program access and success rates in states like Arkansas, which has had the “Parties Working Collaboratively,” convened regularly by the Arkansas Public Service Commission. The Louisiana Public Service Commissions’ recently approved new efficiency rule⁵⁸ includes such a working group, with the intention of providing insight to both commissioners and implementers. The working group is not intended to supplant the guidance or direction of the Council, but to efficiently address challenges to program success on an interim and intersectional basis.

One example of a challenge the Working Group could address would be whether there is sufficient workforce for a program or project, and how to address insufficiencies. A Working Group should be comprised not only of intervenors, but also local organizations, individuals, and trade allies who have on-the ground insight into program insufficiencies. Another useful participant in a DSM Working Group may be participants in the Office of Resilience and Sustainability’s Community Energy Advisor Initiative, who are trained and tasked with socializing various clean and affordable energy programs available to residents. These individuals will have consistent and direct feedback from the community as to barriers to participation.

⁵⁸ Louisiana Public Service Commission, August 20, 2025, R-31106 Final Energy Efficiency Rule.

Summary of AAE Recommendations

1. The Council should select and approve the 2% energy savings scenario for the PY16 to PY18 program cycle. The 2% scenario is more cost-effective than the reduced savings scenario using both the societal and WACC discount rates, provides greater aggregate benefits to customers, and will provide greater opportunities for customers to manage unaffordable energy bills
2. The Council should approve all of the programs proposed by ENO for all years of the PY16-PY18 plan, with the following adjustments:
 - a. The Council should reject without prejudice the Company's proposed Battery Storage Pilot program pending its determinations in Docket UD-24-02.

Approving the pilot in the instant case would circumvent the case record established in that docket and would negate any evidence provided in that case by parties who have not intervened in this Plan proceeding
 - b. ENO should modestly increase its BYOT participation, savings, and budget projections for PY16-PY18 to reflect steady year-over-year growth from the PY15 plan forecast;
 - c. ENO should continue and expand its workforce development efforts as needed to achieve its increased low-income weatherization participation projections. If not already embedded in program budgets ENO should include additional budget to support this effort
3. AAE appreciates inclusion of ENO's proposed implementation plans from its selected Third Party Administrators and Third-Party Evaluators, however, not having been a party

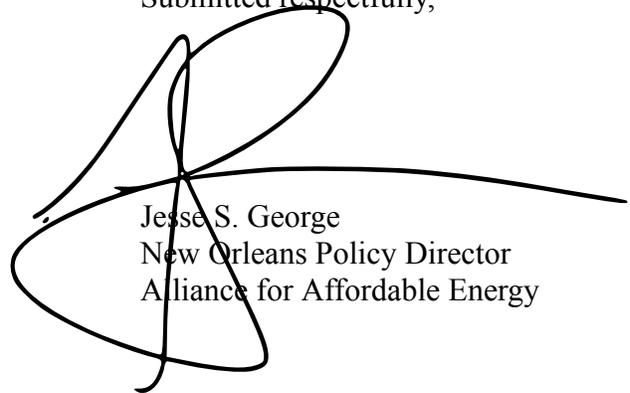
to the solicitation and review of alternate proposals does not offer an opinion on the Company's selections

4. Expand C&I incentives to encourage adoption of and compliance with benchmarking
5. Initiate functional improvements to facilitate customer access to the data needed for benchmarking compliance
6. The Council should take action quickly (before the end of October 2025) in order to ensure workforce and momentum is retained, in order to alleviate challenges from prior years that have hindered success in C&I and residential programs.

III. CONCLUSION

AAE appreciates the opportunity to provide these comments for the Council's consideration. We look forward to the continued success of energy efficiency and demand-side management in New Orleans, including the integration of new benchmarking requirements.

Submitted respectfully,



Jesse S. George
New Orleans Policy Director
Alliance for Affordable Energy

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

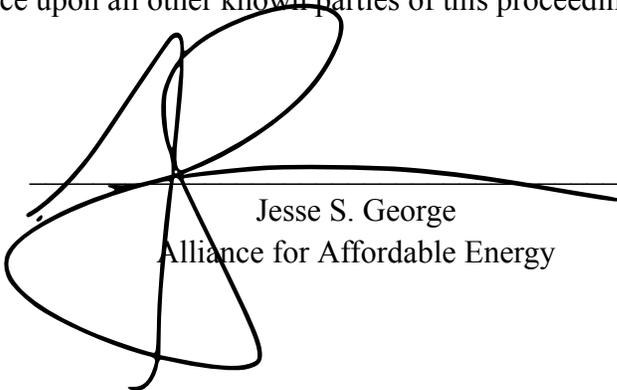
**In Re: 2024 TRIENNIAL INTEGRATED
RESOURCE PLAN OF ENTERGY
NEW ORLEANS, LLC**

DOCKET NO. UD-23-01

AUGUST 26, 2025

CERTIFICATE OF SERVICE

I do hereby certify that I have, this 26th day of August 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



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