



August 8, 2025

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

RE: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND PROCEDURAL  
SCHEDULE TO ENHANCE DISTRIBUTED ENERGY RESOURCE PROGRAMS  
(UD-24-02)

Dear Clerk,

Please find the attached Comments of the Alliance for Affordable Energy on the Advisors' Report Regarding Parties' Proposed Distributed Energy Resources Programs and Policies 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,

A large, stylized handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

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

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

**In Re: RESOLUTION AND ORDER  
ESTABLISHING A DOCKET AND  
PROCEDURAL SCHEDULE TO  
ENHANCE DISTRIBUTED ENERGY  
RESOURCE PROGRAMS**

**DOCKET NO. UD-24-02**

**AUGUST 8, 2025**

**COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY ON THE  
ADVISORS' REPORT REGARDING PARTIES' PROPOSED DISTRIBUTED  
ENERGY RESOURCES PROGRAMS AND POLICIES**

The Alliance for Affordable Energy (“the Alliance”) hereby submits the following comments on the Advisors’ Report Regarding Parties’ Proposed Distributed Energy Resources Programs and Policies:

**I. USE OF SYSTEM ENERGY RESOURCES, INC. SETTLEMENT FUNDS**

Despite the fact that Entergy New Orleans, LLC (“ENO”) has itself shifted from its original position of complete opposition to use of System Energy Resources, Inc. (“SERI”) settlement funds for the purpose of a DER program to a concession that these funds could be used in this way under its BESS proposal, the Advisors have taken a hardline stance against use of SERI funds. The Council’s acceptance of the Advisor’s recommendation would amount to a weakening of the Council’s authority as regulator, and completely ignores the Council’s own long history of applying funds associated with Grand Gulf settlements in many ways over the years that did not reflect a direct bill credit to all customers. This precedent began in 1986 with Resolution R-86-112, which created the Entergy/City Council Economic Development Fund. This fund was used in myriad ways, all at the Council’s discretion. Some examples include a

1995 allocation to support performances at French Quarter Fest<sup>1</sup>, the 1998 New Orleans National Convention Attraction Committee<sup>2</sup>, and in 2002 the Central City Economic Opportunity Corporation, Teen Court of Greater New Orleans, and to install ornamental lights in New Orleans East<sup>3</sup>, all of which have a far more tenuous connection to utility relief than the proposal submitted by the Alliance and Together New Orleans (“TNO”), which would ultimately benefit not only participating households but all ratepayers.

The Advisors have instead recommended – in a separate docket (UD-18-07) – the use of SERI settlement funds to offset bill effects of a proposed rate increase under ENO’s formula rate plan. While this would mitigate the effect of granting ENO’s rate increase on customer bills, at least for a short time, it would amount to handing back to ENO settlement funds it agreed to return just last year, leaving ratepayers with nothing to show for it. Moving forward with a DER program with no dedicated funding source would virtually guarantee that the program would be inaccessible to low-income households, who most stand to benefit but who will be excluded without a robust funding source. The Council should reject the Advisors’ recommendation and dedicate the SERI settlement funds to a vendor-neutral, independently-administered DER program.

## **II. VENDOR NEUTRALITY**

While the Advisors’ recommend a distributed energy resources (“DER”) expansion pilot program with vendor neutrality, their recommendations do not make a clear commitment to independent administration. The Alliance supports the goal of true vendor neutrality and

---

<sup>1</sup> Resolution R-95-356 [retrievable at [https://library.municode.com/la/new\\_orleans/munidocs/munidocs?nodeId=172705d5d4ec5](https://library.municode.com/la/new_orleans/munidocs/munidocs?nodeId=172705d5d4ec5)]

<sup>2</sup> Resolution R-98-335 [retrievable at [https://library.municode.com/la/new\\_orleans/munidocs/munidocs?nodeId=17270d21b7914](https://library.municode.com/la/new_orleans/munidocs/munidocs?nodeId=17270d21b7914)]

<sup>3</sup> Resolutions R-02-139, R-02-269, R-02-557 [retrievable at [https://library.municode.com/la/new\\_orleans/munidocs/munidocs?nodeId=172711ba4b4d0](https://library.municode.com/la/new_orleans/munidocs/munidocs?nodeId=172711ba4b4d0)]

reiterates that the Council has already determined a vendor-neutral program to be in the public interest in the preamble of initiating resolution R-24-624.

### **III. THE ADVISORS' INCREMENTAL APPROACH DOES NOT MATCH THE URGENCY OF THE MOMENT**

The Advisors' ultimate recommendation of a DER expansion pilot program does not match the urgency of the moment, either in terms of need or in terms of maximizing resources and impact. Nearly 1 out of every 5 New Orleanians faces utility disconnection annually due to inability to pay ENO's rising bills<sup>4</sup> and the City continues to experience frequent outages and increasingly frequent extreme weather events, including extreme heat and cold.

Additionally, while the so-called One Big Beautiful Bill retains incentives for battery storage, as we noted in our joint letter with Together New Orleans dated July, 16, 2025, the solar Investment Tax Credit will be available at its current level only for projects that become operational by the end of 2027. While this program pertains to battery storage only, the possibility of combining the benefits of federal incentives for solar with an aggressive battery program in New Orleans is a remarkable opportunity. Quite simply, New Orleans cannot afford an incremental approach, but must adopt a program capable of utilizing available resources while they last to achieve maximum benefit for ratepayers, particularly low-income and medically-vulnerable residents who are most in need.

### **IV. CONCLUSION**

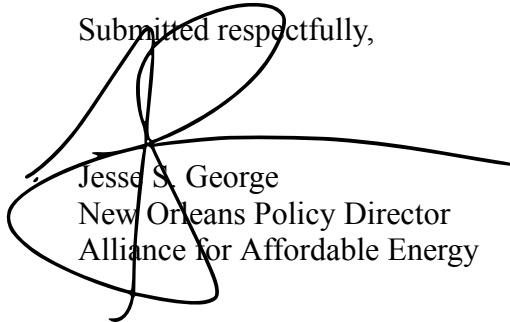
The Council is very close to achieving something beneficial for the City of New Orleans, if only it has the courage and vision to do so. Frankly, New Orleans should be leading the country in the adoption of battery storage, as we are among the cities most in need. Fortunately, we have the benefit of model programs from other, forward-looking jurisdictions to guide our

---

<sup>4</sup> <https://lailluminator.com/2023/09/24/new-orleans-shutoffs/>

efforts, such as Puerto Rico, where battery storage has played a crucial role in meeting demand this summer.<sup>5</sup> We urge you to implement a vendor-neutral, fully-funded DER program to bring much-needed bill relief, reliability, and resilience to the people of New Orleans.

Submitted respectfully,



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

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

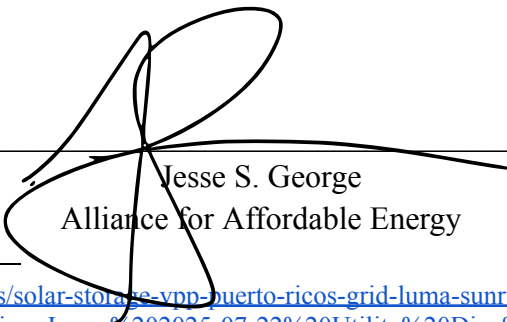
**In Re: RESOLUTION AND ORDER  
ESTABLISHING A DOCKET AND  
PROCEDURAL SCHEDULE TO  
ENHANCE DISTRIBUTED ENERGY  
RESOURCE PROGRAMS**

**DOCKET NO. UD-24-02**

**AUGUST 8, 2025**

**CERTIFICATE OF SERVICE**

I do hereby certify that I have, this 8th day of August 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



Jesse S. George  
Alliance for Affordable Energy

<sup>5</sup>[https://www.utilitydive.com/news/solar-storage-vpn-puerto-ricos-grid-luma-sunrun/753722/?utm\\_source=Sailthru&utm\\_medium=email&utm\\_campaign=Issue.%202025-07-22%20Utility%20Dive%20Storage%20%5Bissue:75179%5D&utm\\_term=Utility%20Dive:%20Storage](https://www.utilitydive.com/news/solar-storage-vpn-puerto-ricos-grid-luma-sunrun/753722/?utm_source=Sailthru&utm_medium=email&utm_campaign=Issue.%202025-07-22%20Utility%20Dive%20Storage%20%5Bissue:75179%5D&utm_term=Utility%20Dive:%20Storage)

## **Service List**

[clerkofcouncil@nola.gov](mailto:clerkofcouncil@nola.gov)

Clerk of Council

City Hall - Room 1E09

1300 Perdido Street

New Orleans, LA 70112

Tel: (504) 658-1085

Fax: (504) 658-1140

*Service of Discovery not required*

**Erin Spears**, [espears@nola.gov](mailto:espears@nola.gov)

Chief of Staff, Council Utilities Regulatory Office

**Bobbie Mason**, [bfmason1@nola.gov](mailto:bfmason1@nola.gov)

**Christopher Roberts**, [cwroberts@nola.gov](mailto:cwroberts@nola.gov)

**Byron Minor**, [Byron.minor@nola.gov](mailto:Byron.minor@nola.gov)

**Candace Carmouche**, [Candace.Carmouche@nola.gov](mailto:Candace.Carmouche@nola.gov)

**Jared Reese**, [jared.reese@nola.gov](mailto:jared.reese@nola.gov)

**Tyrianne Varnado**, [tyrianne.varnado@nola.gov](mailto:tyrianne.varnado@nola.gov)

City Hall - Room 6E07

1300 Perdido Street

New Orleans, LA 70112

Tel: (504) 658-1110

Fax: (504) 658-1117

**Krystal D. Hendon**, CM Morrell Chief-of-Staff, [Krystal.hendon@nola.gov](mailto:Krystal.hendon@nola.gov)

1300 Perdido St. Rm. 2W50

New Orleans, LA. 70112

**Sayde Finkel**, CM Moreno Chief-of-Staff, [sayde.finkel@nola.gov](mailto:sayde.finkel@nola.gov)

1300 Perdido St. Rm. 2W40

New Orleans, LA. 70112

**Justyn Hawkins**, 504-658-1108 [jahawkins@nola.gov](mailto:jahawkins@nola.gov)

Chief of Staff

City Hall - Room 1E06

1300 Perdido Street

New Orleans, LA 70112

**Donesia D. Turner**, [Donesia.Turner@nola.gov](mailto:Donesia.Turner@nola.gov)

Law Department  
City Hall - 5th Floor  
New Orleans, LA 70112  
Tel: (504) 658-9800  
Fax: (504) 658-9869  
*Service of Discovery not required*

**Tanya L. Irvin**, [tirvin@nola.gov](mailto:tirvin@nola.gov)

Chief Deputy City Attorney  
Law Department  
City Hall - 5th Floor  
New Orleans, LA 70112  
Tel: (504) 658-9800  
Fax: (504) 658-9869

**Norman White**, [Norman.White@nola.gov](mailto:Norman.White@nola.gov)

Department of Finance  
City Hall - Room 3E06  
1300 Perdido Street  
New Orleans, LA 70112  
Tel: (504) 658-1502  
Fax: (504) 658-1705

**Greg Nichols**, [grnichols@nola.gov](mailto:grnichols@nola.gov)

Deputy Chief Resilience Officer  
Office of Resilience & Sustainability  
1300 Perdido Street, Suite 8E08  
New Orleans, LA 70112  
Tel: 504-658-4958  
Cell: 504-253-1626

**Sophia Winston**, [sophia.winston@nola.gov](mailto:sophia.winston@nola.gov)

Energy Policy & Program Manager  
Office of Resilience & Sustainability  
1300 Perdido Street, Suite 8E08  
New Orleans, LA 70112  
Tel: 504-658-4914  
Cell: 504-677-9756

#### **ADMINISTRATIVE HEARING OFFICER**

**Hon. Calvin Johnson**, (504) 439-2514  
[fourwakes@gmail.com](mailto:fourwakes@gmail.com)

## **CITY COUNCIL CONSULTANTS and SUPPORT STAFF**

**Clinton A. Vince**, [clinton.vince@dentons.com](mailto:clinton.vince@dentons.com)

**Presley Reed**, [presley.reedjr@dentons.com](mailto:presley.reedjr@dentons.com)

**Emma F. Hand**, [emma.hand@dentons.com](mailto:emma.hand@dentons.com)

**Dee McGill**, [dee.mcgill@dentons.com](mailto:dee.mcgill@dentons.com)

Denton Law Firm,  
1900 K Street NW  
Washington, DC 20006  
Tel: (202) 408-6400  
Fax: (202) 408-6399

**Basile J. Uddo** (504) 583-8604 cell, [buddo@earthlink.net](mailto:buddo@earthlink.net)

**J. A. "Jay Beatmann, Jr.** (504) 256-6142 cell, (504) 524-5446 office direct,  
[jay.beatmann@dentons.com](mailto:jay.beatmann@dentons.com)

c/o DENTONS US LLP  
650 Poydras Street  
Suite 2850  
New Orleans, LA 70130

**Joseph W. Rogers**, [jrogers@legendcgl.com](mailto:jrogers@legendcgl.com)

**Victor M. Prep**, [vprep@legendcgl.com](mailto:vprep@legendcgl.com)

**Byron S. Watson**, [bwatson@legendcgl.com](mailto:bwatson@legendcgl.com)

Legend Consulting Group  
6041 South Syracuse Way, Suite 105  
Greenwood Village, CO 80111  
Tel: (303) 843-0351  
Fax: (303) 843-0529

## **ENTERGY NEW ORLEANS, LLC**

**Leroy Nix**, [lnix@entergy.com](mailto:lnix@entergy.com)

Entergy New Orleans, LLC  
Vice-President, Regulatory and Public Affairs

**Deanna Rodriguez**, [drodri2@entergy.com](mailto:drodri2@entergy.com)

Entergy New Orleans, LLC  
President and Chief Executive Officer  
Entergy New Orleans, LLC  
Mail Unit L-MAG-505B  
1600 Perdido Street  
New Orleans, LA 70112



**Polly Rosemond**, [prosemo@entergy.com](mailto:prosemo@entergy.com)  
**Kevin T. Boleware**, (504) 670-3673, [kbolewa@entergy.com](mailto:kbolewa@entergy.com)  
**D'Angela Savoie**, [dsavoil@entergy.com](mailto:dsavoil@entergy.com)  
**Keith Wood**, (504) 670-3633, [kwood@entergy.com](mailto:kwood@entergy.com)  
**Derek Mills**, (504) 670-3527, [dmills3@entergy.com](mailto:dmills3@entergy.com)

**Ross Thevenot**, (504) 670-3556, [rtheven@entergy.com](mailto:rtheven@entergy.com)  
1600 Perdido Street, L-MAG 505B  
New Orleans, LA 70112

**Vincent Avocato**, (281) 297-3508, [vavocat@entergy.com](mailto:vavocat@entergy.com)  
Entergy New Orleans, LLC  
2107 Research Forest Drive, T-LFN-4  
The Woodlands, TX 77380

**Courtney Nicholson**, [cnicho2@entergy.com](mailto:cnicho2@entergy.com)  
**Heather Silbernagel**, (504) 576-2806, [hsilber@entergy.com](mailto:hsilber@entergy.com)  
**Leslie M. LaCoste** (504) 576-4102, [llacost@entergy.com](mailto:llacost@entergy.com)  
**Lacresha D. Wilkerson**, (504) 576-6571, [lwilke1@entergy.com](mailto:lwilke1@entergy.com)

**Ed Wicker**, (504) 576-3101, [ewicker@entergy.com](mailto:ewicker@entergy.com)  
**Linda Prisuta**, (504) 576-4137, [lprisut@entergy.com](mailto:lprisut@entergy.com)  
Entergy Services, LLC  
Mail Unit L-ENT-26E  
639 Loyola Avenue  
New Orleans, LA 70113  
Fax: 504-576-5579

**Joe Romano, III** (504) 576-4764, [jroman1@entergy.com](mailto:jroman1@entergy.com)  
**Tim Rapier**, (504) 576-4740, [trapier@entergy.com](mailto:trapier@entergy.com)  
**Erin Farrell**, (504) 576-2758, [efarrel@entergy.com](mailto:efarrel@entergy.com)  
Entergy Services, LLC  
Mail Unit L-ENT-3K  
639 Loyola Avenue  
New Orleans, LA 70113  
Fax: (504) 576-6029

**Jessica Coolidge**, (504) 576-5407, [jcoolid@entergy.com](mailto:jcoolid@entergy.com)

**Greg Crisler**, (504) 670-3538, [gcrisle@entergy.com](mailto:gcrisle@entergy.com)  
**Tamika Robinson**, (225) 515-3575, [trobi10@entergy.com](mailto:trobi10@entergy.com)

## **INTERVENORS**

### **Alliance For Affordable Energy**

Logan A. Burke, [logan@all4energy.org](mailto:logan@all4energy.org)  
Jesse S. George, [jesse@all4energy.org](mailto:jesse@all4energy.org)  
Sophie Zaken, [regulatory@all4energy.org](mailto:regulatory@all4energy.org)  
4505 S. Claiborne Ave.  
Tel: (504) 208-9761

### **TOGETHER NEW ORLEANS**

Broderick Bagert, (225) 803-5876, [broderick@togetherla.org](mailto:broderick@togetherla.org)  
Abel Thompson, (225) 978-1667, [abel@togethernola.org](mailto:abel@togethernola.org)  
Nathalie Jordi, (504) 715-1742, [nathalie@togetherla.org](mailto:nathalie@togetherla.org)

### **LOUISIANA GREEN CORPS**

Ryan Mattingly, [ryan@lagreencorps.org](mailto:ryan@lagreencorps.org)  
26455 Toulouse Street  
New Orleans, LA 70119

### **FINANCE NEW ORELANS**

Annie Clark, [Aclark@financeauthority.org](mailto:Aclark@financeauthority.org)

### **PILA ENERGY INC.**

Cole Ashman, 504-952-5026, [cole@pilaenergy.com](mailto:cole@pilaenergy.com)  
1362 Hayes Street  
San Francisco, CA, 94117

### **POSIGEN PBC**

Kyle Wallace, (208) 608-6179, [kwallace@posigen.com](mailto:kwallace@posigen.com)  
Ruthie DeWit, (510) 910-6512, [rdewit@posigen.com](mailto:rdewit@posigen.com)  
145 James Drive East, Suite 300  
St. Rose, LA 70087

### **SOLAR UNITED NEIGHBORS**

Shannon Anderson, (307) 288-4525, [sanderson@solarunitedneighbors.org](mailto:sanderson@solarunitedneighbors.org)  
1350 Connecticut Avenue NW, Suite  
412 Washington, DC 20036

## **GREATER NEW ORLEANS INTERFAITH CLIMATE COALITION**

**Pastor Gregory Manning**, (913) 940-5713, [gmanning1973@yahoo.com](mailto:gmanning1973@yahoo.com)

**Jonathan Leo**, [jonathan.s.leo@gmail.com](mailto:jonathan.s.leo@gmail.com)

**Peter Digre**, (310) 346-4361, [peterdigre@gmail.com](mailto:peterdigre@gmail.com)

Broadmoor Community Church

2021 S. Dupre St.

New Orleans, LA 70125

## **INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS LOCAL UNION 130**

**Calvin Lawrence**, (504) 644-1192, [calvin@ibewlu130.com](mailto:calvin@ibewlu130.com)

**Rodney Wallis**, (504) 913-4728, [rodney@ibewlu130.com](mailto:rodney@ibewlu130.com)

3200 RidgelakeDr., Suite 300

Metairie, LA 70002

## **SOUTH LOUISIANA CHAPTER, INC. – NATIONAL ELECTRICAL CONTRACTORS ASSOCIATION**

**Shawn Martinez**, (504) 352-6417, [SMartinez@solaNECA.org](mailto:SMartinez@solaNECA.org)

501 Commerce Point,

New Orleans, LA 7012

## **PRORATE ENERGY INC.**

**Myron Katz**, (504)-343-1243, [myron.bernard.katz@gmail.com](mailto:myron.bernard.katz@gmail.com)

302 Walnut St

New Orleans, La 70118

## **SOUTHERN RENEWABLE ENERGY ASSOCIATION**

**Simon Mahan**, (337) 303-3723, [simon@southernwind.org](mailto:simon@southernwind.org)

**Whit Cox**, (501) 701-0874, [whit@southernrenewable.org](mailto:whit@southernrenewable.org)

11610 Pleasant Ridge Road, Suite 103 #176

Little Rock, AR 72223

## **ENPHASE ENERGY INC.**

**Marc Monbouquette**, (415) 488-6035, [mmonbouquette@enphaseenergy.com](mailto:mmonbouquette@enphaseenergy.com)

**Steve Lasher**, (617) 519-6631, [slasher@enphaseenergy.com](mailto:slasher@enphaseenergy.com)

47281 Bayside Pkwy

Fremont, CA 94538

### **SUNNOVA ENERGY INTERNATIONAL, INC**

**Jamie Charles, (703) 489-5735, [James.Charles@Sunnova.com](mailto:James.Charles@Sunnova.com)**  
20 Greenway Plaza, Suite 475  
Houston, TX 77046

### **504 HEALTHNET, INC**

**Currin Wallis, (978)-505-3059, [cwallis@504healthnet.org](mailto:cwallis@504healthnet.org)**  
1030 Lesseps St,  
New Orleans LA 70122

### **RESILIENCE NEW ORLEANS**

**Casey DeMoss, (504) 982-0468, [casey@resiliencenola.org](mailto:casey@resiliencenola.org)**  
4659 Clara St.,  
New Orleans, LA 70115

### **EFFORTS OF GRACE, INC/ASHE CULTURAL ARTS CENTER**

**Asali DeVan Ecclesiastes, (504) 813-1586, [adecclesiastes@ashenola.org](mailto:adecclesiastes@ashenola.org)**  
2236 D'Abadie Street  
New Orleans, 70119

**Patricia Smith, (504) 515-3899, [patricias@ashenola.org](mailto:patricias@ashenola.org)**  
6101 Ransom Street  
New Orleans, 70126

### **VOLTUS INC.**

**Kimaya Abreu, (609) 994-7686, [kabreu@voltus.co](mailto:kabreu@voltus.co)**  
2443 Fillmore St.  
San Francisco, CA 94115  
**Harry Alper, (617)-974-1116, [halper@voltus.co](mailto:halper@voltus.co)**  
1114 Crete St.  
New Orleans, LA 70119

### **ENERGYHUB, INC**

**Gabriela Olmedo, (949) 518-5695, [gabriela.olmedo@energyhub.net](mailto:gabriela.olmedo@energyhub.net)**  
41 Flatbush Avenue Suite 400A  
Brooklyn, NY 11217

## **GROUNDWORK NEW ORLEANS**

**Todd Reynolds**, (504) 256-1336, [todd@groundworknola.org](mailto:todd@groundworknola.org)

## **GULF STATES RENEWABLE ENERGY INDUSTRIES ASSOCIATION**

**Monika Gerhart**, (504) 258-9294, [mgerhart@gsreia.org](mailto:mgerhart@gsreia.org)

Executive Director

**Jeffrey Cantin**, [jcantin@gsreia.org](mailto:jcantin@gsreia.org)

Chairman of the Board

**Christopher Pourciau**, [cmpourciau@gmail.com](mailto:cmpourciau@gmail.com)

Energy Fellow

## **RECURVE ANALYTICS, INC**

**Ted Thomas**, [ted.thomas@energizestrategies.com](mailto:ted.thomas@energizestrategies.com)

Energize Strategies

1910 Navarre School Road

Navarre FL, 32566

**Cailee Mangan**, [cailee@recurve.com](mailto:cailee@recurve.com)

## **CITIZENS CLIMATE LOBBY NEW ORLEANS**

**Keely Lewis**, (504) 372-7599, [utopiantemple@gmail.com](mailto:utopiantemple@gmail.com)

Chapter Leader

701 Loyola Avenue # 58542

New Orleans, LA 70113