



VIA ELECTRONIC MAIL

August 8, 2025

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

**Re: Advisors' Report Regarding Parties' Proposed Distributed Energy Resource Programs
and Policies (CNO Docket No. UD-24-02)**

Dear Ms. Collier,

Enphase Energy, Inc. ("Enphase") respectfully submits the attached filing in the above-referenced docket pertaining to the City's Distributed Energy Resource Program.

Please do not hesitate to contact me with any questions regarding the ensuing comments.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'M. Monbouquette', written over a horizontal line.

Marc Monbouquette
Senior Manager, Policy and Government Affairs
Enphase Energy, Inc.
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Email: mmonbouquette@enphaseenergy.com



BEFORE THE COUNCIL OF THE CITY OF NEW ORLEANS

RESOLUTION AND ORDER R-24-624)	
ESTABLISHING A DOCKET AND)	
PROCEDURAL SCHEDULE TO)	DOCKET NO. UD-24-02
ENHANCE DISTRIBUTED ENERGY)	
RESOURCE PROGRAMS)	

**COMMENTS OF ENPHASE ENERGY, INC. ON ADVISORS' REPORT REGARDING PARTIES' PROPOSED
DISTRIBUTED ENERGY RESOURCE PROGRAMS AND POLICIES**

Enphase Energy, Inc. ("Enphase") respectfully submits the below brief comments on the Council's *Advisors' Report Regarding Parties' Proposed Distributed Energy Resource (DER) Programs and Policies* issued in Docket No. UD-24-02 on July 16, 2025.

Enphase is disappointed to learn of the Advisors' conclusions that – after almost a year's worth of stakeholder engagement in this docket, and despite the overarching objective to increase the availability of DERs and battery storage in the face of increasing extreme weather events, as stated in Resolution R-24-624 – they are not able to recommend moving forward with a permanent program for near-term implementation that will help grow the VPP market and enhance customer resiliency in New Orleans.

As several parties have indicated, the current Energy Smart BESS pilot program has, on its own, failed to attract meaningful customer adoption of behind-the-meter ("BTM") batteries and VPP participation. Enphase supports continuing and building on this basic program framework to provide a basic VPP dispatch function, but the customer value proposition for BTM batteries must be enhanced to scale adoption and achieve comparable levels of participation and ensuing grid benefits as has been realized from several related programs across the country. The incentives proposed by Together New Orleans and the Alliance for Affordable Energy would importantly extend access to low- and moderate-income customers and community facilities.

Having launched the docket with the presumption that parties should propose how SERI credits could be utilized for the benefit of all ratepayers through supporting DER deployment, it is perplexing that the Advisors ultimately state alignment with ENO's position that such credits can only to be returned to ratepayers as bill credit, as a matter of law. The Council should reject this interpretation, lest another funding source be identified to support the stated goals of the docket.



BEFORE THE COUNCIL OF THE CITY OF NEW ORLEANS

Re: Advisors' Report on VPP Programs

(Docket No. UD-24-02)

CERTIFICATE OF SERVICE

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

/s/ Marc Monbouquette

Marc Monbouquette
Enphase Energy