

OFFICE OF RESILIENCE & SUSTAINABILITY

CITY OF NEW ORLEANS

LATOYA CANTRELL
MAYOR

GREG R. NICHOLS
DEPUTY CHIEF RESILIENCE OFFICER

August 8, 2025

Via Electronic Delivery

Clerk of Council
City Hall, room 1E09
1300 Perdido St
New Orleans, LA 70112

Re: City of New Orleans Docket – UD-24-02, Distributed Energy Resources

Dear Clerk of Council,

The Office of Resilience & Sustainability (ORS) respectfully submits these comments regarding UD-24-02, Distributed Energy Resources and the creation of a Virtual Power Plant (VPP) through the deployment of residential, commercial, and industrial back-up battery systems.

If there are any questions or concerns, please do not hesitate to reach out to Greg Nichols (grnichols@nola.gov) or Sophia Winston (Sophia.winston@nola.gov).

Thank you,



Greg Nichols
Deputy Chief Resilience Officer
Office of Resilience & Sustainability
1300 Perdido St, Suite 7E05
New Orleans, LA 70112



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DEPUTY CHIEF RESILIENCE OFFICER

To City of New Orleans Docket UD-24-02 Service List Members,

Thank you to the City Council, Entergy New Orleans, The Alliance for Affordable Energy, and Together New Orleans in their work establishing this docket and providing technical expertise and insights into the feasibility of battery storage program for residential, commercial, and industrial customers.

In many ways, New Orleans is leading the nation in forward thinking approaches to energy resilience in the face of climate change and severe weather events. In 2024, The City of New Orleans received \$9 million from the Environmental Protection Agency (EPA) to support the establishment of a solar subsidy program administered through the City's Solar for All NOLA Program. Together New Orleans, and their partners around the state of Louisiana, have catalyzed a grassroots effort to arm our community assets with solar and battery microgrid systems that provide accessible, neighborhood level resources such as cooling, charging, and air conditioning to residents experiencing power outages. These opportunities, along with Council actions to develop a Community Solar program and a Renewable and Clean Portfolio Standard, create a dynamic energy ecosystem poised to take action around a variety of reliability solutions.

New Orleanians experience some of the highest energy burden rates and some of the fastest growing electric rates in the nation. According to data from the U.S Energy Information Administration, electric rates for residential customers in Louisiana are rapidly increasing – between January 2025 to May 2025, the cost of a kilowatt hour increased from \$0.0831 to \$0.0978, a nearly 18% price increase in just 5 months.¹ We also know that residents of New Orleans experience some of the highest outage rates in the country - between 2013-2023, Louisiana experienced 198 hours of power interruptions, greatly ahead of second place West Virginia, which experienced 142 hours in the same period of time.² While state level trends may vary from energy use trends and rates in New Orleans, the rising cost of electricity has been top of mind for our residents and small businesses, forcing residents and business owners to make difficult decisions.

The recent passage of H.R.1 will have implications in the feasibility of rapidly and equitably deploying clean energy resources with the early sunset of residential (25D) and commercial (48E/Y) tax incentives for the purchase of solar panels and batteries. In order to meet the needs of New Orleanians in the absence of federal incentives, growing electric rates, and increasing risk, decision makers should:

- Build on best practices seen in existing battery incentive and demand response programs, such as programs deployed through Green Mountain Power (Vermont), National Grid (Massachusetts & New York), and Eversource (Connecticut, Massachusetts, & New Hampshire) or similar direct-to-customer rebate programs such as e-bike programs, to quickly and effectively distribute funds and batteries

¹ [Electricity data browser - Average retail price of electricity](#)

² [The-New-Orleans-Index-at-Twenty.pdf](#)



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- Ensure that incentive structures are provided directly to the vendor for a point-of-sale discount and that incentive structures provide enough up-front capital to make up for the loss of 30% federal tax credits.
- Prioritize the equitable deployment of batteries and marketing/education around their benefits for demand response and resilience.
- Pair battery systems with existing solar PV systems through a lottery system and pair low-to-moderate income battery installation with programs like Solar for All NOLA and income qualified Energy Smart programs.

Now is the time to provide resources at the local level and build on the success and innovative approaches to energy resilience and grid reliability that we are already seeing take shape in New Orleans.

Sincerely,



Greg Nichols
Deputy Chief Resilience Officer
Office of Resilience & Sustainability
1300 Perdido St, Suite 7E05
New Orleans, LA 70112



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GREG R. NICHOLS
DEPUTY CHIEF RESILIENCE OFFICER

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

**Docket No. UD-24-02
Distributed Energy Resources
August 8, 2025**

Certificate of Service

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



Greg Nichols
Deputy Chief Resilience Office
Office of Resilience & Sustainability
1300 Perdido St, Suite 7E05
New Orleans, LA 70112



OFFICE OF RESILIENCE & SUSTAINABILITY
CITY OF NEW ORLEANS

LATOYA CANTRELL
MAYOR

GREG R. NICHOLS
DEPUTY CHIEF RESILIENCE OFFICER

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

Chief of Staff, Council Utilities Regulatory Office

Bobbie Mason, bfmason1@nola.gov

Christopher Roberts, cwroberts@nola.gov

Byron Minor, Byron.minor@nola.gov

Candace Carmouche, Candace.Carmouche@nola.gov

Jared Reese, jared.reese@nola.gov

Tyrianne Varnado, 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

1300 Perdido St. Rm. 2W50

New Orleans, LA. 70112

Sayde Finkel, CM Moreno Chief-of-Staff, sayde.finkel@nola.gov

1300 Perdido St. Rm. 2W40

New Orleans, LA. 70112

Justyn Hawkins, 504-658-1108 jahawkins@nola.gov

Chief of Staff

City Hall - Room 1E06

1300 Perdido Street

New Orleans, LA 70112

Donesia D. Turner, Donesia.Turner@nola.gov

1300 PERDIDO STREET SUITE 7E05 NEW ORLEANS, LOUISIANA 70112
PHONE 504-658-8600



OFFICE OF RESILIENCE & SUSTAINABILITY
CITY OF NEW ORLEANS

LATOYA CANTRELL
MAYOR

GREG R. NICHOLS
DEPUTY CHIEF RESILIENCE OFFICER

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, tlirvin@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
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
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
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

1300 PERDIDO STREET SUITE 7E05 NEW ORLEANS, LOUISIANA 70112
PHONE 504-658-8600



OFFICE OF RESILIENCE & SUSTAINABILITY
CITY OF NEW ORLEANS

LATOYA CANTRELL
MAYOR

GREG R. NICHOLS
DEPUTY CHIEF RESILIENCE OFFICER

fourwakes@gmail.com

CITY COUNCIL CONSULTANTS and SUPPORT STAFF

Clinton A. Vince, clinton.vince@dentons.com

Presley Reed, presley.reedjr@dentons.com

Emma F. Hand, emma.hand@dentons.com

Dee McGill, 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

J. A. "Jay Beatmann, Jr. (504) 256-6142 cell, (504) 524-5446 office direct,

jay.beatmann@dentons.com

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

Joseph W. Rogers, jrogers@legendcgl.com

Victor M. Prep, vprep@legendcgl.com

Byron S. Watson, 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

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

Deanna Rodriguez, drodri2@entergy.com

Entergy New Orleans, LLC
President and Chief Executive Officer
Entergy New Orleans, LLC



OFFICE OF RESILIENCE & SUSTAINABILITY
CITY OF NEW ORLEANS

LATOYA CANTRELL
MAYOR

GREG R. NICHOLS
DEPUTY CHIEF RESILIENCE OFFICER

Mail Unit L-MAG-505B
1600 Perdido Street
New Orleans, LA 70112

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

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

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

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

Ed Wicker, (504) 576-3101, ewicker@entergy.com
Linda Prisuta, (504) 576-4137, lpisut@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
Tim Rapier, (504) 576-4740, trapier@entergy.com
Erin Farrell, (504) 576-2758, 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

Greg Crisler, (504) 670-3538, gcrisle@entergy.com

Tamika Robinson, (225) 515-3575, trobi10@entergy.com

1300 PERDIDO STREET SUITE 7E05 NEW ORLEANS, LOUISIANA 70112
PHONE 504-658-8600



OFFICE OF RESILIENCE & SUSTAINABILITY
CITY OF NEW ORLEANS

LATOYA CANTRELL
MAYOR

GREG R. NICHOLS
DEPUTY CHIEF RESILIENCE OFFICER

INTERVENORS

Alliance For Affordable Energy

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

TOGETHER NEW ORLEANS

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

LOUISIANA GREEN CORPS

Ryan Mattingly, ryan@lagreencorps.org
26455 Toulouse Street
New Orleans, LA 70119

FINANCE NEW ORELANS

Annie Clark, Aclark@financeauthority.org

PILA ENERGY INC.

Cole Ashman, 504-952-5026, cole@pilaenergy.com
1362 Hayes Street
San Francisco, CA, 94117

POSIGEN PBC



OFFICE OF RESILIENCE & SUSTAINABILITY
CITY OF NEW ORLEANS

LATOYA CANTRELL
MAYOR

GREG R. NICHOLS
DEPUTY CHIEF RESILIENCE OFFICER

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

SOLAR UNITED NEIGHBORS

Shannon Anderson, (307) 288-4525, 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
Jonathan Leo, jonathan.s.leo@gmail.com
Peter Digre, (310) 346-4361, 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
Rodney Wallis, (504) 913-4728, 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
501 Commerce Point,
New Orleans, LA 7012

PRORATE ENERGY INC.

Myron Katz, (504)-343-1243, myron.bernard.katz@gmail.com



OFFICE OF RESILIENCE & SUSTAINABILITY
CITY OF NEW ORLEANS

LATOYA CANTRELL
MAYOR

GREG R. NICHOLS
DEPUTY CHIEF RESILIENCE OFFICER

302 Walnut St
New Orleans, La 70118

SOUTHERN RENEWABLE ENERGY ASSOCIATION

Simon Mahan, (337) 303-3723, simon@southernwind.org
Whit Cox, (501) 701-0874, 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
Steve Lasher, (617) 519-6631, slasher@enphaseenergy.com
47281 Bayside Pkwy
Fremont, CA 94538

SUNNOVA ENERGY INTERNATIONAL, INC

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

504 HEALTHNET, INC

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

RESILIENCE NEW ORLEANS

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



OFFICE OF RESILIENCE & SUSTAINABILITY
CITY OF NEW ORLEANS

LATOYA CANTRELL
MAYOR

GREG R. NICHOLS
DEPUTY CHIEF RESILIENCE OFFICER

EFFORTS OF GRACE, INC/ASHE CULTURAL ARTS CENTER

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

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

VOLTUS INC.

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

ENERGYHUB, INC

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

GROUNDWORK NEW ORLEANS

Todd Reynolds, (504) 256-1336, todd@groundworknola.org

GULF STATES RENEWABLE ENERGY INDUSTRIES ASSOCIATION

Monika Gerhart, (504) 258-9294, mgerhart@gsreia.org
Executive Director

Jeffrey Cantin, jcantin@gsreia.org
Chairman of the Board



OFFICE OF RESILIENCE & SUSTAINABILITY

CITY OF NEW ORLEANS

LATOYA CANTRELL
MAYOR

GREG R. NICHOLS
DEPUTY CHIEF RESILIENCE OFFICER

Christopher Pourciau, cmpourciau@gmail.com

Energy Fellow

RECURVE ANALYTICS, INC

Ted Thomas, ted.thomas@energizestrategies.com

Energize Strategies

1910 Navarre School Road

Navarre FL, 32566

Cailee Mangan, cailee@recurve.com

CITIZENS CLIMATE LOBBY NEW ORLEANS

Keely Lewis, (504) 372-7599, utopiantemple@gmail.com

Chapter Leader

701 Loyola Avenue # 58542

New Orleans, LA 70113

