



VIA ELECTRONIC MAIL

March 14, 2025

Clerk of Council
Clerkofcouncil@la.gov
City Hall - Room 1E09
1300 Perdido Street
New Orleans, LA 70112

Re: Resolution (R-24-624) and Order Establishing a Docket and Procedural Schedule to Enhance Distributed Energy Resource Programs (CNO Docket No. UD-24-02)

Dear Clerk of Council,

Attached, please find the Comments of Enphase Energy, Inc. ("Enphase") pertaining to distributed energy resource proposals filed in the above-referenced docket, pursuant to Resolution No. 24-624.

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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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 DISTRIBUTED ENERGY RESOURCE PROPOSALS

Pursuant to Resolution and Order R-24-624 issued by the Council of the City of New Orleans (“the Council”) on October 24, 2024, Enphase Energy, Inc. (“Enphase”) respectfully submits the ensuing comments on the Distributed Energy Resource (“DER”) proposals issued in Docket No. UD-24-02 on December 20, 2024.

Founded in 2006, Enphase is a global energy technology company and a market leading manufacturer of solar microinverters, battery energy storage, electric vehicle supply equipment, and home energy management systems that optimize the use of locally produced solar energy to power homes and provide grid services. As of December 31, 2024, Enphase has deployed around 4.7 million systems in 160 countries, consisting of 80 million microinverters (representing approximately 28.1 GW of solar capacity) as well as 1.69 GWh of energy storage systems.¹ Enphase works with local and regional small businesses who distribute and install its products at residential and small commercial customer facilities, including at over 1,500 customer sites in Entergy New Orleans (“Entergy”) territory. Enphase is a participating battery vendor in Entergy’s Energy Smart Battery Storage virtual power plant (“VPP”) pilot program.

As a threshold matter, Enphase broadly supports the proposals from Together New Orleans (“TNO”) and the Alliance for Affordable Energy (“AAE”), Solar United Neighbors (“SUN”), and PosiGen that focus on the use of SERI settlement funds to support deployment of customer-sited, behind-the-meter (“BTM”) batteries. We further agree with AAE’s analysis in its standalone December 20th filing, and with the presentation from TNO’s legal advisor in the February 4, 2025 technical conference, that the Council has broad discretion to implement these credits as it sees fit to provide benefits to customers. We reiterate the conclusion that incentives for customer sited BTM batteries, as demonstrated with Entergy’s VPP pilot and in several comparable programs across the country, can be deployed in a cost-effective manner, providing net reliability and resiliency benefits to all Entergy ratepayers and the broader distribution grid.

Of the above-cited stakeholder proposals, those from TNO / AAE and SUN include specifics on incentive structure, incentive levels, and intended use of the battery. The primary difference between the two proposals hinges on whether the settlement funds are used solely for up-front incentives, as proposed by TNO / AAE, or if the funds would provide a small up-front payment but primarily be applied as performance payments as part of a Virtual Power Plant program, as proposed by SUN.

TNO / AAE state that their primary intent in structuring their proposal around up-front incentives is to rapidly increase battery deployment in the near-term, which can then be enabled for grid services

¹ See <https://investor.enphase.com/static-files/7a95029a-a55b-4f1a-8fe1-5b3c41fef946?v=February-2025>, slide 4.



through Entergy's Battery Storage Demand Response program. Enphase observes that an up-front incentive level of \$1,000 / kW of "deliverable" battery capacity (i.e., the level of continuous discharge that a battery can sustain during eventual Virtual Power Plant dispatch events), capped at \$10,000 per residence or \$300,000 for institutional or commercial customer sites, would be among the strongest BTM battery incentives in the country. This would enable robust uptake among harder-to-reach customer segments such as low-to-moderate income residential customers in both single- and multi-family dwellings, and community resilience hubs

We believe that the TNO / AAE proposal would have the biggest reach in terms of MWh of deployed batteries that can operate as an aggregated fleet to provide peak-time reduction to Entergy's grid, while also providing critical resiliency services to customers. A key aspect of the TNO / AAE proposal is enabling enrollment in Entergy's existing VPP program within a reasonable amount of time after battery systems are deployed. In adopting the TNO / AAE proposal, the Council should also thus approve an expansion or extension of Entergy's VPP offering beyond the pilot phase, or should direct Entergy to file such a proposal.

Enphase appreciates the Council's review of the foregoing comments. We strongly urge that the Council approve TNO / AAE's proposal without protracted delay, in order to put the SERI credits swiftly to work in providing enhanced reliability and resiliency benefits to Entergy customers.



BEFORE THE COUNCIL OF THE CITY OF NEW ORLEANS

Re: Resolution and Order R-24-624 Re: Distributed Energy Resource Program

(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 March 14, 2025.

/s/ Marc Monbouquette

Marc Monbouquette
Enphase Energy