



Mar 14, 2025

Via Electronic Mail

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

Re: Comments on UD 24-02: DERs

Dear Ms. Collier,

Gulf States Renewable Energy Industries Association (GSREIA) respectfully submits the following comments regarding UD 24-02 (DER docket).

Please do not hesitate to reach out with any questions related to this filing.

Sincerely,

Monika Gerhart
Gulf States Renewable Energy Industries Association

Gulf States Renewable Energy Industries Association
400 Poydras Street
Suite 900
New Orleans, LA 70130

Mar 14, 2025

Dear Council Members, Council Staff, CURO and Advisors:

In October of 2024, the New Orleans City Council took the bold step to open UD-24-02 to meet constituent needs and expand Distributed Energy Resources (DERs). The docket is poised to strengthen grid resilience, meet growing energy demand, maximize ratepayer value, and provide new renewable energy generation and energy storage resources.

Since the 2017 adoption of the City's Climate Action Plan, climate impacts in New Orleans have been significant, with New Orleanians experiencing the second-longest streak of days with extreme heat across the world. Since 2021, the number of extreme heat days in Louisiana has nearly doubled, and the number of heat-related deaths jumped from 15 in 2020 to 88 in 2023.¹

Every Louisiana parish has experienced at least 13 FEMA disaster declarations since 2020 — four times more than the national average. Since 2013, Louisiana has experienced 198 hours of power interruption, which is the most of any state, and three times more than the national average.²

New Orleanians across our city have urgent needs for resilient and affordable energy, which requires power continuity and grid improvements. The cost of electricity has risen at a pace that exceeds the national average. Mature, affordable and quick-to-deploy solutions to these problems exist and have taken root all over the country

In December, Together New Orleans and Alliance for Affordable Energy submitted a proposal for DER expansion that **grows the existing Entergy New Orleans (ENO) Demand Response BESS pilot so it can meet these goals**. These proposals were tailored to meet ENO's feedback. The proposals expand ENO's existing pilot, maintain their existing DERMS infrastructure, and scale their program to a point where **the utility can genuinely rely on it for resource adequacy, emergency planning and hazard mitigation**.

In response to the Council's invitation to present ideas to expand DERs, the Entergy New Orleans' submission was limited to a rejection of the Council's suggestion that SERI credits paid by ratepayers could be reinvested in community for DER expansion, but did not advance prospective solutions.

¹ Allison Plyer, Taylor Savell, and Anissa Hyde. Pathways to Prosperity: Louisiana
Published: Feb 12, 2025

² Ibid.

The DER docket could be used to implement lessons learned after Hurricane Ida to ensure New Orleanians are protected from prolonged power outages after disaster. It could posit New Orleans as a national leader in DERs, and attract subsequent capital investment, jobs and industry growth. It could ensure that more New Orleanians have access to reliable, affordable power, and enable a distributed resilience strategy that is by far the most cost-effective and cleanest way to strengthen the grid. In a nutshell: we could have nice things.

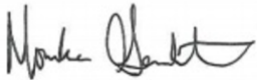
Given federal uncertainty, potential cost increases in the supply chain, and the local workforce standing ready to implement this vision, timeliness is critical.

Ratepayers want technologically mature, available, quickly deployable solutions. They want to leverage existing resources and a fleet of existing batteries that can leverage private capital and meet peak demand. A stronger grid, less extreme demand peaks and cheaper access to clean, dispatchable energy saves ratepayers money in ways that simple bill credits never could, making VPPs a good investment.

Given the wide base of support, technical expertise that has been offered, and urgent needs by ratepayers citywide, GSREIA member companies and partners remain ready to partner in this work.

GSREIA applauds the Council for its leadership. The actions taken by Council last October pave the way to a more resilient and more affordable renewable power supply. GSREIA urges the Council, CURO and the Advisors to continue its initial, yet significant, efforts and expedite this docket to advance ratepayers' needs.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Monika Gerhart', with a stylized, cursive script.

Monika Gerhart
Gulf States Renewable Energy Industries Association

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

**Re: Comments on UD 24-02: DERs
CERTIFICATE OF SERVICE**

I do hereby certify that I have, this Mar 14, 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

/s/ Monika Gerhart

Monika Gerhart, Gulf States Renewable Energy Industries Association