

March 14, 2025

Via Electronic Mail

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

RE: Docket UD-24-02 Proposal to Enhance Distributed Energy Resource Programs for the City of New Orleans

Dear Clerk of Council,

On behalf of Recurve, I respectfully submit these comments on the proposals that were filed in Docket UD-24-02 on December 20, 2024.

Please let me know if you have any questions related to this filing.

Respectfully submitted,

Recurve Analytics, Inc.

BY: /s/ Ted Thomas
Energize Strategies
1910 Navarre School Road
Navarre FL, 32566

**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

COMMENTS OF RECURVE REGARDING PROPOSALS

On October 24, 2024, the City Council directed parties to submit proposals for changes to existing policies or programs, new programs, costs, and proposed funding mechanisms to support programs which increase the availability of DERs, battery storage, and related facilities, including any changes to ENO-related policies, funding mechanisms, and establishing a vendor-neutral program to facilitate these goals. The City Council also gave parties the opportunity to respond to proposals made in initial filings.

Recurve encourages the City Council to continue exploration of the important policy issues raised in this docket. Recurve believes that transparent measurement of the costs and benefits of a VPP program will be critical to the success of any program that is established. In its initial comments, Recurve stated in detail how a technologically neutral DER program that is measured with open-source transparent methodologies should be established by the City Council. All proposals for specific DER technologies should be optimized by a single compensation methodology that provides the same compensation for various services provided to the grid regardless of technology. Low-income customers could be targeted with an adder to the standardized compensation.

Recurve also believes that the City Council has authority to establish such a program and to fund it with settlement credits. The funding source should not limit the Council's

options with respect to establishment of a DER program. The Council should focus on program design and not be distracted by threatened litigation over the funding source.

Respectfully submitted,

Recurve Analytics, Inc.

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