



March 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 (Proposal to Enhance Distributed Energy Resource Programs for the City of New Orleans)

Dear Ms. Collier,

Solar United Neighbors (SUN) respectfully submits the following comments regarding the proposals submitted in UD 24-02 (Proposal to Enhance Distributed Energy Resource Programs for the City of New Orleans). Please file the attached communication and this letter in the record for the proceeding.

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

Respectfully submitted this 14th day of March, 2025.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Anderson", with a long horizontal line extending to the right.

Shannon Anderson  
Distributed Power Plant Policy Director  
Solar United Neighbors  
[sanderson@solarunitedneighbors.org](mailto:sanderson@solarunitedneighbors.org)



BEFORE THE COUNCIL OF THE CITY OF NEW ORLEANS

RESOLUTION AND ORDER ESTABLISHING	)	
A DOCKET AND PROCEDURAL SCHEDULE	)	UD-24-02
TO ENHANCE DISTRIBUTED ENERGY	)	
RESOURCE PROGRAMS	)	

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COMMENTS OF SOLAR UNITED NEIGHBORS

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By and through its undersigned staff, and pursuant to the scheduling order issued in UD-24-02, Solar United Neighbors (SUN) respectfully submits these comments on the proposals submitted to the Council of the City of New Orleans (Council) by the Parties to this proceeding. These written comments supplement verbal comments provided by SUN at the virtual technical conference held on February 4, 2025.

At the outset it is important to note that SUN remains supportive of the Council proceeding with this docket given the tremendous opportunity it presents for energy justice, affordability, and resiliency in New Orleans. In short, SUN is not persuaded by any of the concerns raised thus far in these proceedings from Entergy New Orleans. Regrettably, Entergy New Orleans has not proposed a program to complete the mission of this docket, but rather the utility has attempted to delay the proceedings through misplaced legal arguments around the source of funding. It is SUN's position that the Council should continue to promptly and efficiently move forward with this docket on the schedule initially created for it. As such, the time for a proposal from Entergy New



Orleans has passed, and the Council should continue to consider the proposal submitted by the organizations Together New Orleans and the Alliance for Affordable Energy.

SUN supports the Together New Orleans and Alliance for Affordable Energy proposal because it builds upon Entergy New Orleans's existing demand response battery storage program that has already demonstrated program success. The proposal incorporates existing technology and infrastructure in place at the utility, such as the utility's Distributed Energy Resource Management System (DERMS), reducing needed overhead and administration costs. But importantly, the proposal scales that existing program to one that will more meaningfully address energy affordability, energy access, and energy reliability in New Orleans. With increased enrollment, customer participation, and opportunity, the program will be at a scale that will become an asset for all customers by creating resource adequacy to reduce peak power demands.

As SUN discussed in our opening comments submitted in December in these proceedings, there are numerous opportunities and benefits to creating a Virtual Power Plant (VPP) program for New Orleans, including cost savings, creating greater access to and use of customer-owned clean energy resources, greater resiliency at the customer level and greater reliability at the grid level, and modernizing the grid by enabling greater electrification. We stand ready to assist the Council and the other Parties in the technical discussions necessary to implement a successful program for customers. We welcome



the opportunity for the Council to proceed with consideration of the Together New Orleans and Alliance for Affordable Energy proposal.

Respectfully submitted this 14th day of March, 2025.

/s/Shannon Anderson  
Solar United Neighbors



## CERTIFICATE OF SERVICE

I, Shannon Anderson, do hereby certify that on March 14, 2025 I served the forgoing COMMENTS OF SOLAR UNITED NEIGHBORS upon all other known Parties of this proceeding via electronic mail.

/s/ Shannon Anderson  
Shannon Anderson  
Solar United Neighbors