

Mar 14, 2025

Via Electronic Mail

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

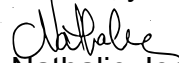
Re: Comments on UD 24-02: DERs

Dear Ms. Collier,

Together New Orleans 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,

A handwritten signature in black ink, appearing to read 'Nathalie', written over the printed name.

Nathalie Jordi

Together New Orleans

Mar 14, 2025

Dear Council Members, Council Staff, CURO and Advisors:

New Orleans has urgent needs for resilience and grid improvements. The pressures on ratepayers are immense. The threat from extreme weather and long-duration power outages are extreme and growing. Mature, affordable and quick-to-deploy solutions to these problems exist and are being implemented successfully by hundreds of utilities across the country. Recognizing the urgency, the Council opened UD-24-02, with the goal of expanding DERs to strengthen grid resilience, maximize value for ratepayers, meet growing energy demand, and expand clean, local power.

In December, Together New Orleans and the Alliance for Affordable Energy (TNO/AAE) submitted a [proposal for DER expansion](#). Building on ENO's existing Demand Response BESS Program, a solid beginning that currently has only ~70 customers, this plan would expand DERs by 60x over 3 years, save ratepayers money, and strengthen our grid. We met with ENO multiple times to design the proposal to align with ENO's existing infrastructure in mind. It maintains their current Distributed Energy Resource Management System (DERMS), scales their existing pilot to a meaningful level and ensures the utility can rely on DERs for resource adequacy and emergency planning.

The public response to this docket has been extraordinary. Hospitals, clinics, universities, senior living facilities, labor unions, faith institutions, non-profits, restaurants – a cross-section of civic and commercial institutions support this plan. They see the potential for DERs to lower costs, enhance resilience, and reduce reliance on polluting peaker plants. In addition, TNO / AAE consulted over 20 industry leaders, including regulators from states that have successfully implemented similar programs (Puerto Rico, Texas, North Carolina, and Massachusetts), battery providers, grid experts and resilience planners. There is broad agreement: a major DER expansion in New Orleans is achievable, affordable and sensible.

This overwhelming support has one notable exception: Entergy New Orleans (ENO), whose only response to the Council's invitation for proposals has been an emphatic rejection of the Council's own suggestion that SERI credits be used for DER expansion, including subtle threats to litigate. (ENO contends that the only entity entitled to spend the hundreds of millions of dollars in the settlement is ENO. That is not a serious position, either on legal or public policy grounds.¹)

Although we believe it is wholly within their authority, we are agnostic as to whether the Council opts to use SERI credits or other funds to expand DERs, but are frustrated that the argument over funding has successfully monopolized the conversation and prevented useful progress toward DER expansion. There's no reason why we can't be simultaneously working to refine the plan and figure out its funding source.

So far, that opportunity is being wasted. There has been one static and unproductive technical conference that focused single-mindedly on SERI credits, with no opportunity for discussion on that or any other topics. The plan we proposed is a starting point that will require a lot of discussion and collaborative decision-making. We hope to reverse the lack of progress and consensus that has occurred since the docket was introduced in October and would genuinely like to work productively to build on ENO's existing program.

In January 2025, Berkeley National Labs published the following reports showing the speed with which other jurisdictions are scaling VPPs all over the country:

- [Virtual Power Plant Profiles and Inventory](#), with information on 790 Demand Response Programs with a capacity of 27 GWs and **180 VPP programs with a potential VPP capacity of 19 GWs**.
- [Insights into Scaling Virtual Power Plants](#), the currently most up-to-date "state of the union" on VPPs sharing best practices nationwide - well worth reading.

¹ This topic will be further addressed in a separate filing submitted March 14, 2025 by the Alliance for Affordable Energy.

The resilience docket lasted three years and ultimately took no action to support the fastest, most cost-effective means to build resilience, distributed energy resources. UD 24-02 is an opportunity to correct this and position New Orleans as a national leader in DER deployment.

A stronger grid, less extreme peaks in demand, and cheaper access to clean, dispatchable energy saves ratepayers money. Not every improvement needs to be buried in a yearslong rate case, and this does not need to be an adversarial docket. We urge the Council to ensure that this process remains focused on solutions rather than stalled by tactics oriented toward deferral and delay. The Council set this docket in motion with a clear vision, to create and fund a plan for DER expansion to meet our urgent needs as a community. There is no reason to defer action. The Council should instruct its staff and advisors to develop and fund the program on the timeframe established in the docket, so that real progress can be made toward expanding DERs and strengthening resilience in New Orleans.

Sincerely,

Nathalie Jordi

Together New Orleans

**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.



Nathalie Jordi, Together New Orleans