



**VIA ELECTRONIC MAIL**

March 31, 2025

Clerk of Council  
[Clerkofcouncil@la.gov](mailto: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 Reply 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**

<b>RESOLUTION AND ORDER R-24-624</b>	)	
<b>ESTABLISHING A DOCKET AND</b>	)	
<b>PROCEDURAL SCHEDULE TO</b>	)	<b>DOCKET NO. UD-24-02</b>
<b>ENHANCE DISTRIBUTED ENERGY</b>	)	
<b>RESOURCE PROGRAMS</b>	)	

**REPLY 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 reply comments responding to parties’ March 14, 2025 opening comments on the Distributed Energy Resource (“DER”) proposals issued in Docket No. UD-24-02 on December 20, 2024.

Enphase observes that Entergy New Orleans’s (“Entergy”) March 14, 2025 opening comments contains a new battery incentive proposal that was not included in their original proposal submission on December 20, 2024. Enphase has no position on the procedural propriety of such a late-filed proposal, and would like to reserve the right to issue further feedback and responses based on a more detailed comparison of Entergy’s proposal and that of Together New Orleans and the Alliance for Affordable Energy (“TNO and AAE”), which Enphase supports.

As a threshold matter however, Enphase would like to register its strong opposition to Entergy’s proposal to limit battery incentives to 13.5 kWh of capacity, which matches exactly with the capacity of the Tesla Powerwall 3.<sup>1</sup> Setting incentives in such a blatantly vendor-specific manner would result in an anti-competitive playing field and would violate the Council’s intent to “[establish] a vendor-neutral program” to facilitate the docket’s DER goals.<sup>2</sup> Enphase instead would recommend that incentive caps are established in a more vendor-agnostic manner, for instance, in 5 or 10 kWh increments, such that all battery vendors can compete on a level playing field in an eventual program.

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<sup>1</sup> See Entergy Opening Comments, footnote 2, at p 3.

<sup>2</sup> See Resolution No. R-24-624, at p. 3



**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 31, 2025.

**/s/ Marc Monbouquette**

Marc Monbouquette  
Enphase Energy