



September 5, 2025

Via Electronic Mail
Clerk of Council
Room 1E09, City Hall
1300 Perdido Street
New Orleans, LA 70112

RE: A RULEMAKING PROCEEDING TO ESTABLISH RULES FOR COMMUNITY SOLAR
PROJECTS (UD-18-03)

Dear Clerk,

Please find the attached Comments of the Alliance for Affordable Energy on Entergy New Orleans, LLC's Consolidated Billing Proposal for filing under the docket referenced above. We will submit physical copies at your instruction. If you have any questions, please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely,

Jesse S. George
New Orleans Policy Director
Alliance for Affordable Energy

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

**IN RE: A RULEMAKING PROCEEDING
TO ESTABLISH RULES FOR
COMMUNITY SOLAR PROJECTS**

DOCKET NO. UD-18-03

SEPTEMBER 5, 2025

**COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY ON ENTERGY
NEW ORLEANS, LLC'S CONSOLIDATED BILLING PROPOSAL**

On October 30, 2024, Entergy New Orleans, LLC (“ENO”) filed with the New Orleans City Council (“the Council”) its Comments Regarding Consolidated Billing Implementation. ENO supplemented those comments with a letter dated December 13, 2024 and with its Cost Estimates to Implement Net Crediting Consolidated Billing on June 11, 2025. The Alliance for Affordable Energy (“AAE”) hereby submits the following comments in response to ENO’s filings.

AAE would reiterate that consolidated billing is recognized as a best practice in community solar programs for the clarity and ease of use it provides to consumers.¹ In general, AAE agrees with the concept of net crediting consolidated billing as elucidated in its redline filing of June 11, 2025. However, the 3% Utility Administrative Fee that ENO proposes is excessive. New York, for example, allows utilities to charge a 1% discount rate to developers to cover costs associated with net crediting². It is unclear why ENO’s administrative costs should be

¹ https://www.nclc.org/wp-content/uploads/2024/02/202402_Report_Community-Solar.pdf; see Table 1 on p. 4: “State administrators must implement consolidated billing so that households do not receive separate bills for their community solar subscription, and all program costs and credits are included on their electric bill monthly.”

² <https://www.naseo.org/data/sites/1/documents/publications/Community%20Solar%20Consolidated%20Billing%20Final%5B43%5D.pdf>; see Table 1 on pg. 13

three times higher than those of utilities in New York, and ENO offers no justification for this 3% fee.

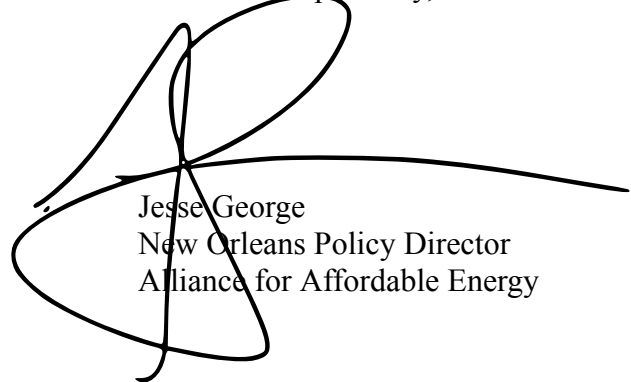
Likewise, ENO's projection of implementation costs, ranging up to \$3.1Mk, do not reflect the realities of other jurisdictions that have successfully adopted community solar consolidated billing. For example, in Oregon, Portland Gas and Electric, which serves more ratepayers than ENO, implemented community solar consolidated billing in 2023 for a cost of \$1.4M.³

ENO has delayed and resisted the clear will of the Council for long enough under this docket. The Council should:

- 1) order ENO to submit a final estimate of the cost to implement consolidated billing that is transparent and justifies all expenses;
- 2) order ENO to implement community solar consolidated billing within 8 months; and
- 3) limit the Utility Administrative Fee to no more than 1%.

AAE urges the Council to assert its regulatory authority and put an end to ENO's delay tactics. With a full queue of community solar projects in development, the Council must act now to implement this important ratepayer protection measure.

Submitted respectfully,



Jesse George
New Orleans Policy Director
Alliance for Affordable Energy

³<https://www.naseo.org/data/sites/1/documents/publications/Community%20Solar%20Consolidated%20Billing%20Final%5B43%5D.pdf>, p. 11

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

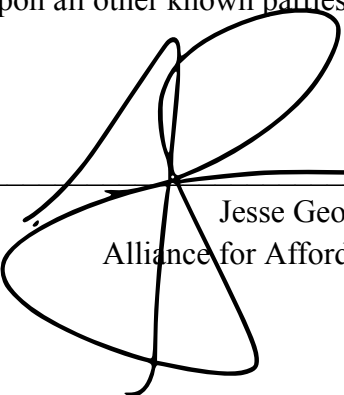
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CERTIFICATE OF SERVICE

I do hereby certify that I have, this 5th day of September 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



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