



July 16, 2026

VIA ELECTRONIC MAIL

Ms. Aisha R. Collier
Clerk of Council
Council of the City of New Orleans
1300 Perdido Street, Second Floor West
New Orleans, Louisiana 70112
clerkofcouncil@nola.gov

Re: Docket No. UD-26-01, Resolution and Order Establishing Rulemaking to Consider Revising the Integrated Resource Plan Rules with Respect to Distributed Energy Resources; Petition of the Gulf States Renewable Energy Industries Association for Leave to Intervene Out of Time and Initial Comments on Proposed Changes to the IRP Rules

Dear Ms. Collier:

On behalf of the Gulf States Renewable Energy Industries Association ("GSREIA"), enclosed for filing into the record of the above-referenced docket please find (1) GSREIA's *Petition for Leave to Intervene Out of Time* and (2) GSREIA's *Initial Comments on Proposed Changes to the Integrated Resource Plan Rules with Respect to Distributed Energy Resources*. GSREIA respectfully requests that both documents be filed into the record of Docket No. UD-26-01 and submitted to the Council for its consideration.

GSREIA submits its Comments contemporaneously with its Petition, consistent with the July 17, 2026 comment deadline established by Resolution R-26-220, and respectfully requests that the Comments be received and considered upon the Council's admission of GSREIA as a party to this proceeding.

In accordance with the procedural requirements established by Resolution R-26-220, a copy of this filing is being served contemporaneously upon Mr. Byron Minor (bminor@nola.gov) and upon the parties reflected on the official service list for this docket, as set forth in the attached Certificate of Service.

GSREIA respectfully requests that any applicable filing fee associated with this intervention be waived pursuant to Council Resolution R-16-365.

Please do not hesitate to contact the undersigned representatives with any questions regarding this filing. Thank you for your assistance in this matter.

Respectfully submitted,

GULF STATES RENEWABLE ENERGY INDUSTRIES ASSOCIATION

Stephen Wright, JD
Consultant to the Association
swright@gsreia.org

Monika Gerhart
Executive Director
mgerhart@gsreia.org

Gulf States Renewable Energy Industries Association
400 Poydras Street, Suite 900, New Orleans, Louisiana 70130

Enclosures: Petition for Leave to Intervene Out of Time; Initial Comments on Proposed Changes to the IRP Rules; Certificate of Service

cc: Mr. Byron Minor (bminor@nola.gov)

**BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS**

RESOLUTION AND ORDER ESTABLISHING	)	
RULEMAKING TO CONSIDER REVISING THE	)	
INTEGRATED RESOURCE PLAN RULES WITH	)	
RESPECT TO DISTRIBUTED ENERGY	)	DOCKET NO. UD-26-01
RESOURCES	)	

**PETITION OF THE GULF STATES RENEWABLE ENERGY INDUSTRIES
ASSOCIATION FOR LEAVE TO INTERVENE OUT OF TIME**

NOW INTO the record of Docket No. UD-26-01 comes the Gulf States Renewable Energy Industries Association (“GSREIA” or “Petitioner”), through its designated representatives, which respectfully petitions the Council of the City of New Orleans (the “Council”), pursuant to the Council’s rules governing intervention in utility proceedings, including Sections 158-236, 158-240, 158-286 through 158-288, 158-322, and 158-324 of the Code of the City of New Orleans, for leave to intervene *out of time* in the above-captioned proceeding. In support of this Petition, GSREIA respectfully represents as follows:

I. IDENTITY OF PETITIONER AND DESIGNATED REPRESENTATIVES

1. GSREIA is a regional trade association representing the renewable energy, energy storage, and distributed energy resource industry across the Gulf States region, including companies that develop, finance, manufacture, install, and operate distributed energy resources within the service territory of Entergy New Orleans, LLC (“ENO”). GSREIA’s principal office is located at 400 Poydras Street, Suite 900, New Orleans, Louisiana 70130.
2. Pursuant to Section 158-30 of the Code of the City of New Orleans, GSREIA designates the following as its representatives for purposes of this proceeding, upon whom all notices, orders, and other communications should be served:

Stephen Wright, JD
Consultant to the Gulf States Renewable Energy Industries Association
400 Poydras Street, Suite 900, New Orleans, Louisiana 70130
swright@gsreia.org

Monika Gerhart
Executive Director, Gulf States Renewable Energy Industries Association
400 Poydras Street, Suite 900, New Orleans, Louisiana 70130
mgerhart@gsreia.org

II. THE PROCEEDING

3. By Resolution R-26-220, the Council established Docket No. UD-26-01 and commenced a rulemaking proceeding to review and update the Council’s Integrated Resource Plan (“IRP”) Rules applicable to ENO. As reflected in the Council’s docket materials, the

purpose of the proceeding is to modernize how distributed energy resources (“DERs”), including battery storage, rooftop solar, demand response, and other distributed technologies, are evaluated in future utility resource planning and demand-side management (“DSM”) analyses, including both the DSM Potential Study and the IRP analysis.

III. INTEREST OF PETITIONER

4. GSREIA and its members have a direct, substantial, and legally cognizable interest in the outcome of this proceeding. The manner in which DERs are valued, modeled, and incorporated into the DSM Potential Study and the IRP analysis directly affects the market for, and the deployment of, the distributed energy and storage technologies that GSREIA’s members develop, finance, and install within ENO’s service territory. The rules adopted in this docket will shape the treatment of these resources in ENO’s resource planning for years to come and will have a corresponding effect on the business interests of GSREIA’s members and on the customers they serve.
5. GSREIA’s interest in the fair and accurate valuation of DERs is not adequately represented by the existing parties to this proceeding. As the regional voice of the renewable energy and storage industry, GSREIA offers a distinct, technically informed perspective on the capabilities and value of distributed resources that is not fully advanced by ENO, the Council’s Advisors, or the other parties currently of record. GSREIA’s participation will assist the Council in developing a complete record and will promote the maximum public disclosure of information relevant to the proceeding.

IV. GOOD CAUSE FOR LEAVE TO INTERVENE OUT OF TIME

6. GSREIA recognizes that the deadline to file a motion to intervene in this docket was June 5, 2026, and that this Petition is therefore filed out of time. GSREIA respectfully submits that good cause exists to permit its intervention notwithstanding the passage of that deadline. Interested member companies of GSREIA only recently alerted the Association to their interest in this filing and to the significance of this rulemaking to their regulatory priorities. GSREIA has acted promptly in seeking leave to intervene based on that member outreach.
7. Granting this Petition will not delay, disrupt, or prejudice this proceeding or the rights of any existing party. The procedural schedule established by Resolution R-26-220 remains ongoing, with comments on proposed changes due July 17, 2026, reply comments due July 31, 2026, and certification of the record scheduled for August 7, 2026. GSREIA accepts the record and the procedural schedule as they presently stand, does not seek to reopen any expired deadline, and does not request any modification, extension, or deferral of the schedule.
8. To underscore that its participation will impose no burden or delay, GSREIA submits its Initial Comments on the proposed changes to the IRP Rules contemporaneously with this Petition, within the July 17, 2026 comment period, and requests only that those Comments be received and considered upon its admission as a party. GSREIA seeks to participate in the remaining phases of this proceeding within the existing schedule, including by submitting reply comments. Because GSREIA’s participation will further the Council’s

objective of a thorough and well-informed rulemaking without disrupting the schedule, the interests of justice and sound public policy favor granting leave to intervene.

V. POSITION OF PETITIONER

9. GSREIA supports revisions to the IRP Rules that ensure distributed energy resources are fully, fairly, and accurately valued within both the DSM Potential Study and the IRP analysis, as set forth in GSREIA's Initial Comments filed herewith. GSREIA reserves the right to address the specific language changes proposed by the parties and the Advisors in reply comments.

VI. FILING FEE

10. GSREIA respectfully requests that any applicable filing fee associated with this intervention be waived pursuant to Council Resolution R-16-365.

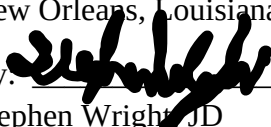
PRAYER FOR RELIEF

WHEREFORE, the Gulf States Renewable Energy Industries Association respectfully prays that the Council of the City of New Orleans **GRANT** this Petition for Leave to Intervene Out of Time; recognize GSREIA as a party of record in Docket No. UD-26-01 with full rights of participation, including the right to submit comments and reply comments; receive and consider GSREIA's Initial Comments filed herewith; and grant such other and further relief as the Council deems just and proper.

Respectfully submitted,

GULF STATES RENEWABLE ENERGY INDUSTRIES ASSOCIATION

400 Poydras Street, Suite 900
New Orleans, Louisiana 70130

By:  _____

Stephen Wright JD
Consultant to the Association
swright@gsreia.org

Monika Gerhart
Executive Director
mgerhart@gsreia.org

**BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS**

RESOLUTION AND ORDER ESTABLISHING	)	
RULEMAKING TO CONSIDER REVISING THE	)	
INTEGRATED RESOURCE PLAN RULES WITH	)	
RESPECT TO DISTRIBUTED ENERGY	)	DOCKET NO. UD-26-01
RESOURCES	)	

**INITIAL COMMENTS OF THE GULF STATES RENEWABLE ENERGY
INDUSTRIES ASSOCIATION ON PROPOSED CHANGES TO THE
INTEGRATED RESOURCE PLAN RULES WITH RESPECT TO
DISTRIBUTED ENERGY RESOURCES**

The Gulf States Renewable Energy Industries Association (“GSREIA”) respectfully submits these Initial Comments on the proposed changes to the Council’s Integrated Resource Plan (“IRP”) Rules with respect to how distributed energy resources (“DERs”) are included in both the Demand-Side Management (“DSM”) Potential Study and the IRP analysis. GSREIA submits these Comments contemporaneously with its Petition for Leave to Intervene Out of Time and respectfully requests that they be received and considered upon the Council’s admission of GSREIA as a party to this proceeding, consistent with the July 17, 2026 comment deadline established by Resolution R-26-220. GSREIA reserves the right to address specific proposed language in reply comments.

I. INTRODUCTION AND SUMMARY

The stated purpose of this rulemaking is to modernize how DERs, such as battery storage, rooftop solar, demand response, and other distributed technologies, are evaluated in future utility resource planning and demand-side management analyses. GSREIA strongly supports that objective. The IRP Rules originally adopted in 2017 (Resolutions R-17-332 and R-17-429) established a strong planning foundation, but the commercialization of energy storage, virtual power plants (“VPPs”), advanced demand response, and other grid-edge technologies has outpaced the manner in which those resources are currently treated. Today, many DERs are evaluated as supplemental programs rather than as planning resources capable of deferring or replacing conventional utility investments.

GSREIA’s central recommendation is straightforward: DERs should be evaluated as full planning resources, on a technology-neutral basis, in both the DSM Potential Study and the IRP analysis. This is not merely a modeling refinement. It carries direct regulatory and market consequences for the renewable energy industry and, more importantly, for the New Orleans customers that industry serves. When DERs are fairly valued, private capital flows to the resources and locations that deliver the greatest system benefit, competition disciplines cost, and customers realize savings, greater choice, and improved resilience.

II. INTEREST OF GSREIA, ITS MEMBERS, AND THE CUSTOMERS THEY SERVE

GSREIA is the regional trade association for the renewable energy, storage, and DER industry across Louisiana, Mississippi, and Alabama. Its members develop, finance, manufacture, install, and operate the distributed technologies, rooftop and community solar, battery storage, demand flexibility, and aggregated resources, directly at issue in this proceeding. The manner in which these resources are counted in the DSM Potential Study and the IRP analysis determines both the size of the addressable market for GSREIA's members and the degree to which ENO's customers can access the cost, choice, and resilience benefits that DERs provide. GSREIA's interest is therefore inseparable from the interest of the customers who ultimately pay for, and benefit from, the resource decisions that flow from the IRP.

III. THE DSM POTENTIAL STUDY SHOULD FULLY CAPTURE DER CAPABILITY

The DSM Potential Study is the analytical gateway through which demand-side and distributed resources enter the IRP. If the potential study understates what DERs can achieve, the IRP will systematically under-procure them, regardless of their cost-effectiveness. GSREIA respectfully recommends that the Rules require the DSM Potential Study to:

- assess the technical, economic, and achievable potential of the full range of DERs, including battery storage, demand flexibility, managed electric-vehicle charging, smart thermostats and water heaters, and aggregated VPPs, rather than treating them as supplemental programs;
- use realistic, current technology-cost and performance assumptions that reflect commercially deployed products; and
- evaluate DERs under multiple adoption and program-design scenarios so that the Council can see the full range of achievable savings.

Regulatory and market impact: A potential study that fully captures DER capability expands the addressable market for member companies and, at the same time, surfaces avoided-cost savings that lower bills for customers. An artificially narrow study forecloses both outcomes before the IRP analysis even begins.

IV. THE IRP ANALYSIS SHOULD EVALUATE DERs AS PLANNING RESOURCES ON A TECHNOLOGY-NEUTRAL BASIS

Once DER potential is properly characterized, the IRP analysis should evaluate those resources on equal footing with conventional supply-side options. GSREIA recommends that the Rules direct ENO to:

- **Apply resource neutrality.** Every resource, utility-owned generation, third-party and customer-owned DERs, storage, and demand-side resources, should compete under identical reliability assumptions and production-cost modeling. Technology-neutral evaluation is the single most consequential change the Council can make, because it removes the structural preference for conventional investment that raises costs for customers and narrows the market for renewable providers.
- **Recognize DERs as capacity resources.** Battery aggregation, VPPs, demand flexibility, and managed charging should be modeled as capacity resources capable of

replacing conventional generation under appropriate performance assumptions, not merely as energy-savings programs.

- **Evaluate storage across durations.** Storage should be modeled across a range of durations and operational strategies and allowed to compete directly against conventional peaking resources.
- **Screen for non-wires alternatives.** Before conventional distribution or transmission investments proceed, the analysis should test whether distributed resources could defer or avoid the investment.
- **Capture locational and avoided-cost value.** The analysis should reflect that a DER's value depends on where it is sited, using hosting-capacity and locational avoided-cost information so investment targets the highest-value locations, and should employ a comprehensive avoided-cost framework spanning avoided generation, transmission, distribution, capacity, reserves, fuel, and resilience.
- **Ensure modeling transparency.** Key assumptions, technology and fuel costs, load and DER-performance forecasts, and optimization constraints, should be disclosed so that parties can meaningfully evaluate and reproduce the results.

Regulatory and market impact: Each of these changes converts DERs from a peripheral program into a resource that competes for, and wins, a share of ENO's future portfolio wherever it is cost-effective. For the renewable energy industry, that means a fair opportunity to compete and invest. For customers, it means a lower reasonable-cost portfolio, more choice over how they meet their energy needs, and a more resilient grid.

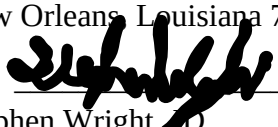
V. CONCLUSION

GSREIA respectfully urges the Council to adopt IRP Rule revisions that (1) require the DSM Potential Study to fully capture DER capability and (2) require the IRP analysis to evaluate DERs as capacity and grid resources on a technology-neutral basis, using locational and comprehensive avoided-cost valuation and transparent modeling. These changes directly serve the purpose of this docket, modernizing how DERs are evaluated in future utility planning and demand-side management analyses, and will benefit both the renewable energy industry and the New Orleans customers it serves through greater competition, lower costs, expanded choice, and improved resilience. GSREIA appreciates the opportunity to participate and reserves the right to address specific proposed language in reply comments.

Respectfully submitted,

**GULF STATES RENEWABLE ENERGY
INDUSTRIES ASSOCIATION**

400 Poydras Street, Suite 900
New Orleans, Louisiana 70130

By: _____

Stephen Wright, JD
Consultant to the Association
swright@gsreia.org

Monika Gerhart
Executive Director
mgerhart@gsreia.org

**BEFORE THE
COUNCIL OF THE CITY OF NEW ORLEANS**

DOCKET NO. UD-26-01

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition of the Gulf States Renewable Energy Industries Association for Leave to Intervene Out of Time and the Initial Comments of the Gulf States Renewable Energy Industries Association on Proposed Changes to the IRP Rules have, on this 16th day of July, 2026, been filed with the Clerk of Council of the City of New Orleans and served upon Mr. Byron Minor (bminor@nola.gov), and upon all parties on the official service list for Docket No. UD-26-01 (a copy of which is attached hereto), by electronic mail.

A handwritten signature in black ink, appearing to read 'Stephen Wright', is written over a horizontal line.

Stephen Wright, JD

Consultant to the Gulf States Renewable Energy Industries Association

SERVICE LIST

June 25, 2026

IRP RULEMAKING

DOCKET NO. UD-26-01

Aisha Collier, clerkofcouncil@nola.gov
Clerk of Council
City Hall – Room 1E09
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-1085 Fax: (504) 658-1140
Service of Discovery not required

Erin Spears, espears@nola.gov
Chief of Staff, Council Utilities Regulatory Office
Bobbie Mason, bfmason1@nola.gov
Christopher Roberts, cwroberts@nola.gov
Byron Minor, Byron.minor@nola.gov
Candace Carmouche, Candace.Carmouche@nola.gov
Jared Reese, jared.reese@nola.gov
Tyrianne Varnado, tyrianne.varnado@nola.gov
City Hall – Room 6E07
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-1110 Fax: (504) 658-1117

Krystal D. Hendon, CM Morrell Chief-of-Staff, Krystal.hendon@nola.gov
1300 Perdido St., Rm. 2W50
New Orleans, LA 70112

Justyn Hawkins, 504-658-1108, jahawkins@nola.gov
Chief of Staff
City Hall – Room 1E06
1300 Perdido Street
New Orleans, LA 70112

Sherae M. Hunter, CM McCarron Chief-of-Staff, smhunter@nola.gov
Razan Badr, Community Engagement Director, Razan.Badr@nola.gov
LeeAnn Moss, Policy Director, LeeAnn.Moss@nola.gov
City Hall, Room 2W80
1300 Perdido Street
New Orleans, LA 70112

Courtney Fleming, CM Willard Chief-of-Staff, Courtney.Fleming@nola.gov
Erin Hansen, Policy Director, Erin.Hansen@nola.gov
1300 Perdido St., Rm. 2W40
New Orleans, LA 70112

Sandra G. Thomas, CM Green Chief-of-Staff, Sandra.Thomas@nola.gov
1300 Perdido St., Rm. 2W20
New Orleans, LA 70112

Tammie Jackson, CM Hughes Chief-of-Staff, ttjackson@nola.gov
1300 Perdido St., Rm. 2W60
New Orleans, LA 70112

Melissa Quigley, msquigley@nola.gov
Law Department
City Hall – 5th Floor
New Orleans, LA 70112
Tel: (504) 658-9800 Fax: (504) 658-9869
Service of Discovery not required

Tanya L. Irvin, tlirvin@nola.gov
Chief Deputy City Attorney
Law Department
City Hall – 5th Floor
New Orleans, LA 70112
Tel: (504) 658-9800 Fax: (504) 658-9869

Norman White, Norman.White@nola.gov
Department of Finance
City Hall – Room 3E06
1300 Perdido Street
New Orleans, LA 70112
Tel: (504) 658-1502 Fax: (504) 658-1705

Meagan Williams, memwilliams@nola.gov
Office of Resilience & Sustainability
1300 Perdido Street, Suite 8E08
New Orleans, LA 70112
Tel: 504-658-8420 Cell: 504-729-9615

ADMINISTRATIVE HEARING OFFICER

Hon. Jeffrey S. Gulin, judgegulin@gmail.com
3203 Bridle Ridge Lane
Lutherville, MD 21093
Tel: (410) 627-5357

CITY COUNCIL CONSULTANTS and SUPPORT STAFF

Clinton A. Vince, clinton.vince@dentons.com
Presley Reed, presley.reedjr@dentons.com
Emma F. Hand, emma.hand@dentons.com
Dee McGill, dee.mcgill@dentons.com
Dentons US LLP
1900 K Street NW

Washington, DC 20006
Tel: (202) 408-6400 Fax: (202) 408-6399

Basile J. Uddo, (504) 583-8604 cell, buddo@earthlink.net
J. A. "Jay" Beatmann, Jr., (504) 256-6142 cell, (504) 524-5446 office, jay.beatmann@dentons.com
c/o Dentons US LLP
650 Poydras Street, Suite 2850
New Orleans, LA 70130

Joseph W. Rogers, jrogers@legendcgl.com
Victor M. Prep, vprep@legendcgl.com
Byron S. Watson, bwatson@legendcgl.com
Legend Consulting Group
6041 South Syracuse Way, Suite 105
Greenwood Village, CO 80111
Tel: (303) 843-0351 Fax: (303) 843-0529

ENTERGY NEW ORLEANS, LLC

Sharonda Williams, swill62@entergy.com
Vice-President, Regulatory and Public Affairs
Harry Barton, hbarton@entergy.com
Director, Regulatory Affairs
Deanna Rodriguez, drodri2@entergy.com
President and Chief Executive Officer
Entergy New Orleans, LLC
Mail Unit L-MAG-505B, 1600 Perdido Street
New Orleans, LA 70112

Polly Rosemond, prosemo@entergy.com
Kevin T. Boleware, (504) 670-3673, kbolewa@entergy.com
D'Angela Savoie, dsavoi1@entergy.com
Keith Wood, (504) 670-3633, kwood@entergy.com
Derek Mills, (504) 670-3527, dmills3@entergy.com
Ross Thevenot, (504) 670-3556, rtheven@entergy.com
1600 Perdido Street, L-MAG 505B
New Orleans, LA 70112

Vincent Avocato, (281) 297-3508, vavocat@entergy.com
Entergy New Orleans, LLC
2107 Research Forest Drive, T-LFN-4
The Woodlands, TX 77380

Courtney Nicholson, cnicho2@entergy.com
Heather Silbernagel, (504) 576-2806, hsilber@entergy.com
Ed Wicker, (504) 576-3101, ewicker@entergy.com
Linda Prisuta, (504) 576-4137, lprisut@entergy.com
Entergy Services, LLC
Mail Unit L-ENT-26E, 639 Loyola Avenue
New Orleans, LA 70113 Fax: 504-576-5579

Joe Romano, III, (504) 576-4764, jroman1@entergy.com
Tim Rapier, (504) 576-4740, trapier@entergy.com
Jessica Coolidge, (504) 576-5407, jcoolid@entergy.com
Greg Crisler, (504) 670-3538, gcrisle@entergy.com
Regina Bartholomew-Woods, rbartho@entergy.com
Kimberly Caron, kcaron@entergy.com
Margaret Saik, madler@entergy.com

INTERVENORS

Alliance for Affordable Energy

Logan A. Burke, logan@all4energy.org
Jesse S. George, jesse@all4energy.org
Alyx Darensbourg, regulatory@all4energy.org
4505 S. Claiborne Ave.
New Orleans, LA 70115
Tel: (504) 208-9761

Together New Orleans

Broderick Bagert, (225) 803-5876, broderick@togetherla.org
Nathalie Jordi, (504) 715-1742, nathalie@togetherla.org

Air Products and Chemicals, Inc.

Carrie R. Tournillon, carrie.tournillon@keanmiller.com
Theresa Phillips, theresa.phillips@keanmiller.com
Kean Miller LLP
900 Poydras Street, Suite 3600
New Orleans, LA 70112