



October 10, 2025

**Via Electronic Mail**

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Council of the City of New Orleans  
Room 1E09, City Hall  
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**Re: Renewable and Clean Portfolio Standard (CNO Docket No. UD-19-01)**

Dear Clerk:

Please find enclosed the Alliance for Affordable Energy's comments related to the above captioned docket. Please file the attached communication and this letter into the record. The Alliance submits this letter electronically and will submit the requisite original and number of hard copies as you direct.

Thank you for your time and attention,  
Sincerely,

A handwritten signature in black ink, reading "Logan Atkinson Burke".

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Logan Atkinson Burke  
Executive Director  
Alliance for Affordable Energy

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

**In Re: RESOLUTION AND ORDER  
ESTABLISHING A DOCKET AND  
OPENING A RULEMAKING PROCEEDING  
TO ESTABLISH RENEWABLE PORTFOLIO  
STANDARDS**

**DOCKET NO. UD-19-01**

**OCTOBER 10, 2025**

**COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY ON ENTERGY  
NEW ORLEANS, LLC’S RENEWABLE AND CLEAN PORTFOLIO STANDARD  
COMPLIANCE PLAN FOR COMPLIANCE YEARS 2026-2028**

**I. INTRODUCTION**

On August 14, 2025, pursuant to Section 4(e) of the Renewable and Clean Portfolio Standard (“RCPS”) the Council of the City of New Orleans (“the Council”) adopted in Resolution No. R-21-182, Entergy New Orleans, LLC (“ENO”) filed its Compliance Demonstration Plan (“the Plan”) for compliance years 2026-2028. On September 25, 2025, the Council adopted Resolution No. R-25-484, providing an opportunity for intervenors in this docket to comment on ENO’s Plan by October 10, 2025. Accordingly, the Alliance for Affordable Energy (“AAE”) respectfully submits the following comments:

**II. ENO’S COMPLIANCE IS STILL LARGELY DEPENDENT ON NON-  
RENEWABLE RESOURCES AND PURCHASED RENEWABLE ENERGY  
CERTIFICATES**

AAE acknowledges that ENO’s Plan has met the technical compliance requirements under the RCPS. However, we would note that the vast majority of ENO’s projected compliance continues to be from existing nuclear power generating facilities, an expensive non-renewable resource, and from purchased renewable energy certificates (“RECs”), meaning that the RCPS is still doing little to steer ENO toward truly renewable generation resources. Renewable resources offer benefits beyond reducing greenhouse gas emissions that nuclear cannot, including

flexibility, the creation of a local economy and workforce around distributed resources, and being truly clean and sustainable, without the long-term radioactive waste storage issues associated with nuclear energy. As AAE has advocated since the drafting of the RCPS, the Council should amend the RCPS to encourage the development of locally-generated renewable energy.

### **III. THE COUNCIL SHOULD NOT APPROVE LARGE EVENT ELECTRIFICATION AS AN ELIGIBLE COMPLIANCE RESOURCE**

In its Plan, ENO proposes to include what it calls “large event electrification” as a Tier 3 compliance resource. While a reduction in the usage of diesel generators is an admirable goal, “large event electrification” is merely an opportunity for ENO to sell more electricity, regardless of the generation source. As the Council stated rightly in the preamble to Council Resolution R-21-182 adopting the RCPS: “[T]he Council finds that the primary purpose of the RCPS will be to eliminate carbon emissions from the Utility’s generation portfolio, and that Beneficial Electrification has the potential to prolong the extent to which the Utility may keep carbon emitting resources in its portfolio.” Essentially, ENO would be creating new load by electrifying large events with no regard to the generation resources supplying that new load, which is contrary to the “primary purpose” of the RCPS, reducing dependence on carbon-emitting resources in its own generation portfolio. ENO needs no additional incentive to pursue these electrification projects, as they stand to benefit directly from increased sales, and thus the Council should deny ENO’s request to include large event electrification as an eligible Tier 3 resource.

### **IV. THE COUNCIL SHOULD NOT APPROVE THE ELECTRIFICATION OF THE NEW ORLEANS SEWERAGE & WATER BOARD AS AN ELIGIBLE COMPLIANCE RESOURCE**

Similar to its proposal to treat “large event electrification” as an eligible compliance resource, ENO proposes to treat the impending electrification of the New Orleans Sewerage & Water Board (“S&WB”) as a Qualified Measure. Again, while electrification is a prudent step for the S&WB, for ENO, it simply represents a massive new retail load to serve, regardless of the generation resource. It would create a massive increase in demand while doing nothing to change ENO’s generation portfolio. In fact, ENO’s decision to balk on its previous commitment of \$30M to the project seriously jeopardized its development.<sup>1</sup> ENO should not receive compliance credit for a project that the S&WB undertook for its own purposes, and would have done so even without Entergy’s involvement.

#### **V. ENO SHOULD RECEIVE COMPLIANCE CREDIT ONLY FOR COMMUNITY SOLAR PROJECTS THAT IT DEVELOPS**

ENO proposes to treat all community solar resources currently in development as Tier 1 resources. Harkening back to the “primary purpose” of the RCPS as described in the adopting resolution, the goal is to eliminate carbon emissions from ENO’s generation portfolio. Community solar projects, developed and owned by third parties, are not part of ENO’s generation portfolio. In fact, community solar is being undertaken *in spite* of ENO’s persistent resistance to its development, including most recently in their resistance to consolidated billing under docket UD-18-03. Furthermore, the Council’s most current Community Solar Rules make it clear that the “owner” of the RECs is the Subscriber, who may transfer them (for example to the Subscriber Organization) as they choose.<sup>2</sup> ENO should not receive compliance credit for projects that it has actively opposed. If ENO would like to retire RECs generated using local

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<sup>1</sup>[https://www.nola.com/news/politics/entergy-pulling-30m-funding-commitment-for-s-wb-substation-leaving-pumping-power-in-doubt/article\\_d0e56718-7d45-11ec-b6e8-3b01c9c1ebed.html](https://www.nola.com/news/politics/entergy-pulling-30m-funding-commitment-for-s-wb-substation-leaving-pumping-power-in-doubt/article_d0e56718-7d45-11ec-b6e8-3b01c9c1ebed.html)

<sup>2</sup> CNO Resolution R-25-352, Community Solar Rules, section XII. B-C, at pg 16-17.

Community Solar, they have the right to contract with either project Subscribers or the Subscriber Organizations who may aggregate transferred RECs.

## **VI. THE COUNCIL SHOULD SEEK CLARITY FROM ENO ON CHANGES TO ITS ACQUISITION OF RECS**

On page 2 of ENO's Plan, under section 2.b pertaining to the Green Select program, ENO states, "In previous years, ENO sourced RECs for Green Select customers from the same pool of generated or purchased RECs that would otherwise be used for RCPS compliance. As of 2025, ENO intends to separately purchase RECs that will be used to serve Green Select obligations. As a result, no RECs or CECs in Table 1 will be associated with the Green Select program." ENO offers no explanation for this change in the acquisition of RECs. The Council should require clarity from ENO as to why it has implemented this change.

## **VII. CONCLUSION**

AAE appreciates this opportunity to comment on ENO's 2024 RCPS Compliance Plan. The RCPS is a powerful tool for preserving New Orleans' future, but the Council can and should do more to ensure that the full benefits of renewable energy accrue to the City of New Orleans.

Submitted respectfully,



Logan A. Burke  
Executive Director  
Alliance for Affordable Energy

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

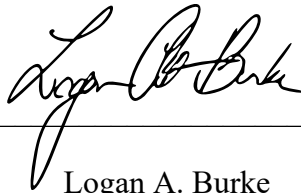
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**DOCKET NO. UD-19-01**

**OCTOBER 10, 2025**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 10th day of October 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

A handwritten signature in black ink, appearing to read "Logan A. Burke", is positioned above a horizontal line.

Logan A. Burke  
Alliance for Affordable Energy

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