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July 17, 2026

Via Electronic Delivery

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

**In Re: Rulemaking to Consider Revisions to the Integrated Resource Planning Rules
With Respect to Distributed Energy Resources (CNO Docket No. UD-26-01)**

Dear Clerk of Council:

Entergy New Orleans, LLC (“ENO” or “the Company”) submits these Comments on Proposed Changes to the Integrated Resource Planning Rules pursuant to the Council’s request in Resolution No. R-26-220.

ENO submits this filing electronically in accordance with Council regulations.

Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'Regina Bartholomew-Woods'.

Regina Bartholomew-Woods

RBW/bkd
Enclosures
cc: Official Service List (*via email*)

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

IN RE: RULEMAKING TO CONSIDER	)	
REVISIONS TO THE INTEGRATED	)	
RESOURCE PLANNING RULES WITH	)	DOCKET NO. UD-26-01
RESPECT TO DISTRIBUTED ENERGY	)	
RESOURCES	)	

**COMMENTS OF ENTERGY NEW ORLEANS, LLC ON PROPOSED
CHANGES TO THE INTEGRATED RESOURCE PLANNING RULES**

Entergy New Orleans, LLC (“ENO” or “the Company”) submits these comments pursuant to Resolution No. R-26-220 regarding the proposed modifications and comments filed June 18, 2026, by the Council’s Advisors (“Advisors”) and Alliance for Affordable Energy (“AAE”) to the Integrated Resource Planning (“IRP”) Rules (the “Rules”) previously adopted by the Council in Resolution No. R-17-429, dated August 10, 2017.

COMMENTS

Advisors’ Proposed Modifications

As an initial matter, the Company notes that the Advisors’ proposed definitions of Distributed Energy Resources in Section 2.A.6 and Distributed Resources in Section 2.A.8 align with those submitted by the Company on June 18. These definitions will better describe these resources for purposes of inclusion in the IRP studies and analyses.

The Company suggests that the Advisors’ proposed edits to Section 2.A.10, Integrated Resource Planning, are acceptable to the extent they acknowledge that utility planning involves consideration of transmission and distribution systems as well as supply-side and demand-side resources and programs. However, to go further and attempt to incorporate holistic transmission and distribution planning and the optimized selection of DERs in portfolios into the IRP process would present numerous issues.

The current Aurora model that the System Planning and Operations (“SPO”) uses to optimize the future buildout of resources under combinations of Planning Scenarios and Strategies (i.e., capacity expansion modeling) does not contain a detailed representation of the transmission or distribution systems. SPO can still model distribution-connected resources and include them in optimization, assuming they are given the relevant cost and performance inputs, although this type of modeling does not evaluate possible benefits of distribution connected resources, such as deferring or avoiding otherwise-needed transmission or distribution projects.¹ Distribution lines, transmission lines, and other upgrades that do not provide capacity or energy are not valid inputs for the capacity expansion model. Transmission planning is largely accomplished through the MTEP process, which is administered by the Midcontinent Independent System Operator (“MISO”). This process is entirely separate from the Council’s IRP dockets and is not materially influenced by the IRP process. Attempting to incorporate transmission planning into the IRP process would be a waste of time and resources, given the existence of the MTEP process, MISO’s role in transmission planning, and the fact that ENO is located within its own Transmission Pricing Zone (“TPZ”).

Manual portfolios offer a way to evaluate specific types and amounts of DERs, and were used in the 2024 IRP to address the requested Stakeholder Scenario and Strategy which specified inclusion of certain amounts and types of DERs. The Company expects manual portfolios could be useful for addressing specific portfolios in future IRPs as well, and that Section 7.G should be edited to contemplate that method of portfolio development. Section 6.E was included in the IRP

¹ To capture such benefits in the capacity expansion modeling, there would need to be a transmission and/or distribution systemwide DER study conducted for ENO to determine where DERs could be located to provide avoided T&D project benefits. Then SPO could net those costs against the gross costs of the DERs and model the net cost to compete with supply side alternatives for purposes of creating optimized IRP portfolios. To produce such studies would add cost and time to the IRP process.

Rules for ENO to provide information on its progress in developing the ability to evaluate possible distribution system benefits from added DERs. ENO will continue to comply with this requirement in its IRPs as it adds functionality in this area.

In Section 3.A.3, it is unclear what the addition of the word “outages” is attempting to address. While thermal unit outage rates based on historical data are already used in IRP modeling, ENO cannot anticipate and mitigate the risk of outages on the distribution or transmission grid in the IRP planning process. ENO would propose to remove that addition subject to further clarification from the Advisors.

Regarding the proposed changes to Section 4.A.2, the load forecast reflects as decrements to load the organic adoption of customer-controlled DERs such as net metered solar, as shown in Table 1 included in the Company’s June 18 comments, while Company- or customer-owned/controlled DERs are modeled as supply side resources in the AURORA model and do not affect the load forecast. The Company believes that the proposed changes are intended to capture those points but would ask that the Advisors clarify if not.

Regarding the proposed changes to Section 4.A.6, ENO can provide the assumed reductions to the load forecast due to net metered solar as part of the discussion in the IRP Report. However, reductions due to organic energy efficiency or company-run DSM programs are built into the load forecast regression model as an input variable so separating those elements could present a challenge. Additionally, as ENO combines organic EE and OpCo DSM together, separating the effects of the two could be problematic.

The Company does not oppose the Advisors’ proposal to remove the >300 kW threshold from the requirement in Section 4.E, given that the annual DER filing made by ENO pursuant to Resolution No. R-21-153 satisfies this requirement.²

In Section 5.A.4.c, Potential Demand-Side resources, the Advisors propose to remove the requirement that the DSM potential study incorporate the four main benefit-cost tests from the California Standard Practice Manual and instead allow the required tests to be specified in the IRP initiating resolution. ENO has used the California Standard Practice Manual (as well as the New Orleans Technical Reference Manual (“NO TRM”), which the Council required ENO, the Advisors and Stakeholders to develop and which development required time and financial resources) throughout the first 16 Program Years of Energy Smart and finds the trend analysis to be extremely beneficial for planning a mature portfolio and suggests that these tests continue to be performed as part of the potential study. To the extent the Council decides to add other cost-benefit tests to the DSM potential study from the National Standards Practice Manual or other sources that are not broadly recognized industry standards, or which have not been specifically tailored to ENO’s operations, like the NO TRM, consideration should be given to the time involved in developing the inputs and understanding the outputs of those methods.

Edits in Sections 7.J and 9.A refer to “DER expansion,” a term that does not appear elsewhere in the Rules. It is not clear whether this is intended to refer to portfolios that include DERs, some aspect of the DSM potential study, or another concept. ENO requests clarification on the intended meaning.

² The Company recently made its annual DER filing for 2025 on June 12, 2026.

AAE Comments

While the AAE did not propose specific edits to the IRP Rules, it raised several issues regarding inclusion of DERs in portfolio modeling and the DSM potential study. As discussed above, the Aurora capacity expansion software can evaluate DERs if given the necessary cost and performance inputs, although it cannot quantify benefits associated with avoided T&D projects. Manual portfolios can also be used to analyze different levels and types of DERs, as was done in the 2024 IRP.

In the DSM Potential Study, the potential of DERs as standalone grid-connected devices would need to be studied as an additional component beyond the DSM and DR potential normally evaluated. ENO has considered adding this additional scope to the potential study for the 2027 IRP and can discuss that possibility, as well as any necessary modifications to the IRP schedule associated with these efforts, with the parties at the appropriate time.

CONCLUSION

ENO appreciates the opportunity to provide these comments regarding the potential changes to the IRP process.

Respectfully submitted,

By: 
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**ATTORNEYS FOR
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CERTIFICATE OF SERVICE
CNO Docket No. UD-26-01

I hereby certify that I have served the required number of copies of the foregoing pleading upon all other known parties of this proceeding individually and/or through their attorney of record or other duly designated individual.

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New Orleans, Louisiana, this 17th day of July, 2026.



Regina Bartholomew-Woods