



July 31, 2026

Via Electronic Mail

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

RE: RESOLUTION AND ORDER ESTABLISHING RULEMAKING TO CONSIDER
REVISING THE INTEGRATED RESOURCE PLAN RULES WITH RESPECT TO
DISTRIBUTED ENERGY RESOURCES
(UD-26-01)

Dear Clerk,

Please find the attached Reply Comments of the Alliance for Affordable Energy for filing under the docket referenced above. We will submit physical copies at your instruction. Thank you for your attention to this matter.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to be "Jesse S. George".

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

Before
The Council of the City of New Orleans

**IN RE: RESOLUTION AND ORDER
ESTABLISHING RULEMAKING
TO CONSIDER REVISING
THE INTEGRATED RESOURCE PLAN RULES
WITH RESPECT TO DISTRIBUTED ENERGY
RESOURCES**

DOCKET UD-26-01

JULY 31, 2026

REPLY COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY

On July 1, 2026, parties to this proceeding, including the Alliance for Affordable Energy (“AAE”), Entergy New Orleans, LLC (“ENO”) and the New Orleans City Council’s (“Council”) Utility Advisors (“the Advisors”), filed proposed changes to the Council’s rules governing integrated resource planning (“IRP”) regarding the inclusion of distributed energy resources (“DERs”) in future Demand-Side Management (“DSM”) Potential Studies and IRP analyses. Subsequently, on July 17, 2026, parties filed comments on the various proposals, per the procedural schedule. AAE hereby submits the following reply comments in response:

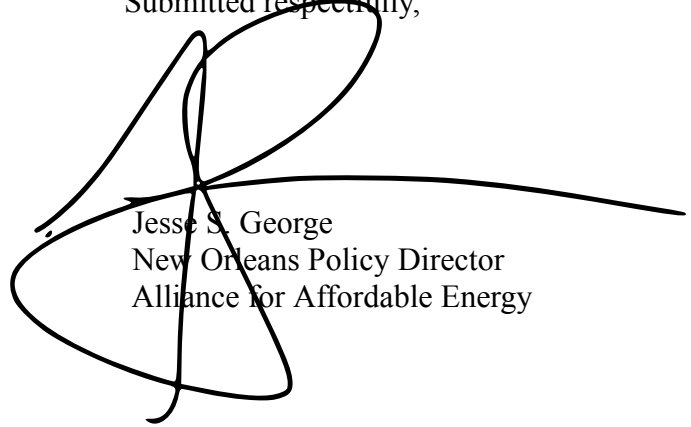
The Gulf States Renewable Energy Industries Association (“GSREIA”) filed both a Petition for Intervention Out of Time and Initial Comments on July 16, 2026. AAE agrees broadly with GSREIA’s recommendations with regard to modeling and evaluation of DERS, insofar as they align with AAE’s own recommendations. In its comments, ENO addresses these concerns and expresses a willingness to work with parties in the next IRP cycle to ensure that they are addressed.

AAE would reiterate its objection to ENO’s proposed revision to the definition of “Distributed Energy Resources” under the IRP Rules inasmuch as it includes non-renewable

generation.¹ The Council's Renewable and Clean Portfolio Standard has an explicit goal of achieving carbon-free generation by 2050.² New distributed fossil generation should be excluded from future IRP modeling scenarios.

AAE thanks the Council and parties for working to ensure that ENO considers the full benefits of DERs in its future planning.

Submitted respectfully,

A large, stylized handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

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

¹ *Comments of Entergy New Orleans, LLC on Proposed Changes to the Integrated Resource Planning Rules*, June 18, 2026, p. 2.

² Renewable and Clean Portfolio Standard § 1(a)(1).

Before
The Council of the City of New Orleans

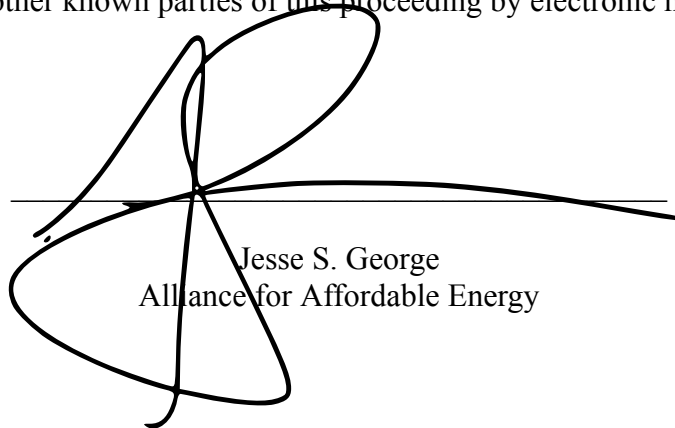
**IN RE: RESOLUTION AND ORDER
ESTABLISHING RULEMAKING
TO CONSIDER REVISING
THE INTEGRATED RESOURCE PLAN RULES
WITH RESPECT TO DISTRIBUTED ENERGY
RESOURCES**

DOCKET UD-26-01

JULY 31, 2026

CERTIFICATE OF SERVICE

I hereby certify that I have this 31st day of July 2026, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



Jesse S. George
Alliance for Affordable Energy

Service List

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, tjackson@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, tirvin@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 2109
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
Denton Law Firm,
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 direct,
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 Willuams, swill62@entergy.com

Entergy New Orleans, LLC
Vice-President, Regulatory and Public Affairs

Harry Barton, hbarton@entergy.com
Entergy New Orleans, LLC
Director, Regulatory Affairs

Deanna Rodriguez, drodri2@entergy.com
Entergy New Orleans, LLC
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, dsavoil@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.

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

GULF STATES RENEWABLE ENERGY INDUSTRIES ASSOCIATION

Stephen Wright, swright@gsreia.org

Consultant to the Association

Monika Gerhart, mgerhart@gsreia.org

Executive Director

400 Poydras Street, Suite 900,

New Orleans, Louisiana 70130