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July 31, 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 Reply 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/rh
Enclosure
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	)	

REPLY COMMENTS OF ENTERGY NEW ORLEANS, LLC

Entergy New Orleans, LLC (“ENO” or “the Company”) submits these reply comments pursuant to Resolution No. R-26-220 regarding the comments filed July 17, 2026, by the Alliance for Affordable Energy (“AAE”).

1. The Definition of Distributed Energy Resources Should Not Exclude Non-Renewable Generation

The AAE suggests that the definition of “Distributed Energy Resources” should exclude non-renewable generation.¹ The Company disagrees and believes the proposed definition in the redlined IRP rules should accurately reflect the full range of Distributed Energy Resources (“DERs”) available to, and active in, the ENO market.

Numerous ENO commercial and industrial customers have installed fossil-fueled generation behind their meters and are available to participate in demand response (“DR”) programs. The Company has previously alerted the Council to the operations of Aggregators of Retail Customers (“ARCs”) in New Orleans that directly register with MISO demand response programs composed of ENO’s customers. Two negative effects result from ARCs directly registering demand response resources: 1) ENO cannot rely on the capacity as part of its resource planning, and 2) ENO’s other customers do not benefit from MISO revenues associated with the DR program since revenues are shared solely between the participating customer and the ARC.

¹ AAE Comments, July 17, 2026, at p.1.

The retail regulators over the other four Entergy operating companies have prohibited the direct registration by ARCs of those companies' customers in MISO demand response programs and require ARCs to work through the utility as the MISO Market Participant. These policy decisions ensure the demand response programs are available for inclusion in the utility's resource planning process and revenues received from MISO benefit all customers of the utility, not just the ARC and the DR participant.

To protect New Orleans customers from the ongoing risks of direct registration of DR programs by ARCs, ENO requests that the Council initiate a rulemaking to investigate the implications of direct registration of its jurisdictional customers through ARCs and consider adoption of a Market Valued Demand Response tariff to facilitate registration of ENO customers. ENO also requests that the Council issue a temporary prohibition on the practice starting with the 2027/28 MISO Planning year until such time as a final rule is issued. In the absence of these steps, ARCs will continue to directly register DR programs in MISO to the detriment of ENO's resource planning process and other customers. Absent action from the Council, ARCs will continue to erode the DR potential and savings available to ENO's customers and may tarnish the Council's award-winning Energy Smart program.

2. The Procedural Schedule for the 2027 IRP Should Include Time for a Distribution System Non-Wires Alternative Study

As the Company noted in its previous comments, including DERs in the IRP capacity expansion and optimization modeling requires the development of inputs that can be offered into the tool used for the long-term resource planning analysis in the IRP, such as the Aurora software.² Developing these inputs requires a study of the costs and benefits that might result from specific DER projects that can be operated and controlled in a manner such that they could help avoid other

² ENO Comments, July 17, 2026, at p. 2.

capital upgrades on the ENO distribution grid. Such use of controllable DERs that are operated in a manner to mitigate a planning constraint in the distribution system is typically referred to as a non-wires alternative (“NWA”). Most of ENO’s planned distribution capital projects focus on replacing aging infrastructure; it is unclear whether DERs placed on the distribution grid as NWAs can help avoid such infrastructure renewal and replacement work, and if so, the degree to which it is possible to quantify the benefit to customers of avoiding that infrastructure replacement work through NWAs. Given the Council’s policy decisions to support DERs such as Community Solar, the battery Virtual Power Plant, and net metered solar, the Company agrees it would be instructive and helpful to undertake a distribution system “non-wires alternative” study as part of the 2027 IRP to identify a number of possible DER projects and evaluate the costs and benefits such that they could be included in the Aurora capacity expansion and portfolio optimization used as part of the IRP process.

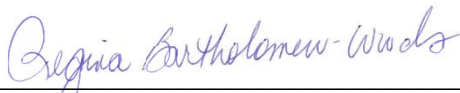
Based on initial discussions with SPO and the Company’s distribution planners, the Company would retain a third-party consultant to assist in identifying potential DER projects, as well as scoping and executing the NWA distribution system study. The Company believes the study will require approximately six to eight months to complete, which is consistent with the time required in previous IRP cycles for the DSM potential study.³ The Company expects that both the NWA distribution system study and the DSM potential study can be executed in parallel and requests that the Council account for the required time at the beginning of the 2027 IRP procedural schedule.

³ As discussed in previous comments, the Company plans to include in the scope of the 2027 DSM potential study an assessment of potential DERs as standalone grid-connected devices in addition to the DSM and DR potential normally studied.

CONCLUSION

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

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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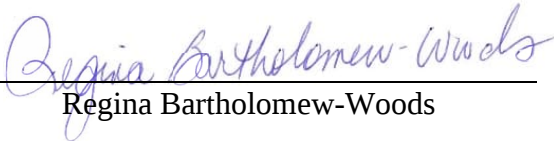
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New Orleans, Louisiana, this 31st day of July, 2026.


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