

September 2, 2025

Via Electronic Mail

Aisha Collier
Assistant Clerk of Council
Room 1E09, City Hall
1300 Perdido St
New Orleans, LA 70112

Re: GSREIA Comments Re ENO's June 10 Proposal for Consolidated Billing - UD 18-03

Dear Ms. Collier,

Gulf States Renewable Energy Industries Association (GSREIA) respectfully submits the following comments about ENO's June 10 proposal for consolidated billing.

Please do not hesitate to reach out with any questions related to this filing.

Sincerely,

Monika Gerhart

Gulf States Renewable Energy Industries Association (GSREIA)

GSREIA Comments Re ENO's June 10 Proposal for Consolidated Billing

GSREIA welcomes the foundation for ENO's June 10 proposal for the net crediting method of consolidated billing for New Orleans' community solar program, yet strongly urges the Council to establish, as soon as possible, a consolidated working group consisting of ENO, developers and experts to figure out implementation details. It is critical that any working group includes deliverables and timelines. Much has changed at the state and federal levels since the Council opened this docket; further delays will only endanger the viability of projects that have actively secured financing. It is essential that a reasonable and customer-centered consolidated billing standard is ready for implementation with a year.

GSREIA has many points of agreement with the June 10 redlines, and a few points of difference. They are discussed below.

1. Customers in Good Standing

ENO argues that only ENO customers in good standing should be able to enroll as community solar subscribers. We propose striking this requirement. Customers not in good standing are those who would most benefit from participation in community solar. If a customer with a balance is disqualified, this will disproportionately discriminate against those who face the highest energy burden. Besides discriminatory impact, the administrative burden of monitoring potential customers who begin in good standing but in the interim fall behind becomes administratively costly and unnecessary. GSREIA therefore proposes striking the redline that appears in the Definitions, under "Subscriber."

Proposed Redline: "Subscriber" means a Customer of the Utility that holds a Subscription to one or more CSG Facilities and has identified one or more individual meters or accounts related to electric service to which the Subscription(s) shall be attributed. ~~At the time a Customer enrolls as a Subscriber, the Customer's account with the Utility must be in good standing.~~

2. Utility Administrative Fee

ENO has proposed to charge 3% of the total value of the credits as an administrative billing fee, which is far above what other jurisdictions charge. A more reasonable fee, commiserate with national standards is 1%.

State	Admin Fee %	Fee Basis	Utilities
New Jersey	Up to 1%	Subscription Fee	Jersey Central Power & Light (JCP&L), Atlantic City Electric (ACE), Rockland Electric Company
New York	Up to 1%	Bill Credit Value	Consolidated Edison (ConEd), Central Hudson Gas & Electric, Orange & Rockland Utilities (O&R), National Grid
Maryland	1%	Bill Credit Value	Baltimore Gas & Electric (BGE), Pepco
Illinois	up to 2%	Bill Credit Value	
Virginia	1%	Bill Credit Value	
Oregon	Not specified	Subscription Fee	Portland General Electric (PGE)
Pennsylvania	TBD	TBD	

As the graph above demonstrates, of all states with consolidated billing, most charge 1%, with only Illinois charging 2%. In fact, half of the utilities on this list only charge **1% of the subscription fee instead of 1% of the bill credit value**, which is even less (maybe 20% less).

Proposed redline: “Utility Administrative Fee” is the ~~3.0%~~ 1.0% amount deducted by the Utility from the subscriber Organization’s portion of the Allocated Credit that is used to defray costs incurred by the Utility to administer Net Crediting Consolidated Billing.

3. VIII.E Time Needed to Post Credits

ENO has proposed two months to post credits, whereas one month is standard practice, and a better customer experience.

Proposed savings should be automated, and a two-month delay in posting credits and therefore savings for customers is an unnecessarily long time and long delay for the utility to apply a simple software solution. There is no reason why a utility should not be able to calculate the credit allocation and savings on the same month after the generation is created, meaning posting credits in March for February generation. If the community solar credit is mismatched with the subscription fee on a subscriber’s bill, it’s confusing to the subscriber. In Oregon, the process takes 5 days.

Proposed redline: VIII.E. The Utility shall calculate and render Allocated and Net Credits for each Subscription using the most recently updated monthly Subscriber report and CSG Facility Output data on a ~~one- two-month~~ lag.

Example: the Allocated and Net Credits for Subscribers listed on a Subscriber report as participating in February would be calculated after receipt of actual CSG Facility Output for February. These Net Credits would appear on the Subscribers’ ~~March~~ ~~April~~ Utility bills. The Utility would remit the Subscriber Organization’s portion of the Allocated Credits less the Utility Administrative Fee in ~~March~~ ~~April~~.

4. VIII.C Method of Communicating Subscriber Changes to the Utility

This point may require additional clarification and is an example of an issue that could easily be resolved within a working group established by Council.

In their June 10 proposal, ENO requests a monthly list showing each subscriber and their allocation.

If an SO wishes to remove a customer, they could submit a form and then the utility can take 60 days to implement that change in allocation lists. This may decrease the administrative burden for the utility and the SO, such that in months where no changes are needed, the utility simply uses what is on file and no new fields must be exchanged. Again, it may be more effective for minor implementation details to be discussed and settled in a regularly scheduled working group charged with operationalizing implementation details.

5. VIII.G.iii: Calculation of Payment to the Subscription Organization

The text here should be changed to align with the amount of the Utility Administrative Fee in the Definitions section.

Proposed redline: VIII.G.iii. less Utility Administrative Fee (1.0% ~~3.0%~~ of Allocated Credit)

6. General Cost of the Program

New Orleans ratepayers deserve transparency and accountability in any program. While ENO has provided only a high-level cost estimates associated with consolidated billing, citing \$1.55M with a +100% to -50% sensitivity range and suggesting the need for two additional analysts at an annual cost of \$110-125K each. The Council and the public deserve far greater transparency. What specific changes to ENO's IT systems and back-end processes are required? Why do these changes cost so much, and what alternatives were considered? Again, the costs to implement such programs in other jurisdictions is much more limited. New Orleans ratepayers deserve an accurate understanding and detailed breakdown of ENO's assumptions commiserate with any legislative body's oversight, including scope of IT changes, workflow impacts, and whether more cost-effective solutions are available.

7. Timeline

The Council mandated consolidated billing nearly a year ago. GSREIA suggests that Council require a much more ambitious timeline than the eight-month window to finalize requirements and complete implementation of consolidated billing, given that most of this work should be close to final per the Council's mandate. Industry stakeholders and subscribers cannot afford continued uncertainty, and the success of community solar depends on timely execution. The Council should require clear interim milestones and accountability mechanisms to prevent further delay.

8. Making Substantive Progress

Council has been unequivocal about consolidated billing. In Resolution R-24-310 (July 2024), ENO was ordered to submit a consolidated billing plan by September 2024 for full

implementation by July 2025. ENO failed to comply. A year later, in Resolution R-25-352, the Council reaffirmed and strengthened its mandate, and at the July 30 technical conference, the Council reiterated its expectation that consolidated billing must move forward without obstruction.

GSREIA is a local affiliate of a national industry group, the Solar Energy Industries Association (SEIA). The Community Solar section of counterpart affiliates in other states, stakeholders in the national section, and the industry partners themselves demonstrate that there is a keen willingness to invest in New Orleans—community solar could be an economic development driver. Yet, somehow the programs that work seamlessly in other jurisdictions have faced repeated and unforeseen delays in New Orleans, despite Council's mandate and with little to no accountability.

Instead, ENO appears to wish to litigate the program to extinction through endless and burdensome RFIs to intervenors such as GSREIA, a flow of legal documents questioning the merits of consolidated billing itself, failure to meet Council's timelines or directives, and a workflow of conferences that are ineffectual in outcomes. These tactics waste ratepayers' money through de facto litigation, tie up Council and intervenor resources, slow progress, and have failed to result in timely solutions to resolve important issues. The Council, its Advisors, and intervenors' resources are precious, and should not be wasted by ENO's attempts to **paper the docket to extinction**.

New Orleans ratepayers deserve a focus on timely implementation. The path forward is clear: enforce the Council's mandates, establish a working group to resolve technical details, and require ENO to execute consolidated billing on schedule as mandated by Council. New Orleans residents should not wait any longer for the bill savings and clarity that consolidated billing will provide.

Before
The Council of the City of New Orleans

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CERTIFICATE OF SERVICE

I do hereby certify that I have, this September 2, 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

Monika Gerhart, Gulf States Renewable Energy Industries Association