

Aug 11, 2025

**Via Electronic Mail**

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

Re: **Advisors' Report on VPP** (Docket No. **UD-24-02**)

Dear Ms. Collier,

Together New Orleans respectfully submits the attached filing in docket **UD-24-02** pertaining to the City's **Distributed Energy Resource Program**.

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

Sincerely,

Nathalie Jordi  
Together New Orleans

## **TNO's Responses to ENO's Consolidated Billing RFI:**

**Question 1.1: List all states in which you or your Affiliates have community solar operations or have had such operations in the last five years, and describe with specificity the locations within the state that you or your Affiliates have operated, including utility interconnections.**

None.

**Question 1.2: For each state in which you or your Affiliates have or have had operations in the last five years, describe the applicable billing process for subscription fees (e.g., dual-billing, consolidated billing, other billing process).**

N/A

**Question 1.3: For each state in which you or your Affiliates have or have had operations in the last five years, identify the laws or regulations governing the applicable billing process for subscription fees and the collection process in case of untimely payment.**

N/A

**Question 1.4: For each state in which you or your Affiliates have or have had operations in the last five years, identify the laws or regulations governing interconnection and communication with the interconnected utility.**

None. But interconnection is governed by state-level interconnection standards. Most jurisdictions follow IEEE standards with utility-specific processes and oversight by state commissions.

**Question 1.5: Identify what community solar generating assets that you or your Affiliates own and/or operate, or have owned and/or operated in the last five years.**

None.

**Question 1.6: For each community solar generating asset that you or your Affiliates own and/or operate, or have owned and/or operated in the last five years, describe in detail the method of communicating solar generating asset operation data with the interconnected utility.**

We do not operate any community solar generating assets, but understand that communications with utilities are typically automated and use industry-standard protocols like SCADA or APIs, depending on the utility's system.

**Question 1.7: Provide your and your Affiliates' annual revenues with regard to community solar generating assets for each of the last five years.**

N/A

**Question 1.8: Provide your and your Affiliates' annual cost with regard to community solar generating assets for billing processes for each of the last five years.**

N/A

**Question 1.9: Describe any disputes regarding your and your Affiliates' community solar operations filed with a state regulator.**

None.

**Question 1.10: Identify any penalties or fines ordered against you and your Affiliates by a state regulator.**

None.

**Question 1.11: Please explain, in detail, how, if at all, the provisions of the One Big Beautiful Bill, including but not limited to provisions regarding clean energy tax credits, the accelerated phase-out of tax credits, and restrictions on component sourcing, may impact a time-table and the ability of you or your Affiliates to implement a community solar program in New Orleans.**

The federal Inflation Reduction Act ("One Big Beautiful Bill") maintains some clean energy incentives but imposes phase-outs and sourcing requirements that add urgency to near-term implementation.

**Question 1.12: Please identify and explain alternatives to utility consolidated billing that can achieve similar benefits.**

There is no true substitute for utility consolidated billing. Alternatives such as dual billing or third-party consolidated billing are more complex, impose higher customer acquisition and servicing costs, and tend to depress participation, especially among low- and moderate-income subscribers.

**Question 1.13: With a consolidated billing program, how do you propose to address nonpayment or partial payment by a subscribing customer?**

Delays or non-payments are reduced with consolidated billing. Utilities can apply existing collections protocols and set clear rules for partial payments.

**Question 1.14: Do you propose that the Council limit the return that Subscriber Organizations (and Affiliates) earn on their community solar generation investments? If so, please identify and explain the limitations. If not, please explain why.**

We do not support Council-imposed limits on returns. Standard business risks, competitive markets, and transparency offer sufficient checks.

**Question 1.15: Please provide the estimated costs for a Subscriber Organization (and Affiliates) to conduct its own billing to program participants in a dual-billing model in New Orleans.**

Billing costs for Subscriber Organizations vary widely based on business model, technology choices, and project scale. Having each subscriber organization mount its own billing operation is an inefficient way to run a citywide program.

**Question 1.16: Please provide any analyses or estimates in your possession concerning the costs for ENO to implement consolidated billing for the community solar program in New Orleans.**

We do not possess proprietary estimates for ENO's internal costs, but public estimates from states like New York and Minnesota show that utility consolidated billing is cost-effective compared to duplicative third-party billing systems.

**Question 1.17: Please provide any analyses or estimates in your possession concerning the bill impacts to ENO's customers resulting from ENO's implementing consolidated billing for the community solar program in New Orleans.**

We do not possess this proprietary information, and without knowing how much the implementation of consolidated billing will cost, it's impossible to tell. But under net crediting, utilities recover administrative costs relating to billing and benefit from avoided procurement. Further, net crediting reduces program attrition and bad debt, lowering systemic cost exposure.

**Question 1.18: Please identify your expected annual revenues and expenses resulting from your participation in a community solar program in New Orleans.**

We respectfully decline to provide the requested financial data. The requested data is competitively sensitive and proprietary.

**Question 1.19: Please produce copies of any investment proposals or business plans that you have prepared in connection with your planned participation in a community solar program in New Orleans.**

We respectfully decline to provide the requested financial data. The requested data is competitively sensitive and proprietary.

**Question 1.20: What protections should the Council provide ENO (and its customers) to address any losses or damage to its existing systems that result from implementation or attempted implementation of a consolidated billing program?**

Reasonable indemnification clauses and utility input into billing design can mitigate risks to utility systems. These are standard in other markets.

**Question 1.21: What protections should the Council provide to ensure that utility consolidated billing does not increase delayed or partial payments by subscribing customers?**

Delays or non-payments are reduced with consolidated billing. Utilities can apply existing collections protocols and set clear rules for partial payments.

**Question 1.22: What protections should the Council provide to protect ENO (and its customers) from claims against it by Subscriber Organizations (and Affiliates)?**

Dispute resolution procedures and standardized contracts can insulate ENO from undue risk while ensuring fair treatment of Subscriber Organizations.

**Question 1.23: What protections should the Council provide to keep ENO customer data secure under a consolidated billing program?**

Data security can be addressed through nondisclosure agreements and cybersecurity standards, following best practices from utilities nationwide.

**Question 1.24: If you contend that non-participating customers should bear any costs of a community solar program (including for consolidated billing), please explain the basis or rationale for your contention, and state how much non-participating customers should pay.**

Community solar delivers broad public benefits, expanding access to clean energy, supporting grid resilience, and advancing equity by including renters and low-income households who are otherwise excluded from renewable options. These outcomes serve the public interest and align with Council policy goals.

Utility cost structures are, by necessity, shared. All customers routinely support system costs for infrastructure, programs, and services from which they may not individually benefit to the same extent, such as electric vehicle infrastructure, energy efficiency programs, demand response pilots, or transmission upgrades driven by regional reliability needs. The electric utility is a shared platform, and cost distribution is not, and cannot be, perfectly individualized. This is a feature of a modern, integrated utility system, not an exception.

Community solar's system-wide benefits, such as reduced peak load, deferred capacity investment, avoided procurement of marginal energy, and potential locational benefits on the distribution grid, accrue broadly. In that light, modest administrative costs, if any, borne by the wider customer base are not categorically unfair, particularly when weighed against the program's role in creating a more inclusive and sustainable energy system.

We do not propose a specific amount that non-participating customers should pay. That determination belongs in a broader policy discussion that weighs costs against system-wide and societal benefits.

**Question 1.25: Do you support a competitive procurement process among Subscriber Organizations (and Affiliates) seeking to participate in the community solar program. If not, please explain why.**

Competitive procurement is not appropriate for subscriber-driven community solar. Open enrollment supports innovation and access.

**Question 1.26: Concerning your March 26, 2024 comments in this docket, please identify the states that have adopted the net crediting model of utility-consolidated billing.**

According to NREL's [data set](#), states with utility-consolidated billing either implemented or mandated include Alaska, Colorado, Illinois, Maryland, Minnesota, New Jersey, New York, Oregon, Virginia. States having implemented or that are working on implementing the net crediting model are New York, New Jersey, Maryland and Minnesota.

**Question 1.27: Concerning your March 26, 2024 comments in this docket, please identify and quantify the "billing and collection costs that Subscription Organizations (and Affiliates) would incur in the absence of utility consolidated billing."**

Billing costs for Subscriber Organizations vary widely based on business model, technology choices, and project scale. Having each subscriber organization mount its own billing operation is an inefficient way to run a citywide program.

**Question 1.28: Concerning your March 26, 2024 comments in this docket, please share all documents in your possession that estimate the costs of executing the billing.**

See answer to 1-27.

**Question 1.29: Concerning your March 26, 2024 comments in this docket, please identify all successful community solar programs that have implemented net crediting.**

See 1-26.

**Question 1.30: Please explain your September 13, 2024 comments in this docket that "net crediting is an essential linchpin to this program."**

Net crediting simplifies the customer experience and removes barriers that disproportionately affect low-income residents. Under dual billing, customers must navigate two separate bills—one from the utility and one from the subscriber organization—making it difficult to determine whether they are receiving a benefit. Net crediting consolidates these into a single utility bill, where solar credits appear directly and automatically reduce the customer's electric bill.

This clarity and ease of participation are especially critical for low-income households, many of whom may be unbanked or enrolled in assistance programs like LIHEAP. Net crediting ensures that savings are guaranteed and visible, making participation possible for residents who could not otherwise take on the financial and administrative risk of dual billing. It also helps subscriber organizations reduce risk, enabling more financing for LMI-targeted projects.

In short, we believe net crediting is a prerequisite for accessibility, transparency, and scalability of the program—not just a billing preference, but a structural requirement for success.

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

**Re: Advisors' Report on VPP  
(Docket No. UD-24-02)**

**CERTIFICATE OF SERVICE**

I do hereby certify that I have, this **Aug 11, 2025**, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.



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Nathalie Jordi  
Together New Orleans