



July 20, 2026

Via Electronic Mail

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

RE: RESOLUTION AND ORDER ESTABLISHING A DOCKET AND PROCEDURAL  
SCHEDULE TO ENHANCE DISTRIBUTED ENERGY RESOURCE PROGRAMS  
(UD-24-02)

Dear Clerk,

Please find the attached Comments of the Alliance for Affordable Energy Regarding Entergy New Orleans, LLC's Proposed Implementation Plan for a Phase 3 Battery Energy Storage System 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 A DOCKET AND  
PROCEDURAL SCHEDULE TO  
ENHANCE DISTRIBUTED ENERGY  
RESOURCE PROGRAMS**

**DOCKET UD-24-02**

**JULY 20, 2026**

**COMMENTS OF THE ALLIANCE FOR AFFORDABLE ENERGY REGARDING  
ENTERGY NEW ORLEANS, LLC’S PROPOSED IMPLEMENTATION PLAN FOR A  
PHASE 3 BATTERY ENERGY STORAGE SYSTEM**

**I. INTRODUCTION**

On December 18, 2026 the New Orleans City Council (“the Council”) approved Resolution R-25-699, directing Entergy New Orleans, LLC (“ENO”) to design an implementation plan to incentivize widespread adoption of battery energy storage systems (“BESS”) at homes and commercial sites. On March 2, 2026 Entergy filed its “Energy Smart Battery Energy Storage System Pilot Phase 3 Implementation Plan.” Subsequently, on March 31, 2026, Together New Orleans (“TNO”) filed its “Comments of Together New Orleans Regarding ENO Proposed BESS Phase 3 Implementation Plan.”

In order to gain additional information from ENO and to clarify the procedural schedule, the Council then adopted Resolution R-26-258, ordering ENO to make a supplemental filing by July 6, 2026, and providing for party comments on both ENO’s and TNO’s filings by July 20, 2026. The Alliance for Affordable Energy (“AAE”) respectfully submits these comments in response:

## **II. AAE’S RECOMMENDATIONS**

### **A. Phase 3 Program Implementer and Third Party Incentive Administrator**

AAE agrees that EnergyHub should remain on as the BESS Program Implementer for the Energy Smart Program Years 16 through 18. There appears to be no reason to conduct additional RFPs for this third phase of the program while Phase 2 is already underway.

AAE agrees that a Third Party Incentive Administrator (“TIPA”) is appropriate for upfront incentives and other elements outlined in the company’s potential scope of work. Should the Council elect to move forward with separate designations (and incentives) for commercial facilities intended to provide public services in the case of outages, AAE recommends that the TIPA also determine and track qualifications and on-going requirements for such participants. There is some precedent for this, as the Energy Smart third party administrator has historically been tasked with qualifying and ensuring on-going performance of trusted “Trade Allies.” The Council should set such qualifications, and they should include standards and expectations associated with public communication of availability, annual event readiness, and basic reporting following major outage events.

### **B. Upfront Incentive**

The Council must ensure that this program is workable for low-to-moderate income (“LMI”) customers. Many New Orleans households struggle with the cost of living, and if the Council truly intends to reach customers without funds-in-hand to make this investment, then the upfront incentive for the program should mean qualified LMI households do not pay any cost upfront. Further, many households who fall into this category also have a need for BESS in order to protect health, such as requiring access to life-saving electricity to power medical equipment or for keeping medication cool.

This category must be a no-cost option, in the same way the current Energy Smart Income Qualified program does not require an investment or financing from the household. This would mitigate the need for longer term-higher level performance incentives, which ENO indicates third party owners<sup>1</sup> (who may use a lease model to reach low-income households) would have to cover the full investment. **The incentive should ensure there are no barriers or gaps in funding that would slow adoption in this customer category.** The Council made clear in Resolution R-25-669, approving the BESS program, that “[t]he DER Program shall include a not-to-exceed budget of twenty-eight million dollars (\$28,000,000) for customer upfront incentives over the initial three-year Program term.” AAE encourages the Council to direct ENO to divert the full \$28M to upfront incentives, as the Council intended, and to increase upfront incentive caps for all residential investments to \$20,000 from \$10,000 to ensure the costs are covered.

### **C. Ongoing Incentive**

Ongoing incentives are effectively payments that acknowledge performance, or “showing up” when called on to serve the grid. AAE does not support ENO’s proposal to provide differing levels of performance incentives to the different types of participants. If the incentive is based on equal increments of delivered capacity, there is no basis for residents who provide the same level of value to the system to receive a lower ongoing payment than a commercial customer. We encourage the Council to standardize this performance incentive across all participating customers, and raise residential per average kW delivered to \$250.

Additionally, one of the purposes of these performance incentives is to reduce the need for more expensive capacity on either an annual or event basis. As the Council’s Resolution R-25-669 allows for these values to be adjusted, we encourage the use of Evaluation,

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<sup>1</sup> ENO plan at pg 7

Measurement, and Verification to consider future changes or “right sizing” of the ongoing incentive as appropriate. This should mean that the long term cost of the BESS program more closely tracks the value provided to all customers, in order to reach greater cost effectiveness in the long run.

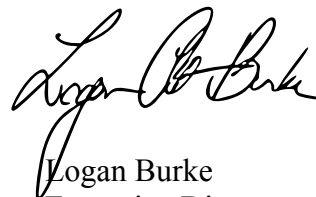
#### **D. Clawback Provisions**

While AAE understands the importance of a clawback provision, in the interest of protecting ratepayer funds, we recommend a lower threshold for compliance for at least the first year. Alternatively, an escalating compliance schedule, beginning at 50% and escalating to 70%, could allow for participants, administrators, and grid operators to learn over time. Lessons taken from other BESS programs have shown that compliance challenges may require flexibility in early years. For LMI participants, or those on the margin, a clawback mechanism that requires 50% of the annualized incentive in a first year of non-compliance would put undue financial stress on such a household.

### **III. CONCLUSION**

AAE appreciates this opportunity to provide comments on this implementation plan. We encourage the Council to ensure that a robust BESS program benefits all customers and has incentives that will enable successful implementation.

Submitted respectfully,

A handwritten signature in black ink, appearing to read "Logan Burke". The signature is fluid and cursive, with the first name "Logan" and last name "Burke" clearly distinguishable.

Logan Burke  
Executive Director  
Alliance for Affordable Energy

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

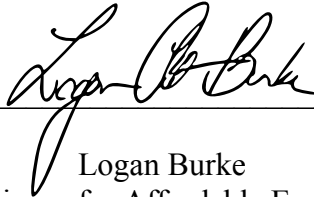
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**DOCKET UD-24-02**

**JULY 20, 2026**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 20th day of July 2026, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

A handwritten signature in black ink, appearing to read "Logan Burke", is written over a horizontal line.

Logan Burke  
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