

September 5, 2025

Via Electronic Mail

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

Re: Neighborhood Sun (“NSUN”) Comments Re ENO’s June 10 Proposal for Consolidated Billing - UD 18-03

Dear Ms. Collier,

NSUN 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,

Signed by:




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Gary Skulnik

CEO

Neighborhood Sun Benefit Corp.

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

NSUN is a community solar customer aggregator with seven years of experience in the market in both dual billing and consolidated billing states. We very much appreciate the work gone into launching the New Orleans program to date, and would like to be helpful in getting the rules finalized. We agree with all of the points brought forward by Together New Orleans in their filing, so will not write the same thing twice.

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. We are active in three other states that have, or are about to have consolidated billing and none of them allow the utility to deny access to the program if they are not in good standing. This is likely because a big part of the impetus for community solar programs is to help low income people save money.

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. Allocating Net Credits and Timing

ENO proposes a two month time frame to enroll subscribers in Net Crediting Consolidated Billing. This is too long of a lead time and does not provide a good experience for the actual subscribers. Instead, we propose a one month lead time prior to a project going live, and thereafter no actual lead time. We also believe that it's vital for ENO to allow subscriber verification at any time prior to a project going live. In other words, allow a subscriber organization to submit subscriber lists at any time, and require ENO to respond with a report listing which of those subscribers do not have accounts, or where some account information is incorrect.

VIII. SUBSCRIPTION CREDITS AND NET CREDITING CONSOLIDATED BILLING

A. Subscriber Organizations are required to provide real time reporting of production as specified by the Utility. For CSG Facilities greater than 250 kW, the Subscriber Organization

shall provide real time electronic access to production data. The Utility may require different real time reporting for CSG Facilities 250 kW and smaller.

B. To enroll a Subscriber in a CSG Facility under Net Crediting Consolidated Billing, before the CSG Facility has received PTO, a Subscriber Organization shall provide the following to the Utility at least one month prior to the desired month in which the Subscription would take effect:

i. Subscriber name

ii. Subscriber service address

iii. Subscriber Utility account number

iv. Designation as either a Low-Income Subscriber (along with documentation supporting this designation) or non-Low Income Subscriber v. Subscriber's allocated percentage of the CSG Facility

C. The Utility shall notify the Subscriber Organization, within 24 hours of submission, of any Subscriber accounts that are not valid and the reason for this determination.

Another area we'd like to point out is how the credits appear on a Subscriber's bill. The current language from ENO states:

F. The Net Credit shall be shown on the Subscriber's Utility bill as follows:

i. Initial billed amount (electricity charges)

ii. less Net Credit (Allocated Credit x Guaranteed Savings Rate)

iii. equals Final amount billed (\$)

We suggest adding

Iv: The words "Community Solar" and the name of the CSG the credits come from shall also be on the Subscriber's Utility bill.

The reason for this is to dispel confusion from the subscribers and make it very clear what they are receiving these net credits for. Our experience in other states shows that this can be a big issue if not addressed properly here.

In summary, Neighborhood Sun supports the position of Together New Orleans and we're

pleased to add a few more suggestions that will make this program even more of a success. Community solar is so important for New Orleans as a way to generate new revenue, produce clean energy close to home, and to help address issues of energy justice by providing extra savings for low income households. We urge the Council to move forward as quickly as possible in order to achieve the maximum benefits for the city before Federal tax credits run out.

Before
The Council of the City of New Orleans

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

CERTIFICATE OF SERVICE

I do hereby certify that I have, this September 5, 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

Signed by:

Gary Skulnik

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Gary Skulnik, Neighborhood Sun Benefit Corp