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July 15, 2019

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Hand Delivery  
Ms. Lora W. Johnson,  
CMC Clerk of Council  
Room 1E09, City Hall  
1300 Perdido Street  
New Orleans, LA 70112

In Re: A Rulemaking Proceeding to Establish Renewable Portfolio Standards

*(Docket No. UD-19-01)*

*Reply Comments of National Audubon Society/Audubon Louisiana*

Dear Ms. Johnson:

Please find enclosed an original and three (3) copies of National Audubon Society/Audubon Louisiana's reply comments in the above-referenced docket.

Please file the attached communication and this letter in the record of the proceeding and return one time-stamped copy to our courier, in accordance with normal procedures. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention.

Sincerely,



Karen J. Profita  
Vice President/Executive Director  
Audubon Louisiana

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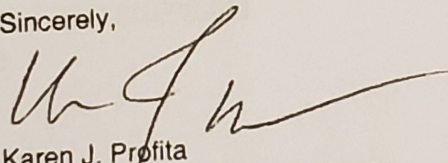
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Vice President/Executive Director  
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RECEIVED  
JUL 15 2019

BY: 

**BEFORE THE  
COUNCIL OF THE CITY OF NEW ORLEANS**

<b>IN RE: A RULEMAKING PROCEEDING</b>	)	
<b>TO ESTABLISH RENEWABLE PORTFOLIO</b>	)	<b>DOCKET NO. UD-19-01</b>
<b>STANDARDS</b>	)	<b>July 15, 2019</b>
	)	

1     **REPLY COMMENTS OF NATIONAL AUDUBON SOCIETY/AUDUBON LOUISIANA**

2     ***Introduction and Overview***

3             National Audubon Society/Audubon Louisiana (“Audubon”) submits these *Reply*  
4     *Comments* in the Council of the City of New Orleans (“Council”) Docket No. UD-19-01  
5     pursuant to Council Resolution No. R-19-109, dated March 28, 2019. The purpose of these  
6     Reply Comments is to address and rebut comments filed by Entergy New Orleans (“ENO”) and  
7     Air Products on June 3, 2019.

8             The Council’s groundbreaking decision to initiate this Renewable Portfolio Standards  
9     (“RPS”) rulemaking docket is an important leadership step that Audubon strongly supports.  
10    Audubon again thanks the Council for its leadership and vision. Audubon has previously  
11    submitted comments to the Council in this proceeding and continues to urge the Council’s  
12    favorable consideration of the issues raised therein.

13            In addition to these Reply Comments, Audubon joins with other members of the Energy  
14    Future New Orleans coalition to urge the Council’s favorable consideration of the Proposed RPS  
15    Rule submitted in parallel with these comments as Joint Reply comments.

16            After considering the comments of other parties filed on Jun. 3, 2019, Audubon’s view  
17    remains that the Council’s establishing mandatory, workable, and strong renewable portfolio

1 standards remains a reasonable and necessary major step in achieving the Climate Action vision,  
2 and more importantly, in achieving a 100% renewable energy future for the City of New  
3 Orleans. Realizing a 100% renewable energy goal is completely aligned with Audubon’s mission  
4 of conserving and restoring natural ecosystems as well.

5 As we stated in our initial comments filed on Jun. 3, 2019:

6 *Audubon urges the Council to set itself on a course to adopt and enforce a 100%*  
7 *decarbonization goal and supporting 100% renewable portfolio standards for services*  
8 *today provided through electricity and gas. These goals should apply to City functions,*  
9 *and all energy uses and services, public and private. The Council should set an*  
10 *aggressive timeline for achieving these goals that also takes full account of equity,*  
11 *affordability, and technological considerations. As a starting point, Audubon believes a*  
12 *2040 goal meets these considerations.*

13 Audubon continues to urge the Council to ground its work in implementing a vision of  
14 decarbonization through 100% renewable energy supply on five key principles as pillars for its  
15 work. These principles are equity, affordability, reliability, resilience, and technological  
16 innovation.

17 Audubon’s Reply Comments are organized in two parts to address comments from ENO  
18 and Air Products, which in turn generally track the questions put forth in Council’s Resolution  
19 No. R-19-109.

20 ***Replies to ENO Comments***

21 1. *Re: ENO Comments, p. 1* – Audubon agrees that Council should undertake the  
22 consideration and adoption of a “comprehensive clean energy policy focused on carbon  
23 reductions across all sectors of New Orleans, using all tools available, including increased

1 utilization of solar and other renewable resources, electrification of transportation and other  
2 sectors, other measures that reduce the City’s carbon footprint, demand-side management  
3 (“DSM”), and the incorporation of existing emission-free nuclear and hydro generation.”

4         However, such an effort should start with the adoption of an RPS rule as proposed by  
5 Audubon and other aligned parties and should have an explicit goal of 100% renewable energy  
6 for New Orleans. Audubon recognizes that fairly-priced energy from existing nuclear plants may  
7 play a role in providing carbon-free energy over the coming years. However, renewables are  
8 increasingly less expensive and promise to beat nuclear energy pricing even before the end of  
9 existing generators’ useful lives. The same facts apply to gas generation. As such the use of  
10 existing nuclear generation should only be considered as a bridge to a 100% renewable energy  
11 future for New Orleans.

12         Further, Audubon disagrees that any RPS should stop short of an effort to ensure that  
13 100% of New Orleans’ customers’ energy needs are met with zero carbon emitting resources by  
14 2040. Audubon also disagrees with ENO’s “preferred path” proposals. The ENO path involves  
15 only a 70% zero/low carbon *voluntary* goal, indefinite reliance on nuclear power, no increase in  
16 planned levels of efficiency, almost-total utility ownership of generation, and a planning  
17 approach that dictates policy.

18         Audubon takes the further position that the existing supply arrangements and pricing for  
19 ENO affiliate generation must be fully reevaluated to eliminate any above-market pricing that  
20 may currently exist, especially for nuclear generation. After such evaluation, Audubon  
21 anticipates that true emissions-free renewable and efficiency alternatives to current nuclear  
22 energy supply are likely to emerge as cost-effective options. That is, Audubon rejects ENO’s



1 contentions (p. 2) that utilizing such alternatives are likely to result in unacceptable increases in  
2 customer rates.

3 2. *Re: ENO Comments, p. 2* – Audubon rejects ENO’s summary assertion that the Council  
4 should adopt an RPS that is only voluntary. A voluntary goal would undermine the fundamental  
5 objective of timely and comprehensive decarbonization of energy resources used to meet New  
6 Orleans’ demand for energy services.

7 3. *Re: ENO Comments, p. 3* – Audubon asserts that a first step the Council should take is to  
8 reject and replace ENO’s 2001 voluntary goals as no longer sufficient to accomplish the  
9 Council’s goals for New Orleans. Further, Audubon urges the Council to refuse ENO’s assertion  
10 and recommendation that the appropriate benchmark for its climate performance should be the  
11 performance of “large generation companies in the U.S.” Likewise, the Council should not  
12 accept a measurement of New Orleans’ reductions performance against historical benchmarks  
13 such as year-2000 levels. The goal and requirement of the RPS should be 100% carbon-free  
14 energy by 2040.

15 4. *Re: ENO Comments, p. 4* – Audubon rejects the assertion by ENO that the outcomes it  
16 generates in its Integrated Resource Plans (“IRP”) should drive the setting of the RPS targets and  
17 goals. To the contrary, the goal and target of zero carbon emissions by 2040 should drive the IRP  
18 process. ENO should be explicitly required to initiate and propose a new IRP that meets the  
19 100% carbon-free goals, including electrification of transportation, building heat, cooking, and  
20 other thermally-driven residential, commercial, and industrial processes.

21 5. *Re: ENO Comments, pp. 4-5, Fig. 1* – Audubon takes the position that ENO’s current  
22 carbon emissions rate should be seen as a good start, not an excuse for slower achievement of  
23 weaker carbon emissions goals.

1 6. *Re: ENO Comments, p. 5* – Audubon recognizes that ENO has taken several steps in a  
2 positive direction, as listed in ENO’s comments. However, Audubon urges the Council to  
3 categorically reject the implication that ENO has achieved any of its accomplishments without  
4 fully charging New Orleans’ customers for the cost of such projects.

5 Audubon also calls out the glaring absence of any evidence that ENO has done all it  
6 should or is committed to supporting the emergence and growth of *non-utility* markets for clean  
7 energy solutions. The Council and New Orleans will not realize a clean energy future solely  
8 through utility resource development and construction. There is abundant evidence that ENO is  
9 not the least-cost provider of clean energy options for New Orleans. The comments of Southern  
10 Renewable Energy Association address this fact in great detail.

11 7. *Re: ENO Comments, p. 5* – Audubon categorically rejects ENO’s assertion that because it  
12 has not identified a “need” for additional resources beyond those already planned prior to 2040,  
13 that adding new resources and ceasing to rely on other would not be a least-cost path forward.  
14 The fundamental objective of IRP is to continuously update the utility’s resource assessment and  
15 to pursue reliance on new, cleaner, and more affordable resources for meeting the demands for  
16 energy services, regardless of historical or current presence of or plans for resources. To adopt  
17 ENO’s approach would effectively prevent a timely transition to carbon-free energy resources  
18 for New Orleans and allow the dead hand of past decisions to control New Orleans’ future.

19 8. *Re: ENO Comments, p. 6* – In summary, Audubon asserts that the obvious and essential  
20 consequence of the adoption of a 100% carbon-free resource plan requires four new planning  
21 elements:

- 22 a. ENO’s accelerated and complete exit from reliance on coal as a source of electricity  
23 for New Orleans.

1 b. ENO’s development of an aggressive plan for an accelerated and complete exit from  
2 reliance on methane gas as a fuel for all purposes.

3 c. ENO’s continued reliance on nuclear generation should only be considered as a  
4 bridge technology to a 100% renewable energy future, and only if and for so long as  
5 nuclear generation is cost-competitive at market rates—even if that period is shorter  
6 than the currently expected retirement dates for such generation.

7 d. ENO’s development of a plan and agenda of action to create non-utility market  
8 opportunities to develop and rely upon carbon-free resources for energy services.

9 9. *Re: ENO Comments, pp. 7-9* – Audubon urges the Council to reject the “all tools in the  
10 toolbox” approach to resource planning and utilization for New Orleans. All of the “tools” that  
11 ENO proposed are not carbon-free. Moreover, ENO has not offered a reasonable argument for  
12 rejecting the Council’s commitment in Resolution R-19-109 calling for meeting specified  
13 percentages of load with power from renewable energy resources. ENO’s proposed alternative  
14 Clean Energy Standard (“CES”) would maintain high costs and carbon emissions and was  
15 rejected by Council. In addition, ENO’s proposed CES disregards the important criteria of clean,  
16 local, and resilient—which should be core elements of New Orleans’ energy future.

17 Audubon finds unpersuasive and urges the Council reject ENO’s argument that the  
18 utility’s policy and energy planning for New Orleans should rely upon or track the arguments  
19 urged by the pro-nuclear study co-chaired by former Energy Secretary Moniz or any report by  
20 the pro-nuclear International Energy Agency. Those sources were not designed for and did not  
21 address the specific local concerns and needs of New Orleans. In particular, Audubon would call  
22 the Council’s attention to the factual and contextual disconnect between the argument cited by  
23 ENO (p. 8) that a decline in reliance on nuclear energy for New Orleans would result in



1 increased rates for New Orleans customers. Audubon rejects the misleading “cautionary tale”  
2 offered by ENO which mischaracterizes the energy policies implemented in Germany. Audubon  
3 further urges the Council to assign no weight to comments submitted by pro-nuclear trade  
4 associations, “AstroTurf” advocacy groups, and others who are specifically paid to have pro-  
5 nuclear positions by companies like ENO.

6 10. *Re: ENO Comments, p. 7* – Regarding ENO’s specific proposals for its alternative CES,  
7 Audubon again urges the Council to *reject* ENO’s proposals that:

8 a. The targets should be consistent with the outcome of the IRP process. (p. 7, at B.1.1.)

9 Rather the IRP process should assume and conform to the Council’s RPS targets.

10 b. The singular focus should be on resources developed by ENO (p. 7, at § B.1.2.).

11 Rather, ENO should also be charged with developing a resource and market

12 environment that supports development of clean energy resources and services by  
13 non-utility parties.

14 c. The implication that the RPS should be used to extend the reliance on nuclear

15 resources (p. 7, at § B.1.3.). Rather, the Council’s RPS should be designed to

16 accelerate the transition away from expensive and unsustainable nuclear generation  
17 and toward clean, local, and resilient renewable energy and efficiency resources.

18 11. *Re: ENO Comments, pp. 11-13, § B.2.* – Audubon rejects ENO’s scare tactic implying  
19 that a strong RPS built around clean, local, resilient, and non-utility energy resources could result  
20 in “unintended consequences” such as higher rates and impaired utility financial health. As  
21 Audubon has emphasized, the Council’s RPS goals must drive a robust IRP process and resource  
22 procurement decisions and will ensure that adverse consequences are avoided. The Council  
23 should reject ENO’s contention that hypothetical, potential, unintended consequences should

1 prevent it from doing what is right and necessary for New Orleans simply because the utility  
2 lacks the vision and planning capacity to lead on a course to a carbon-free future for the City.

3 Audubon urges the Council to categorically reject ENO’s assertions about the costs of an  
4 RPS based on a widely-discredited draft research report that has not been formally peer-  
5 reviewed. In addition, the Council should reject ENO’s straw man argument that anyone is  
6 urging a “renewables only” focused policy. Rather, Audubon and other advocates have stridently  
7 urged solutions that include utility and non-utility energy storage, energy efficiency, and energy  
8 management resources.

9 Audubon urges the Council to demand much more detailed and carefully vetted scenario  
10 analysis than that offered by ENO in its comments. This is the heart of Audubon’s argument to  
11 the Council that ENO must conduct a comprehensive and transparent IRP process built on the  
12 Council’s RPS goals and targets, and that fully and fairly evaluates all resource options for  
13 meeting the need for energy services. ENO’s list of “important assumptions and considerations”  
14 (p. 13) is a good place to start for framing such IRP efforts.

15 12. *Re: ENO Comments, pp. 14-15, § B.3.* –Audubon agrees with ENO that an Alternative  
16 Compliance Payment (“ACP”) mechanism may not be ideal for a city-based RPS. Audubon  
17 urges the Council to also evaluate and consider adoption of penalties to ENO return on equity  
18 (“ROE”) for failure to meet goals and targets of a mandatory RPS.

19 13. *Re: ENO Comments, p. 15* –Audubon asserts that ENO’s comments about dormant  
20 Commerce Clause issues are a red herring. The issue has been thoroughly explored and is largely  
21 settled in U.S. law.<sup>1</sup>

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<sup>1</sup> See Gavin Bade, “Supreme Court Won’t Hear Nuke Subsidy Cases, Clarifying State Energy Jurisdiction,” Utility Dive (April 15, 2019), available at <https://www.utilitydive.com/news/supreme-court-wont-hear-nuke-subsidy-cases-clarifying-state-energy-jurisd/552768/>.

1 14. *Re: ENO Comments, p. 16* –Audubon agrees that RECs from non-New Orleans  
2 renewable energy generation facilities offer benefits for achieving a carbon-free resource  
3 portfolio. However, Audubon cautions the Council over the financial and planning constraints  
4 associated with ownership by ENO of underlying generation resources. Unnecessarily long  
5 contracts for RECs can become stranded assets just like investments in coal and gas plants. Self-  
6 dealing with affiliates inflates costs. In addition, Audubon urges the Council to direct ENO to  
7 conduct a broad-based evaluation of a portfolio of REC procurements, especially including  
8 procurement of RECs from non-utility resources.

9 15. *Re: ENO Comments, pp. 17-19* – Audubon again urges the Council to reject the ENO  
10 recommendation for a non-binding, voluntary CES in lieu of an RPS. Further, Audubon would  
11 point out that all of the selected examples from other jurisdictions are distinguishable. The  
12 Council should start from the proposition that a transition to a 100% carbon-free, clean,  
13 affordable, and resilient energy system is a requirement, not an option or mere aspiration.

14 16. *Re: ENO Comments, pp. 20-21, § C.1.* – Audubon again urges the Council to reject any  
15 “all of the above” framing for the RPS that puts ENO solely in the driver’s seat for resource  
16 planning, development, and acquisition. In particular, several resource options have no  
17 reasonable place in New Orleans’ energy future, including new or increased dependence on  
18 nuclear energy, new gas generation, continued operation of coal units, and increases in direct gas  
19 use for thermal energy demands.

20 Audubon urges the Council to require ENO to develop transparent and comprehensive  
21 Benefit-Cost Analysis (“BCA”) frameworks for use in evaluating alternative resource options as  
22 part of the IRP process. These BCA frameworks should evaluate all reasonable alternatives and

1 fully evaluate all benefits and costs (including societal costs and benefits) over the full life cycle  
2 of each alternative resource. BCA frameworks are a best practice in resource planning.

3 17. *Re: ENO Comments, pp. 22-23* – Audubon urges the Council to require regular, detailed,  
4 and public reporting of ENO’s progress in meeting its RPS obligations. The reporting period  
5 should be at least annual for comprehensive reports. In addition, the Council should require ENO  
6 to establish and maintain public dashboards of key metrics updated on a nearly-continuous basis.

7 Audubon further urges Council to reject any suggestion that ENO should be immune  
8 from any procedural or substantive accountability relating to its RPS reporting.

9 Audubon is extremely skeptical of the need for or merits of Council pre-approvals for  
10 resource acquisitions.

11 Given the gravity and urgency of a transition to a carbon-free future for New Orleans,  
12 Audubon urges that the Council adopt mechanisms for review of ENO resource planning on a  
13 cycle shorter than triennial submission. At the very least, ENO should be required to update  
14 short-term action plans on an annual basis.

15 18. *Re: ENO Comments, pp. 23-24, § D* – Audubon urges considerable skepticism by  
16 Council of any assertions regarding a threat to ENO’s financial integrity associated with the  
17 RPS. ENO earnings are dependent on providing affordable, reliable, and resilient energy services  
18 to New Orleans; the impacts of runaway climate change are the threat; the transition to a clean  
19 energy future for New Orleans is the solution.

20 Audubon agrees with ENO that performance standards and mechanisms of performance-  
21 based regulation (“PBR”) should be evaluated by the Council as a mechanism or supplement to  
22 conventional regulation for the utility. Unlike ENO, Audubon believes that incentives should  
23 include penalties, especially to authorized return on equity.

1           Several utility regulatory jurisdictions are designing and implementing performance-  
2 based regulatory (“PBR”) mechanisms and systems to address fundamental problems inherent in  
3 the cost-of-service rate making model.<sup>2</sup> Notable examples include Hawaii<sup>3</sup> and Rhode Island.<sup>4</sup>  
4 The well-understood utility bias toward excessive and expensive over-investment in capital  
5 assets, antipathy toward competitive and customer-owned generation, and inadequate focus on  
6 energy justice has led several regulatory bodies to explore PBR approaches to better align utility  
7 profitability with policy priorities. Audubon believes there is significant opportunity to reap  
8 benefits and progress toward energy sustainability through targeted application of PBR tools.  
9 Audubon encourages to explore such mechanisms as it implements the RPS.

10           Audubon strongly encourages the Council to reject any current or future rate design  
11 proposals that are inimical to or would frustrate accomplishment of RPS goals and objectives.  
12 ENO’s proposal for increased fixed customer charges is counterproductive to the adoption of  
13 clean energy resources such as distributed generation and energy efficiency and insulates ENO  
14 from the consequences of overbuilding distribution systems and unnecessarily increasing fixed  
15 costs. Such proposals also weaken regulatory incentives for ENO to meet clean energy  
16 objectives.

17

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<sup>2</sup> See, generally, Holden, C., More States Explore Performance-Based Ratemaking, but Few Incentives are in Place, GTM Research (Jun. 13, 2019). Available at: <https://www.greentechmedia.com/articles/read/more-states-explore-performance-based-ratemaking-but-few-incentives-in-plac#gs.og9shp>.

<sup>3</sup> State of Hawaii, Performance Based Regulation, at <https://puc.hawaii.gov/energy/pbr/>.

<sup>4</sup> State of Rhode Island, Power Sector Transformation Initiative, at [http://www.ripuc.org/utilityinfo/electric/PST\\_home.html](http://www.ripuc.org/utilityinfo/electric/PST_home.html).

1    ***Replies to Air Products Comments***

2           Air Products, like ENO, does not support a mandatory RPS for New Orleans. Audubon  
3   urges the Council to reject this proposal as inadequate to meet the energy and security needs of  
4   New Orleans. Likewise, Audubon urges Council to reject Air Products’ position that no specific  
5   binding renewable energy targets be set or that no date certain for compliance should be  
6   established.

7           Audubon stresses that while, in the past, a failure to account for climate impacts  
8   associated with fossil energy use might have resulted in lower energy *prices*, the *costs* of climate  
9   emissions are all too real and too high. Air Products’ position would externalize those costs onto  
10  the people and businesses of New Orleans in order to preserve Air Products’ low energy prices.  
11  That approach can no longer be acceptable.

12          Audubon also disagrees with Air Products’ position that the Council should not adopt an  
13  RPS preference for clean, local, resilient, and truly renewable energy resources.

14  
15    ***Conclusion***

16          National Audubon Society/Audubon Louisiana appreciates the Council’s continued  
17  leadership in exploring the adoption of a strong set of renewable energy standards for New  
18  Orleans. We offer this comments in order to emphasize the significant gap between ENO’s  
19  policy positions and the kind of clean, renewable, and resilient energy future New Orleans’s needs  
20  and wants for its citizens. In addition, we are pleased to join with several other local, regional,  
21  and national clean energy leaders through the Energy Future New Orleans coalition to sponsor a  
22  carefully crafted, affordable, and doable plan for getting to a renewable and resilient New  
23  Orleans through our proposed “R-RPS.” We advance all these ideas because they present the



1 very best opportunity we have to create a pathway to turn away from an energy system that is too  
2 expensive, too brittle, and too polluting, and toward meeting the growing and recurring threats of  
3 climate catastrophe and transforming New Orleans' energy systems into engines of  
4 sustainability, reliability, and prosperity for all its citizens, today and tomorrow. We are  
5 committed to working with the Council and all parties in realizing this vision.

CHAIR  
Cathy Pierson

June 3, 2019

VICE CHAIR  
Kevin O. Long

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(Docket No. UD-19-01)

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I hereby certify that this 3<sup>rd</sup> day of June 2019, I have caused to be filed and served the required number of copies of Audubon Louisiana's comments dated June 3, 2019 in this proceeding by hand-delivery to the Clerk of Council and by electronic mail to all known parties in this proceeding.



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*[Continued on Next Page]*

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