



July 30, 2024

**Via Electronic Mail**

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

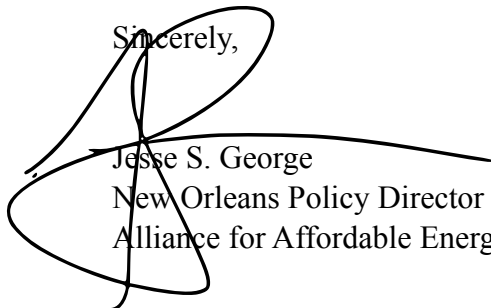
RESOLUTION AND ORDER ESTABLISHING A DOCKET AND PROCEDURAL  
SCHEDULE WITH RESPECT TO STORM HARDENING AND RESILIENCE (Docket No.  
UD-21-03)

Dear Clerk:

Please find the enclosed letter to the New Orleans City Council under the docket referenced above. Please file the attached communication in the record of the proceeding. We will submit physical copies at your instruction. If you have any questions, please do not hesitate to contact me.

Thank you for your time and attention.

Sincerely,



Jesse S. George  
New Orleans Policy Director  
Alliance for Affordable Energy



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SCHEDULE WITH RESPECT TO STORM HARDENING AND RESILIENCE (Docket No.  
UD-21-03)

Dear Council,

On July 24, 2024, the parties to docket New Orleans City Council docket UD-21-03, pertaining to storm hardening and resilience, held a fourth technical conference in the docket to discuss a framework for prioritizing investments and evaluation metrics and accountability measures for proposed resilience improvements, among other topics.

The Alliance has proposed metrics used in a distributional equity analysis (DEA) framework that allows utilities, regulators, communities, and stakeholders to answer questions about the equity implications of utility investments in grid resilience (including grid hardening and distributed energy resources) and consider those implications alongside benefit-cost analysis (BCA), as well as an enforcement mechanism based on a Customer Average Interruption Duration Index (CAIDI) minimum performance standard with major event days included.

The metrics proposed by Entergy New Orleans (ENO) represent a narrow approach to resilience that is focused almost exclusively on distribution hardening (and pole replacement in particular) and does not intentionally consider equity implications in prioritizing investments. ENO pushed back on the application of CAIDI to resilience, claiming that it is appropriate for reliability but not resilience and that the utility industry has yet to develop industry-wide standards for measuring the performance of resilience investments.

As a city on the front lines of a changed climate, where we are experiencing more frequent and severe extreme weather events, including cold, heat, and storms, we cannot afford to wait for other jurisdictions to lead. New Orleans should be setting the standards that other



cities follow. “It has never been done before” is no longer an acceptable excuse in an age unprecedented in human history. We have too much at stake to wait for the industry to regulate itself.

The Council must adopt broad metrics that can be applied to a variety of resilience investments (grid hardening and distributed energy resources, among other potential types of investments) and that prioritize investments that can help vulnerable populations survive and recover quickly from the next extreme weather event. Resilience planning must address historic inequities that have profound human health effects, or it will only serve to exacerbate existing disparities.

Sincerely,

Jesse S. George  
New Orleans Policy Director  
Alliance for Affordable Energy