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May 1, 2025

VIA Electronic Delivery
Clerk of Council
City Hall, Room 1E09
1300 Perdido Street
New Orleans, Louisiana 70112

Re: Rulemaking Proceeding to Establish Renewable Portfolio Standards
Council Docket No. UD-19-01

Dear Clerk of Council:

Entergy New Orleans, LLC ("ENO") respectfully submits its Renewable and Clean Portfolio Standard ("RCPS") Compliance Demonstration Report for the 2024 compliance year.

If you have any questions regarding this information, please contact me at (504) 670-3680.

Sincerely,

Leroy Nix

cc: Official Service List (via email)

ENTERGY NEW ORLEANS, LLC
RCPS COMPLIANCE DEMONSTRATION REPORT COVERING 2024

1. BACKGROUND

a. Requirement for a Retrospective RCPS Compliance Demonstration Report

Under Section 4.f of the Renewable and Clean Portfolio Standard ("RCPS") rules ("the Rules") adopted by the Council of the City of New Orleans ("Council") in Resolution R-21-182 on May 20, 2021, Entergy New Orleans, LLC ("ENO") is required to submit a retrospective Compliance Demonstration Report for the 2024 compliance year by May 1, 2025. This report describes and demonstrates ENO's compliance with the RCPS in 2024 and satisfies the informational requirements of Section 4.f.

2. 2024 RCPS COMPLIANCE REQUIREMENT

Section 3.a.3 of the RCPS rules specifies that for 2024, ENO must meet "68% of Retail Compliance Load … with a combination of Tier 1, 2 and 3 resources … with not more than 25% compliance through RECs purchased without the associated energy." Per Section 4.a of the RCPS rules, "Retail Compliance Load is the reported annual MWh sales for each compliance year, increased by the cumulative MWh savings of DSM programs installed after January 1, 2021."

Table 1: 2024 Retail Compliance Load and RCPS Requirement

	2024
Retail Sales (MWh)	5,631,584
Demand-Side Management Post-1/21 (MWh)	209,308
Retail Compliance Load (MWh)	5,840,892
RCPS Requirement (68% of Retail Compliance Load)	3,971,807

As shown in the above table, ENO's retail compliance load is 5,840,892 MWh. The 2024 RCPS requirement is 2.1% higher than in 2023 on account of a 0.9% decrease in retail compliance load and the requirement to reach 68% rather than 66% of retail compliance load. The 2024 RCPS requirement is 3,971,807 RCPS Compliance Credits, which can include both Clean Energy Credits ("CECs") and Renewable Energy Credits ("RECs").

3. 2024 RCPS COMPLIANCE CREDITS

a. Clean Energy and Renewable Energy Credits

Based on the verified generation output, demand-side reductions, and calculated impact of beneficial electrification, ENO applies the following credits towards 2024 RCPS compliance:

Table 2: 2024 RCPS Compliance Credits

Resource Name	Type	2024 MWh	Tier	RCPS Multiplier or CEC/MWh Rate[1]	2024 Compliance Credits
Grand Gulf	Nuclear	1,892,371	2	1.00	1,892,371
River Bend	Nuclear	880,170	2	1.00	880,170
Energy Efficiency[2] (implemented after 1/2021)	EE	209,308	1	1.25	261,635
ANO Unit 2	Nuclear	219,654	2	1.00	219,654
ANO Unit 1	Nuclear	188,449	2	1.00	188,449
Waterford Unit 3	Nuclear	113,535	2	1.00	113,535
Iris Solar	Solar	103,969	2	1.00	103,969
St. James Solar	Solar	49,246	2	1.00	49,246
New Orleans Solar Station	Solar	23,332	1	1.25	29,165
Vidalia[3]	Hydro	15,366	2	1.00	15,366
Commercial Rooftop Solar	Solar	5,338	1	1.25	6,672
Public EV Chargers[4]	EVCI	1,320	3	1.92	2,534
Paterson Solar	Solar	1,455	1	1.25	1,818
				Sub-total:	**3,764,584**
RECs in Compliance Reserve Retired for 2024 Compliance	Solar				29,997
Purchased RECs[5]	REC				220,000
				Total Compliance Credits	**4,014,581**
				Total RCPS Requirement:	**3,971,807**
Compliance Credits beyond RCPS Requirement (to be Placed in Compliance Reserve)	REC				42,774

[1] For Tier 3 Qualified Measures, the figure in this column represents the measure-specific Council-approved CEC-per-MWh conversion rate.

[2] Energy Efficiency MWh reflect total MWh of reductions delivered in 2024 from measures installed after January 1, 2021. Because 2024 reductions from the EnergySmart Behavioral Program have not yet been finalized, a conservative assumption of 5,000,000 kWh has been used for this program. The figure in this line will differ from the annualized figures in which Energy Smart Plan Year targets are denominated for two reasons: 1) measures installed in 2024 are assumed to provide 50% of their expected annualized reductions in 2024 to reflect installation throughout all months of the year, and 2) the efficacy of measures installed in 2021-2023 is assumed to degrade in subsequent years as measures reach the end of their expected useful lives.

[3] Because it is more than 15 years old, the Vidalia hydroelectric facility is not eligible for Green-e certification. Therefore, its output cannot create certificates that qualify for the definition of "Renewable Energy Credit" under Section 2 of the RCPS. As a result, ENO accounts for the energy received from the Vidalia hydroelectric facility as a Zero Carbon Emissions Resource and recognizes its entitlement to the output of Vidalia through CECs.

[4] Provides credit for 2024 electric vehicle charging MWh at public ENO Level 2 EV chargers in 25 locations.

[5] All purchased RECs were from Green-E registered wind resources located in ERCOT or tracked by M-RETS, as permitted under the Rules.

Resources in ENO's portfolio provided 3,764,584 in Compliance Credits from their 2024 operations. Output from Tier 1 resources – Energy Efficiency and solar resources – receive a 1.25 multiplier in the table above.

To ensure compliance with the RCPS, ENO will utilize these Compliance Credits as well as RECs in the compliance reserve and 220,000 purchased RECs. Per the definition in Section 2 of the RCPS, all RECs meet the following criteria: "(1) they were generated from a Renewable Energy Resource in MISO, the Electric Reliability Council of Texas, or elsewhere that are deliverable into the MISO region; (2) they are Green-e certified at the time of their creation and are subsequently tracked with M-RETS or an equivalent; and (3) they are retired against the compliance requirements in the compliance year in which they were utilized for compliance." ENO will place 42,774 RECs from the Iris Solar and St. James Solar facilities with a 2024 vintage in the Compliance Reserve.

No RECs that are retired on behalf of ENO's Green Select program can be counted toward RCPS compliance. To meet the requirements of its 2024 Green Select program, ENO retired 8,391 RECs. Of this total, 7,932 RECs were from 2023 generation at the Iris facility that were previously placed in the Compliance Reserve; these RECs have been removed from the Compliance Reserve, as detailed in Table 3. The remaining 459 RECs were from 2024 generation at the Iris facility; these RECs have been removed from the total in Table 2. No incremental costs are associated with these RECs.

No other entity can claim credit for the environmental attributes associated with any resource output or credits included in the table above. All RECs, alternative energy credits, or other attributional certificates created from these resources have been retired.

4. ENO HAS COMPLIED WITH RCPS PROVISIONS

a. Alternative Compliance Payment

As stated in Section 5.a, "In the event that the Utility is unable to comply with the RCPS standard using reasonable measures for the applicable calendar year, the Utility shall make an Alternative Compliance Payment ('ACP') into a CleanNOLA Fund established by the Council."

In its RCPS Compliance Plan Covering Compliance Years 2023-2025, ENO calculated an ACP of $8.45 per megawatt-hour for 2024. As shown previously in Tables 1 and 2, ENO was able to comply with the RCPS standard through existing resources and purchased RECs, and therefore did not need to utilize the ACP in 2024. The costs of all purchased RECs were below $8.45/REC; therefore, compliance through REC purchases had lower costs than compliance through the ACP.

b. Compliance Reserve

Section 4.h of the RCPS rules describes the Banking and Compliance Reserve Provision as follows:

> The utility may use RECs produced and Green-e certified in one compliance year for compliance in either of the two subsequent compliance years, subject to a review of the accounting for the banking and compliance reserve, and provided that the utility was in compliance for the compliance year in which the RECs were created. In addition, the utility shall demonstrate to the satisfaction of the Council that such Compliance Credits:
>
> 1) were in excess of the Compliance Credits needed for compliance in the compliance year in which they were generated;
> 2) do not exceed the REC limitation specified in Section 3 for compliance with the RCPS in the year they were used for compliance and retired; and
> 3) have not otherwise been, nor will be, sold, retired, claimed or represented as part of clean energy output or sales, or used to satisfy obligations in other jurisdictions.

In the previous 2023 compliance year, ENO placed 37,929 RECs into the Compliance Reserve. To ensure compliance for the 2024 year, ENO needed to utilize and retire the RECs from the Compliance Reserve, as well as purchase additional unbundled RECs, in order to avoid triggering the ACP. In February 2025, ENO made purchases of 220,000 total unbundled RECs through an RFP to market providers. At the time of this purchase, not all components of ENO's 2024 compliance position were known with certainty. Namely, verified 2024 EnergySmart totals were not yet finalized and the RECs associated with November-December output at the Iris and St. James solar facilities were not yet delivered to ENO's North American Renewables ("NAR") Registry account. Because market quotes for unbundled RECs were well below the ACP, ENO purchased a sufficient quantity of RECs to ensure that the ACP would not be triggered regardless of the final treatment of these uncertain components of ENO's compliance position. As a result, ENO is placing 42,774 RECs from Iris Solar (29,774 RECs) and St. James Solar (13,000 RECs) in the Compliance Reserve, which will be the starting balance for the Compliance Reserve in 2025.

Because ENO is placing RECs from the Iris Solar and St. James Solar facilities into the Compliance Reserve, and these resources do not carry any incremental costs as defined in Section 4.d, there will be no incremental costs associated with these RECs when they are retired for compliance by ENO in 2025 or 2026.

Table 3: Compliance Reserve Detail

		RECs	Costs *(Treated as Working Capital)*
2024 Compliance Reserve Starting Balance		37,929	
Adjustment to Compliance Reserve for Green Select Retirement		(7,932)	0
Withdrawals from Compliance Reserve, RECs from ENO Resources		(29,997)	0
Withdrawals from Compliance Reserve, Purchased RECs		0	0
RECs Deposited into Compliance Reserve from ENO Resources		42,774	0
Purchased RECs Deposited into Compliance Reserve		0	0
2025 Compliance Reserve Starting Balance		42,774	0
RECs in Reserve by Vintage:	2023	0	0
	2024	42,774	0

c. RCPS Customer Protection Cost Cap

Section 6 of the RCPS rules establishes a Customer Protection Cost Cap "that the Utility shall not exceed to acquire RCPS Compliance Credits. The Customer Protection Cost Cap in any RCPS plan year is one percent (1%) of plan year total utility retail sales revenues, beginning in 2022." Section 4.d of the RCPS rules describes the calculation of RCPS compliance costs that are subject to this Cost Cap as follows:

1) The RCPS Cost of Compliance is calculated as all incremental costs prudently incurred by the Utility in complying with RCPS Section 3, including, but not limited to, the incremental costs of new resources for compliance, the Incremental DSM costs, and other costs related to RCPS compliance. The cost of RECs as allowed through the Banking and Compliance Reserve provision that are applied in the compliance year shall be included in the RCPS Cost of Compliance for that year. The cost of RECs acquired for the Banking and Compliance Reserve provision but not applied in that year shall be treated as working capital and shall not be included in the RCPS Compliance Cost for the compliance year.
2) Incremental costs are the total electric utility revenue requirements associated with the Utility's operations in compliance with the RCPS, less the total electric utility revenue requirements associated with the optimized resource portfolio that may have been in place absent the requirements of the RCPS. The Utility's most recently filed Integrated Resource Plan shall inform the calculation of incremental costs as to the optimized resource portfolio that may have been in place absent the requirements of the RCPS.

ENO's 2024 utility retail sales revenues were ~$643 million. As a result, the Customer Protection Cost Cap is $6.43 million. All resources in ENO's existing resource portfolio would be included in the optimized resource portfolio that may have been in place absent the requirements of the RCPS; therefore, there are no incremental costs associated with those resources. Market REC purchases, however, would not have been made in the absence of RCPS requirements; therefore, their costs are included in the determination of incremental costs.

Table 4 illustrates that the Customer Protection Cost Cap was not exceeded in 2024.

Table 4: 2024 RCPS Incremental Costs

Source	Compliance Credits Provided	Average Incremental Cost	Incremental Cost
Existing Generation Portfolio	3,457,641	0	-
Energy Efficiency	261,635	0	-
EV Charging Infrastructure	2,534	0	-
RECs used from Compliance Reserve (from St. James and Iris, 2023 vintage)	29,997	0	-
2024 Vintage Purchased RECs (purchased 2/2025)	220,000	$1.68 / REC	$369,600
Total	**3,971,807**		**$369,600**

d. Limitation on Use of Purchased RECs

As stated in Section 3.a.3, in 2024, "not more than 25% compliance [shall be] through RECs purchased without the associated energy." As shown in the following table, 5.5% of compliance was achieved through RECs purchased without the associated energy.[6] This is lower than 2022 and 2023 when 14.8% and 10.3% of compliance was achieved using purchased RECs, respectively.

Table 5: Limit on Purchased RECs

	2024
Compliance Credits Required	3,971,807
Purchased RECs Used for 2024 Compliance	220,000
Percent of Compliance Achieved Via Purchased RECs	5.5%

[6] Retired RECs from the Compliance Reserve associated with Iris included 19,997 RECs from the Dressor Plains solar facility in Illinois. ENO received these RECs from its Iris Solar counterparty per the terms of its power purchase agreement in 2023 and placed them in the Compliance Reserve. These RECs are tracked by M-RETS and from a facility located in MISO, therefore they are eligible for use for RCPS purposes. If these RECs were considered to be Purchased RECs, ENO would instead have achieved compliance with 6.0% of compliance through purchased RECs. Under either treatment, ENO still complies with Section 3.a.3.

5. OTHER RCPS REPORT REQUIREMENTS

a. Energy portfolio report

Section 4.f.3 of the Rules requires ENO to include "an energy portfolio report for the preceding compliance year which shall identify the MWh hours produced by each supply and demand-side resource comprising the utility's total resource portfolio. RECs purchased and utilized by the utility and their associated MWh, including RECs that can be associated with net metering, and incremental MWh associated with DSM and other eligible resources should also be included in the energy portfolio report. For each resource in the portfolio, the utility shall identify the resource name, MWh, fuel type, the average per MWh energy-related cost associated with that resource, and the average per MWh energy related revenue received from MISO for that resource."

ENO received 7,962,455 MWh in 2024 from its entitlement of generation from ENO's wholly-owned, partially-owned, and contracted resources and from ENO's purchases of energy. The total electricity that ENO generates or purchases exceeds ENO's total load because it includes electricity that serves energy sales to the MISO market. These wholesale sales benefit ENO customers. When ENO resources are dispatched by MISO to generate power in excess of ENO customer needs, these resources receive MISO energy revenues in excess of their costs; this margin is then credited to ENO customers.

The table below summarizes the energy-related costs for each resource; that is, the average variable costs that would be avoided if the resource did not generate that megawatt-hour of energy. Also shown is the average MISO energy price at the unit's location when the resource is generating. When the resource is needed to meet ENO load, ENO customers pay the variable cost of the resource. When the resource's output is in excess of ENO load, ENO customers are credited with the difference between the MISO energy price and the variable cost.

Table 6: 2024 Energy Portfolio Report

Resource Name	Fuel Type	MWh	Fuel and O&M Cost ($/MWh)[7]	Average MISO Energy Price ($/MWh)[8]
Union Unit 1	Gas	2,687,931	$25.80	$25.09
Grand Gulf	Nuclear	1,892,371	$23.92	$24.95

[7] "Fuel and O&M Cost" refers to costs reported on Entergy FERC Form 1s associated with production expenses, including fuel. Some portion of O&M costs reported here may be fixed costs that would not vary with the output of the plant. For non-Entergy-owned resources whose output is acquired through a Power Purchase Agreement, costs are not known. All solar facilities are assumed to have variable costs of $0/MWh. Cost and production values for certain units of the same plant were reported as aggregate values on the FERC Form 1s.

[8] This value is calculated as the output-weighted average of the MISO Day Ahead Locational Marginal Price at the generator's pricing node, or at an equivalent nearby price point, and does not include any MISO uplift payments or other credits.

Resource Name	Fuel Type	MWh	Fuel and O&M Cost ($/MWh)[7]	Average MISO Energy Price ($/MWh)[8]
River Bend	Nuclear	880,170	$28.24	$25.50
Ninemile Unit 6	Gas	792,635	$22.75	$27.99
MISO Purchases	Purchase	565,703	$29.35	$29.35
Arkansas Nuclear One Unit 2	Nuclear	219,654	$22.22	$22.98
Arkansas Nuclear One Unit 1	Nuclear	188,449	$22.22	$23.02
New Orleans Power Station	Gas	139,508	$72.58	$36.64
Waterford Unit 3	Nuclear	113,535	$41.06	$24.87
Iris	Solar	104,428	$0.00	$26.88
Ninemile Unit 4	Gas	50,325	$31.46	$28.31
St. James	Solar	49,246	$0.00	$27.22
Ninemile Unit 5	Gas	44,540	$31.46	$28.07
Occidental Power – Taft	Gas	44,198	N/A	$26.99
Acadia Unit 2	Gas	43,353	$23.39	$25.83
White Bluff Unit 2	Coal	24,377	$45.63	$30.80
New Orleans Solar Station	Solar	23,332	$0.00	$29.89
Independence Unit 1	Coal	21,326	$32.10	$29.41
Perryville Unit 1	Gas	17,102	$22.09	$24.70
Little Gypsy Unit 2	Gas	16,443	$38.59	$29.60
Vidalia	Hydro	15,366	N/A	$22.10
White Bluff Unit 1	Coal	8,373	$45.63	$28.35
Little Gypsy Unit 3	Gas	6,875	$38.59	$33.53
Waterford Unit 2	Gas	5,833	$68.80	$32.92
Commercial Rooftop Solar	Solar	5,338	$0.00	$27.81
Paterson Solar	Solar	1,455	$0.00	$25.29
Perryville Unit 2	Gas	413	$22.09	$43.00
Montauk	Biomass	115	N/A	$25.18
Basic Chemicals QF	Gas	31	N/A	$28.00
Waterford Unit 4	Oil	31	$68.80[9]	$67.70

[9] No value was reported in Entergy Louisiana, LLC's FERC Form 1 for Waterford Unit 4. It is assumed to be the same as Waterford Unit 2.

Resource Name	Fuel Type	MWh	Fuel and O&M Cost ($/MWh)[7]	Average MISO Energy Price ($/MWh)[8]
Energy Efficiency, Installed after 1/1/21	Demand	209,308	N/A	N/A
Supply-Side Resources Total:		**7,962,455**		
Demand-Side Resources:		**209,308**		
Purchased RECs Retired for 2024 RCPS Compliance:		**220,000**		

b. Carbon emissions report

Section 4.f.3 of the Rules requires this report to include a "carbon emissions report that details the carbon emissions resulting from the production of the electricity used by the Utility to serve its Retail Compliance Load, whether or not each generator is owned by the Utility."

To help its customers measure progress towards their climate goals, Entergy has developed an emissions accounting system that tracks emissions incurred to meet ENO customer demand on an hourly basis. Resources with the lowest hourly variable operating costs are assigned to ENO customers first, while higher cost resources are more likely to be dispatched by MISO to meet non-ENO demand. This system is audited subject to protocols developed by the Center for Resource Solutions, a leading environmental Non-Governmental Organization. Table 7, below, summarizes preliminary results of this system for 2024, including the emissions rate and megawatt-hours from each resource associated with meeting ENO customer demand, subject to finalization and audit by Entergy's emissions accounting team. It should be noted that the megawatt-hours listed from each resource will differ from the energy portfolio report in Table 6, above, because not all generation in the energy portfolio was necessary to meet ENO demand.

Table 7: Carbon Emissions Report

Resource	Type	Estimated MWh Serving ENO Customer Load	Average CO_2 Rate (lbs/MWh)
Grand Gulf	Nuclear	1,892,371	0
River Bend	Nuclear	879,125	0
Arkansas Nuclear One Unit 2	Nuclear	218,827	0
Arkansas Nuclear One Unit 1	Nuclear	187,503	0
Waterford Unit 3	Nuclear	113,118	0
Iris	Solar	104,428	0
St. James	Solar	45,395	0
New Orleans Solar Station	Solar	23,332	0
Commercial Rooftop Solar	Solar	5,560	0
Paterson Solar	Solar	1,463	0
Vidalia	Hydro	15,366	0
Montauk	Biomass	109	0
Union Unit 1	Gas	1,313,457	868
Ninemile Unit 6	Gas	507,410	830

Resource	Type	Estimated MWh Serving ENO Customer Load	Average CO_2 Rate (lbs/MWh)
New Orleans Power Station	Gas	70,105	1,224
Occidental Power – Taft	Gas	43,244	834
Acadia Unit 2	Gas	20,907	884
White Bluff Unit 2	Coal	20,328	2,468
Ninemile Unit 4	Gas	17,161	1,227
Independence Unit 1	Coal	14,706	2,482
Ninemile Unit 5	Gas	13,988	1,177
Perryville Unit 1	Gas	11,648	825
White Bluff Unit 1	Coal	7,834	2,574
Little Gypsy Unit 2	Gas	6,681	1,356
Little Gypsy Unit 3	Gas	2,029	1,383
Waterford Unit 2	Gas	1,812	1,262
Perryville Unit 2	Gas	182	1,300
Waterford Unit 4	Oil	20	2,168
MISO Purchases	Purchase	299,480	1,160
Resources Used to Meet ENO Customer Load		5,837,590[10]	380
Net Additional RECs Retired for 2024 Load		207,223[11]	Offset at (380)
Portfolio Carbon Emissions, Adjusted for RECs		5,837,590	367

c. Draft Bill Insert

See Appendix A for a draft bill insert to be included in customer bills per Section 4.f.5 with an easy-to-understand explanation of the Utility's compliance status for Council review and approval.

6. COST RECOVERY

Section 6.a.1 of the Rules provides that "the Utility shall be allowed the opportunity to recover prudently incurred costs in complying with a mandated renewable and clean portfolio standard." The RCPS contemplates customer cost impacts through its inclusion of a Customer Protection Cost Cap.

In Resolution No. R-24-120, the Council approved ENO's 2022 RCPS Compliance Demonstration Report and the Company's proposal to recover the incremental costs of RECs retired for 2022 compliance in the Fuel Adjustment Clause ("FAC") over/under recovery balance. Given this guidance from the Council, ENO will recover the total 2024 incremental costs of

[10] This figure will not match ENO's retail sales total. Entergy's emissions accounting matches resources to ENO's hourly wholesale load, which is higher than its retail sales due to line losses.

[11] As discussed in Sections 3 and 4, above, ENO purchased and retired 220,000 RECs for 2024 compliance. It also retired 29,997 RECs from the Compliance Reserve, as detailed in Table 4. Offsetting these REC retirements are the 42,774 RECs from Iris and St. James shown in the table that are going into the RCPS Compliance Reserve for use towards future years' RCPS requirements. 207,223 is the net of these figures, derived as follows: 220,000 + 29,997 – 42,774 = 207,223.

$369,600 in the FAC over/under recovery balance following approval by the Council of this 2024 Compliance Demonstration Report.

7. 2025 RCPS ACTIVITIES

In its *Compliance Plan Covering Compliance Years 2023-2025*, approved by the Council in Resolution No. R-22-525, ENO projected that it will generate Compliance Credits in 2025 that will exceed its compliance requirement of 70% of Retail Compliance Load. In Resolution R-22-525, the Council approved ENO's plan to purchase unbundled RECs as needed to achieve RCPS compliance. ENO will continue to monitor its resource output and retail sales throughout the year and purchase RECs, if needed, to ensure RCPS compliance.

In addition, ENO has been working to test a concept involving the installation of points of grid connection at locations that have historically utilized diesel generators to power large events, such as Woldenberg Park and the Fairgrounds. These grid connections will allow the events to discontinue the use of diesel generators at some stages or tents in the area, thereby improving local air quality and driving a net reduction in carbon dioxide emissions. ENO proposes to treat these projects as Tier 3 resources, with a CEC multiplier for each megawatt-hour of electrified demand proposed in Appendix B.

8. CONCLUSION

ENO requests that the Council:

1. Determine that ENO met the RCPS target for 2024 while staying within the Customer Protection Cost Cap;
2. Approve the Compliance Demonstration Report covering Compliance Year 2024;
3. Approve the draft Bill Insert included in Appendix A; and
4. Approve the treatment of large event electrification as a Tier 3 resource for 2025 RCPS compliance, as proposed in Appendix B.

APPENDIX A

Sample Bill Insert

In May 2021, the New Orleans City Council adopted a Renewable and Clean Portfolio Standard ("RCPS") with the goal of achieving net zero carbon emission electricity by 2040, among the most aggressive standards in the country. In 2024, the third year of the RCPS, Entergy New Orleans ("ENO") was required to meet an interim goal of 68% zero carbon emission electricity.

ENO uses a variety of zero emissions electricity sources located in Louisiana or neighboring states to meet these requirements such as:

- nuclear energy
- solar power
- hydroelectric power
- energy efficiency measures from ENO's Energy Smart program, which allow ENO customers to reduce their electricity consumption
- electric vehicle charging infrastructure, which replaces street-level gasoline emissions with cleaner electricity
- purchases of renewable energy certificates, which support renewable energy in the region

Each megawatt-hour supplied by these resources is recognized with one credit under the Council's policy, and resources located within Orleans Parish receive additional credits.

ENO has met its RCPS compliance requirements for 2024 with the following resources:

Electricity Source	Credits	% of Credits	Portion of 68% Goal for 2024
Nuclear	3,294,179	82.9%	56.4%
Energy Efficiency	261,635	6.6%	4.5%
Solar	176,907	4.5%	3.0%
Hydroelectric	15,366	0.4%	0.3%
Public Electric Vehicle Charging	2,534	0.1%	0.0%
Additional Renewable Energy Certificates	220,000	5.5%	3.8%
Total	**3,971,807**	**100%**	**68%**

ENO's costs to comply with the RCPS in 2024 were $370 thousand which would result in an estimated monthly bill effect for a Residential customer using 1,000 kWh of electricity of approximately $1.10 for customers located outside of the Fifteenth Ward of the City of New Orleans, that is, Algiers and $1.06 for customers located in Algiers.

Further information on the RCPS and ENO's compliance in 2024 can be found at: https://www.entergy-neworleans.com/renewable-clean-standard/

APPENDIX B

Proposed CEC Multiplier for Large Event Electrification

ENO proposes to use the following CEC credit rate for large event electrification to be treated as a Tier 3 resource beginning with its 2025 RCPS Compliance Demonstration Report. This electrification project avoids the use of small, high-emitting diesel generators within Orleans Parish. The credit rate calculation is centered around carbon dioxide emissions reductions, although this electrification also delivers significant benefits from the reduction of surface-level air pollutants like particulate matter, sulfur dioxide, and nitrous oxides. The structure of the credit rate calculation is similar to that used by ENO for crediting Electric Vehicle Charging Infrastructure as a Tier 3 resource in its *Compliance Plan Covering Compliance Years 2023-2025*, approved by the Council in Resolution No. R-22-525.

Table B-1: Preliminary CEC Credit Rate for Large Event Electrification, 2025

(1)	Fuel Consumption Rate, 60 kW diesel generator[12]	4.8	gal/hr
(2) =[**1**] / 0.06	Diesel Fuel Consumed per MWh	80	gal/MWh
(3)	CO_2 Content of Diesel Fuel[13]	10.18	kg/gal
(4) = [**2**]*[**3**] * 2.205	CO_2 Emissions Avoided from Diesel Generator	1,795	lbs/MWh
(5)	2025 RCPS Requirement	70%	
(6)	Approximate MISO South Marginal Emission Rate	1,200	lbs/MWh
(7) = (100%–[**5**]) * [**6**]	Approximate Electric Sector Emissions Increase from Incremental Electric Demand	360	lbs/MWh
(8) =([**4**]–[**7**])	Net Emissions Reduction from Large Event Electrification	1,435	lbs/MWh
(9) = [**6**]	Expected CO_2 Emissions Reduction per CEC	1,200	lbs/CEC
(10) = [**8**] / [**9**]	**Large Event Electrification CECs per MWh Electrified**	**1.20**	**CEC/MWh**

In 2025, ENO would receive 1.20 CECs for every megawatt-hour of electrified demand during large events when diesel generation would otherwise have been used. If the electrified demand is separately metered, ENO will apply the 1.20 credit rate to the metered electrified demand. If the electrified demand is behind an existing meter and not separately metered, ENO will estimate the

[12] "Approximate Diesel Fuel Consumption Chart," Generator Source, 60 kW generator at full load https://www.generatorsource.com/Diesel_Fuel_Consumption.aspx

[13] "Greenhouse Gas Equivalencies Calculator," U.S. EPA, https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator-calculations-and-references

electrified demand based on the size of the diesel generator that would have been used otherwise and the duration of its avoided operation.

ENO will update this calculation if new or updated data becomes available.