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October 30, 2024

Via Hand Delivery

Mr. Brandon M. Frey
Executive Secretary
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North Fifth Street
Baton Rouge, Louisiana 70802

Re: Application of Entergy Louisiana, LLC for Approval of Generation and Transmission Resources Proposed in Connection with Service to a Significant Customer Project in North Louisiana, Including Proposed Rider, and Request for Timely Treatment (LPSC Docket No. U-_____)

Dear Mr. Frey:

I have enclosed, on behalf of Entergy Louisiana, LLC (“ELL” or “Company”), the original and three copies of a Non-Confidential Public Version of the Company’s Application for Approval of Generation and Transmission Resources Proposed in Connection with Service to a Significant Customer Project in North Louisiana, Including Proposed Rider, and Request for Timely Treatment. along with the Direct Testimony and Exhibits of eleven witnesses. Please retain the original and two copies for your files and return a date-stamped copy to our courier.

Please note that the filing contains information that is designated Highly Sensitive Protected Material (“HSPM”), which is being provided to you under seal pursuant to the provisions of the LPSC General Order dated August 31, 1992, and Rules 12.1 and 26 of the Commission’s Rules of Practices and Procedures. The confidential materials included in the filing consist of competitively sensitive information and customer-specific confidential information. For this reason, this material is confidential and commercially sensitive. The disclosure of the information contained herein would subject not only the Company, but also its customers, to a substantial risk of harm. Accordingly, it is critical that this information remain confidential.

Please retain the appropriately marked Confidential Version for your files and return a date-stamped copy to our courier. The three additional confidential copies are for the Administrative Law Judge, Staff Attorney, and Research Attorney. Additional copies of the Confidential Version of this filing will be provided to the appropriate representatives of the Louisiana Public Service Commission Staff and made available to intervenors once a suitable Confidentiality Agreement has been executed by the parties.

Thank you for your assistance with this request. If you have any questions, please feel free to call me.

Sincerely,



D. Skylar Rosenbloom

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OCT 30 2024

DSR/rih

Enclosures

cc: LPSC Commissioners (*public version only via electronic mail*)

LA Public Service Commission

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**APPLICATION OF ENTERGY)
LOUISIANA, LLC FOR APPROVAL OF)
GENERATION AND TRANSMISSION)
RESOURCES PROPOSED IN)
CONNECTION WITH SERVICE TO A)
SIGNIFICANT CUSTOMER PROJECT IN)
NORTH LOUISIANA, INCLUDING)
PROPOSED RIDER, AND REQUEST FOR)
TIMELY TREATMENT)**

DOCKET NO. U-_____

**APPLICATION OF ENTERGY LOUISIANA, LLC
FOR APPROVAL OF GENERATION AND TRANSMISSION RESOURCES PROPOSED
IN CONNECTION WITH SERVICE TO A SIGNIFICANT CUSTOMER PROJECT IN
NORTH LOUISIANA, INCLUDING PROPOSED RIDER, AND REQUEST FOR
TIMELY TREATMENT**

Entergy Louisiana, LLC (“ELL” or “the Company”)¹ respectfully submits this Application of Entergy Louisiana, LLC for Approval of Generation and Transmission Resources Proposed in Connection With Service to A Significant Customer Project in North Louisiana, Including Proposed Rider, and Request for Timely Treatment (the “Application”) seeking, among other things, approval of the generation and transmission resources needed to serve a substantial new load proposed for [REDACTED] (the “Customer”), a customer seeking to locate a large (and economically transformative) facility in Richland Parish, Louisiana. As set forth more fully below, the project at issue in this Application represents a planned investment by the Customer of at least \$5 billion and is expected to employ directly 300 to 500 employees with an average salary of \$82,000, in a region of the state that has long struggled with a lack of economic development and

¹ ELL is a limited liability company duly authorized and qualified to do and doing business in the State of Louisiana, created and organized for the purposes, among others, of manufacturing, generating, transmitting, distributing, and selling electricity for power, lighting, heating, and other such uses.

high levels of poverty. Timely review and approval from the Louisiana Public Service Commission (the “Commission” or “LPSC”) of ELL’s proposals for the requisite generators, transmission facilities, and certain rate- and sustainability-related terms is critical for this region-altering investment to proceed.

This Application, filed in accordance with the General Order dated September 20, 1983 (the “1983 General Order”),² General Order R-36199 dated September 10, 2024 (the “Transmission Siting Order”),³ and other Orders issued by the LPSC, as applicable, requests certification that the public convenience and necessity would be served by construction and use of three new Combined Cycle Combustion Turbine (“CCCT”) generators (the “Planned Generators”), two of which would be next to the Customer’s selected site in Holly Ridge, Louisiana; a new 500 kV transmission line extending from a substation near Sarepta, Louisiana to a substation near Mt. Olive, Louisiana; and certain equipment upgrades at the 500 kV substation near Sterlington, Louisiana. The Company further respectfully requests a finding that the specific facts and circumstances of this case—including in particular the Customer’s urgent need for power and the significant financial contributions by the Customer towards constructing the facilities at issue in this Application—provide good cause to excuse ELL from complying with the Commission’s Market-Based Mechanisms General Order (the “MBM Order”).⁴ Moreover, ELL

² See The 1983 General Order, as amended by General Order (May 27, 2009), *In re: Possible modifications to the September 20, 1983 General Order to allow (1) for more expeditious certifications of limited-term resource procurements and (2) an exception for annual and seasonal liquidated damages block energy purchases*, Docket No. R-30517.

³ See General Order 09-10-2024 (R-36199) (September 10, 2024), *In re: Review and Possible Modification of the Commission’s General Order dated October 10, 2013 Governing Transmission Certification and General Siting*, Docket No. R-36199.

⁴ See General Order (February 16, 2004), *In re: Development of Market-Based Mechanisms to Evaluate Proposals to Construct or Acquire Generating Capacity to Meeting Native Load, Supplements the September 20, 1983 General Order*, Docket No. R-26172 Subdocket A., as amended by General Order, Docket No. R-26172 Subdocket B, dated November 3, 2006 and further amended by the April 26, 2007 General Order and the amendments approved

asks for, among other things, approval of the Corporate Sustainability Rider (the “CSR”)—a sustainability rider created specifically for, and available only to, the Customer—as well as findings relating to appropriate cost recovery and rate-making treatment and the development of a schedule and procedures to permit this Application to be considered on a timely basis.

THE CUSTOMER’S PROJECT

I.

Through this Application, ELL seeks approval, certification, and specific findings with respect to a project that, once fully operational, is expected to represent more than \$5 billion in new investment and to employ 300 to 500 full-time employees with an average salary of \$82,000, all in a region of Louisiana—Richland Parish—that has long struggled with attracting largescale industrial and economic development as well as high levels of poverty. The level of upfront and continuing investment by this one specific Customer is unprecedented, especially in Northeast Louisiana, and the effects from such a massive infusion of financial and human capital will undoubtedly be transformative. The Customer Project at issue in this Application truly has the potential to transform the economic landscape of North Louisiana.

II.

The project at issue is a planned [REDACTED] to be developed near Holly Ridge, Louisiana (the “Project”) by the Customer. The Customer is expected to invest at least \$5 billion in the Project, and the ripple effects from that investment are expected to be enormous: as Company witness, ELL President and Chief Executive Officer (“CEO”) Phillip May testifies in his Direct Testimony, the economies of Richland Parish and the surrounding communities are expected to

by the Commission at its October 15, 2008 Business and Executive Meeting; the October 29, 2008 General Order No. R-26172, Subdocket C; and the October 14, 2024 General Order No. R-34247.

boom, not just from the addition of hundreds of well-paying jobs at the Project itself, but also from the huge influx of capital investment needed to develop the community infrastructure required to support such a large number of new employees and their families, and other direct and indirect economic activity that flows from the Project.

III.

A largescale, economically transformative project necessarily requires a largescale energy supply, and, recognizing the benefits to the State of Louisiana that can be realized from the Project, ELL has worked closely and expeditiously with the Customer to reach a contractual arrangement—captured in the Customer’s Electric Service Agreement (“ESA”)⁵ and Contribution in Aid of Construction Agreement (“CIAC Agreement”)—that provides the electricity needed to serve the Customer in a manner that shields ELL’s other customers from undue rate impacts (and indeed that is expected to yield significant rate-related benefits that all of the Company’s customers will enjoy). The Project is anticipated to require a substantial amount of reliable power—a projected demand that, when fully realized, translates to a similarly substantial increase in the amount of energy currently sold annually by ELL statewide. To achieve this significant increase in ELL’s overall load, ELL will need (and is seeking approval and certification in this Application) to construct the Planned Generators and certain transmission upgrades, all as described further below and in the associated testimony.

IV.

The costs of these construction projects and other commitments are substantial, and ELL and the Customer have worked collaboratively from the outset to craft a financial arrangement that

⁵ The ESA includes a number of attachments, including Rider 1 to the ESA, ELL’s Terms and Conditions, a reproduction of ELL’s standard Large Load, High Load Factor Power Service Rate Schedule (“Rate Schedule LLHLFPS-L”), and the Corporate Sustainability Rider (“CSR”). The individual attachments to the ESA are referenced by their specific names as needed for clarity.

attempts to minimize (and in fact improve) rate impacts on ELL's other customers. Through its CIAC Agreement, the Customer is agreeing to make substantial contributions toward constructing certain transmission-related facilities near the Project's site as well as certain other contributions more fully described in the supporting Direct Testimony. Moreover, through its participation in ELL's standard Rate Schedule LLHLFPS-L, the Customer is paying (1) a minimum monthly charge that will cover, during the fifteen-year Original Term of the ESA, the full annual revenue requirement for the Planned Generators, and (2) its allocated share of all fixed and variable costs in ELL's Formula Rate Plan ("FRP") and associated riders (including, significantly, storm securitization and resiliency riders). ELL has calculated that, based on the percentage share of ELL's annual sales for which the Customer is expected to be responsible, the Customer will contribute a large percentage of the costs that would otherwise be borne by all of ELL's customers. This large financial commitment from the Customer is expected to result in substantial cost savings for ELL's other customers for years to come.

V.

The Customer is also making transformative investments in sustainability in Louisiana. Through the CSR, the Customer has committed to paying for 1,500 megawatts ("MW") of designated solar and/or solar and storage ("hybrid") resources—an amount that is in addition to the 3 gigawatts ("GW") of solar resources approved by the Commission in Order No. U-36697 (the "3 GW Order") and which, as Company witness Laura Beauchamp explains, will assist with ELL's long-term planning needs. Moreover, the Customer is expected to make a substantial contribution toward the cost of implementing Carbon Capture and Storage ("CCS") technology at an existing ELL CCCT generation resource — a contribution that, as Company witness Nicholas Owens describes in his Direct Testimony, could meaningfully demonstrate for the domestic and

international electric generation industries the viability of this technology as applied to utility scale gas generation—and has committed to explore other clean opportunities. Further, as one of the clearest examples of direct community benefits promised by the Project, the Customer has committed to match up to \$1 million in contributions by Entergy Corporation shareholders to “The Power to Care” program, with the specific intent of providing financial assistance to ELL’s senior customers and customers with disabilities that live on low or fixed incomes in Louisiana.

VI.

The result of all of this, and as explained further below and in the supporting Direct Testimony and Exhibits, is a tremendous economic win for the State of Louisiana. Louisiana is receiving a huge investment that will bring a large number of well-paying jobs while covering a substantial part of its energy costs and reducing energy costs to other ELL customers. The benefits to the public are manifest; ELL accordingly seeks the Commission’s approval of the resources to serve the Customer and other relief as specified below in order that this economic development that is unprecedented in North Louisiana can proceed.

VII.

With this Application, the Company submits the Direct Testimonies of Phillip May, Laura Beauchamp, Nicholas Owens, Matthew Bulpitt, Daniel Kline, Ryan Jones, Ryan O’Malley, Elizabeth Ingram, Joshua Thomas, Samrat Datta, and Jeremy Halland. The purpose of the Direct Testimony of each witness is as follows:

- **Phillip May** – Mr. May, President and CEO of ELL, introduces and supports the Company’s Application, identifies each of the Company’s witnesses, and provides a general description of each witness’s Direct Testimony. Mr. May further explains the opportunity that the Project presents for Richland Parish, the surrounding region, and the

State of Louisiana as a whole, while providing an overview of the Project and the related generation and transmission investments that are needed to bring the Project to fruition. Mr. May also describes the terms of the agreements between ELL and the Customer (including, in particular, the collateral and security protections included in those agreements) and explains the CSR created for the Customer to assist with the Company's and the Customer's sustainability goals.

- **Laura Beauchamp** – Ms. Beauchamp, Director of Resource Planning and Market Operations for ELL, explains the Customer's load profile and provides an overview of the Project, the generation and transmission resources needed to serve the Project, and the contractual terms between ELL and the Customer, including both the CSR and the standard rate schedule under which the Customer is taking service. Ms. Beauchamp further describes ELL's resource-planning objectives, explains the manner in which the Project satisfies those objectives, and explains that ELL will have a long-term use for the Planned Generators even in the unlikely event the Customer decides not to renew the ESA after its fifteen-year Original Term. Ms. Beauchamp concludes her Direct Testimony by discussing the estimated costs for the resources needed to serve the Customer, the fuel supply for the new CCCTs, the plans to provide clean energy, and the proposed monitoring plan for construction of the Planned Generators and the transmission-related facilities.
- **Nicholas Owens** – Mr. Owens, Partner at The NorthBridge Group, addresses (1) ELL's proposal to build gas-fired generation to meet its capacity and energy needs arising from serving the Customer, (2) proposals to build gas-fired generation elsewhere in the country, and (3) the significance of the Customer's clean energy funding commitments.

- **Matthew Bulpitt** – Mr. Bulpitt, Vice President of Power Development for ESL, covers five subject-matter areas in his testimony: (1) a description and explanation of the technology for the Planned Generators; (2) a description and explanation of the estimated costs, construction process, and schedule for the two Planned Generators located near the site of the Customer’s Project; (3) the process through which ELL plans to contract for the construction of a third generator within ELL’s Southeast Louisiana Planning Area (“SELPA”); (4) the engineering, procurement, and construction (“EPC”) contractor project management risk mitigation plan implemented for the Customer Project; and (5) how the Planned Generators will be configured to enable CCS technology to meet future federal emission standards.
- **Daniel Kline** – Mr. Kline, Director of Power Delivery Planning for Entergy Services, LLC (“ESL”), provides (1) an overview of the ELL transmission system, including facilities relevant to the Project, in North Louisiana; (2) a general description of the transmission-related facilities proposed for the Project and the planning evaluation that was performed to assess the costs, benefits, and necessity of those facilities; (3) an explanation of the costs and benefits of the proposed transmission-related facilities and why those facilities are a reasonable solution for providing service to the Project; (4) an explanation of the Midcontinent Independent System Operator, Inc. (“MISO”) transmission-interconnection process for the Planned Generators and the interconnection process’s impact on ELL’s analysis and plans for serving the Project; and (5) the various information required by the Commission’s Transmission Siting Order with respect to the proposed transmission facilities of which certification is requested.

- **Ryan Jones** – Mr. Jones, Manager of Regulatory Affairs for ESL, explains the billing terms to which the Customer agreed in the ESA as well as certain ratemaking treatment being requested by ELL. With respect to the billing terms, Mr. Jones analyzes the Customer’s participation in Rate Schedule LLHLFPS-L and its corresponding contributions to the FRP and applicable riders (including, for example, storm securitization and resiliency riders). Based on his analysis, Mr. Jones explains that the billing terms are reasonable and consistent with the terms received by other customers through Rate Schedule LLHLFPS-L, and he further discusses that the Customer’s full participation in the FRP will result in hundreds of millions of dollars in savings for ELL’s other customers. As to ratemaking treatment, Mr. Jones explains the reasons that ELL is asking to exclude from ELL’s FRP Evaluation Report, in the year of receipt, certain revenue/payment amounts received from the Customer. Mr. Jones further explains the manner in which ELL has complied (through the filing of this Application) with the requirements of the Transmission Siting Order for the planned transmission-related investments and discusses certain aspects of the Tariff Filings General Order (LPSC General Order R-34738), as well as the Industrial Load Rule included as Rule 3 in General Order No. R-34860 dated July 29, 2019.
- **Ryan O’Malley** – Mr. O’Malley, Controller of Utility Operations Accounting for ESL, testifies concerning the accounting treatment for three categories of payments being received from the Customer in connection with the Project: (1) amounts received from the Customer through the CIAC Agreement for transmission-related facilities; (2) other amounts received from the Customer through the CIAC Agreement; and (3) amounts

received from the Customer through its minimum monthly charge during the period in which ELL is unable to provide service at the full contracted load level.

- **Elizabeth Ingram** – Ms. Ingram, Director of Regulatory Strategy for ESL, provides an explanation of the CSR and each of its individual components, specifically, the 1,500 MW of solar and storage resources contemplated by the CSR, the CCS component, the wind and nuclear components, and the substantial contribution by the Customer to Entergy’s “The Power to Care” program for the benefit of senior customers and customers with disabilities in Louisiana. Ms. Ingram further explains the cost-recovery treatment associated with the CSR.
- **Joshua Thomas** – Mr. Thomas, Vice President of Regulatory Services for ESL, testifies concerning ELL’s request for the Commission to find that the Planned Generators are system resources, the manner in which the public interest is served by approval and certification of the proposed generation and transmission resources, and the reasons that ELL should be excused, for good cause, from complying with the requirements of the MBM Order. Finally, Mr. Thomas testifies concerning compliance by ELL with the Commission’s Orders (separate from, and in addition to, the 1983 General Order and the MBM Order, including the Industrial Load Rule included as Rule 3 in General Order No. R-34860 dated July 29, 2019) as well as both the proposed cost recovery treatment of the Long-Term Service Agreements that ELL proposes to execute for the long-term maintenance of the Planned Generators and the application of the Commission’s General Order dated November 6, 1997 in Docket No. U-21497 to that proposed cost-recovery treatment.

- **Samrat Datta** – Mr. Datta, Director of Advanced Network Planning for the System Planning Organization of ESL, provides an economic analysis of the Customer’s Project and its costs and benefits, including the costs and benefits of the generation and transmission resources needed to serve the Project (net of the Customer’s contributions to the costs of those resources), the benefits to all ELL customers of the Customer’s payment of other ELL rates such as the FRP and storm securitization and resilience riders during the fifteen-year Original Term of the ESA, and the economic impact on ELL customers in the unlikely event the Customer were to decide not to renew at the end of the ESA’s Original Term.
- **Jeremy Halland** – Mr. Halland, Manager of Environmental Projects at ESL, testifies concerning the permitting requirements for the Planned Generators as well as the current status with respect to permitting issues for the two CCCTs that will be located near the Customer’s site in Richland Parish.

As required by the 1983 General Order, this Application and the supporting Direct Testimony include the specific data that the Company relied upon to justify the Company’s decision to construct the Planned Generators, an estimate of the costs to construct the Planned Generators, ELL’s estimated first-year revenue requirement associated with the Planned Generators, the estimated in-service dates, and the construction schedule and milestones. The Application and supporting testimony also set forth, as to the transmission facilities for which certification is requested, the various facts and information required by the Commission’s Transmission Siting Order.

PROPOSED GENERATION AND TRANSMISSION RESOURCES**VIII.**

As set forth throughout the accompanying Direct Testimony, the Customer's anticipated load for the Project is substantial and translates to an equally substantial increase in the amount of energy currently sold by ELL statewide. As explained in the Direct Testimony of both Ms. Beauchamp and Mr. Kline, ELL will need to construct new generation and certain transmission-related facilities in order to provide sufficient, reliable electric service to the Customer and to meet ELL's own planning-reserve obligations. As explained throughout this Application and the associated Direct Testimony, the Customer is making substantial financial contributions toward these resources such that the impacts on ELL's other customers have been minimized. The economic assessment that Mr. Datta presents in his Direct Testimony shows that it is reasonable to conclude that ELL's other customers are not harmed by the addition of the Project and the resources to serve it, and in fact are expected to benefit.

IX.

With respect to generation resources, ELL is proposing to construct three new 1x1 CCCT generators, each of which will have a nameplate capacity of 754 MW for a combined addition of 2,262 MW of new baseload generation. Two of the three generators will be at Franklin Farms, near the site of the Customer's Project. All of the Planned Generators will be capable of approximately 30% hydrogen co-firing with the capability of supporting 100% hydrogen firing in the future with upgrades, and all will have the ability to incorporate a CCS component in the future. Company witness Matthew Bulpitt explains the mechanical specifications and operations of the CCCT generators in his Direct Testimony. Ms. Beauchamp explains the alternatives to the Planned Generators that were considered and the reasons for which each alternative was rejected as an

inferior solution. Similarly, Mr. Owens explains the reasons for which the portfolio of gas-fired and renewable resources selected by ELL is the best available option to serve the Project.

X.

As to the Planned Generators' proposed locations, both Ms. Beauchamp and Company witness Daniel Kline explain in their respective Direct Testimony that locating two of the Planned Generators near the Customer's site is the best siting solution, including because placing two of the three generators in close proximity to the Customer's Project will allow ELL to meet certain bulk electric system compliance and operational reliability and flexibility requirements. As to the third CCCT, ELL is actively working to find an exact location for the third generator within SELPA, an area selected by ELL to assist with, among other things, mitigating any adverse reliability effects from the change in power flows between the northern and southern parts of the state as a result of adding the Customer's large new load. Moreover, as Ms. Beauchamp and Company witness Joshua Thomas explain in their respective Direct Testimony, ELL is asking that the Commission find that the Planned Generators are system resources and, in doing so, support the ability of ELL to offer the capacity and energy from the Planned Generators into MISO's markets, thereby enabling ELL to receive capacity and energy credits/revenues from MISO that will effectively lower rates for all of ELL's customers.

XI.

Ms. Beauchamp explains that the Customer has an urgent need for capacity and energy, and further sets out the timing in which the Project is expected to begin taking service for construction power and ramp up to full capacity. ELL intends to use EPC contractors to assist with constructing the Planned Generators, and ELL includes in the Direct Testimony current estimates for both the total capital investment for the three new CCCTs and the financing costs for this

construction. As Company witness Ryan Jones testifies (and as set out more fully throughout this Application and the supporting Direct Testimony), the Customer is paying significant costs through a CIAC Agreement, and the Customer's minimum charge under its rate schedule will cover (among other amounts) the full annual revenue requirement for the Planned Generators during the fifteen-year Original Term of the Customer's ESA.

XII.

As to the transmission-related facilities needed to serve the Project, Mr. Kline explains in his Direct Testimony the process employed by ELL to identify the specific facilities and upgrades that were needed to serve the Customer as well as to reject certain alternatives that were less desirable than the transmission-related facilities proposed by ELL in the Application. The below chart is reproduced in large part from Mr. Kline's Direct Testimony and categorizes (and provides a general description of) each transmission-related facility proposed by ELL in connection with the Project:

TABLE 1	
Substation Projects	General Description
Smalling Substation	The Customer site is located south of the Baxter-Wilson to Perryville 500 kV transmission line. A substation (tentatively called Smalling) will be constructed adjacent to the line. The substation will contain 500/230 kV autotransformers to reduce the voltage to a level at which the Customer will take service. The Baxter-Wilson to Perryville line will be cut in to the station.
Car Gas Road 500 kV Substation	The ELL Perryville substation is in close proximity to the Customer site but is not suitable for expansion on its existing footprint due to several physical constraints. As a result, a new 500 kV switchyard will be constructed approximately one mile away to receive transmission lines from the Smalling substation and the connections to Perryville.
Customer Substations 1-6	The Customer plans to build six substations on its property. The exact location and ultimate owner (Customer or ELL) of each substation is the subject of ongoing discussions with the Customer.

Point-of-Delivery Projects	General Description
Car Gas Road to Smalling Substation 500 kV Lines 2 and 3	A third and fourth source of 500 kV transmission service is required to meet the Customer's load requirements. Two thirty-mile 500 kV transmission lines will be installed from the Customer substations to the Car Gas Road 500 kV switching station. A routing study is being conducted to determine the optimal right of way.
Smalling Substation to Customer Substations 1-6 230 kV Transmission Lines	ELL will build eight 230 kV lines to the Customer's six substations located at Franklin Farms. The location of the Customer substations and line routing on the property are the subject of ongoing discussions.
System Improvement Projects	General Description
Mount Olive to Sarepta 500 kV Transmission Lines and Facilities	ELL will construct a new sixty-mile Mount Olive to Sarepta 500 kV transmission line from the existing Mount Olive 500 kV substation to the existing Sarepta 345/115 kV switching station. Both substations will require upgrades, most notably a new 500/345 kV 1,200 MVA autotransformer at Sarepta. A routing study is being conducted. ELL expects that the route for the new lines will largely parallel existing transmission lines.
Substation Equipment Upgrades	ELL will upgrade station equipment at the Sterlington 500 kV substation to a minimum of 3,000 amps. This project takes place within an existing substation.

The three projects included in the category titled “Substation Projects”—the Smalling Substation, Car Gas Road 500 kV Substation, and Customer Substations 1-6—are referred to in this Application as the “Customer-Paid Substations”. The two projects categorized as “Point-of-Delivery Projects”—*i.e.*, the Car Gas Road to Smalling Substation 500 kV Lines 2 and 3 and Smalling Substation to Customer Substations 1-6 230 kV Transmission Lines—are referenced in this Application as the “Point-of-Delivery Transmission Facilities.” The Mount Olive to Sarepta 500 kV Transmission Lines and Facilities are referred to as the “Mount Olive to Sarepta Transmission Facilities,” while the Substation Equipment Upgrades are referred to as the “500kV Sterlington Substation Equipment.”

XIII.

The estimated amount needed to construct the transmission-related facilities is set forth in the accompanying Direct Testimony and includes the costs to build the facilities identified in the above chart as well as the cost of the transmission facilities needed to provide the Customer with construction and commissioning power (collectively, the construction-power and commissioning-power transmission facilities are referred to as the “Interim Transmission Facilities”). Further, as Ms. Beauchamp and Mr. Jones testify, the Customer is paying the full cost of the Customer-Paid Substations and the Point-of-Delivery Transmission Facilities through its CIAC Agreement; only the costs associated with the Mount Olive to Sarepta Transmission Facilities and the 500 kV Sterlington Substation Equipment—both of which are system improvements that entail benefits to all of ELL’s customers—will be included in the FRP and paid by all ELL customers. To that end, and as Mr. Kline discusses in his Direct Testimony, the transmission upgrades (and especially the Mount Olive to Sarepta Transmission Facilities) will enhance ELL’s transmission system, including by strengthening north-south transmission ties that are becoming more crucial as development continues to grow throughout Louisiana.

XIV.

In sum, and as described more fully in the accompanying Direct Testimony, the Planned Generators and the transmission-related facilities proposed in this Application will enable ELL to serve the Customer and its significant new load while harnessing substantial reliability benefits for all of its customers. ELL accordingly asks that the Commission find that the Planned Generators are system resources and that the Company’s construction of two new CCCT generators at Franklin Farms, a third CCCT in SELPA, the Mount Olive to Sarepta Transmission Facilities, and the Sterlington 500 kV Substation Equipment serves the public convenience and necessity and is in

the public interest. ELL further asks that the Commission find that all of the above-described construction projects—of both the Planned Generators and the proposed transmission-related facilities—are prudent.

CORPORATE SUSTAINABILITY RIDER

XV.

As Ms. Beauchamp explains in her Direct Testimony, the Company has robust sustainability goals, and it was also important for the Customer in selecting ELL and the State of Louisiana as the site of its Project that the Company provide options for zero to near-zero carbon emission resources. ELL was able to leverage both the flexibility previously granted by the Commission for solar resources supported by subscriptions from a New Customer, as that term is contemplated in the 3 GW Order, and its strong position for taking advantage of clean resources to create a sustainability offering for the Customer. The result of those efforts is the CSR—an agreement specific to the Customer that, as explained below and in the supporting Direct Testimony, includes substantial benefits for all of ELL’s customers while offsetting a significant percentage of emissions from the Planned Generators⁶ and serves as a relevant factor for the Customer in deciding to select Louisiana for its investment.

XVI.

As explained by Company witness Elizabeth Ingram, the CSR is an agreement designed specifically for (and open only to) the Customer that (1) identifies customer-specific commitments for clean resources, including solar, hybrid, CCS, and, potentially, wind and nuclear resources, and (2) specifies relevant charges for such resources, where applicable. The CSR also includes a \$1

⁶ While the resources in the CSR are intended to help with offsetting the emissions from the Planned Generators, it bears mentioning that, as Mr. Bulpitt testifies, CCCT technology is considered throughout the industry as the best available technology for limiting greenhouse gas emissions when combusting fossil fuels for electrical generation.

million matching contribution to Entergy’s “The Power to Care” program, with a primary focus of providing financial assistance to seniors and customers with disabilities that live on low or fixed incomes in Louisiana.

XVII.

As to the solar resources contemplated by the CSR, ELL is not seeking certification of any resources at this time; rather, ELL asks that the Commission confirm ELL is entitled to use the expedited procurement and certification processes established by the Commission in the 3 GW Order in order to procure and secure approval of 1,500 MW of additional solar capacity—in excess of the 3 GW previously authorized by the Commission in the 3 GW Order—for the Customer. As to CCS, ELL is again not seeking certification at this time. As Ms. Ingram explains, ELL currently plans to implement CCS at Lake Charles Power Station, and the Customer has agreed to pay a capped amount towards the cost of CCS at that plant. The general characteristics of CCS are described by Mr. Bulpitt, and Mr. Owens provides an analysis describing the unique (and groundbreaking) potential for Louisiana to showcase CCS as a scalable and effective emissions-reduction technology. Lastly, as to both wind and nuclear resources, ELL has committed in good faith to attempt to reach commercial terms with a wind developer on a project and to notify the Customer of any potential development opportunities for nuclear and other near-zero or zero-emission projects.

XVIII.

The CSR was a relevant factor for the Customer in deciding to move forward with building the Project in Louisiana, but it includes benefits that will be enjoyed by all ELL customers and deployment of new technologies that, as characterized by Mr. Owens, could act as a “force multiplier for decarbonization.” ELL respectfully asks that the Commission approve the CSR and

affirm that ELL is entitled to use the expedited-certification and procurement processes to procure and secure approval of the additional 1,500 MW of solar and storage resources sought for the Customer.⁷

RATE INFORMATION AND ECONOMIC BENEFITS

XIX.

As Mr. May, Ms. Beauchamp, and Mr. Jones explain in their Direct Testimony, the Customer has agreed in the ESA to take electric service from ELL pursuant to the standard Rate Schedule LLHLFPS-L and subject to FRP Rate Adjustment, the Fuel Adjustment Clause (“FAC”), and all other applicable Riders including Financed Storm Cost and Resiliency Riders such that the Customer will bear a reasonable share of ELL’s cost to provide electric service over the ESA’s term. Indeed, as to the Riders, ELL expects the Customer will contribute substantial amounts toward the repayment of existing securitized storm debt and ELL’s current Resilience Program, and those contributions represent amounts that would otherwise have been solely paid by ELL’s existing customers. Even more, as Mr. Jones explains in his Direct Testimony, the minimum charge for the Customer under the ESA is expected to cover the full annual revenue requirement for the Planned Generators for the fifteen-year Original Term of the ESA.

XX.

Both Mr. Jones and Company witness Ryan O’Malley explain the ratemaking treatment sought by ELL in this proceeding. [REDACTED]

⁷ Paragraph 19 of the Commission’s 3 GW Order allows ELL “to utilize the expedited certification process . . . outlined in Paragraph 14” of the Order for purposes of procuring solar resources for a “New Customer”, as that term is defined in Attachment 2 to the “Motion for Consideration of Uncontested Stipulated Settlement Term Sheet Pursuant to Rules 6, 51, and 57” filed by ELL in Docket No. U-36697 on May 15, 2024. To the extent a finding is required that the Customer is a “New Customer” in order for ELL to be able to use the expedited certification process contemplated by the 3 GW Order, ELL requests the Commission make such a finding and, in doing so, enable ELL to procure the solar resources required by the Customer for its investment in Louisiana.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. Further, as to amounts

received by ELL through the CIAC Agreement—specifically, amounts for the Customer-Paid Substations, the Interim Facilities, and the Point-of-Delivery Transmission Facilities, as well as other amounts—ELL asks that the Commission approve ELL’s plan to (1) offset the full amount of transmission capital additions for the Interim Transmission Facilities, the Customer-Paid Substations, and the Smalling to Car Gas 500 kV Transmission Line Project, and (2) account for the other contributions detailed in the Direct Testimony of Mr. Jones.

XXI.

As can be seen, the Customer is not only paying its fair share and rate, it is also paying a significant portion of the costs that would otherwise fall on ELL’s other customers. The Customer’s participation in Rate Schedule LLHLFPS-L can be expected to save ELL’s other customers hundreds of millions of dollars in storm recovery costs and other costs they would otherwise have had to bear. ELL accordingly asks that the Commission approve of the accounting and ratemaking treatment described above.

COMPLIANCE WITH COMMISSION ORDERS**XXII.**

A number of Orders issued by the Commission are implicated or potentially implicated by the relief sought by ELL in this Application, including the 1983 General Order, the MBM Order, the Transmission Siting General Order, the Tariff Filings General Order, and the Load-Serving/Footprint Order issued in Docket No. R-34860. As described more completely in the Direct Testimony accompanying this Application—and especially in the Direct Testimony from Mr. Jones and Mr. Thomas—ELL’s proposed resources and arrangements satisfy all of the relevant Commission Orders, with the sole exception of the MBM Order, for which ELL seeks, and should be granted, an exception in consideration of the specific facts and circumstances presented in the Company’s Application.

XXIII.

As an overarching inquiry, the proposals by ELL in this Application serve the public interest. As Mr. Thomas explains in his Direct Testimony, the public interest is generally defined as that which is thought to best serve everyone; it is the common good. If the net effect of a decision is believed to be positive or beneficial to society as a whole, it can be said that the decision serves the public interest. And here, with the tremendous economic opportunity presented by the Customer’s Project as well as the significant financial benefits all of ELL’s customers will receive through the Customer’s participation in the FRP and associated riders, the public interest is indeed served by undertaking the necessary measures to allow the Project to proceed. For those reasons and others discussed in the attached Direct Testimony, the Commission should approve construction of the Planned Generators, the above-described transmission-related facilities, and the other components of the Application as being within the public interest.

XXIV.

With respect to the MBM Order, the Customer's urgent need for electric service and the speed with which ELL needed to act to secure the Customer's commitment to Louisiana limited ELL's ability to issue a Request for Proposals ("RFP") for the Planned Generators.⁸ The timing and unique financial contributions by the Customer nevertheless support a finding that good cause excuses compliance with the MBM Order: in addition to compliance being impracticable based on the timing considerations mentioned above, the Customer is paying for a significant portion of the generation resources that are proposed in this Application, both through the contributions specified in the CIAC Agreement and through its monthly minimum charges pursuant to the ESA and Rate Schedule LLHLFPS-L. The underlying concerns with the MBM Order are mitigated where, as here, a substantial amount of the costs is being borne, after arm's length negotiations, by a private third party. Given the tremendous opportunities presented by the Project and the need for expedited action by ELL to ensure the Customer moved forward with its investment in Louisiana, ELL asks for, and should be granted, a good-cause exception to the requirements of the MBM Order.

XXV.

Apart from the exception to the MBM Order requested by ELL for the reasons set forth above and in the supporting Direct Testimony, the remaining requests for relief in ELL's Application satisfy the relevant Commission Orders, and the resources needed to serve the Customer—and to bring a tremendous opportunity for economic revitalization to Northeast Louisiana—can be achieved within the standard parameters established by the Commission's Orders. ELL accordingly asks that the Commission grant it a good-cause exception with respect

⁸ It bears noting that, although not an RFP for the Planned Generators, ELL intends to issue an RFP to select an EPC contractor for the third CCCT to be located in SELPA. Moreover, based on past experience in selecting the EPC contractors that will assist with the two CCCT generators to be located in close proximity to the Customer's Project, ELL anticipates that the major components of the CCCT will be procured at prices that are competitive.

to the requirements of the MBM Order and otherwise find that the relief requested in the Application is in the public interest and complies with all other applicable Commission Orders.

REQUEST FOR TIMELY TREATMENT

XXVI.

As Mr. May and Ms. Beauchamp explain, the Customer has an urgent need for electricity, and ELL's ability to reach an agreement on (and ultimately provide) service for the Customer's Project quickly was a key consideration for the Customer as it chose to move forward with its major investment in Louisiana. In order to meet the in-service dates specified by the Customer, ELL respectfully asks that the Commission timely review and approve the relief requested in the Application and, to that end, direct the Administrative Hearings Division to adopt a procedural schedule necessary to facilitate a decision no later than the Commission's September 2025 Business & Executive Session ("B&E"). Material delays in a decision beyond that B&E would undermine the Company's ability to deliver the resources needed to meet the Customer's desired timeline, could hinder the ability of the Customer to do business effectively in the State of Louisiana and guide the Project to fruition – and may ultimately jeopardize whether the Project moves forward at all.

SERVICE OF NOTICES AND PLEADINGS

XXVII.

The Company requests that notices, correspondence, and other communications concerning this Application be directed to the following persons:

Lawrence J. Hand, Jr.
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D. Skylar Rosenbloom
Matthew T. Brown
Michael R. Dodson
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639 Loyola Avenue
Mail Unit L-ENT-26E
New Orleans, Louisiana 70113
Telephone: (504) 576-2603
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drosenb@entergy.com
mbrow12@entergy.com
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The Company requests that the foregoing persons be placed on the Official Service List for this proceeding and respectfully requests that the Commission permit the designation of more than one person to be placed on the Official Service List for service in this proceeding.

REQUEST FOR CONFIDENTIAL TREATMENT

XXVIII.

Portions of this Application, the Direct Testimony, and Exhibits contain information considered by the Company and the Customer to be proprietary and confidential. Disclosure of certain information may present an unreasonable risk of harm to ELL and ELL's customers (including the Customer specifically). Therefore, in light of the sensitive nature of such information, the Company has submitted two versions of each witness's Direct Testimony and relevant Exhibits, one marked "Non-Confidential Redacted Version" and the other marked "Confidential Version." In anticipation of the execution of a suitable confidentiality agreement in this Docket, the Confidential Versions bear the designation "Highly Sensitive Protected Materials" or words of similar import. Although the confidential information and documents included within this Application may be reviewed by appropriate representatives of the LPSC Staff and interested parties pursuant to the terms and conditions of a suitable confidentiality agreement once such an

agreement has been executed in this Docket, this confidential information also is being provided pursuant to, and shall be exempt from public disclosure pursuant to, the Commission's General Order dated August 31, 1992 and Rule 12.1 of the Rules of Practice and Procedure of the LPSC.

PRAYER FOR RELIEF

XXIX.

WHEREFORE, Entergy Louisiana, LLC respectfully requests that the Commission, subject to the fullest extent of its jurisdiction, grant relief and give its approval as follows:

1. Find that the Company's construction of two new CCCT generators at Franklin Farms in Richland Parish, Louisiana, serves the public convenience and necessity and is in the public interest, and is therefore prudent, in accordance with the Commission's 1983 General Order;
2. Find that the construction of one other CCCT in SELPA, including potentially the Amite South subregion, at a specific location that will be disclosed in a supplemental filing serves the public convenience and necessity and is in the public interest, and is therefore prudent, in accordance with the Commission's 1983 General Order;
3. Based on the facts and analyses presented herein demonstrating the benefits of the Planned Generators to all ELL customers, approve of the inclusion and treatment of the Planned Generators as system resources for the benefit of all ELL customers, and not as resources constructed and designated for the benefit and use of a specific Customer;
4. Find that the Application complies with the requirements of General Order in Docket R-34860, and that the requirements for entering into the ESA have been satisfied, because ELL has submitted a filing pursuant to the 1983 General Order requiring Commission certifications for the acquisition of power supply;

5. Find that, under the specific facts and circumstances of this case including significant third-party funding, the need for expedited action to secure the Customer's investment in Louisiana, the substantial economic benefits to the citizens of the State of Louisiana afforded by the Project, and other circumstances described in the Company's Application and supporting Direct Testimony, good cause exists for the granting of, and for the Commission to grant, an exemption to the formal RFP process included in the MBM Order, the stated prohibition in the MBM Order against alternative market-based mechanisms being "limited to self-build or utility-owned resources," and any other requirements of the MBM Order (including the recent amendments to that order) that may not be met based on the facts presented herein;
6. With respect to transmission, the Commission should find:
 - o As to the Sterlington 500 kV Substation Equipment and the Customer-Paid Substations, that these transmission facilities do not require certification pursuant to the Transmission Siting Order as they do not fall within the definition of "Transmission Facilities" and, further, that the exemption set forth in Section VIII(a) therein applies.
 - o As to the Interim Transmission Facilities and the Point-of-Delivery Transmission Facilities, that those facilities are exempt from certification pursuant to the Transmission Siting Order and the exemption in Section VIII(f) therein (exempting "[n]ew transmission point-of-delivery facilities . . . undertaken for the sole purpose of . . . accommodating a new or expanding load for specifically identified customers located in Louisiana that have executed interconnection agreements and/or electric services agreements");

- As to the Customer-Paid Substations, the Interim Transmission Facilities, and the Point-of-Delivery Transmission Facilities, the Commission should find in the alternative to the findings above, that such projects are exempt from the requirements of the Transmission Siting Order pursuant to the first sentence of Section VIII and the exemption in Section VIII(h) of the Transmission Siting Order, because (1) “the costs of the [referenced facilities], and the cost of any associated System Impacts, will never be reflected or recovered in the retail or wholesale rates to be assessed to customers of Louisiana electric utilities including cooperatives,” or (2) in the further alternative, “good cause” exists to exempt the interconnection from certification, because there is no risk that the costs of the Customer-Paid Substations, the Interim Transmission Facilities, or the Point-of-Delivery Transmission Facilities will fall on retail customers;
- As to the Sarepta-to-Mount-Olive Transmission Facilities—and as to the Interim Transmission Facilities, Point-of-Delivery Transmission Facilities, 500 kV Sterlington Substation Equipment, and Customer-Paid Substations, if none of the above-referenced exemptions are found to apply—that (1) such facilities are in the public interest and the interests of affected customers, taking into account the costs, retail rates, service reliability, reduction of congestion, material economic benefits, the interstate or intrastate benefits expected to be achieved, and the fact that such facilities are consistent with public policy, including policy goals of the Commission; and that (2) the generalized siting of the facilities is appropriate and construction of the facilities (as opposed to construction of other transmission facilities or construction of generation, or

non-transmission alternative) is a reasonable and cost-effective solution to the problems being addressed by such facilities;

7. As to the CSR described in the Application and presented as HSPM Exhibit ECI-2 to the Direct Testimony of Ms. Ingram and an attachment to the ESA included as HSPM Exhibit LKB-2 to the Direct Testimony of Ms. Beauchamp, approve and authorize the implementation of the CSR, including the processes for procuring the solar and/or hybrid resources that will supply the Customer's portfolio under the CSR and securing Commission approval to add future resources to the CSR and the allocation of costs as between the Customer and the Company's other customers as described therein;
8. Confirm and/or find that ELL may solicit and procure the 1,500 MW of solar and/or hybrid resources contemplated by the CSR through an alternative procurement process based upon the process approved in the 3 GW Order;
9. Confirm the Customer referenced in the Application is a "New Customer" (as defined in Attachment 2 to the "Motion for Consideration of Uncontested Stipulated Settlement Term Sheet Pursuant to Rules 6, 51, and 57" filed by ELL in Docket No. U-36697 on May 15, 2024) and that ELL is accordingly permitted, pursuant to Paragraph 19 of the 3 GW Order, "to utilize the expedited certification process . . . outlined in Paragraph 14" of the 3 GW Order for purposes of securing approval of the 1,500 MW of solar and/or hybrid resources contemplated by the CSR and to designate those resources under the CSR pursuant to its terms;
10. Approve the Company's establishment of an unearned revenue liability for accounting purposes, as described in the Application and supporting Direct Testimony, to, *inter alia*,

stabilize the effects of unearned revenue on the rates charged in accordance with the FRP and resulting customer bill impacts;

11. Approve of the requested accounting treatment of the Customer's other contributions made pursuant to the CIAC Agreement as described in the Application and supporting Direct Testimony;
12. Find that the retail revenue requirements associated with the actual prudently incurred costs of, respectively, the Sterlington 500 kV Substation Equipment and the Mount Olive to Sarepta Transmission Facilities, estimates of which are provided by Mr. Jones in his Direct Testimony, are deemed eligible for recovery by the Company through the applicable mechanisms of the FRP to the extent the Company remains subject to an FRP at the time the referenced facilities are placed in service, or in the alternative, through the creation and authorization of a regulatory asset, with interest to be accrued thereon at the Company's weighed average cost of capital, until such time that the costs can be reflected in rates through a future base rate proceeding;
13. Find that the retail revenue requirement associated with the Planned Generators (to be determined in a subsequent revenue requirement filing) is deemed eligible for recovery in the first billing cycle of the month following commercial operation of each of the Planned Generators in accordance with the terms of the Company's then-effective FRP, outside of the FRP sharing mechanism and outside of the cap set forth in Section 2.C.2.d of Rider FRP; in the alternative, if ELL does not have an FRP in place at the time the Planned Generators are placed in service, authorize (i) a deferral of the non-fuel revenue requirement (i.e., costs that are not eligible to be recovered through the FAC) associated with each of the Planned Generators until such time as the costs of each Planned

Generator are reflected in the Company's retail rates; (ii) a deferral of the costs to hire and train each Planned Generators' plant staff in advance of each of the Planned Generators' in-service dates; and (iii) an accrual of carrying charges on the deferred balances at the Company's Commission-authorized rate of return, commencing on the dates of commercial operation for each of the Planned Generators and continuing until such time as such costs for each of the Planned Generators are first reflected in the Company's retail rates.

14. Authorize the recovery, over a two-year period, of any deferred balances referenced in the immediately preceding paragraph, beginning, as to each of the Planned Generators, contemporaneously with the time that the costs of such Planned Generator begins to be recovered from customers through rates;
15. Approve recovery, through the FAC, of the variable expenses incurred under the Long Term Service Agreements applicable to the Planned Generators;
16. Approve the Monitoring Plan in the form presented with the Company's Application as Exhibit LKB-5 to the Direct Testimony of Ms. Beauchamp under which the Company will report to Commission Staff on a quarterly basis the status of the Planned Generators and Mount Olive to Sarepta Transmission Facilities, including schedule, costs, and other critical associated activities;
17. Rule that, with respect to the resources described in the Application, the Company has complied with, or is not in conflict with, the provisions of all applicable LPSC Orders;
18. Find, as provided in the Commission's Special Order No. 7-2000, dated March 22, 2000, that the confidential Direct Testimony, Exhibits, and other materials referenced in the Application shall be exempt from public disclosure pursuant to the Commission's

General Order dated August 31, 1992 and Rule 12.1 of the Rules of Practice and Procedure of the Louisiana Public Service Commission;

19. Direct that the period for interventions and protests be shortened to 10 days;
20. Direct the Administrative Hearings Division to adopt a procedural schedule necessary to facilitate a decision no later than the Commission's September 2025 Business & Executive Session;
21. Direct that notice of all matters in these proceedings be sent to D. Skylar Rosenbloom, Matthew T. Brown, and Michael R. Dodson as counsel of record for the Company, and to Lawrence J. Hand, Jr., and Ryan Jones, as representatives of the Company; and
22. Order such other general and equitable relief as to which the Company may show itself so entitled.

Respectfully submitted,

By: 

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