

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

***IN RE:* APPLICATION OF ENTERGY)
LOUISIANA, LLC FOR RECOVERY)
IN RATES OF COSTS RELATED TO)
HURRICANES LAURA, DELTA,)
ZETA, AND WINTER STORM URI)
AND FOR RELATED RELIEF)**

DOCKET NO. U-_____

DIRECT TESTIMONY

OF

SARAH M. HARCUS

ON BEHALF OF

ENTERGY LOUISIANA, LLC

APRIL 2021

TABLE OF CONTENTS

	Page
I. INTRODUCTION AND QUALIFICATIONS	1
II. STORM COSTS	4
A. AMOUNT OF STORM COSTS.....	4
B. ACCOUNTING FOR STORM COSTS	12
1. PROJECT CODES AND SCOPE STATEMENTS.....	12
2. ACCOUNTING APPROVALS	16
III. STORM ESCROW ACCOUNTS AND RESERVES	27
IV. CARRYING COSTS	29
V. PROPOSED FINANCING PROCEDURES	31
VI. ALLOCATION OF STORM COSTS	36
VII. CONCLUSION.....	36

EXHIBIT LIST

Exhibit SMH-1	Summary of Total Company Costs by Class and Major Resource Category for Hurricanes Laura, Delta, and Zeta
Exhibit SMH-2	Summary of Total Company Costs by Class and Major Resource Category for Winter Storm Uri
Exhibit SMH-3	Hurricanes Laura, Delta, and Zeta and Winter Storm Uri Project Codes
Exhibit SMH-4	Electronic Index of Hurricanes Laura, Delta, and Zeta and Winter Storm Uri Transactions (Highly Sensitive Protected Materials) (CD only)
Exhibit SMH-5	Calculation of Carrying Costs for Hurricanes Laura, Delta, and Zeta
Exhibit SMH-6	Calculation of Carrying Costs for Winter Storm Uri

1 I. **INTRODUCTION AND QUALIFICATIONS**

2 Q1. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.

3 A. My name is Sarah M. Harcus. I am employed by Entergy Services, LLC (“ESL”)¹ as
4 the Finance Director for Entergy Louisiana, LLC (“ELL” or the “Company”). My
5 business address is 4809 Jefferson Highway, Jefferson, Louisiana 70121.

6

7 Q2. WHAT ARE YOUR PRINCIPAL RESPONSIBILITIES FOR THE COMPANY AS
8 JURISDICTIONAL FINANCE DIRECTOR?

9 A. As ELL’s Finance Director, I am responsible for financial management, planning,
10 monitoring, and reporting, as well as providing regulatory support to the Company.

11

12 Q3. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

13 A. I am testifying before the Louisiana Public Service Commission (the “Commission” or
14 “LPSC”) on behalf of ELL.

15

16 Q4. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND, PROFESSIONAL
17 QUALIFICATIONS, AND EXPERIENCE.

18 A. In 2010, I earned a Bachelor of Science degree in Accounting and Spanish from
19 Washington and Lee University in Lexington, Virginia. That same year, I began
20 working for KMPG in its Audit Division as an external auditor of publicly-traded

¹ ESL (formerly Entergy Services, Inc.) is a service company to the five Entergy Operating Companies (“EOCs”), which are Entergy Arkansas, LLC; Entergy Louisiana, LLC; Entergy Mississippi, LLC; Entergy New Orleans, LLC; and Entergy Texas, Inc.

1 companies. In 2014, I left that position to join to ESL's Regulatory Services –
2 Regulatory Filings organization. In 2016, I began working in ESL's Finance Business
3 Partners – Utility Finance and Strategy group, where I provided regulatory support for
4 various matters. In mid-2020, I accepted my current position as the Finance Director
5 for ELL.

6

7 Q5. HAVE YOU EVER TESTIFIED BEFORE THE COMMISSION?

8 A. Yes. I have previously offered Direct Testimony in LPSC Docket No. U-35762, *In re:*
9 *Application of Entergy Louisiana, LLC for Approval of Ratemaking Adjustment for*
10 *Interim Hurricane Laura Financing, and Request for Expedited Treatment.*

11

12 Q6. PLEASE SUMMARIZE THE RELIEF THAT ELL IS SEEKING IN ITS
13 APPLICATION.

14 A. The purpose of this proceeding is to obtain timely recovery of the costs incurred in
15 connection with ELL's efforts to rebuild its electric infrastructure and to restore power
16 to customers resulting from the damage caused by Hurricanes Laura, Delta, and Zeta,
17 as well as those costs incurred in connection with ELL's efforts to restore power to
18 customers resulting from the damage caused by Winter Storm Uri. In this initial phase
19 of the proceeding, ELL is requesting that the Commission issue an order: (1)
20 determining that the total amount of storm costs incurred by the Company was
21 reasonable and necessary and is eligible for recovery from customers; (2) approving
22 the Company's request for the reestablishment of appropriate storm escrow reserves;
23 (3) authorizing the Company to recover carrying costs on the approved storm costs;

1 and; (4) determining the manner in which the storm costs will be allocated among
2 customer rate classes.

3 Concurrent with this initial phase, the Company is preparing supplemental
4 applications in which the Company will request that the storm costs and the
5 replenishment of storm reserves approved in Phase I be financed pursuant through the
6 Louisiana Electric Utility Storm Recovery Securitization Act (“Act 64”), La. R.S.
7 45:1226-1236 or any other viable financing method that is cost effective for customers
8 and approval of an ancillary order. It is ELL’s intention to file the supplemental
9 applications in sufficient time to facilitate approval of an appropriate financing order
10 and ancillary order for the Company no later than the Commission’s December 2021
11 Business and Executive Session. If Commission approvals are obtained in December
12 2021, permanent financing would occur and rate recovery from customers would
13 commence in the first half of 2022.

14
15 Q7. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

16 A. My testimony supports ELL’s request for approval and recovery of costs related to
17 restoration efforts following Hurricanes Laura, Delta, and Zeta and Winter Storm Uri,
18 the funding of the storm reserve escrow, and the financing of these amounts. My
19 testimony addresses:

- 20 • The costs incurred by ELL in connection with Hurricanes Laura, Delta, and Zeta
21 and Winter Storm Uri and the current state of the Company’s storm reserves;
- 22 • ELL’s accounting and auditing procedures for costs related to Hurricanes Laura,
23 Delta, and Zeta as well as Winter Storm Uri;

1

Table 1: Hurricanes Laura, Delta, and Zeta Costs

Storm	Costs Incurred Through February 28, 2021	Estimated Costs to be Incurred After February 28, 2021	Total Gross Storm Costs
Hurricane Laura	\$1,588,225,931	\$7,505,802	\$1,595,731,733
Hurricane Delta	\$212,725,100	\$2,508,887	\$215,233,987
Hurricane Zeta	\$175,301,561	\$1,357,996	\$176,659,557
Total	\$1,976,252,592	\$11,372,685	\$1,987,625,277

2

3 Q9. WHAT ARE THE TOTAL AMOUNTS OF STORM COSTS RELATED TO
 4 WINTER STORM URI THAT THE COMPANY IS ASKING THE COMMISSION
 5 TO APPROVE IN THIS DOCKET?

6 A. As shown on Exhibit SMH-2, ELL incurred \$23.30 million of system restoration costs
 7 associated with Winter Storm Uri through February 28, 2021. ELL estimates that it
 8 will incur storm costs of \$36.70 million related to projects not completed and/or costs
 9 not accrued as of February 28, 2021. Thus, system restoration costs through February
 10 28, 2021; plus estimated costs after February 28, 2021 (“Total Gross Winter Storm
 11 Costs”) for ELL total \$60.00 million. As detailed on Exhibit SMH-2, these system
 12 restoration costs are as follows:

13

Table 2: Winter Storm Uri Costs

	Costs Incurred Through February 28, 2021	Estimated Costs to be Incurred After February 28, 2021	Total Gross Winter Storm Costs
Winter Storm Costs	\$23,297,265	\$36,702,735	\$60,000,000

1 Q10: WHY HAS ELL INCLUDED ESTIMATED COSTS FROM HURRICANES
2 LAURA, DELTA, AND ZETA AND WINTER STORM URI IN ITS TOTAL
3 REQUESTED AMOUNTS?

4 A. ELL has included estimated costs in its total requested amounts primarily because there
5 are specific projects that have not been completed as of February 28, 2021 that are
6 necessary to repair or replace facilities damaged by Hurricanes Laura, Delta, and Zeta.
7 ELL has also included estimated costs in its total requested amounts because there are
8 specific projects that have not been completed as of February 28, 2021 that are
9 necessary to repair or replace facilities damaged by the Winter Storm and certain
10 expenses that were incurred but not accrued as of February 28, 2021. The estimated
11 costs reflected in Exhibits SMH-1 and SMH-2 do not include the potential cost to repair
12 a 31 mile 115 kilovolt transmission line that was damaged during Hurricane Zeta; ELL
13 is still evaluating potential alternatives to a repair and rebuild of this line to identify the
14 lowest reasonable cost alternative considering risk and reliability.

15
16 Q11: WHY HAS ELL SOUGHT RECOVERY OF AMOUNTS RELATED TO WINTER
17 STORM URI IN THIS PROCEEDING?

18 A. ELL is seeking recovery of storm costs associated with Winter Storm Uri in this
19 proceeding in an effort to lower the costs associated with recovery of the Winter Storm
20 Uri storm costs from customers. Given the relatively small Total Gross Winter Storm
21 Costs expected from the Company's response to Winter Storm Uri, it is not
22 economically feasible to separately securitize these costs. By including the Winter
23 Storm Uri costs in these proceedings, ELL seeks to securitize these amounts at a

1 significantly lower interest rate which would dramatically lower the incremental costs
2 to our customers. ELL currently estimates that securitizing the Winter Storm Uri costs
3 at the same time the Hurricanes Laura, Delta, and Zeta costs are securitized will result
4 in incremental savings to customers in excess of \$15.0 million.

5
6 Q12. WHAT FUNCTIONAL CLASSES OF COSTS ARE INCLUDED IN THE TOTAL
7 COST AMOUNTS?

8 A. ELL's storm costs are broken down into the following three major cost classes: (1)
9 Generation, (2) Transmission, and (3) Distribution. In addition, the costs shown on
10 Exhibits SMH-1 and SMH-2 are also separated between those costs incurred as of
11 February 28, 2021, and the costs that are estimated to be incurred after that date.

12
13 Q13. WHAT CATEGORIES OF COSTS ARE INCLUDED WITHIN THE THREE
14 MAJOR CLASSES OF COSTS?

15 A. Within each of the three functional classes of costs, direct costs are further assigned to
16 one of five major cost categories, as shown in Exhibits SMH-1 and SMH-2:

- 17 • The Employee Expenses cost category includes the cost of providing lodging,
18 meals, and other logistical items necessary to the internal restoration work
19 force. This category also includes travel expenses, such as mileage, and other
20 reimbursable expenses incurred by the Company's employees.
- 21 • The Contract Work cost category includes the cost of third-party contractors
22 and workers supplied by other utility companies to assist in the restoration
23 effort.

- 1 • The Labor cost category includes the total labor costs (including employee
2 payroll, benefits, and taxes) incurred on behalf of and charged to the Company
3 by personnel from ELL and other EOCs.
- 4 • The Materials cost category includes the cost of parts and materials used in the
5 restoration effort.
- 6 • Finally, the Other cost category includes additional costs not specifically
7 categorized elsewhere, such as capital suspense, and telecommunications.

8 Affiliate costs are assigned one of two major cost categories – ESL Billings or Loaned
9 Resources. The Loaned Resources category includes the total labor costs incurred on
10 behalf of and charged to the Company by personnel from other Entergy Corporation
11 affiliates. The two remaining cost categories are Mutual Assistance and Adjustments.
12 Mutual Assistance costs includes costs from Entergy’s mutual assistance partners.
13 Finally, the Adjustments category include adjustments to the storm costs, including
14 removal of items for which the Company has not sought recovery. The descriptions
15 above are intended to be illustrative only and the listed examples within each category
16 are not all-inclusive.

17

18 Q14. HOW WILL ANY STORM COSTS THAT ARE NOT YET ACCRUED OR
19 ESTIMATED BE ACCOUNTED FOR?

20 A. Those amounts will be properly recorded on ELL’s books and records as capital or
21 operation and maintenance (“O&M) expense when they are paid or accrued.

1 Q15. DOES ELL ANTICIPATE THAT ITS RECOVERABLE STORM COSTS WILL BE
2 APPROPRIATELY ADJUSTED FOR INCREASES OR DECREASES IN THOSE
3 COSTS THAT ARISE OR BECOME KNOWN AFTER THIS FILING? .

4 A. Yes. It is anticipated that recoverable storm costs will be adjusted (or tried-up) to
5 reflect increases or decreases in storm costs arising after this initial filing, such as
6 receipt of storm cost invoices after the filing that were not included in the Total Gross
7 Storm Costs or Total Gross Winter Storm Costs, differences between estimated costs
8 and actual costs, and any storm-related invoice discounts or rebates received after the
9 filing.

10

11 Q16. HAS ELL REDUCED ITS REQUESTED RECOVERY TO ACCOUNT FOR
12 ESTIMATED INSURANCE PROCEEDS OR FEDERAL OR STATE RELIEF
13 GRANTS?

14 A. No. ELL has not received any insurance proceeds to date, and it is not expected at this
15 time that any insurance proceeds will be received. As discussed in prior storm cost
16 proceedings, insurance has not been reasonably available for damages to transmission
17 and distribution lines, which as reflected on Exhibit SMH-1 represent the vast majority
18 of damages from Hurricanes Laura, Delta, and Zeta. With respect to insurance
19 coverage for other property for which coverage was reasonably available, the damages
20 to generation facilities and company buildings did not exceed the applicable self-
21 insured retention. Additionally, ELL has not received any relief grants or funds from
22 any federal or state governmental bodies nor do they expect to receive any. However,

1 ELL would propose a true-up mechanism to handle any future amounts received, were
2 there to be any.

3

4 Q17. HAS ELL REDUCED ITS REQUESTED RECOVERY TO ACCOUNT FOR
5 DISBURSEMENTS FROM THE STORM RESERVE ESCROW ACCOUNTS IN
6 CONNECTION WITH HURRICANES LAURA, DELTA, AND ZETA?

7 A. Yes, the amounts withdrawn from the storm escrow were applied to the storm costs,
8 but as discussed below, ELL is also seeking to replenish the escrow the level that was
9 approved following Hurricane Isaac - \$290 million.

10

11 Q18. ARE THE TOTAL SYSTEM RESTORATION COST AMOUNTS SHOWN ABOVE
12 RECORDED IN THE COMPANY'S ACCOUNTING BOOKS AND RECORDS?

13 A. Yes, except for the Adjustments identified on Exhibits SMH-1 and SMH-2 and
14 estimated costs included in this filing, as I have discussed above.

15

16 Q19. HOW MUCH OF ELL'S TOTAL COMPANY GROSS STORM COSTS RELATING
17 TO HURRICANES LAURA, DELTA, AND ZETA HAVE BEEN OR WILL BE
18 CAPITALIZED, AND HOW MUCH HAVE BEEN OR WILL BE CHARGED TO
19 O&M EXPENSE AND DEFERRED TO ACCOUNT 228100?

20 A. Exhibit SMH-1 shows that of ELL's Total Gross Storm Costs of \$1.988 billion,
21 approximately \$1.689 billion are or will be capital costs and \$298.8 million are or will
22 be costs charged to O&M expense and deferred to account 228100. As detailed on
23 Exhibit SMH-1, these storm costs are attributable to each storm as follows:

1

Table 3

Storm	Capital Costs	O&M Costs	Total Gross Storm Costs
Hurricane Laura	\$1,360,881,019	\$234,850,714	\$1,595,731,733
Hurricane Delta	\$185,295,415	\$29,938,572	\$215,233,987
Hurricane Zeta	\$142,681,937	\$33,977,620	\$176,659,557
Total	\$1,688,858,371	\$298,766,906	\$1,987,625,277

2

3 Q20. HOW MUCH OF ELL'S TOTAL COMPANY GROSS WINTER STORM COSTS
 4 RELATING TO WINTER STORM URI HAVE BEEN OR WILL BE
 5 CAPITALIZED, AND HOW MUCH HAVE BEEN OR WILL BE CHARGED TO
 6 O&M EXPENSE AND DEFERRED TO ACCOUNT 228100?

7 A. Exhibit SMH-2 shows that of ELL's Winter Storm Costs of \$60 million, approximately
 8 \$46.62 million are or will be capital costs and \$13.38 million are or will be costs
 9 charged to O&M expense and deferred to account 228100. As detailed on Exhibit
 10 SMH-2, these system restoration costs are as follows:

11

Table 4

	Capital Costs	O&M Costs	Total Gross Winter Storm Costs
Winter Storm Uri	\$46,620,000	\$13,380,000	\$60,000,000

12

13 Q21. PLEASE ELABORATE ON THE COSTS INCLUDED IN THE AMOUNTS THAT
 14 ARE CAPITALIZED.

1 A. Capitalized costs include both direct costs (*e.g.*, materials, internal labor, and contract
2 labor) and certain allocated costs called capital suspense.

3 Capital suspense represents labor costs for support personnel who are not
4 included in the direct labor costs associated with capital project work, but who provide
5 support for multiple capital projects. Capital suspense is distributed across multiple
6 capital projects using a rate that distributes these costs proportionally.

7

8 **B. Accounting for Storm costs**

9 **1. Project Codes and Scope Statements**

10 Q22. HOW DID ELL COMPILE AND RECORD THE STORM COSTS ADDRESSED IN
11 THIS DOCKET?

12 A. Consistent with ELL's accounting practices, the storm costs for Hurricanes Laura,
13 Delta, and Zeta and Winter Storm Uri were compiled and recorded on ELL's books
14 and records through the use of specific project codes that have been grouped into the
15 three function-related classes of costs that I discussed previously: Generation,
16 Transmission, and Distribution. The storm costs clearly identified with work on
17 Generation, Transmission, or Distribution were recorded to those classes, as
18 appropriate, using function-specific project codes. Costs that were not specifically
19 identified with those three classes, such as overall organization, common facilities, and
20 information technology costs, were classified as Distribution.

1 Q23. WHAT ARE PROJECT CODES?

2 A. A project code is an alphanumeric code used to capture related costs for a particular
3 task or service. Project codes are used by each EOC to accumulate costs. In addition,
4 project codes are used by ESL to accumulate costs to be billed directly or allocated to
5 affiliated companies.

6
7 Q24. HOW IS A PROJECT CODE ESTABLISHED?

8 A. Project codes are established in the Company's accounting systems when management
9 determines there is a need to be able to identify and aggregate costs for a specific
10 project, which may include an aggregation of expenses for a particular purpose or for
11 the creation of a new capital asset. Setting up a project code requires a substantial
12 amount of information. Additionally, the completion of the project code setup process
13 requires multiple approvals, including those from accounting and management, to
14 ensure that the project code attributes are appropriate.

15
16 Q25. WHAT INFORMATION IS REQUIRED IN ORDER FOR A NEW PROJECT CODE
17 TO BE ESTABLISHED?

18 A. The answer depends on the circumstances under which the project code is established.
19 When a project code that will be used by ESL employees is established, a "scope
20 statement" is developed for that project code. The scope statement sets out, in narrative
21 form, a description of the project and the type of work that will be performed under
22 that project code. The project code scope statement typically describes the overall

1 purpose, the primary activities to be performed, the products or deliverables expected,
2 and a justification of the billing method selected.

3 When project codes that will be used by non-ESL employees are established, a
4 project description is required. The project description may not be as detailed as a
5 scope statement because, in a project that will be used by non-ESL employees, the work
6 typically is performed for a single EOC and, as such, all of the work will be recorded
7 on the books solely of that EOC, rather than being billed to another EOC or allocated
8 among multiple EOCs.

9 Other key information required to establish a project code includes the physical
10 location of the project and the department responsible for the project for which the costs
11 will be incurred. For a capital project, information regarding the following is also
12 required: removal, salvage, additions, project manager, and estimated in-service date.

13

14 Q26. WHAT ARE THE PROJECT CODES THAT CAPTURE ELL'S STORM COSTS
15 FOR HURRICANES LAURA, DELTA, AND ZETA AND WINTER STORM URI?

16 A. The list of project codes applicable to ELL's storm costs for Hurricanes Laura, Delta,
17 and Zeta and Winter Storm Uri and their brief descriptions can be found in Exhibit
18 SMH-3.

1 Q27. HOW DID PERSONNEL KNOW TO WHICH PROJECT CODE THEY SHOULD
2 BILL THEIR TIME AND EXPENSES RELATED TO HURRICANES LAURA,
3 DELTA, AND ZETA AND WINTER STORM URI RESTORATION?

4 A. Immediately following each of Hurricanes Laura, Delta, and Zeta and Winter Storm
5 Uri, Entergy-wide communications were distributed to inform employees of the project
6 codes to be used for system restoration efforts. Those communications included both
7 hard copy and electronic distribution of guidelines and project codes to Entergy
8 employees. The guidelines directed employees to consider whether they were
9 performing non-storm-related tasks, were performing tasks and incurring expenses
10 related to system restoration or were unable to work due to the storm. The
11 communications program also included a list of project codes for each function and
12 business unit. Employee time and expense reports are required to be approved by
13 supervisors or managers. This approval process serves as a key control to ensure that
14 time and expenses are charged to appropriate project codes.

15

16 Q28. WERE ANY OF THE SYSTEM RESTORATION-RELATED PROJECT CODES
17 USED TO RECORD COSTS RELATED TO ANY NON-STORM RESTORATION
18 COSTS?

19 A. As a result of the Company's internal control processes, there should be no non-storm
20 costs included. However, to verify this, the Company engaged Deloitte and Touché,
21 LLP ("D&T" or "Deloitte") to perform an attestation examination of the costs included

1 in the project codes for Hurricanes Laura, Delta, and Zeta, as discussed later in my
2 testimony.³

3

4 Q29. WAS THIS SAME PROCESS UTILIZED WITH RESPECT TO THE WINTER
5 STORM COSTS?

6 A. Yes, in part. ELL relied upon its internal control processes to ensure that no non-storm
7 costs have been included within the Total Gross Winter Storm Costs. However, due to
8 various factors, such as the timing of this filing, the Company did not include the
9 project codes for Winter Storm Uri in D&T's initial attestation engagement. The
10 Company intends to engage D&T to perform an attestation examination of these costs
11 prior to completion of the true-up.

12

13 **2. Accounting Approvals**

14 Q30. PLEASE DESCRIBE THE INTERNAL CONTROLS PROCESS USED BY THE
15 COMPANY TO ENSURE PROPER ACCOUNTING FOR COSTS FOR
16 HURRICANES LAURA, DELTA, AND ZETA AND WINTER STORM URI.

17 A. Entergy Corporation, ELL, and ESL maintain a strong system of internal controls,
18 including the approvals for costs incurred before payments are made to suppliers or
19 when employees record their time and expenses. The system of internal controls is in
20 effect for all Entergy Corporation affiliates, including ELL and ESL. Because of the

³ Mutual assistance costs associated with Hurricanes Laura, Delta, and Zeta were not included within the attestation examination conducted by D&T. These costs were excluded from Deloitte's examination because there was only a limited number of invoices submitted by ELL's mutual assistance partners. ELL intends to have D&T conduct an examination on these costs in conjunction with its upcoming review of Winter Storm Uri costs.

1 emergency nature and magnitude of the system restoration efforts and the number of
2 employees and outside parties involved, additional review processes were implemented
3 by the Contract Invoice Processing Team ("CIPT") to supplement existing procedures
4 to ensure the proper accounting of the hurricane storm costs. Teams were established,
5 and they followed specific procedures to review and approve storm-related invoices
6 from contractors and mutual assistance companies. Except for the CIPT process,
7 discussed in further detail below, these same controls are being utilized with respect to
8 Winter Storm Uri costs.

9
10 Q31. REGARDING INTERNAL CONTROLS, WAS IT POSSIBLE OR NECESSARY TO
11 APPROVE EVERY EXPENSE AND HOUR WORKED AHEAD OF TIME?

12 A. No. Because of the need to restore infrastructure and resume power service as quickly
13 as possible, there are instances in which time spent or costs incurred were not approved
14 ahead of time. Given the health and safety issues involved with power system
15 restoration, both for our own employees and contractors and for the public, it is
16 important that we act quickly and with flexibility, while also working as safely as
17 possible. This means that, in some instances, specific work and expenses may have
18 proceeded on the spot based on decisions by field supervisory personnel without prior
19 management authorization. As discussed below, no invoice was paid in full until it was
20 reviewed by auditors in light of the applicable contract and supporting documentation,
21 especially time sheets that were approved by Entergy operations personnel.

1 Q32. DESCRIBE THE PROCEDURES USED BY THE COMPANY TO ENSURE THAT
2 COSTS BILLED BY CONTRACTORS WERE ACCURATE AND WERE
3 RECORDED PROPERLY IN THE COMPANY'S FINANCIAL RECORDS.

4 A. Each invoice that the Company received from a third-party contractor was audited
5 under the supervision of the Entergy internal audit department or finance department
6 prior to payment in full. Invoice processing teams were established to process the
7 following types of storm-related invoices: (1) transmission and distribution line and
8 vegetation; (2) facilities; (3) fossil; (4) nuclear; and, (5) logistics.⁴

9 Each of these teams accomplished the following tasks with respect to the
10 invoices they processed: (1) obtained confirmation from operations personnel of receipt
11 of the services being billed on the invoice, (2) traced the rates being billed on the
12 invoice to the appropriate contract, if applicable, or confirming the reasonableness of
13 rates with operations for the limited instances in which ELL utilized non-contract-based
14 services, (3) recalculated the amount of the invoice, and, (4) addressed disputes prior
15 to payment. The appropriate accounting codes were assigned to each invoice, based
16 on the information supplied by operations as to the location and scope of the work
17 performed. In particular, costs were either assigned to an expense project code or a
18 capital project code for the appropriate EOC and the relevant storm. For costs

⁴ The Company refers to storm preparation and restoration support costs as "logistics" costs. Logistics costs include those costs necessary to support restoration crews as they prepare for and then work on system restoration following a weather event. Logistics activities include among other things: (1) setting up and manning staging sites; (2) feeding, housing, and providing hygiene facilities for restoration crews; and, (3) providing incremental transportation-related support needed due to storm restoration conditions, such as access to fuel, tire repair, etc. For the storms covered in this filing, ELL had to adjust its logistics support plan to account for COVID-19 in order to keep the restoration force healthy and available to perform restoration work. To account for their use by class, logistics costs were functionalized to the Distribution and Transmission classes based on the number of personnel utilized to restore power at the peaks of the restoration effort for the two functions.

1 associated with Hurricanes Laura, Delta, and Zeta, the CIPT was responsible for
2 processing all invoices for transmission and distribution line and vegetation contract
3 crew services. These services represented a substantial majority of the contractor
4 invoices processed for Hurricanes Laura, Delta, and Zeta in terms of the number and
5 dollar value of invoices processed.

6
7 Q33. PLEASE EXPLAIN THE INTERNAL AUDIT CONTROLS FOR THIRD-PARTY
8 CONTRACT LINE AND VEGETATION SERVICES IN MORE DETAIL.

9 A. The Company's procedures for processing invoices for Hurricanes Laura, Delta, and
10 Zeta were based upon the control procedures that were developed to process invoices
11 for the restoration costs following Hurricanes Katrina, Rita, Gustav, Ike, and Isaac.
12 These procedures were refined to facilitate improved efficiencies and timeliness of
13 audit information, while maintaining a high degree of accuracy, to enable ESL to audit
14 each invoice prior to its payment in full. Because this process was designed to identify
15 billing discrepancies for a given invoice prior to the release of funds for payment in
16 full of that invoice, ESL on behalf of ELL maintained maximum negotiating leverage
17 to settle accounts with vendors when it was determined that charges were not in accord
18 with the documentation of work performed and/or the applicable contract.

19 This traditional approach to auditing utilized a two-phase process that included
20 an initial audit review and a second audit review, both of which were performed by
21 professional auditors. In the first review, the auditors performed the following steps:
22 (1) recalculated all of the basic arithmetic on the face of the invoice; (2) tested a
23 minimum of 20% of the line items of each invoice by tracing the calculations back to

1 the applicable contract and supporting documentation, especially the time sheets that
2 were approved by Entergy operations personnel; and, (3) assessed the overall
3 reasonableness of the invoice in light of all of the available information. The second
4 review included the following steps: (1) a sample of yet more invoice line items, at
5 least an additional 20% of invoice charges, that were traced back to the contract and
6 supporting documentation, (2) an assessment of the accuracy of the first auditor's work,
7 and, (3) a second assessment of the overall reasonableness of the invoice. If a
8 significant billing discrepancy was discovered in either the first or second audit review,
9 all line items of the invoice were recalculated, traced back to supporting
10 documentation, and compared to the applicable contract terms. All discrepancies were
11 then itemized and quantified and, if material, brought to the vendor's attention for
12 resolution. A material discrepancy is defined as all billing discrepancies that exceeded
13 the lesser of \$3,000 or 20% of the original amount of the invoice.

14 Due to the significant damage in ELL's service territory in a short nine weeks,
15 ELL's third-party vendors have each submitted as many as hundreds of storm
16 restoration-related invoices, including one vendor with more than 1,100 separate
17 invoices. In order to strike the proper balance between accuracy and efficiency, ELL
18 instituted a statistically-driven streamlined review process for select third-party
19 vendors who have submitted more than fifty invoices.⁵ For each eligible contractor,
20 the traditional review process outline above was followed until the number of reviewed

⁵ Contractors who had not worked with Entergy prior to 2020 or those contractors which had not demonstrated consistently accurate invoice practices in prior years were also excluded from this streamlined approach.

1 invoices without a material finding reached the statistical basis that provided a 95%
2 assurance rate, meaning that there is a 95% probability that all invoices from the
3 contract would have the same characteristics (*i.e.*, no material findings) as those
4 previously reviewed under the traditional process. Provided these parameters were
5 met, the remaining invoices for a contractor would be reviewed pursuant to a
6 streamlined process. Under this streamlined process, one in five, rather than all, of the
7 contractor's remaining invoices would be reviewed utilizing the traditional approach.
8 Should a material finding be discovered during the streamlined review, the contractor
9 would no longer be eligible for the streamlined process and all remaining invoices
10 would be subject to the traditional review process. Further, an evaluation of any
11 material finding was performed to determine whether the finding was a one-time event,
12 such as a transposition or typographical error, or a systematic error that may have
13 occurred on other invoices, such as the application of incorrect rates to the invoice. If
14 a material finding was determined to be a systematic error, all invoices from that
15 contractor were subjected to the full traditional review process, not just the remaining
16 invoices. Only 21 third-party contractors qualified for the streamlined review process.
17 Of these 21 contractors, a material finding was identified for 8 contractors during the
18 streamlined review process. None of these material findings were considered to be the
19 result of a systemic error.

20 The implementation of this streamlined review process is estimated to have
21 allowed invoice processing to occur three to four months faster than had the Company
22 simply utilized the traditional approach for all invoices. Furthermore, it is estimated
23 that the streamline review process avoided approximately \$1.28 million in incremental

1 invoice processing costs. Both the time and costs savings expected from the
2 streamlined audit approach are anticipated to result in lower costs and risk for the
3 Company and its customers.

4 Because no invoices were paid in full until completion of the audit process and
5 prior to dispute resolution for any given invoice, ELL was generally able to settle most
6 disputes in a reasonable and timely manner. Difficult cases were sent to a special
7 dispute resolution team. When the audit revealed a material discrepancy in the
8 vendor's favor, the auditors informed the vendor and adjusted the invoice accordingly.
9 ELL believes that this is the proper approach and also lowers costs in the long run by
10 developing goodwill with the vendors, which generally enables the Company to
11 amicably settle other disputes that are in its favor without incurring legal fees.
12 Additionally, ELL believes that it is important, whenever possible, to maintain good
13 relations with vendors because sooner or later the Company will need to call upon most
14 of them again to assist with emergency storm restoration or normal base-load work. In
15 fact, in 2020, ELL called on many of the same vendors to respond to all three hurricane
16 events. ELL believes that the third-party contractor invoice payment process is a
17 prudent and effective way of processing the Company's storm invoices to minimize the
18 cost of storm restoration for customers for this storm and over the long run.

19
20 Q34. WAS THE CIPT USED FOR THE COSTS ASSOCIATED WITH WINTER STORM
21 URI AS WELL?

22 A. Not at this time and it is not likely that the CIPT will be used for Winter Storm Uri as
23 those costs were largely internal costs with few third-party contractor costs. Given the

1 limited volume of third-party costs associated with the Company's response to Winter
2 Storm Uri and the fact that all other internal controls are being applied to Winter Storm
3 Uri costs, the Company determined that sufficient controls were in place to
4 appropriately monitor these costs and it was not necessary to engage the CIPT for
5 Winter Storm Uri storm costs. In the event D&T's forthcoming review of Winter Storm
6 Uri costs results in any adverse findings, the Company may consider additional internal
7 review protocols.

8
9 Q35. DID THE OTHER INVOICE PROCESSING TEAMS OBTAIN THE SAME LEVEL
10 OF ASSURANCE AS DID THE TEAM PROCESSING THE INVOICES FOR
11 TRANSMISSION AND DISTRIBUTION LINE AND VEGETATION CONTRACT
12 CREW SERVICES?

13 A. Yes. Each of the other teams confirmed receipt of the services received, verified the
14 reasonableness of rates charged, recalculated the amount of the invoice, and addressed
15 disputes before the invoices were paid, in order to obtain a similar level of assurance
16 as was achieved with respect to the transmission and distribution invoices. These
17 teams, which were comprised of personnel from the operations, supply chain, finance,
18 and internal audit departments, obtained assurance regarding storm-related invoices for
19 facilities, fossil generating facilities, nuclear generating facilities, and logistics using
20 audit procedures that were tailored to the situation underlying the invoices to be
21 processed.

1 Q36. IF A VENDOR DISAGREED WITH ESL'S CONCLUSION THAT THE VENDOR
2 HAD OVERBILLED ELL, WHAT PROCEDURES WERE FOLLOWED TO
3 RESOLVE THE DISPUTE?

4 A. When a material discrepancy was found by a member of one of the invoice processing
5 teams, he or she made a good faith effort to resolve the dispute by obtaining from the
6 vendor an explanation of the variance, additional documentation, and/or acceptance of
7 a reduction in the amount of the invoice. If the auditor was unable to settle the matter
8 with the vendor after an initial good faith effort, payment of the invoice was withheld,
9 and the invoice file was typically forwarded to a special dispute resolution team that
10 would continue to negotiate with the vendor until the dispute was resolved. In difficult
11 cases, ESL's dispute resolution personnel consulted with the Supply Chain and Legal
12 departments, and a small number of invoice files were transferred to the Supply Chain
13 department for ultimate resolution. At the present time, less than 1% of transmission
14 and distribution invoices related to Hurricanes Laura, Delta, and Zeta are still in
15 dispute, and we believe that the disputes for most of these unpaid invoices will be
16 properly settled in an amicable manner in the near future. Any cost changes related to
17 the settlement of outstanding billing disputes will be reflected in a subsequent phase of
18 this proceeding, such as in filings related to securitization, or in subsequent base rate
19 and/or true up proceedings.

1 Q37. DID ELL SEEK AN EXTERNAL REVIEW OF THEIR STORM COSTS FOR
2 HURRICANES LAURA, DELTA, AND ZETA?

3 A. Yes. ELL retained D&T to undertake an independent attestation examination of the
4 Company's summaries of the storm costs for Hurricanes Laura, Delta, and Zeta to
5 determine if the summaries were a complete and accurate presentation of valid storm
6 costs. The mutual assistance costs associated with Hurricanes Laura, Delta, and Zeta
7 were excluded from D&T's engagement scope because the Company determined that
8 it had not received sufficient invoices from external contractors to allow for a
9 meaningful review. Similarly, D&T was not asked to conduct a review of Winter
10 Storm Uri costs because of the limited number of invoices received from external
11 contractors as of the date of this filing. The Company intends to have D&T conduct a
12 review of the mutual assistance costs and Winter Storm Uri costs when possible and
13 will supplement the record with the results of that review. Amy Parker addresses
14 D&T's engagement and its findings in her Direct Testimony.

15
16 Q38. IS ELL MAKING AVAILABLE DATA FOR THE PARTIES TO CONDUCT A
17 REVIEW OF THE STORM COSTS FOR HURRICANES LAURA, DELTA, AND
18 ZETA AND WINTER STORM URI IF THEY SO CHOOSE?

19 A. Yes. ELL will make available documentation supporting the costs for which it is
20 seeking recovery. Because of the huge volume of this information, ELL is not attaching
21 and filing this information as a workpaper. I am, however, attaching as Highly
22 Sensitive Protected Materials Exhibit SMH-4 a detailed electronic database in
23 Microsoft Excel® that contains all transactions relating to the system restorations for

1 Hurricanes Laura, Delta, and Zeta as well as Winter Storm Uri. This database includes
2 information regarding storm costs recorded on the Company's books as of February
3 28, 2021 and reviewed by D&T as well as all adjustments to the recorded storm costs.
4 It does not include information regarding the estimated portion of the Company's
5 requests for recovery because the transactions underlying those estimated costs had not
6 yet occurred or been accrued as of February 28, 2021 or the Company's mutual
7 assistance accrual. However, some information regarding these costs can be found in
8 Exhibits SMH-1 and SMH-2. With this electronic database, a party can sort the data
9 and determine which transactions to audit or review. Although D&T has already
10 conducted an independent attestation of the vast majority of the costs related to
11 Hurricanes Laura, Delta, and Zeta, the data production process that I am suggesting
12 here should allow the parties to undertake their own review of those costs and the
13 Winter Storm Uri costs if they wish. This could work much like a financial audit in
14 which the parties will determine a statistically relevant but discrete level of transactions
15 out of the entire set of transactions that they wish to review and test for accuracy. From
16 this database, the parties can submit their selected transactions list to ELL. To
17 streamline the review process, ELL ask that the parties submit a single joint list for
18 testing. Based on this list, ELL would then pull all documents underlying those
19 selected transactions and make them available to the parties.

1 **III. STORM ESCROW ACCOUNTS AND RESERVES**

2 Q39. WHAT IS THE STATE OF THE COMPANY'S STORM ESCROW ACCOUNTS?

3 A. On August 27, 2020, the date that Hurricane Laura made landfall in Louisiana, ELL
4 had approximately \$250 million in its storm escrow accounts. The amounts had been
5 funded primarily by the LPSC's orders following Hurricane Isaac (Order Nos. U-
6 32764, U-32764-A, U-32764-B, and U-32764-C), which provided the Company with
7 the ability to draw down the restricted storm reserves under specific conditions. On
8 November 17, 2020, the Company notified the LPSC of a drawdown of the restricted
9 reserves in order to provide temporary liquidity until the Company could plan for
10 financing of restoration costs.⁶ Thereafter, ELL withdrew the entire remaining balance
11 of its escrow accounts on November 18, 2020.

12
13 Q40. IS ELL SEEKING TO REPLENISH THE STORM ESCROW ACCOUNTS
14 THROUGH THIS PROCEEDING?

15 A. Yes, ELL is requesting that the Commission authorize storm escrow funding in the
16 amount of \$290 million, which is the level established after Hurricane Isaac for Legacy
17 EGSL⁷ and Legacy ELL. However, escrow amounts approved by the Commission will

⁶ On October 14, 2020, ELL filed its *Application for Approval of Ratemaking Adjustment for Interim Hurricane Laura Financing, and Request for Expedited Treatment* (the "Application"). Through the Application and supplemental filings, ELL sought approval of certain ratemaking treatment for the Company's efforts to finance, on an interim basis, the significant storm costs resulting from Hurricanes Laura, Delta, and Zeta. The Commission approved the requested relief in Order U-35762 (11/23/20) (the "Interim Financing Order"). The Interim Financing Order allowed ELL to issue up to \$1.1 billion of shorter-term debt to finance storm costs, until permanent financing for the costs could occur. These borrowings are to be excluded from the Company's capital structure and cost of debt for ratemaking purposes.

⁷ On October 1, 2015, pursuant to Commission Order No. U-33244-A, Entergy Gulf States Louisiana, L.L.C. ("Legacy EGSL") and Entergy Louisiana, LLC ("Legacy ELL") combined substantially all of their

1 be deposited into a single account for ELL, as opposed to separate accounts for Legacy
2 EGSL and Legacy ELL.

3
4 Q41. WHY IS IT NECESSARY TO MAINTAIN STORM ESCROW FUNDS?

5 A. In Louisiana, hurricanes are a “when” and not “if” proposition. Thus, maintaining
6 storm escrow funds will allow ELL to be better prepared when the next major storm
7 event affects its operations. Storm escrow funds may also allow the Company to
8 mitigate a future rate change when the next major storm event occurs, depending on
9 the magnitude of damages. Furthermore, restoring the escrow funds sends positive
10 signals to credit rating agencies, vendors, and suppliers, which assists ELL in obtaining
11 the funds needed to pay storm costs.

12 As discussed in prior storm cost filings, utility companies are not able to obtain,
13 at a reasonable cost, property insurance for most of their transmission and distribution
14 assets, which typically are the majority of the assets damaged by hurricanes. Because
15 of the lack of reasonable alternatives, a utility company must self-insure or rely on its
16 own reserves to finance storm restoration efforts. Further, the immediate need to
17 restore service following a major storm event places a significant and immediate cash
18 requirement on a utility such as ELL. Thus, having a pre-funded storm escrow balance
19 reduces the effect of an unexpected and immediate cash requirement on the Company’s

respective assets and liabilities into a single operating company, Entergy Louisiana Power, LLC, which subsequently changed its name to Entergy Louisiana, LLC. Upon consummation of the business combination, ELL became the public utility that was subject to LPSC regulation and now stands in the shoes of Legacy EGSL and Legacy ELL in pending LPSC dockets.

1 financial statements and allows vendors and contractors to more confidently do
2 business with ELL following the next major weather event.

3 Maintaining the storm escrow account also amounts to effectively pre-funding
4 the costs of another storm restoration effort. Of course, the Commission would
5 maintain its jurisdiction to review future storm restoration costs for prudence.

6
7 Q42. IS ELL REQUESTING THE FUNDING OF ADDITIONAL STORM ESCROW
8 FUNDS OVER AND ABOVE THE LEVELS PREVIOUSLY AUTHORIZED?

9 A. No, not at this time. The prior escrow level approved by the LPSC coupled with the
10 LPSC's prompt and reasonable approvals for storm cost recovery have enabled ELL to
11 have adequate resources to respond to storms even as large as Hurricanes Laura, Delta,
12 and Zeta.

13
14 **IV. CARRYING COSTS**

15 Q43. IS ELL REQUESTING THAT THE COMMISSION APPROVE RECOVERY OF
16 CARRYING COSTS ASSOCIATED WITH ITS STORM COSTS FOR
17 HURRICANES LAURA, DELTA, AND ZETA AND WINTER STORM URI FOR
18 PURPOSES OF ESTABLISHING THE RECOVERABLE AMOUNT TO BE
19 FINANCED?

20 A. Yes. ELL requests that the Commission approve the carrying costs that it may recover
21 on the storm costs incurred in connection with Hurricanes Laura, Delta, and Zeta and
22 Winter Storm Uri through January 2022.

1 Q44. HOW HAVE YOU DETERMINED THE PROJECTED CARRYING COSTS
2 THROUGH JANUARY 2022 THAT ELL IS SEEKING TO RECOVER IN THIS
3 PROCEEDING?

4 A. ELL seeks recovery of carrying costs on net storm costs at its weighted average pre-
5 tax cost of capital from the date of incurrence through the date of recovery, provided
6 that the carrying costs on the \$1.1 billion of shorter-term debt authorized by the Interim
7 Financing Order would be at the specific interest applicable to that issuance. My
8 calculation of projected carrying charges through January 2022 is set forth in Exhibit
9 SMH-5 for Hurricanes Laura, Delta, and Zeta and Exhibit SMH-6 for Winter Storm
10 Uri. For purposes of this filing, I have calculated projected carrying costs through the
11 end of January 2022, but ELL proposes that this amount be adjusted either upward or
12 downward through the date the costs are recovered through the Company's ultimate
13 financing plan approved by the Commission. As reflected in Exhibits SMH-5 and
14 SMH-6, ELL seeks the recovery of carrying costs through January 2022 in the amount
15 of \$45.4 million for Hurricanes Laura, Delta, and Zeta and \$4.4 million for Winter
16 Storm Uri.

17

18 Q45. DID ELL TAKE ANY STEPS THAT HAD THE EFFECT OF REDUCING THE
19 CARRYING COSTS IT IS SEEKING TO RECOVER?

20 A. Yes. First, ELL drew on the available escrow funds which reduced the amount of storm
21 costs ELL was supporting with utility capital. Second, with appropriate ratemaking
22 relief provided by the Commission in the Interim Financing Order, ELL issued \$1.1
23 billion in shorter-term, low cost bonds to provide temporary financing of the storm

1 costs. Collectively, these efforts provided approximately \$1.35 billion of short-term,
2 low cost financing which significantly reduced the carrying costs on storm
3 expenditures. The ultimate savings to customers will depend on when permanent
4 financing is approved and in place, but assuming permanent financing is in place on
5 February 1, 2022, ELL estimates that issuance of the shorter-term bonds will reduce
6 carrying costs by approximately \$110 million. ELL had not used this approach before,
7 and it was only possible through the LPSC taking timely action on ELL's request to
8 exclude this shorter-term debt from ratemaking. The interest expense on the \$1.1
9 billion in shorter-term debt is included in my carrying cost calculation.

10
11 **V. PROPOSED FINANCING PROCEDURES**

12 Q46. PLEASE DESCRIBE ELL'S PROPOSED PROCEDURE FOR RECOVERING ITS
13 STORM COSTS AND REPLENISHING THE STORM RESERVE ESCROW
14 ACCOUNT.

15 A. The Company proposes to recover the storm costs and replenish storm escrow funds
16 through a two-phase procedure. In this initial filing, ELL is requesting that the
17 Commission (1) approve the amount and recovery of the storm costs requested,
18 including carrying costs, and, (2) approve the appropriate level of storm escrow as
19 requested.

20 In a supplemental application ELL plans to file in mid-2021, ELL expects to
21 request that the Commission issue a Financing Order authorizing the issuance of storm
22 recovery bonds under Act 64 or other Commission approved financing method. ELL
23 will propose to finance the following amounts: (1) \$1.735 billion in net storm costs

1 incurred by ELL in response to Hurricanes Laura, Delta, and Zeta⁸ and \$60.0 million
2 relating to the Company's response to Winter Storm Uri for total net storm costs of
3 \$1.795 billion, (2) \$290 million of storm escrow funds, and (3) \$45.4 million in
4 carrying costs for Hurricanes Laura, Delta, and Zeta storm restoration costs and an
5 estimated \$4.4 million for Winter Storm restoration costs for a total of \$49.8 million in
6 carrying costs. In total, the Company is seeking to finance \$2.135 billion in storm
7 restoration and related costs. In connection with the proposed Financing Order, the
8 Company will also request that the Commission (1) set a procedural schedule that
9 would allow for consideration of the Company's requests, including approval of the
10 Financing Order, at the Commission's December 2021 Business and Executive
11 Session, and, (2) issue orders approving proposed tariffs to implement ancillary
12 adjustments relating to the system restoration process.

13

14 Q47. HAS THE COMPANY CONSIDERED OTHER METHODS OF RECOVERING ITS
15 STORM COSTS?

16 A. Yes. The Company has considered all three of the currently available methods of
17 recovering its storm costs, which include: (1) traditional base rate recovery of capital
18 expenditures and ten-year levelized recovery of O&M costs; (2) securitization of the
19 entire amount of Commission-approved storm restoration costs through Act 64; and,
20 (3) financing of the entire amount of Commission-approved storm costs through
21 Louisiana Restoration Corporation Act ("Act 55"), La. R.S. 45:1311-1328. In all three

⁸ The \$1.735 billion in net storm costs for Hurricanes Laura, Delta, and Zeta represents the \$1.988 billion in Total Gross Storm Costs presented above less the \$253 million in escrow funds already applied to those costs.

1 scenarios, the Company also considered reestablishing storm escrow. In addition to
2 these methods, and as discussed further below, the Company is also pursuing new
3 legislation in the Spring 2021 session of the Louisiana Legislature that would create
4 additional storm cost financing alternatives that could be beneficial for ELL and its
5 customers.

6
7 Q48. PLEASE EXPLAIN THE BASE-RATE METHOD OF RECOVERY.

8 A. The base-rate method of recovery is based on traditional methods of utility cost
9 recovery. Under traditional recovery, the Company would propose to recover
10 Hurricanes Laura, Delta, and Zeta and Winter Storm Uri capital expenditures through
11 any formula rate plan (“FRP”) that may be in effect, but over the normal life of the
12 assets, *i.e.*, currently approximately 30 years for ELL. Hurricanes Laura, Delta, and
13 Zeta and Winter Storm Uri O&M expenses would be recovered through a regulatory
14 asset with ten-year fixed recovery through any FRP that may be in effect. The capital
15 investment would require a return at the Company’s weighted average cost of capital.

16
17 Q49. PLEASE EXPLAIN THE CONCEPT OF SECURITIZATION OF UTILITY STORM
18 RESTORATION COSTS.

19 A. Securitization is a relatively low-cost means for utility customers to pay storm
20 restoration costs because it permits those costs to be financed with generally lower-cost
21 capital. This financing is accomplished by the sale or assignment of “tariff
22 monetization” or securitization bonds that have special legal protections for the benefit
23 of the bondholders, including rights to the collection of charges from the utility’s

1 customers. These rights are provided for in a financing order issued by the utility's
2 retail regulator.

3

4 Q50. WHAT IS THE STATUTORY BASIS IN LOUISIANA FOR SECURITIZATION OF
5 STORM RECOVERY COSTS OR FINANCING UTILITY SYSTEM
6 RESTORATION COSTS?

7 A. Act 64 authorizes the securitization of utility storm recovery costs and Act 55
8 authorizes the financing of utility system restoration cost.

9

10 Q51. WHAT IS THE DIFFERENCE BETWEEN SECURITIZATION UNDER ACT 64
11 AND FINANCINGS UNDER ACT 55?

12 A. The primary difference between the two financing methods is that, under Act 64,
13 certain "storm recovery property" is first created in the utility and then transferred by
14 the utility to an affiliated special purpose entity ("SPE") in exchange for the net
15 proceeds of the storm recovery bonds that are issued by the SPE. Under Act 55, the
16 "system restoration property" is created in the Louisiana Utilities Restoration
17 Corporation ("LURC"), which is then transferred or pledged to a conduit issuer in
18 exchange for the proceeds of system restoration bonds issued by the conduit issuer.
19 The LURC then transfers the proceeds of the bonds to the utility as a non-shareholder
20 contribution to the utility's capital in exchange for the utility's promise not to seek
21 recovery of storm costs from its customers.

1 Q52. DOES ACT 55 FINANCING PROVIDE THE POTENTIAL FOR ADDITIONAL
2 BENEFITS IN COMPARISON TO SECURITIZATION UNDER ACT 64 OR
3 TRADITIONAL RECOVERY OF STORM COSTS?

4 A. No. As a result of the change in federal law, the additional benefits provided by an Act
5 55 financing are no longer available.

6
7 Q53. IS THE COMPANY PURSUING LEGISLATION THAT HAS THE POTENTIAL
8 TO REDUCE THE FINANCING COST TO CUSTOMERS RELATIVE TO ACT 64
9 SECURITIZATION?

10 A. Yes. The Company is pursuing legislation in the Spring 2021 session that would create
11 alternative storm cost financing tools that could be available to the Commission and
12 that could provide reductions to customers' financing obligations relative to Act 64
13 securitization and Act 55 financing. Whether this legislation will be passed and the
14 extent of potential savings to customers is unknown at this time. In mid-2021, after the
15 legislative session is well underway, ELL will make a supplemental filing in this docket
16 requesting a financing order under the legislation that is reasonably expected to provide
17 the greatest opportunity for customer savings.

18
19 Q54. WILL THE COMPANY'S REQUEST TO FULLY REPLENISH ITS STORM
20 ESCROW ACCOUNT OCCUR UNDER THE PROPOSED FINANCING ORDER?

21 A. Yes.

1 Q55. HOW DOES THE COMPANY PLAN TO REPLENISH ITS STORM ESCROW
2 RESERVE ACCOUNT?

3 A. Before replenishing its escrow account, the Commission must determine the
4 appropriate funding level for the escrow account. Assuming the Commission agrees
5 that the escrow balance should be replenished to the same level as most-recently
6 authorized, for a total of \$290 million, the Company intends to finance this amount
7 along with the storm costs and carrying costs sought in this proceeding.

8

9

VI. ALLOCATION OF STORM COSTS

10 Q56. DOES ELL SPONSOR A PROPOSAL TO ALLOCATE STORM COSTS AMONG
11 ITS CUSTOMERS?

12 A. No. Experience has shown that each storm presents unique challenges and results in
13 unique damage to the infrastructure used to provide electric service to customers. ELL
14 recognizes that the Commission has used different allocation methods for storm
15 restoration costs from Hurricanes Katrina and Rita, and Hurricanes Gustav, Ike, and
16 Isaac and that those allocations were made based on information presented to the
17 Commission in those proceedings. In this proceeding, the Commission will have
18 similar information available to it which can be used to arrive at an allocation of storm
19 costs that is fair and reasonable to all customers.

20

21

VII. CONCLUSION

22 Q57. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

23 A. Yes, at this time.

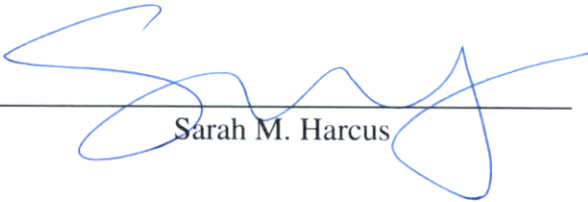
AFFIDAVIT

STATE OF LOUISIANA

PARISH OF JEFFERSON

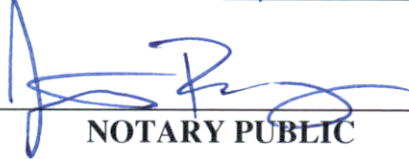
NOW BEFORE ME, the undersigned authority, personally came and appeared, **Sarah M. Harcus**, who after being duly sworn by me, did depose and say:

That the above and foregoing is his sworn testimony in this proceeding and that he knows the contents thereof, that the same are true as stated, except as to matters and things, if any, stated on information and belief, and that as to those matters and things, he verily believes them to be true.



Sarah M. Harcus

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 20th DAY OF April, 2021



NOTARY PUBLIC

My commission expires: is for life



Louisiana Public Service Commission
 Docket No. U- _____
 Entergy Louisiana, LLC
 Storm Costs

Hurricane Laura

Description	Distribution	Generation	Transmission	Total
Direct				
Contract Work	\$ 873,522,165	\$ 10,935,810	\$ 372,462,742	\$ 1,256,920,717
Employee Expenses	\$ 33,085,320	\$ 62,159	\$ 387,368	\$ 33,534,847
Labor	\$ 15,834,058	\$ 2,078,967	\$ 2,377,206	\$ 20,290,231
Materials	\$ 67,391,535	\$ 3,509,870	\$ 50,533,800	\$ 121,435,206
Other	\$ 8,109,936	\$ 449,459	\$ 32,529,162	\$ 41,088,557
ESL Billings	\$ 13,670,148	\$ 774,269	\$ 4,094,776	\$ 18,539,192
Loaned Resources	\$ 5,656,098	\$ 238,358	\$ 662,479	\$ 6,556,935
Audited Costs through 2/28/2021	\$ 1,017,269,260	\$ 18,048,892	\$ 463,047,533	\$ 1,498,365,685
Mutual Assistance	\$ 67,866,112	\$ -	\$ 23,683,265	\$ 91,549,377
Adjustments	\$ (1,674,774)	\$ (3,288)	\$ (11,069)	\$ (1,689,130)
Total Costs through 2/28/2021	\$ 1,083,460,598	\$ 18,045,604	\$ 486,719,729	\$ 1,588,225,931
Estimated Cost to Complete Repair	2,831,535	214,267	4,460,000	7,505,802
Total Gross Cost	\$ 1,086,292,133	\$ 18,259,871	\$ 491,179,729	\$ 1,595,731,733
Capital	\$ 905,238,551	\$ 2,517,166	\$ 453,125,302	\$ 1,360,881,019
O&M / Other	181,053,582	15,742,705	38,054,428	234,850,714
Total Gross Cost	\$ 1,086,292,133	\$ 18,259,871	\$ 491,179,729	\$ 1,595,731,733

Louisiana Public Service Commission
 Docket No. U-
 Entergy Louisiana, LLC
 Storm Costs

Hurricane Delta

Description	Distribution	Generation	Transmission	Total
Direct				
Contract Work	\$ 137,935,273 \$	371,882 \$	12,839,974 \$	151,147,129
Employee Expenses	12,867,952	384	10,104	12,878,441
Labor	4,513,769	44,898	579,598	5,138,265
Materials	10,642,626	39,142	1,315,283	11,997,051
Other	1,305,098	(15,456)	1,393,573	2,683,215
ESL Billings	2,037,074	-	128,434	2,165,509
Loaned Resources	609,449	-	26,060	635,509
Audited Costs through 2/28/2021	\$ 169,911,242 \$	440,850 \$	16,293,026 \$	186,645,118
Mutual Assistance	\$ 26,561,210 \$	- \$	458,575 \$	27,019,785
Adjustments	(925,631)	(0)	(14,172)	(939,802)
Total Costs through 2/28/2021	\$ 195,546,821 \$	440,850 \$	16,737,429 \$	212,725,100
Estimated Cost to Complete Repair	2,508,887	-	-	2,508,887
Total Gross Cost	\$ 198,055,708 \$	440,850 \$	16,737,429 \$	215,233,987
Capital	\$ 172,675,105 \$	- \$	12,620,311 \$	185,295,415
O&M / Other	25,380,603	440,850	4,117,118	29,938,572
Total Gross Cost	\$ 198,055,708 \$	440,850 \$	16,737,429 \$	215,233,987

Louisiana Public Service Commission

Docket No. U-
 Entergy Louisiana, LLC
 Storm Costs

Hurricane Zeta

Description	Distribution	Generation	Transmission	Total
Direct				
Contract Work	\$ 115,435,837	\$ 193,201	\$ 12,655,481	\$ 128,284,519
Employee Expenses	10,207,615	-	8,142	10,215,756
Labor	4,676,789	-	360,101	5,036,891
Materials	15,847,593	2,416	1,953,511	17,803,521
Other	873,197	1,036	1,734,742	2,608,975
ESL Billings	1,696,235	-	81,810	1,778,045
Loaned Resources	2,713,236	-	15,026	2,728,262
Audited Costs through 2/28/2021	\$ 151,450,502	\$ 196,653	\$ 16,808,814	\$ 168,455,969
Mutual Assistance	\$ 6,851,514	\$ -	\$ -	\$ 6,851,514
Adjustments	(5,457)	-	(464)	(5,922)
Total Costs through 2/28/2021	\$ 158,296,558	\$ 196,653	\$ 16,808,349	\$ 175,301,561
Estimated Cost to Complete Repair	1,357,996	-	-	1,357,996
Total Gross Cost	\$ 159,654,554	\$ 196,653	\$ 16,808,349	\$ 176,659,557
Capital	\$ 128,059,092	\$ -	\$ 14,622,845	\$ 142,681,937
O&M / Other	31,595,462	196,653	2,185,504	33,977,620
Total Gross Cost	\$ 159,654,554	\$ 196,653	\$ 16,808,349	\$ 176,659,557

Louisiana Public Service Commission
 Docket No. U- _____
 Entergy Louisiana, LLC
 Storm Costs

Winter Storm Uri

Description	Distribution	Generation	Transmission	Total
Direct				
Contract Work	\$ 12,580,079	\$ 174,221	\$ 1,252,820	\$ 14,007,121
Employee Expenses	53	1,198	180	1,430
Labor	2,387,617	233,668	251,768	2,873,053
Materials	1,439,830	(11,571)	74,172	1,502,431
Other	4,346,030	279	104,432	4,450,741
ESL Billings	453,271	5,919	3,299	462,489
Loaned Resources	-	-	-	-
Costs Recorded Through 2/28/2021	\$ 21,206,880	\$ 403,714	\$ 1,686,671	\$ 23,297,265
Estimated Cost to Complete Repair	\$ 34,683,120	\$ 746,286	\$ 1,273,329	\$ 36,702,735
Total Gross Cost	\$ 55,890,000	\$ 1,150,000	\$ 2,960,000	\$ 60,000,000
Capital	\$ 43,426,530	\$ 893,550	\$ 2,299,920	\$ 46,620,000
O&M / Other	12,463,470	256,450	660,080	13,380,000
Total Gross Cost	\$ 55,890,000	\$ 1,150,000	\$ 2,960,000	\$ 60,000,000

Project	Project Desc	Major Storm Name
C7PPSJ2753	STRM DMG ELL HURRICAN LAURA 8/21/20	Hurricane Laura
C7PPSJ2756	STORM DGM Hur Delta ELL 10.08.20	Hurricane Delta
C7PPSJ2757	STORM DMG HUR ZETA ELL 10/27/20	Hurricane Zeta
C7PPSJ8654	STM DMG EGSL HURRICAN LAURA 8/21/20	Hurricane Laura
C7PPSJ8657	STORM DMG Hur Delta EGSL 10.08.2020	Hurricane Delta
C7PPSJ8658	STORM DMG EGSL HUR ZETA 10/27	Hurricane Zeta
C8PPDLACCR	ELA H Delta Work Order Accrual	Hurricane Delta
C8PPELL102	Sibley Septic System Repair	Hurricane Laura
C8PPELL103	West Monroe Awning	Hurricane Laura
C8PPELL268	ONT - Old Nat. Trans. - Storm 2020	Hurricane Laura
C8PPELL275	Lake Charles Bldg C Storm	Hurricane Laura
C8PPELL276	Lake Charles Bldg A Storm	Hurricane Laura
C8PPELL277	Lake Charles Bldg B Roof STORM	Hurricane Laura
C8PPELL278	Lake Charles Storeroom STORM	Hurricane Laura
C8PPELL279	Lake Charles Bldg M Storm	Hurricane Laura
C8PPELL280	Lake Charles Garage 2 Storm	Hurricane Laura
C8PPELL281	Lake Charles Repair Shop Storm	Hurricane Laura
C8PPELL282	Lake Charles Truck Shed Storm	Hurricane Laura
C8PPELL283	Lake Charles Wire Storage Storm	Hurricane Laura
C8PPELL284	LC Dielectric Truck Test Bld Storm	Hurricane Laura
C8PPELL342	LMT HVAC Upgrade	Hurricane Laura
C8PPELL417	Lafayette Kitchen Roof	Hurricane Laura
C8PPELL431	Sulphur Laydown Yard Gate	Hurricane Laura
C8PPLLACCR	ELA H Laura Generic Work Accrual	Hurricane Laura
C8PPSTL007	Tank Farm: T1 Cabinet & Yard Lights	Hurricane Laura
C8PPSTL008	Lake Arthur: Replce OCB 575F & 576F	Hurricane Laura
C8PPSTL009	Contraband: VCB 53F Storm damage	Hurricane Laura
C8PPSTL011	Solac: Fence & Station Srv Repairs	Hurricane Laura
C8PPSTL012	Conoco: Replace 138kV Sw 17734	Hurricane Laura
C8PPSTL013	Mossville: 3-69kV & 1-138kV SW	Hurricane Laura
C8PPSTL014	Jonesboro: Tower & Switch R1166	Hurricane Laura
C8PPSTL015	Nelson 230: Replace Battery Charger	Hurricane Laura
C8PPSTL016	Nelson 500: Control House Panels	Hurricane Laura
C8PPSTL017	Lake Charles Bulk: Line Structures	Hurricane Laura
C8PPSTL018	East Broad : 69kV Switch 8289	Hurricane Laura
C8PPSTL019	Butadiene: Sw 7774, 7768 & 7734	Hurricane Laura
C8PPSTL021	West Monroe: Replace Ctrl Hse Roof	Hurricane Laura
C8PPSTL022	Montgomery: Replace Switch N3724	Hurricane Laura
C8PPSTL023	Gillis: Replace LS T1 Arresters	Hurricane Laura
C8PPSTL024	Hackberry: Replc Fiber Junction Box	Hurricane Laura
C8PPSTL025	Sweet Crude: SW 18673 & T1 arrester	Hurricane Laura
C8PPSTL026	Mimosa: Replace Sw 18587 & Damage	Hurricane Laura
C8PPSTL027	Toomey: Replace 13.8kV Arrestors	Hurricane Laura
C8PPSTL028	Maplewood: Replace RTU	Hurricane Laura
C8PPSTL029	Ellender: Replace T1 H & L Bushings	Hurricane Laura
C8PPSTL030	Sulphur Switching: 69kV Bus PT's	Hurricane Laura
C8PPSTL031	Intracoastal : GCB 37375, & 2 SWs	Hurricane Laura
C8PPSTL033	Black River: Laura Switch R3041	Hurricane Laura
C8PPSTL034	Ann Street: 3 High Side Bus PTs	Hurricane Laura

Project	Project Desc	Major Storm Name
C8PPSTL035	Carlyss: Replace Battery Charger	Hurricane Laura
C8PPSTL036	Choupique: Replace Battery Charger	Hurricane Laura
C8PPSTL037	Frostkraft: 115kV Bus CCVT A-Phase	Hurricane Laura
C8PPSTL038	Citgo: Sw 17714 & 18139, & RTU	Hurricane Laura
C8PPSTL039	Manena: RTU Communications	Hurricane Laura
C8PPSTL040	PPG: RTU Communications	Hurricane Laura
C8PPSTL041	Graywood: Switch 27268 Gear Box	Hurricane Laura
C8PPSTL042	Ford: Replace Modem	Hurricane Laura
C8PPSTL043	Chlomal: Repair Control House	Hurricane Laura
C8PPSTL044	PCI: Repair Control House	Hurricane Laura
C8PPSTL045	Staufco: Replace Battery Charger	Hurricane Laura
C8PPSTL046	Legion: Replce T1 Low Side Bushings	Hurricane Laura
C8PPSTL048	Burton: Convert to LTE	Hurricane Laura
C8PPSTL049	Vincent: T2 Insulators	Hurricane Laura
C8PPSTL051	Calcasieu Switching: Fence Repairs	Hurricane Laura
C8PPSTL052	Alfol: Fence & Control House Repair	Hurricane Laura
C8PPSTL053	Nelson 138: Control House Repairs	Hurricane Laura
C8PPSTL054	Winn: Control House Repairs	Hurricane Laura
C8PPSTL055	Michigan: Control House Repairs	Hurricane Laura
C8PPSTL057	Lone Star Cement: Control House	Hurricane Laura
C8PPSTL059	Julia: Replace 69kV OCB 14380	Hurricane Delta
C8PPSTL060	Lake Street: Replace RTU & Modem	Hurricane Laura
C8PPSTL061	Reigel: Replace RTU & Modem	Hurricane Laura
C8PPSTL062	Smith: Switch 8546, RTU & Modem	Hurricane Laura
C8PPSTL063	Broadmoor: Control House Repairs	Hurricane Laura
C8PPSTL064	Colonial Welch: Control Hse Repairs	Hurricane Laura
C8PPSTL065	Certainteed: Control House Repairs	Hurricane Laura
C8PPSTL066	Firestone: Control House Repairs	Hurricane Laura
C8PPSTL067	Lockmoor: Control House Repairs	Hurricane Laura
C8PPSTL068	Westlake: Control House Repairs	Hurricane Laura
C8PPSTL069	Trousdale: Fence Repairs	Hurricane Laura
C8PPSTL070	Casino: Fence Repairs	Hurricane Laura
C8PPSTL071	Oak Park: Fence Repairs	Hurricane Laura
C8PPSTL073	Greenwich: Fence Repairs	Hurricane Laura
C8PPSTL075	Lowe Grout: Control House Repairs	Hurricane Laura
C8PPSTL076	Swisco: Control House Repairs	Hurricane Laura
C8PPSTL077	Monroe Tie: Battery House Roof	Hurricane Delta
C8PPSTL078	Solac: Replace 69kV L-613 CCVT	Hurricane Delta
C8PPSTL081	Richard: 500kV MOA Switch 18414	Hurricane Delta
C8PPSTL084	Brink: VCB 731F Bushing Failure	Hurricane Delta
C8PPSTL085	Snakefarm: Replace 13.8kV VCB A0954	Hurricane Zeta
C8PPSTL086	Harahan: Replace Battery Charger	Hurricane Zeta
C8PPSTL088	Winn Prison: 115kV MOA Switch R0864	Hurricane Delta
C8PPSTL089	Billeaud: Replace Battery Charger	Hurricane Delta
C8PPSTL090	Lakeshore: Control Hse Roof & Fence	Hurricane Zeta
C8PPSTL100	Leeville: Fence & Yard Zeta Damage	Hurricane Zeta
C8PPSTL104	Terrebonne: Control House Roof	Hurricane Zeta
C8PPSTL105	Valentine: Add Zeta Viper Cameras	Hurricane Zeta
C8PPSTL111	Caminada: Zeta Storm Damage	Hurricane Zeta

Project	Project Desc	Major Storm Name
C8PPSTL112	Arabi: Replace LV AMSB W5525	Hurricane Zeta
C8PPSTL114	Youngsville: Delta Fence Damage	Hurricane Delta
C8PPSTL115	Colonial Lk Chas: Delta Roof Damage	Hurricane Delta
C8PPTL001D	DELTA20: ADDIS-WILLOW GLEN L702	Hurricane Delta
C8PPTL002D	DELTA20: Alaska-Tiger L722	Hurricane Delta
C8PPTL003D	DELTA20: Bayou Cove-Richard L258	Hurricane Delta
C8PPTL004D	DELTA20: Smith-Reigel L273	Hurricane Delta
C8PPTL005D	DELTA20: Richard-Wells 500KV L347	Hurricane Delta
C8PPTL006D	DELTA20: GALLON-OAK GROVE L143	Hurricane Delta
C8PPTL007D	DELTA20: Riser-Cheniere L220	Hurricane Delta
C8PPTL008D	DELTA20: Averico Tap-Averico L645	Hurricane Delta
C8PPTL009D	DELTA20: Scott-Frog L18	Hurricane Delta
C8PPTL010D	DELTA20: Nelson-Richard 500KV L620	Hurricane Delta
C8PPTL011D	DELTA20: Richard-Scott L647	Hurricane Delta
C8PPTL012D	DELTA20: Angola-Francis L386	Hurricane Delta
C8PPTL014D	DELTA20: Jackson-Sandy Creek L365	Hurricane Delta
C8PPTL015D	DELTA20: Ellis Tap-Ellis L662	Hurricane Delta
C8PPTL016D	DELTA20: Nelson-Penton Road L263	Hurricane Delta
C8PPTL017D	DELTA20: Bloomfield-Colton L289	Hurricane Delta
C8PPTL018D	DELTA20: Lafayette-Billeud L221	Hurricane Delta
C8PPTL019D	DELTA20: Billeaud-New Iberia L220	Hurricane Delta
C8PPTL020D	DELTA20: L637 East Tap-Gulf Krotz T	Hurricane Delta
C8PPTL028D	DELTA20: Barnett Oil Mill Tap-Sunse	Hurricane Delta
C8PPTL029D	DELTA20: North Bastrop Tap-North Ba	Hurricane Delta
C8PPTL030D	DELTA20: Winn-Robbie L39	Hurricane Delta
C8PPTL031D	DELTA20: Standard-Winnfield L111	Hurricane Delta
C8PPTL032D	DELTA20: Five Points- Moril L280	Hurricane Delta
C8PPTL033D	DELTA20: Texas Erath Tap-Carlin Tap	Hurricane Delta
C8PPTL034D	DELTA20: Chauvin-Valentine L211	Hurricane Delta
C8PPTL035D	DELTA20: DIXIE BAKER-ZACHARY L332	Hurricane Delta
C8PPTL036D	DELTA20: KLONDIKE-LAKE ARTHUR L270	Hurricane Delta
C8PPTL038D	DELTA20: SWARTZ-ALTO L122	Hurricane Delta
C8PPTL039D	DELTA20: LIVONIA-COLONIAL SPRINGS T	Hurricane Delta
C8PPTL040D	DELTA20: MEAUX TAP-CAMPBEL TAP L610	Hurricane Delta
C8PPTL041D	DELTA20: FIVE POINTS-MEAUX L649	Hurricane Delta
C8PPTL042D	DELTA20: ACADIA-COLONIAL ACADEMY L2	Hurricane Delta
C8PPTL043D	DELTA20: BEAVER CREEK-JENA L117	Hurricane Delta
C8PPTL044D	DELTA20: CHAMPAGNE-BOBCAT TAP L641	Hurricane Delta
C8PPTL045D	DELTA20: HACKBERRY-INTRACOASTAL L20	Hurricane Delta
C8PPTL046D	DELTA20: L-207 EAST TAP-GLOBAL SPOO	Hurricane Delta
C8PPTL048D	DELTA20: ANSE LABUTTE-LAFAYETT L259	Hurricane Delta
C8PPTL049D	DELTA20: WYNDOTTE-SHELL CHEM L708	Hurricane Delta
C8PPTL050D	DELTA20: BARNETT OIL-BARNETT L658	Hurricane Delta
C8PPTL051D	DELTA20: INTERSTATE-INTERSTATE L622	Hurricane Delta
C8PPTL052D	DELTA20: CANE RIVER-WINN PRISON L11	Hurricane Delta
C8PPTL053D	DELTA20: ADDIS-TIGER L782	Hurricane Delta
C8PPTL054D	DELTA20: CARENCRO-INTERSTATE P L216	Hurricane Delta
C8PPTL055D	DELTA20: ST. JOHN TAP-ST. JOHN L625	Hurricane Delta
C8PPTL056D	DELTA20: JENNINGS-LOWE GROUT L298	Hurricane Delta

Project	Project Desc	Major Storm Name
C8PPTL057D	DELTA20: ANN STREET-CHLOMAL L28311/	Hurricane Delta
C8PPTL059D	STRM2-14-21: Addis-Claire	Winter Storms
C8PPTL787B	LAURA20: NELSON-RICHARD L620	Hurricane Laura
C8PPTL788B	LAURA20: FRANCIS-ANGOLA L386	Hurricane Laura
C8PPTL789B	LAURA20: BERNICE-VIENNA L139	Hurricane Laura
C8PPTL802B	LAURA20: HARTBURG-RHODES L520	Hurricane Laura
C8PPTL803B	LAURA20: Rilla-Riverton L109	Hurricane Laura
C8PPTL844B	LAURA20: Nelson-Rhodes L850	Hurricane Laura
C8PPTL845B	LAURA20: Hollywood-Orange L296	Hurricane Laura
C8PPTL846B	LAURA20: RISER-CHENIERE L220	Hurricane Laura
C8PPTL847B	LAURA20: Hollywood-Nelson L321	Hurricane Laura
C8PPTL848B	LAURA20: MEAUX-CAMPBELL L610	Hurricane Laura
C8PPTL849B	LAURA20: ORANGE-MOSSVILLE L295	Hurricane Laura
C8PPTL851B	LAURA20: JUDICE-SCOTT L232	Hurricane Laura
C8PPTL852B	LAURA20: STANDARD-WINNFIELD L111	Hurricane Laura
C8PPTL853B	LAURA20: L654 LCB-NELSON	Hurricane Laura
C8PPTL854B	LAURA20: LAMY LANE - MONROE L225	Hurricane Laura
C8PPTL855B	LAURA20: JENNINGS-LCB L298	Hurricane Laura
C8PPTL856B	LAURA20: HENNING-HEBERT L201	Hurricane Laura
C8PPTL857B	LAURA20: L698 LCB-NELSON	Hurricane Laura
C8PPTL858B	LAURA20: GILLIS GAS TAP-GILLIS L67	Hurricane Laura
C8PPTL859B	LAURA20: MANENA-ROSEBLUFF L696	Hurricane Laura
C8PPTL860B	LAURA20: VERDINE-PPG L295	Hurricane Laura
C8PPTL861B	LAURA20: PECAN GROVE-GRAYWOOD L709	Hurricane Laura
C8PPTL862B	LAURA20: ABAN NELSON-MOSSVILLE L252	Hurricane Laura
C8PPTL864B	LAURA20: MOSSVILLE-SWISCO L616	Hurricane Laura
C8PPTL865B	LAURA20: ARIZONA-CITGO L665	Hurricane Laura
C8PPTL866B	LAURA20: CITGO-POLYCIT L209	Hurricane Laura
C8PPTL867B	LAURA20: BAYOU D'INDE-POLYCIT L643	Hurricane Laura
C8PPTL868B	LAURA20: BAYOU D'INDE-MOSSVILLE 601	Hurricane Laura
C8PPTL869B	LAURA20: CARLYSS-CERTAINTEED L229	Hurricane Laura
C8PPTL870B	LAURA20: JUPITER-OLIN L229	Hurricane Laura
C8PPTL871B	LAURA20: CONOCO-OLIN L029	Hurricane Laura
C8PPTL872B	LAURA20: CARLYSS-SWISCO L646	Hurricane Laura
C8PPTL873B	LAURA20: TOOMEY-MARSHALL L295	Hurricane Laura
C8PPTL874B	LAURA20: SCOTT-MAURICE	Hurricane Laura
C8PPTL875B	LAURA20: S.FERRIDAY-BLK RIVER L166	Hurricane Laura
C8PPTL876B	LAURA20: HOLDER	Hurricane Laura
C8PPTL877B	LAURA20: BILLEAUD-HOLIDAY L221	Hurricane Laura
C8PPTL878B	LAURA20: HOLDER	Hurricane Laura
C8PPTL879B	LAURA20: NELSON-PENTON ROAD (CLECO)	Hurricane Laura
C8PPTL880B	LAURA20: CARLYSS-BOUDOIN L661	Hurricane Laura
C8PPTL881B	LAURA20: CHALKLEY-SOLAC	Hurricane Laura
C8PPTL882B	LAURA20: PROVENCAL-MANY L119	Hurricane Laura
C8PPTL883B	LAURA20: WINN PRISON-WINNFIELD L119	Hurricane Laura
C8PPTL884B	LAURA20: MONTGOMERY-WINNFIELD L249	Hurricane Laura
C8PPTL885B	LAURA20: MINDEN REA-ARCADIA L129	Hurricane Laura
C8PPTL886B	LAURA20: STERLINGTON-VIENNA	Hurricane Laura
C8PPTL887B	LAURA20: JED WELD-WINNFIELD L112	Hurricane Laura

Project	Project Desc	Major Storm Name
C8PPTL888B	LAURA20: CARLYSS-NELSON	Hurricane Laura
C8PPTL889B	LAURA20: GILLIS-CHALKLEY L680	Hurricane Laura
C8PPTL890B	LAURA20: BROADMOOR-SMITH L272	Hurricane Laura
C8PPTL891B	LAURA20: MUD LAKE-SABINE L428	Hurricane Laura
C8PPTL892B	LAURA20: NELSON-MOSS BLUFF L021	Hurricane Laura
C8PPTL893B	LAURA20: CHAMPAGNE-GULF KROTZ L612	Hurricane Laura
C8PPTL894B	LAURA20: BAYOU WREHOUSE-DUBOIN L223	Hurricane Laura
C8PPTL895B	LAURA20:HENNING-LK CHARLES BLK L028	Hurricane Laura
C8PPTL896B	LAURA20: CHLOMAL-SMITH L268	Hurricane Laura
C8PPTL897B	LAURA20: CASINO-CONTRABAND L615	Hurricane Laura
C8PPTL898B	LAURA20: EAST BROAD-LAKE L624	Hurricane Laura
C8PPTL899B	LAURA20: EAST BROAD-LCB L602	Hurricane Laura
C8PPTL900B	LAURA20: CARLYSS-MUD LAKE L441	Hurricane Laura
C8PPTL901B	LAURA20: CARTER-HENNING L202	Hurricane Laura
C8PPTL902B	LAURA20: BEAVER CREEK-STANDARD	Hurricane Laura
C8PPTL903B	LAURA20: RILLA-SWARTZ L153	Hurricane Laura
C8PPTL904B	LAURA20: LAKE- CASINO L841	Hurricane Laura
C8PPTL905B	LAURA20: CHLOMAL-BROADMOOR L278	Hurricane Laura
C8PPTL906B	LAURA20: CARLYSS-FIRESTONE L604	Hurricane Laura
C8PPTL907B	LAURA20: CARLYSS-BUTADIENE L290	Hurricane Laura
C8PPTL908B	LAURA20: COKHAN TAP-COKHAN L282	Hurricane Laura
C8PPTL909B	LAURA20: CATALYST-CHOUPIQUE L15	Hurricane Laura
C8PPTL910B	LAURA20: WINN - THORNWELL L40	Hurricane Laura
C8PPTL911B	LAURA20: FIRESTONE-PCI L275	Hurricane Laura
C8PPTL912B	LAURA20:MOSSVILLE-BURTON L630	Hurricane Laura
C8PPTL913B	LAURA20: SULPHUR-BURTON L657	Hurricane Laura
C8PPTL914B	LAURA20: REIGAL-SMITH L273	Hurricane Laura
C8PPTL915B	LAURA20: REIGEL-SOLAC L639	Hurricane Laura
C8PPTL916B	LAURA20: EAST BROAD-SOLAC L613	Hurricane Laura
C8PPTL917B	LAURA20: WESTLAKE TAP-WESTLAKE L231	Hurricane Laura
C8PPTL918B	LAURA20: WESTLAKE TAP-WESTLAKE L234	Hurricane Laura
C8PPTL919B	LAURA20: MOSSVILLE-MAPLEWOOD L227	Hurricane Laura
C8PPTL920B	LAURA20: LOCKMOOR-MOSSVILLE L660	Hurricane Laura
C8PPTL921B	LAURA20: CHLOMAL-CHLOMAL L012	Hurricane Laura
C8PPTL922B	LAURA20: LONESTAR TAP-LONESTAR L293	Hurricane Laura
C8PPTL923B	LAURA20:SWEET CRUDE TAP-SWEET CRUDE	Hurricane Laura
C8PPTL924B	LAURA20: CONTANK-CLIFTON RIDGE L230	Hurricane Laura
C8PPTL925B	LAURA20: ANN STREET-EAST BROAD L276	Hurricane Laura
C8PPTL926B	LAURA20: CONTRABAND-SOLAC L614	Hurricane Laura
C8PPTL927B	LAURA20: RICHARD-SCOTT L647	Hurricane Laura
C8PPTL928B	LAURA20: REIGEL-SOLAC L676	Hurricane Laura
C8PPTL929B	LAURA20: ANN STREET-CHLOMAL L283	Hurricane Laura
C8PPTL930B	LAURA20: GRAYWOOD-SOLAC L609	Hurricane Laura
C8PPTL931B	LAURA20: BAYOU COVE-RICHARD L258	Hurricane Laura
C8PPTL933B	LAURA20: MCNEESE TAP-MCNEESE L639	Hurricane Laura
C8PPTL934B	LAURA20: JENNINGS-MERMENTAU TP L611	Hurricane Laura
C8PPTL935B	LAURA20: CARLYSS-CHOUPIQUE L286	Hurricane Laura
C8PPTL936B	LAURA20:CHOUPIQUE-INTRACOASTAL L206	Hurricane Laura
C8PPTL937B	LAURA20: NELSON-LONGVILLE L621	Hurricane Laura

Project	Project Desc	Major Storm Name
C8PPTL938B	LAURA20: CARLYSS-SULPHUR SWITC L623	Hurricane Laura
C8PPTL939B	LAURA20: L-207 EAST TAP-L-207 WEST	Hurricane Laura
C8PPTL940B	LAURA20: HACKBERRY-INTRACOASTL L208	Hurricane Laura
C8PPTL941B	LAURA20: L208 TEXSUL TAP-INTRACOAST	Hurricane Laura
C8PPTL943B	LAURA20: WELSH TAP-WELSH L250	Hurricane Laura
C8PPTL944B	LAURA20: CARLYSS-PCI	Hurricane Laura
C8PPTL945B	LAURA20: Nelson Plant Work	Hurricane Laura
C8PPTL946B	LAURA20: CHLOMAL-DEROUEN-LACASSINE	Hurricane Laura
C8PPTL947B	LAURA20: IOWA TAP-IOWA L288	Hurricane Laura
C8PPTL949B	ZETA20: CHURCHILL-NINEMILE SWITCHYA	Hurricane Zeta
C8PPTL950B	ZETA20: CHAUVIN-ASHLAND L206	Hurricane Zeta
C8PPTL951B	ZETA20 CHAUVIN-VALENTINE L211	Hurricane Zeta
C8PPTL952B	ZETA20: LITTLE GYPSY-LULING L215	Hurricane Zeta
C8PPTL953B	ZETA20: GOLDEN MEADOW-CLOVELLY L145	Hurricane Zeta
C8PPTL954B	ZETA20: MICHOD SYARD-FRONT ST L118	Hurricane Zeta
C8PPTL955B	ZETA20: ALLIANCE-BARATARIA L192	Hurricane Zeta
C8PPTL979B	ZETA20: BARATARIA-GOLDEN MEAD L172	Hurricane Zeta
C8PPTL980B	ZETA20: CHALMETTE-PORT NICKEL L158	Hurricane Zeta
C8PPTL981B	ZETA20: CARLISLE (LPL)-PORT NICKEL	Hurricane Zeta
C8PPTL982B	ZETA20: ANGOLA-PLATTENBURG L386	Hurricane Zeta
C8PPTL983B	ZETA20: JENNINGS-LOWE GROUT RD L298	Hurricane Zeta
C8PPTL984B	ZETA20: DESTREHAN-KENNER L184	Hurricane Zeta
C8PPTL985B	ZETA20: COTEAU-RACELAND L131	Hurricane Zeta
C8PPTL991B	Zeta20: Bayou Ramos-Humphrey	Hurricane Zeta
C8PPWGN279	NL0 Hurricane Laura Trctr Shp Doors	Hurricane Laura
C8PPWGN280	NL6 Hurricane Laura Active Storage	Hurricane Laura
C8PPWGN284	NL6 Rplc Turbine Building Exhaust F	Hurricane Laura
C8PPWGN285	HL-NL4 Rplc Precip Building Roof	Hurricane Laura
C8PPWGN287	HURRICANE LAURA NL7 Rplc #1 Fire Pu	Hurricane Laura
C8PPWGN288	HL - NL7 Rplc #2 Fire Pump Bldg Roo	Hurricane Laura
C8PPWGN289	HL - NL7 Rplc Diesel Fire Pump Bldg	Hurricane Laura
C8PPWGN290	HL - NL0 Rplc Admin Bldg Chiller Un	Hurricane Laura
C8PPWGN292	HL - NL6 Rplc Condensate Filter Awn	Hurricane Laura
C8PPWGN304	HL NL6 Cooling Tower Capital Replac	Hurricane Laura
C8PPWGN305	NL6 HL Rplc Cooling Tower Feeder Ca	Hurricane Laura
C8PPWGN310	HL NL0 Rplc Utility Trailer for ERT	Hurricane Laura
C8PPWGN311	HL NL6 Rplc AC @ Precip MCC Bldgs	Hurricane Laura
C8PPWGN313	HL NL6 Rplc A Battery Bank	Hurricane Laura
C8PPWGN314	HL - NL0 Rplc Battery Bank	Hurricane Laura
C8PPWGN315	NL0 HL Rplc U4 Turbine Bldg Siding	Hurricane Laura
C8PPWGN317	NL6 HL Rplc Transfer Station 2 Roof	Hurricane Laura
C8PPWGN324	NL7 HL Rplc #1 Fire Pump Motor	Hurricane Laura
C8PPWLK001	LQ1 HL Install Repl NERC Batter	Hurricane Laura
C8PPWLK002	LQ1 HL Lube Oil Storage Unit Rplc	Hurricane Laura
E2PPOMLADE	ELA Facilities Clean-Up - Delta	Hurricane Delta
E2PPOMLALR	ELA Facilities Clean-Up - Laura	Hurricane Laura
E2PPOMLAZE	ELA Facilities Clean-Up - Zeta	Hurricane Zeta
E2PPSJ8626	ELL HURRICANE LAURA TLINE GRID STRM	Hurricane Laura
E2PPSJ8628	ELL 10072020 DELTA TLINE GRID STORM	Hurricane Delta

Project	Project Desc	Major Storm Name
E2PPSJ8629	ELL 10/27/2020 STORM ZETA T LINEGRI	Hurricane Zeta
E2PPWJ0179	ELA Marco and Laura Storm	Hurricane Laura
E2PPWJ0222	ELA Hurricane Delta Storm	Hurricane Delta
E2PPWJ0226	ELA Hurricane Zeta	Hurricane Zeta
F3PPLALARA	Hurricane Laura Legal Services - LA	Hurricane Laura
F3PPLAURAS	ELL Hurricane Laura Securitization	Hurricane Laura
F3PPN09905	Hurricane Delta	Hurricane Delta
F3PPN09907	Hurricane Zeta	Hurricane Zeta
F3PPZ06979	NISCO Hurricane Laura Storm Damage	Hurricane Laura
F3PPZ07139	NISCO-HurricaneDeltaDamageMitigatio	Hurricane Delta
C7PPSJ2759	STORM LA ELL 2_14_21 Winter Event	Winter Storm Uri
C7PPSJ8659	STORM LA EGSL 2_14_21 Winter Event	Winter Storm Uri
C8PPNLA500	Newellton: Replace 13.8kV OCR N1654	Winter Storm Uri
C8PPTL047C	STORM2-14-21: Brown-Plantation Tap	Winter Storm Uri
C8PPTL048C	STRM2-14-21: Brown-Mickens	Winter Storm Uri
C8PPTL058D	STRM021421: COLY-JAGUAR L750	Winter Storm Uri
C8PPTL060D	STRM2-14-21: Standard-Jena	Winter Storm Uri
C8PPTL992B	STRM021421:CHAMPAGNE-GULF KROTZ 612	Winter Storm Uri
C8PPTL993B	STRM021421: DENHAM-GLORIA L759	Winter Storm Uri
C8PPTL994B	STRM021421: KAISER-MOHICAN L884	Winter Storm Uri
C8PPTL995B	STRM021421: BELFAIR-EAST L336	Winter Storm Uri
C8PPTL996B	STRM021421: BAYOU WAREHOUSE-DUBOIN	Winter Storm Uri
E2PPSJ8630	ELL 02142021 M.GRAS STORM TGRID	Winter Storm Uri
E2PPWJ0228	ELA 2021 Winter Storm	Winter Storm Uri
C8PPTL059D	STRM2-14-21: Addis-Claire	Winter Storm Uri

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**IN RE: APPLICATION OF ENTERGY)
LOUISIANA, LLC FOR RECOVERY)
IN RATES OF COSTS RELATED TO)
HURRICANES LAURA, DELTA,)
ZETA, AND WINTER STORM URI)
AND FOR RELATED RELIEF)**

DOCKET NO. U-_____

EXHIBIT SMH-4

**HIGHLY SENSITIVE
PROTECTED MATERIALS**

INTENTIONALLY OMITTED

APRIL 2021

Entergy Louisiana, LLC
Hurricane Laura, Delta and Zeta Storm Costs
Estimate of Carrying Cost Assumed Securitized February 2022
For Costs Incurred August 2020 - January 2022
(Amounts in Dollars)

Beginning Month of Carrying Cost	Costs Incurred - Hurricane Laura	Costs Incurred - Hurricane Delta	Costs Incurred - Hurricane Zeta	Estimate Adjustment	Escrow Funding	Short-Term Debt Issued	Tax Benefits Realized	Adjusted Cost	Carrying Cost	Balance for Carrying Costs
Aug-20	-1,460,279							1,460,279	5,263	1,465,542
Sep-20	210,845,510							210,845,510	770,486	213,081,538
Oct-20	450,332,863	43,980,111	17,439					494,330,434	3,317,612	710,729,584
Nov-20	114,578,036	16,852,614	31,072,170					(1,190,065,852)	833,980	(478,502,287)
Dec-20	590,172,775	113,146,911	27,625,186		(252,568,672)	(1,100,000,000)		530,772,157		52,269,870
Jan-21	73,316,067	6,198,198	100,742,257					180,256,521	1,026,453	233,552,844
Feb-21	155,026,183	35,056,153	17,202,505	(11,372,685)				195,912,157	2,389,627	431,854,628
Mar-21				3,790,895				3,790,895	3,126,615	438,772,138
Apr-21				3,790,895				3,790,895	3,176,479	445,739,512
May-21				3,790,895				3,790,895	3,226,702	452,757,109
Jun-21									3,263,624	456,020,733
Jul-21									3,287,149	459,307,883
Aug-21									3,310,844	462,618,727
Sep-21									3,334,710	465,953,437
Oct-21									3,358,748	469,312,185
Nov-21									3,382,959	472,695,143
Dec-21									2,703,198	280,028,238
Jan-22									2,018,537	282,046,775
Sub-Totals	1,595,731,733	215,233,987	176,659,557		(252,568,672)	(1,100,000,000)	(395,542,817)	239,513,789	42,532,987	

Sub-Total Carrying Costs	42,532,987
Plus: Interest on Short-Term Debt Nov 2020 - Jan 2021	10,086,538
Less: AFUDC Aug 2020 - Feb 2021	(7,224,231)
Total Carrying Costs	45,395,294

Notes:
Interest on Short-Term debt issued in November 2020 to finance storm added to calculated carrying cost above
ELL Total Carrying Costs exclude AFUDC.
Estimate Adjustment removes costs accrued and estimated as of February 2021 and assumes those will be paid in full by June 2021.
Carrying Cost = (Current Month Adjusted Cost * 1/2 Month + Prior Month Balance to Recover) * BTWACC/12
Amounts may not sum to totals due to rounding.
Before Tax Weighted Average Cost of Capital (BTWACC) 8.65%

37,431,328

Entergy Louisiana, LLC
Winter Storm Uri Storm Costs
Estimate of Carrying Cost Assumed Securitized February 2022
For Costs Incurred February 2021 - January 2022
(Amounts in Dollars)

Beginning Month of Carrying Cost	Costs Incurred - Winter Storm Uri	Estimate Adjustment	Escrow Funding	Short-Term Debt Issued	Tax Benefits Realized	Adjusted Cost	Carrying Cost	Balance for Carrying Costs
Feb-21	60,000,000	(36,702,735)	-	-	-	23,297,265	83,967	23,381,232
Mar-21		9,175,684	-	-	-	9,175,684	201,610	32,758,526
Apr-21		9,175,684	-	-	-	9,175,684	269,205	42,203,415
May-21		9,175,684	-	-	-	9,175,684	337,287	51,716,386
Jun-21		9,175,684	-	-	-	9,175,684	405,860	61,297,929
Jul-21			-	-	-	-	441,856	61,739,785
Aug-21			-	-	-	-	445,041	62,184,826
Sep-21			-	-	-	-	448,249	62,633,075
Oct-21			-	-	-	-	451,480	63,084,555
Nov-21			-	-	-	-	454,735	63,539,290
Dec-21			-	-	-	-	458,012	63,997,302
Jan-22			-	-	-	-	461,314	64,458,616
Sub-Totals	60,000,000					60,000,000	4,458,616	

Sub-Total Carrying Costs	4,458,616
Less AFUDC Feb 2021	(39,956)
Total Carrying Costs	4,418,660

Notes:
 ELL Total Carrying Costs exclude AFUDC
 Accrual Adjustment removes costs accrued and estimated as of February 2021 and assumes those will be paid in full by July 2021
 Carrying Cost = (Current Month Adjusted Cost * 1/2 Month + Prior Month Balance to Recover) * BTWACC/12
 Amounts may not sum to totals due to rounding.
 Before Tax Weighted Average Cost of Capital (BTWACC) 8.65%