

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

DOCKET NO. I-36181

**ENTERGY LOUISIANA, LLC,
EX PARTE**

LA PUBLIC SERVICE COMM
OCT 3 2023 PM3:46

***In re: 2021 Request to Initiate Integrated Resource Planning Process Pursuant to the General
Order (Corrected) in Docket No. R-30021 Dated April 20, 2012.***

STAFF REPORT AND RECOMMENDATION

I. Background

On October 22, 2021, Entergy Louisiana, LLC (“ELL” or “Company”) submitted a request to the Louisiana Public Service Commission (“LPSC,” or “Commission”) to initiate the Integrated Resource Planning (“IRP”) process (Event 1 of the IRP process). On January 25, 2022, ELL filed with the Commission its Assumptions and Inputs Presentation, as well as ICF Energy’s *EE, DR, and DER Potential Study – Draft Results* presentation in support of ELL’s 2021 IRP process (Event 2). The first stakeholder meeting (Event 3 in the IRP process) was held virtually on January 27, 2022, at which ELL and ICF Energy presented the IRP data assumption materials and fielded questions from stakeholders. Stakeholders in attendance were Advanced Energy Management Alliance (“AEMA”), Alliance for Affordable Energy, Gulf States Renewable Energy Industries Association (“GSREIA”), Louisiana Energy User’s Group (“LEUG”), Lafayette Utilities System, Environmental Defense Fund, Sustainable Energy Economy Solutions, the Sierra Club, and the Southern Renewable Energy Association (“SREA”).

ELL filed an *Updated IRP Data Filling Presentation* (“Updated Data Filing”) on February 14, 2022. The updated filing incorporated small changes and corrections to the presentation of January 24, 2022. Stakeholders then filed written comments (Event 4) by March 15, 2022.

On October 24, 2022, ELL published *2023 Integrated Resource Plan* (“Draft IRP Report”) (Event 5). The Second Stakeholder Meeting (Event 6) was held on November 18, 2022.

ELL subsequently filed *ELL’s Response to Informal Questions Related to Second Stakeholder Conference*, on January 13, 2023. This document provided additional numerical data and

addressed a variety of stakeholder questions which arose in the Second Stakeholder Conference. ELL noted that it intends to include the material in an Appendix to its Final IRP Report.

Four stakeholders filed written comments (Event 7) on January 23, 2023:

- AEMA: *Comments of Advanced Energy Management Alliance Regarding Entergy Louisiana's Draft Integrated Resource Plan;*
- LEUG: *Louisiana Energy Users Group Comments on Entergy Louisiana, LLC Draft Integrated Resource Plan Report;*
- Sierra Club: *Sierra Club's Comments on Entergy Louisiana's Draft 2023 Integrated Resource Plan;* and
- SREA: *Southern Renewable Energy Association's Comments Regarding Entergy Louisiana's Draft Integrated Resource Plan.*

On March 8, 2023, Staff filed written comments (Event 8), to identify issues that remained in ELL's Draft IRP Report, that ELL should address in its Final IRP Report and in so doing, meet the requirements established in the IRP Rules contained in LPSC Corrected General Order, Docket No. R-30021, *In re: Development and Implementation of Rule for Integrated Resource Planning/or Electric Utilities* (April 20, 2012) ("IRP Order"). On May 22, 2023, ELL filed its Final IRP Report and associated appendices (Event 9). On July 24, 2023, five stakeholder groups filed comments, including disputed issues and recommendations (Event 10):

- Alliance for Affordable Energy ("AAE"): *The Alliance for Affordable Energy's Comments Regarding Entergy Louisiana's Final Integrated Resource Plan;*
- AEMA: *Comments of Advanced Energy Management Alliance Regarding Entergy Louisiana's Final Integrated Resource Plan;*
- LEUG: *Louisiana Energy Users Group Comments and Identification of Disputed Issues;*
- Sierra Club: *Sierra Club's Disputed Issues of Fact and Law and Final Comments;* and
- SREA: *Southern Renewable Energy Association's Comments Regarding Entergy Louisiana's Final Integrated Resource Plan.*

This report constitutes Staff's Report and Recommendations, upon reviewing ELL's Final IRP Report and filings in the Docket (Event 11).

II. Staff's Comments, summary

Staff is disappointed to see that ELL did not address several important issues identified in the Staff report (Event 8):

- 1) ELL's updated calculations of total relevant supply costs ("TRSC") indicate that Portfolio 2 is the lowest-cost Portfolio across the three futures, by a substantial margin. Nevertheless, ELL maintained that Portfolio 1 is its preferred portfolio. The insights provided by ELL's updated TRSC calculations point to the cost-reducing effect of adopting a Portfolio with some of the features of Portfolio 2, even if wholesale adoption of Portfolio 2 would lead to reliability issues (which ELL asserted but did not demonstrate).
- 2) As discussed below, it is not clear the extent to which the Investment Tax Credit ("ITC") and/or Production Tax Credit ("PTC") provisions of the 2022 Inflation Reduction Act ("IRA") would have impacted the optimal portfolio if ELL had included these provisions in the Aurora capacity expansion modeling and energy price projections.
- 3) ELL did not create even one future which reflects the substantial risks presented by more stringent environmental standards for non-carbon emissions.
- 4) ELL did not examine the going-forward costs and potential economic pressures to retire power plants, in the context of the Aurora modeling.
- 5) ELL did not examine transmission options.

As noted in the Staff report (Event 8) the issues above simply involve transparency, use of up-to-date and timely information, and development of insights that ELL's own methodology supports.

Despite these concerns, and based on clarifications provided by ELL to Staff subsequent to the filing on the Final IRP Report, Staff concludes that ELL has met its obligations under the IRP Order requirements. Therefore, Staff recommends that the Commission acknowledge ELL's Final IRP Report as having complied with the IRP Order, and Staff does not recommend initiation of a proceeding for the resolution of disputed issues.

I. Staff's Comments, details

Staff's comments related to each of these topics are discussed below. In developing its comments, Staff refers to LPSC Corrected General Order, Docket No. R-30021 ("IRP Rule"), the overall objective of which is: *The overall objective of the IRP Process is to evaluate a comprehensive set of potential resource options, including supply-side, demand-side and economic transmission resource options, to determine a base or "reference resource" plan that offers the most economic and reliable combination of resources satisfying the forecasted load requirements. The process shall account for significant constraints such as planning, regulatory, operational, reliability and environmental requirements, and shall take into account the sensitivity of the resource plan to variations in assumptions such as load forecasts, fuel costs, market prices, construction costs, environmental regulations, and other relevant assumptions.*¹

The IRP Rule clearly encompasses consideration of cost and reliability; it requires examining a broad variety of resources, including transmission, and recognition of risk factors (such environmental regulations) outside the control of the utility. As summarized above, on several of these issues, ELL's Final IRP Report raises significant concerns, as discussed below.

1) ELL's analysis shows that Portfolio 2 is the lowest-cost portfolio across all the futures

In ELL's Final IRP Report, ELL's computations show Portfolio 2 as the least-cost Portfolio across the three futures (see Figure 1). The large cost savings indicate that ELL should ultimately consider an investment strategy that incorporates more solar and wind than Portfolios 1 or 3, to reduce future costs to customers. This was an important insight that resulted from ELL's analysis.

¹ LPSC Corrected General Order, Docket No. R-30021. Section 3.

Figure 1. Present value of TRSC across futures and portfolios, Final IRP Report

	Future 1	Future 2	Future 3
Portfolio 1	\$20,211	\$35,699	\$21,604
Portfolio 2	\$17,747	\$27,424	\$18,939
Portfolio 3	\$21,430	\$38,057	\$20,644

Source: ELL Final IRP Report, Appendix K, Table 33.

ELL dismissed Portfolio 2 on the following grounds: *“While Portfolio 2 includes a wider range of potential cost savings, ELL believes that the previously mentioned constraints do not yield an executable resource portfolio, though these do allow for a useful planning analysis exercise that serves to establish a sort of “bookend” for the range of possible outcomes.”*² ELL’s “previously mentioned” constraints seem to be: *“Portfolio 2 is constrained so as not to add gas-fired generation, to only to add renewable generation, and ultimately selects considerably more solar, wind and batteries when compared to Portfolio 1, requiring significantly higher capital investment than the other two Portfolios, as shown in Appendix I (Resource Additions Fixed Costs).”*³ However, ELL’s analysis (shown in Figure 1 above)s demonstrates that Portfolio 2’s lower variable costs more than offset its higher capital investment requirement, as it has the lowest TRSC of all three portfolios across the futures.

ELL implied that Portfolio 1 is preferable to Portfolio 2 based on reliability as well as cost: *“ELL believes that Portfolio 1 is the “...plan that offers the most economic and reliable combination of resources satisfying the forecasted load requirements.”*⁴ It is clear, despite ELL’s claim, that Portfolio 2 is more economic (less costly) than the other portfolios. As to reliability, ELL refused to perform reliability assessments requested by two stakeholders, noting *“ELL’s IRP methodology solves for peak load plus reserve margin requirements for the reference load forecast based on the capacity credit assumptions described in the IRP. ELL’s “investment plans” relative to its preferred portfolio is summarized by way of TRSC located in Appendix I of this report.”*⁵ ELL did not provide results for reserve margins in each of the Portfolio/Future combinations, so it is not possible to determine if Portfolio 2 failed to meet reserve margin requirements in any or all the

² ELL Final IRP Report. P. 95.

³ *Id.*

⁴ *Id.*

⁵ ELL Final IRP Report. P. 139.

futures. In informal conversation ELL noted that after it had completed the Final IRP Report, it had performed calculations using the new MISO PRA seasonal requirements and that Portfolio 2 did not meet these requirements for some seasons. Staff believed these quantitative results should be provided, as they are part of ELL's reasons for dismissing Portfolio 2.

ELL also noted informally that it was concerned that Portfolio 2 relied too much on energy purchases from MISO. Staff believes this quantitative evidence should also be provided. The IRP Rule requires that: *"The utility shall document in its IRP Report, the reliability target it used and provide details about how it arrived at the target. This documentation shall include a description of any analysis that was performed, the data assumptions that were used, and the results of the reliability assessment."*⁶

For these reasons, Staff believes that, while ELL ultimately followed the IRP Rule by providing some justification for its dismissal of Portfolio 2 as a preferred portfolio, ELL should have either considered incorporating elements of Portfolio 2 into a preferred portfolio, or, at a minimum, provide quantitative evidence supporting its assertions related to the lack of reliability of Portfolio 2 in a more formal fashion.

2) It is not clear that computational results upon which ELL relies reflect the provisions of the Inflation Reduction Act

In the Staff Report, Staff noted that "Subsidies which are reflected in current laws such as the IRA should be part of the modeling assumptions for each applicable technology and not simply included in one future and not the others. Staff asked that Table 12 in the Final IRP Report include a column with the after-ITC installed capital cost.

ELL did not do this. It noted that IRA assumptions were not included in the Aurora capacity expansion modeling. Therefore, it is not possible to determine whether the IRA provisions would have impacted the choice of the preferred portfolio.

⁶ LPSC Corrected General Order, Docket No. R-30021. Section 6 (a).

For the sake of transparency and accuracy, ELL should have incorporated IRA tax credits and subsidies into all numerical modeling including Aurora unless ELL wanted to specify one future in which the IRA is explicitly repealed, which ELL opted not to do (see Table 14, IRP Futures Assumptions in the Final IRP Report). Stakeholders' comments (Event 10) indicated they agree unanimously with Staff in their concern over this issue.

3) ELL's Final IRP report ignored an impactful regulatory uncertainty

Staff remains concerned that ELL is still ignoring a key uncertainty in its IRP process. This uncertainty is the impact of potential change to environmental requirements on the cost of operating a substantial share of the capacity it owns. ELL described in detail the historical progression of EPA regulations related to the Cross-State Air Pollution Rule ("CSAPR") which are resulting in ever-tightening NOx allowance budgets at the state level.⁷ ELL also noted that yet more stringent rules are on the horizon, which would in effect require ELL to install selective catalytic reduction ("SCR") technology on its generating units. ELL noted *"(A)bout one-fourth of ELL's total capacity is derived from legacy gas units, which range in age from 47 to 56 years of service and are assumed to deactivate over the course of the IRP planning horizon. As is discussed in further detail in the Environmental section of this IRP, the EPA's revision to its CSAPR may potentially accelerate some of the deactivation assumptions."*⁸ Thus, ELL pointed to a large uncertainty in the operating and investment environment for existing units.

However, in none of its three futures did ELL test the decision to retrofit or de-activate the units. Utilities typically examine many futures and portfolios as part of the IRP process. Dominion Energy South Carolina's recent 2023 IRP examined eight market futures, 14 portfolios, and 24 cases.⁹ An expansive view of future conditions helps capture the uncertainties in the business environment. ELL's three futures fail to capture a key uncertainty—environmental regulations—in its business environment. As Staff recommended in Event 8, such impactful uncertainty should have been a feature of at least one of ELL's futures.

⁷ ELL Final IRP Report. P. 71.

⁸ ELL Final IRP Report. P. 21.

⁹ Dominion Energy South Carolina. *Integrated Resource Plan 2023*. <https://www.dominionenergy.com/-/media/pdfs/global/company/desc-2023-integrated-resource-plan.pdf>.

In informal conversation with Staff, ELL stated that the IRP is not the right venue for such an analysis of existing units, pointing to a previously filed Legacy Economic Study as the right venue. However, the IRP Rule states that *“The IRP Report shall include documentation of all analyses leading to recommendations to retire, life-extend or otherwise make major investments in existing generating units. The documentation shall include a complete description of all assumptions, models and results determined from these analyses(.)”*¹⁰ SCRs are major investments, but ELL performed no analysis of the cost of these for existing generation.

4) ELL’s IRP did not consider potential economic retirements

The IRP Rule states that a company’s IRP Report must contain detailed information with regard to existing supply-side resources, existing demand-side resources, and the existing transmission system.¹¹ However, ELL’s Draft IRP Report does not provide a transparent way to compare the going forward costs of existing resources to the levelized cost of energy (“LCOE”) for new resources. The LCOEs of new resources are provided (in ELL Final Report, Figure 25) but are not compared with the going-forward costs of existing units (with or without environmental retrofits).

To this end, Staff requested that ELL report economic retirements of ELL resources that result from Aurora runs in ELL’s futures (not just the retirements that are assumed by ELL as inputs to the Aurora process). This output is within the capability of Aurora, and utilities in other states provide such results in their IRPs. These are not deactivation decisions, nor is this an analysis of optimal retirement dates. This exercise simply helps to develop a variety of futures and portfolios, to provide insight into the long-term costs of various resource decisions. It would be especially informative in a future which contemplates stricter environmental regulations. ELL did not do this. In informal conversation ELL stated that it did not believe the IRP process was the right venue for this analysis.

5) Future transmission was not addressed

¹⁰ LPSC Corrected General Order, Docket No. R-30021, Section 8.

¹¹ LPSC Corrected General Order, Docket No. R-30021, Section 3 and Section 5.

ELL did not address transmission in its Final IRP Report. The IRP Rule provides that *"At times, there may be large transmission projects that could provide access to economic generation resources, and it may be desirable to treat those projects as separate resource options in the optimization process."*¹² In other states, IRPs include futures with and without major transmission projects, because the existence of a new transmission line (even if it is not a perfect substitute for generation) could change the optimal portfolio of generation resources. In an informal meeting, ELL stated informally that it would not consider transmission a potential resource option unless the transmission were connected to a specific generation resource which was designated to meet ELL's load.

6) Other comments not addressed by ELL

Cost of telematics

AEMA asked ELL to provide the results of the Total Resource Cost test of telematics-based programs for EV resources and for residential battery storage. Staff does not wish to determine which programs do or do not pass the TRC test (or the Total Relevant Supply Cost test) but agrees with AEMA that more explanation is useful, and there is no reason ELL should not provide these results. ELL should not simply claim residential batteries are not economic even with 30% ITC, ELL needs to demonstrate the assertion. ELL did not provide this in its Final IRP Report.

Demand-side resources ("DR") and energy efficiency ("EE")

Staff recommended that ELL re-examine its DR and EE assumptions and the role of energy prices in driving uptake of DR and EE, given that energy prices in Future 2 are much higher than in Future 3, but the quantity of DR and EE are projected to be the same. ELL claimed it is incapable of performing this calculation.

Reliability

In Staff comments on ELL's Draft IRP report, Staff said it did not believe that ELL should be required to include an analysis of expected loss of load for each portfolio/future combination, because, while the IRP Rules contemplate reliability, ELL's inclusion of a reserve margin, peak

¹² LPSC Corrected General Order, Docket No. R-30021. Section 3, Footnote 6.

load projections, and capacity accreditation recognize reliability needs. However, given that ELL has referred to reliability as a reason for not considering Portfolio 2, ELL should have demonstrated (rather than merely asserted) that Portfolio 2 would lead to reduced reliability.

7) Comments which were addressed by ELL

As requested by Staff, ELL added additional “Selected Technologies” to its Figure 25 (Levelized cost of Electricity of Selected Technologies), to show the LCOE of onshore wind, offshore wind, solar, and battery technologies including tax credits. However, as noted previously, it is not clear the extent to which ELL used the IRA tax credits (ITC or PTC) in the TRSC computations or Aurora modeling.

Load forecast

As requested by Staff, ELL added new tables to Appendix K (Table 41 and Table 42) to show summer coincident peaks for residential, commercial, industrial, and total demand for Future 2 and Future 3 (see Figure 2).

Figure 2. ELL outlooks for summer coincident peak load, MW

	Future #1				Future #2				Future #3			
	Res	Com	Ind	Total	Res	Com	Ind	Total	Res	Com	Ind	Total
2023	3,398	2,252	4,965	10,025	3,404	2,276	4,064	10,046	3,399	2,271	4,064	10,039
2042	3,779	2,128	4,430	10,642	3,995	3,097	5,630	13,038	4,504	2,153	4,891	11,848
CAGR	0.56%	-0.30%	-0.60%	0.31%	0.85%	1.63%	1.73%	1.38%	1.49%	-0.28%	0.98%	0.88%

Note: Total includes governmental, company use, and wholesale.

Source: ELL Final IRP Report. Appendix J, Table 40; Appendix K, Tables 41 and 42

Costs of transmission interconnection

ELL was asked to address the following transmission interconnection issues, which ELL addressed in its Final IRP Report:

- For solar resources, ELL reduced the additional \$100/kW (to account for transmission interconnection cost for solar) to \$50/kW following its review of interconnection costs.¹³

¹³ ELL Final IRP Report. P. 64.

- For wind resources, ELL was asked to clarify whether it included transmission costs for wind in the modeling. ELL said, yes, they include it though ELL did not specify the amount of the cost but referred to IHS as the source of the information.¹⁴

Net zero goals

Staff asked ELL to report its current carbon footprint and the carbon footprint of each of the three portfolios in each of the three futures. ELL more-or-less complied, reporting a single CO₂ emission estimate for each future, for 2042. Staff assumes that the single number reflects the emissions of the optimized portfolio only: Portfolio 1 in Future 1 (142 lbs/MWh); Portfolio 2 in Future 2 (15 lbs/MWh), and Portfolio 3 in Future 3 (198 lbs/MWh). ELL reported that its emission rate in 2022 was approximately 744 lbs/MWh.”¹⁵

II. Conclusion

Staff’s concerns, as presented in detail *supra*, center around transparency, use of up-to-date and timely information, and development of insights that ELL’s own methodology supports. These concerns are consistent with the requirements of the IRP Rule. While ELL’s Final IRP Report did not address many issues raised by Staff or stakeholders in response to its Draft IRP Report, it is Staff’s position that ELL has met its obligations under the IRP Order requirements. Staff’s position is based on its thorough review of the IRP Order and ELL’s Final IRP Report, assessing it for substantive methodological errors and omissions, as well as compliance with Staff’s comments.

Staff therefore recommends that the Commission acknowledge ELL’s Final IRP Report as having complied with the IRP Order. Staff does not recommend initiation of a proceeding for the resolution of disputed issues. Staff further recommends that as part of its next IRP cycle, ELL address the concerns as set forth herein.

As stated in the IRP Order, resource planning under the IRP Rules does not change the fundamental relationship between the utilities and the Commission. The IRP Rules do not mandate a specific

¹⁴ ELL Final IRP Report. P. 134.

¹⁵ ELL Final IRP Report, P. 128.

outcome or any specific investment decisions, resource planning should reflect each utility's unique circumstances and the judgment of its management, and each utility will bear the responsibility for the consequences of its decisions. The Commission's acknowledgment of the Final IRP Report does not constitute Commission approval of ELL's IRP or any specific resource decision that ELL made within the IRP, though the IRP may be considered in any future Commission proceedings concerning ELL's resource plans.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this 3rd day of October, 2023, served copies of the foregoing pleading upon all known parties of this proceedings by electronic mail.



Justin Bello

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