> We affirm the Presiding Judge's finding that because the Henderson Facilities are electrically remote from retail customers (e.g., Henderson's 69 kV and 161 kV transmission facilities are not in close electrical-connection proximity to retail customers), the Henderson Facilities qualify as transmission under Factor 1. We also agree with the Presiding Judge's assessment that the Henderson Facilities "do not wrap around and connect to retail customers, but instead are located almost entirely outside the city limits of Henderson," whereas "[Henderson's] distribution system lies mostly within the city limits." Accordingly, as part of the Commission determination on whether the Henderson Facilities are transmission, Factor 1 weighs in favor of transmission.

Based on this ruling, two items were considered when examining the stations:

1. Electrical proximity of the stations relative to SLEMCO's retail customers
2. Geographic location of the stations relative to SLEMCO's service territory and retail customers

Referring to Appendix B: SLEMCO Station One-line Diagrams, GLL's ownership of the stations is limited to equipment operated at 138 kV. No SLEMCO customer receives electrical service directly at 138 kV; they all receive service at 25 kV or 13.8 kV. Crowley, East Opelousas, Hebert, Krotz Springs, Scanlan, and Vatican all have step-down transformers which convert the voltage from 138 kV down to 25 kV or 13.8 kV. SLEMCO will retain ownership of those step-down transformers and other associated lower voltage equipment. Judice, LeBlanc Bulk, and Semere Road do not have any step-down transformers, and, instead, connect to other SLEMCO 138 kV stations which have step-down transformers that provide service to retail customers. SLEMCO will retain ownership of those radially operated 138 kV lines and stations. As a result from an electrical system perspective, all 138 kV stations examined are not in close proximity to the retail customers; instead, they are remote compared to the distribution facilities serving the retail customers.

Referring to Figure 1, Crowley, East Opelousas, Hebert, Krotz Springs, LeBlanc Bulk, and Semere Road are on the edge of SLEMCO's service territory which is considered remote to SLEMCO's retail customers. Judice and Vatican are within SLEMCO's service territory, however, they act as an interface with the Entergy transmission system to feed SLEMCO's radially operated 138 kV lines and stations where the voltage is stepped down to 25 kV to 13.8 kV to serve SLEMCO's retail customers. As a result, from a geographic perspective these eight stations are not in close proximity to the retail customers.

Scanlan is also fully within SLEMCO's service territory and acts as an interface with the Entergy transmission system. Given Scanlan's physical location is wholly within SLEMCO's service territory and it does not feed any SLEMCO 138 kV radially connected stations it is geographically in close proximity to SLEMCO's retail customers; however, since these customers are not directly served at 138 kV and the station is connected to two Entergy 138 kV transmission lines Scanlan should still be considered not in close proximity to the retail customers.

Based on the electrical and geographic proximity of the nine station not being in close proximity to retail customers, all of the stations fail Factor #1, supporting classification as Transmission.

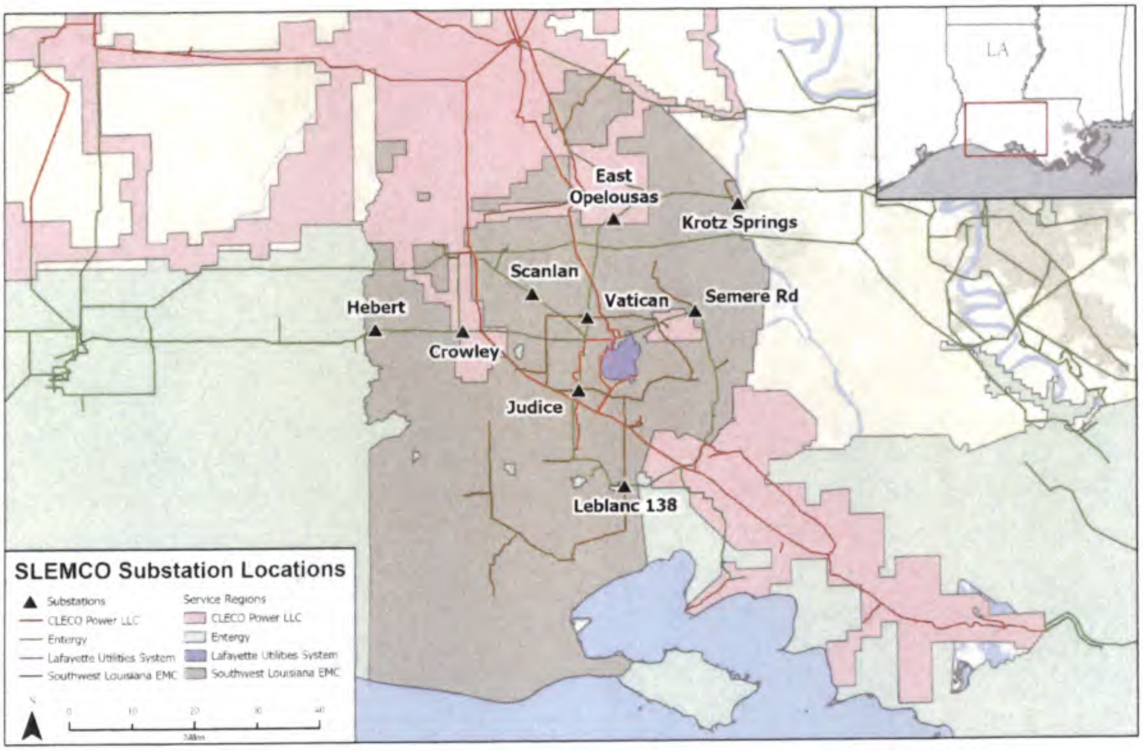


Figure 1. Map of SLEMCO Stations and Service Electric Territories

Factor 2: Local distribution facilities are primarily radial in character

To assess the stations from the perspective of Factor #2 the electrical configuration of each station was reviewed to determine if the asset is radial or networked.

A radial asset describes an asset that branches out from a single point and does not connect back to the transmission grid. The prominent characteristic of a radial facility is that if any one connection located on the system is opened, the resulting impact will separate the facility from the larger electrical network. For radial facilities, this separation would result in the ceasing of power flowing through the facility or facilities under consideration, signifying that the facilities would pass Factor #2 of the seven-factor test, supporting a distribution classification determination.

A networked asset has multiple electrical connections. Instead of branching out from one-point, networked assets are connected to the transmission grid through multiple pathways creating redundancy for electricity to flow. In contrast to a radial asset, the opening of any one connection to a networked asset does not result in a separation for the network asset and power will continue to flow through the networked asset, signifying the asset would fail Factor #2 of the seven-factor test, supporting a transmission classification determination.

Figure 2 provides visual example of radial asset, noted with a red arrow, and network assets, noted with a blue circle. The blue circles show that Entergy's Richard, Scott, and Cecelia, Lafayette Utilities System's (LUS) Bonin and SLEMCO's Crowley and Semere Road stations create a network that allows power to flow between all six stations. Conversely, the single, radial, connection from SLEMCO's Semere Road to Cecilia only allows power to flow between those two stations.

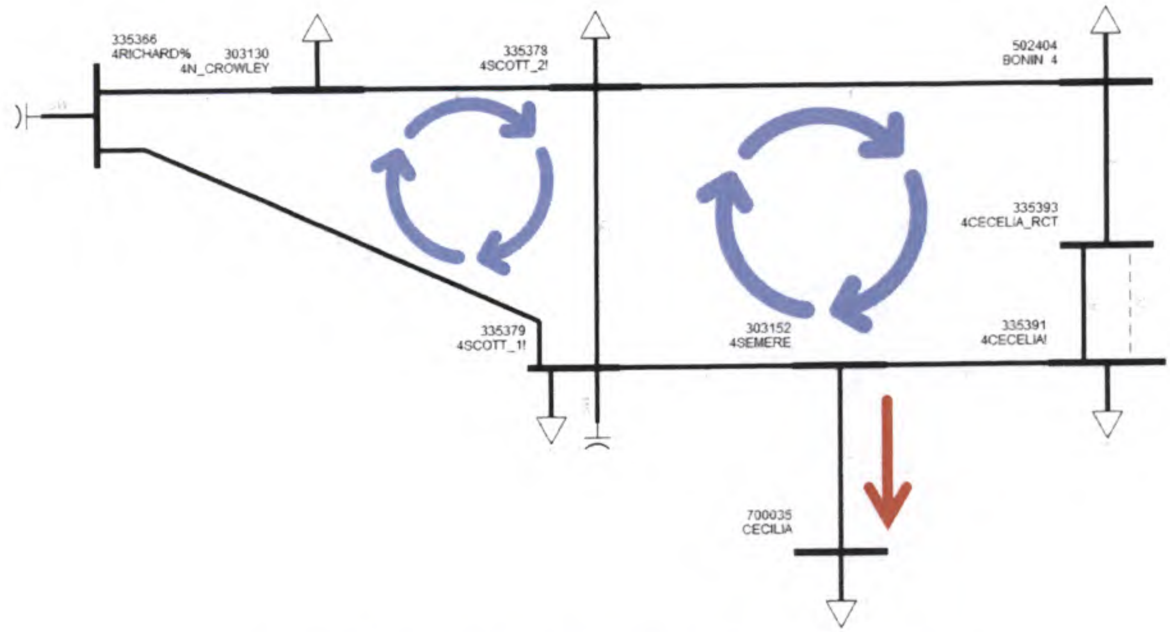


Figure 2: One-line Diagram of Networked and Radial Transmission

Referring to Appendix B: SLEMCO Station One-line Diagrams, all nine stations have two Entergy 138 kV lines connecting to the station and these 138 kV connections connect back to the large transmission grid to provide multiple electrical paths. None of the Entergy 138 kV lines connected to the stations are radial, and, as such, the nine stations are considered networked and not radial. Additionally, all of the Entergy 138 kV lines connecting to the stations are listed in Entergy's Attachment O Appendix H, indicating they are under MISO's control and used for energy market flows, subject to the MISO Open Access Tariff (OATT), and included in the Transmission Owner's Annual Transmission Revenue Requirement (ATRR). The fact that the 138 kV lines connected to the station are under MISO's functional control demonstrates that those lines are transmission and are part of the larger transmission system. Therefore, all nine stations are networked and not radial and as such, all nine stations fail Factor #2, supporting classification as transmission.

Factor 3: Power flows into local distribution systems and it rarely, if ever, flows out

To assess the stations from the perspective of Factor #3 the expected real power flow through the stations was examined.

The MISO Transmission Determination Process, BPM-028, recommends that 2 years of historical data be reviewed to determine if power flow into or out of the facilities being evaluated; however, in the absence of historical data real power flow analysis can be used to make the determination. No historical data was available to GridLiance, and, therefore, a power flow analysis was performed. In order to examine a broad set of system conditions several different power flow cases which modeled different load scenarios and generation dispatch were used. The latest near-term models developed during the 2024 cycle of the MISO Transmission Expansion Plan (MTEP) cycle were used and are listed in Table 4. The MTEP model development process is performed annually with MISO closely collaborating with the MISO Transmission Owners. Additionally, the MTEP model development process is used by MISO and the MISO stakeholders to fulfil their NERC MOD-032 compliance as well as several NERC standards such as TPL-001-5. Ultimately, the models are developed using the data provided to MISO by the owners of the facilities such as Entergy, Lafayette Utilities System, and Cleco.

Table 4: Models Used to Examine Real Power Flow

Year	Load Scenario	Abbreviation	Filename
2025	Spring Light Load	25SLL	MISO24_2025_SLL40_TA_Final.raw
2025	Spring Peak	25SPR	MISO24_2025_SPR___TA_Final.raw
2025	Summer Shoulder	25SSH	MISO24_2025_SHHW__TA_Final.raw
2025	Summer Peak	25SUM	MISO24_2025_SUM___TA_Final.raw
2025	Fall Peak	25FAL	MISO24_2025_FAL___TA_Final.raw
2026	Winter Peak	26WIN	MISO24_2026_WIN___TA_Final.raw

In addition to examining a broad set of load and dispatch conditions, a broad set of transmission conditions were evaluated by simulating thousands of single initiating contingency (N-1) events. The set of contingencies simulated were supplied by MISO Transmission Owners and compiled by MISO during the 2024 MTEP cycle for the MISO South region. By using 6 different load scenarios and simulating over 6,000 contingencies a sufficiently broad set of system conditions were examined and should be considered equivalent to examining historical data.

As previously described all the stations have two Entergy 138 kV lines connected to them (except LeBlanc Bulk which has three). Using the power flow analysis the power flowing on the Entergy 138 kV lines is calculated and reported with a common frame of reference in magnitude and direction. Assuming the frame of reference was the station being examined (e.g., Crowley) a positive value indicating power is flowing out of the station and negative value indicating power is flowing into the station. When the line flows have opposite signs this indicates there is through flow at the station (i.e., power flowing into and out of the station) which indicates that there is power flowing out of station and failing Factor #3. When the lines have the same (negative[1]) sign this indicated power is only flowing into the station to serve SLEMCO customers. For example, for the system intact (N-0) flows observed at East Opelousas in the 2025 Fall Peak scenario were:

- East Opelousas to Colton: 45.8 MW
- East Opelousas to Champagne: -53.9 MW

For this situation the flows are opposite signs indicating power is flowing through (into and out) of the station. Conversely, the system intact flows observed at Judice in the 2025 Fall Peak scenario were:

- Judice to Scott: -54.3 MW
- Judice to Meaux: -10.2 MW

For this situation the flow is the same sign and negative indicating the power is only flowing into the station and no power is flowing out.

The calculated power flow for all the lines under the various system conditions are summarized for each of the stations and load scenario by the system intact through flow, maximum through flow under a N-1 condition, and the amount of N-1 events resulting in through flow.

Crowley

The results of the Factor #3 analysis for Crowley 138 kV station can be found in Table 5. This shows that in all scenarios power is seen to be flowing through the Crowley station and onto the surrounding 138 kV transmission lines under system intact conditions as well as over 6,200 contingencies that were simulated. The max flow through under system intact and contingency conditions was 102.2 MW and

[1] Technically, both lines having a positive value is possible and would indicate that power is flowing out of the station; however, this situation was not observed as the only facilities connected to the stations is SLEMCO customers and there is no generation connected to the station.

139.9 MW, respectively, in the 2026 Winter Peak case. Based on these results, it was determined power often was flowing through and out of Crowley, and, therefore, it fails Factor #3.

Table 5: Through Flow Results for Crowley

Season	Crowley		
	N-0 Through Flow (MW)	Max N-1 Through Flow (MW)	Events w/ Through Flow
25SLL	49.3	67.3	6288
25SPR	74.0	103.9	6288
25SSH	98.9	137.5	6329
25SUM	92.4	129.0	6329
25FAL	60.0	90.9	6346
26WIN	102.2	139.9	6396

East Opelousas

The results of the Factor #3 analysis for East Opelousas 138 kV station can be found in Table 6. This shows that in all scenarios power is seen to be flowing through the East Opelousas station and onto the surrounding 138 kV transmission lines under system intact conditions as well as over 6,200 contingencies that were simulated. The max flow through under system intact and contingency conditions was 73.3 MW and 148 MW, respectively, in the 2025 Summer Peak case. Based on these results it was determined power was often flowing through and out of East Opelousas, and, therefore, it fails Factor #3.

Table 6: Through Flow Results for East Opelousas

Season	East Opelousas		
	N-0 Through Flow (MW))	Max N-1 Through Flow (MW)	Events w/ Through Flow
25SLL	4.8	74.4	6253
25SPR	49.4	119.8	6292
25SSH	14.5	125.4	6326
25SUM	73.3	148.0	6332
25FAL	45.8	98.2	6350
26WIN	23.4	107.7	6396

Hebert

The results of the Factor #3 analysis for Hebert 138 kV station can be found in Table 7. This shows that in all scenarios power is seen to be flowing through the Hebert station and onto the surrounding 138 kV transmission lines under system intact conditions as well as over 6,200 contingencies that were simulated. The max flow through under system intact and contingency conditions was 28.3 MW and 113.3 MW, respectively, in the 2025 Summer Peak case. Based on these results it was determined power was often flowing through and out of Hebert, and, therefore, it fails Factor #3.

Table 7: Through Flow Results for Hebert

Season	Hebert		
	N-0 Through Flow (MW)	Max N-1 Through Flow (MW)	Events w/ Through Flow
25SLL	24.2	88.5	6294
25SPR	7.0	89.1	6256
25SSH	7.3	92.9	6294
25SUM	28.3	113.3	6331
25FAL	14.2	96.5	6338
26WIN	26.5	103.7	6398

Judice

The results of the Factor #3 analysis for Judice 138 kV station can be found in Table 8. This shows that under system intact conditions in four of the six scenarios power is seen to be flowing through the Judice station and onto the surrounding 138 kV transmission lines. Under contingency in the 25 Spring Light Load, Spring Peak, Summer Shoulder, and Summer Peak seasons there were approximately 6,200 – 6,300 contingencies where power was seen to be flowing through the Judice station and in numerous different events in the remaining cases. The max flow through under system intact and contingency conditions was 13.7 MW and 105.1 MW, respectively, in the 2025 Summer Shoulder case. Based on these results it was determined power would often flow through and out of Judice, and, therefore, it fails Factor #3.

Table 8: Through Flow Results for Judice

Season	Judice		
	N-0 Through Flow (MW)	Max N-1 Through Flow (MW)	Events w/ Through Flow
25SLL	7.5	46.9	6277
25SPR	5.4	85.5	6238
25SSH	13.7	105.1	6312
25SUM	9.5	104.2	6301
25FAL	0.0	61.5	17
26WIN	0.0	88.8	43

Krotz Springs

The results of the Factor #3 analysis for Krotz Springs 138 kV station can be found in Table 9. This shows that in all scenarios power is seen to be flowing through the Krotz Springs station and onto the surrounding 138 kV transmission lines under system intact conditions as well as over 6,200 contingencies that were simulated. The max flow through under system intact and contingency conditions was 48.1 MW and 118 MW, respectively, in the 2025 Summer Shoulder case. Based on these results it was determined power was often flowing through and out of Krotz Springs, and, therefore, it fails Factor #3.

Table 9: Through Flow Results for Krotz Springs

Season	Krotz Springs		
	N-0 Through Flow (MW)	Max N-1 Through Flow (MW)	Events w/ Through Flow
25SLL	34.9	61.1	6286
25SPR	39.7	86.2	6285
25SSH	48.1	118.0	6327
25SUM	30.9	63.7	6322
25FAL	20.2	51.5	6316
26WIN	2.4	36.2	6138

LeBlanc Bulk

The results of the Factor #3 analysis for LeBlanc Bulk 138 kV station can be found in Table 10. This showed that under system intact conditions only 2025 Summer Shoulder case showed power flowing out. However, under numerous N-1 contingency events across all studied seasons power was shown to be flowing out of the LeBlanc Bulk station and onto the surrounding 138 kV transmission lines. The max flow through under system intact and contingency conditions was 2 MW and 77.3 MW, respectively, in the 2025 Summer Shoulder case. Based on these results it was determined power was often flowing through and out of LeBlanc Bulk, and, therefore, it fails Factor #3.

Table 10: Through Flow Results for LeBlanc Bulk

Season	LeBlanc Bulk		
	N-0 Through Flow (MW)	Max N-1 Through Flow (MW)	Events w/ Through Flow
25SLL	0.0	30.7	293
25SPR	0.0	45.3	22
25SSH	2.0	77.3	6184
25SUM	0.0	52.7	15
25FAL	0.0	47.8	3
26WIN	0.0	54.5	11

Scanlan

The results of the Factor #3 analysis for Scanlan 138 kV station can be found in Table 11. This shows that in all scenarios power is seen to be flowing through the Scanlan station and onto the surrounding 138 kV transmission lines under system intact conditions as well as over 6,200 contingencies that were simulated. The max flow through under system intact and contingency conditions was 83.4 MW and 126.2 MW, respectively, in the 2025 Summer Shoulder case. Based on these results it was determined power was often flowing through and out of Scanlan, and, therefore, fails Factor #3.

Table 11: Through Flow Results for Scanlan

Season	Scanlan		
	N-0 Through Flow (MW)	Max N-1 Through Flow (MW)	Events w/ Through Flow
25SLL	40.3	57.8	6293
25SPR	56.7	89.6	6293
25SSH	83.4	126.2	6334
25SUM	71.3	107.8	6334
25FAL	41.4	73.4	6351
26WIN	75.0	121.9	6401

Semere Road

The results of the Factor #3 analysis for Semere Road 138 kV station can be found in Table 12. This showed that under system intact conditions the 2025 Spring Light Load, Spring Peak, Summer Shoulder and Summer Peak cases showed power flowing out. Under N-1 contingency events across all studied seasons power was shown to be flowing out of the Semere Road station and onto the surrounding 138 kV transmission lines. The max flow through under system intact and contingency conditions was 2 MW and 77.3 MW, respectively, in the 2025 Summer Shoulder case. Based on these results it was determined power was often flowing through and out of Semere Road, and, therefore, fails Factor #3.

Table 12: Through Flow Results for Semere Road

Season	Semere Road		
	N-0 Through Flow (MW)	Max N-1 Through Flow (MW)	Events w/ Through Flow
25SLL	8.5	20.4	6292
25SPR	0.2	20.9	5950
25SSH	6.5	31.1	6311
25SUM	1.0	26.6	6164
25FAL	0.0	5.8	10
26WIN	0.0	10.0	6

Vatican

The results of the Factor #3 analysis for Vatican 138 kV station can be found in Table 13. This showed that through flow only occurs under contingencies and does not occur system intact. Although through flow only occurs under contingency events, it does occur for numerous different events and across all the loading scenarios. Generally, there are often multiple transmission elements out of service either for planned maintenance or unexpectedly forced out of service. Therefore, it can be concluded that power flowing through Vatican is not rare, and, therefore, fails Factor #3.

Table 13: Through Flow Results for Vatican

Season	Vatican		
	N-0 Through Flow (MW)	Max N-1 Through Flow (MW)	Events w/ Through Flow
25SLL	0.0	31.8	45
25SPR	0.0	46.9	43
25SSH	0.0	39.5	39
25SUM	0.0	56.1	78
25FAL	0.0	23.7	21
26WIN	0.0	21.0	12

Factor 4: When power enters a local distribution system, it is not re-consigned or transported on to some other market

Factor #4 was evaluated by examining the real power flowing through the stations to identify where the power is coming from and where it is going. If power is only flowing into a station it would show that power is only flowing through the station to serve SLEMCO retail customers whereas if power was flowing in and out of the station the power flowing through the station was going to serve customers beyond SLEMCO. Given the station's connection, any power flowing through a station is power associated with MISO market flows and is going on to serve Entergy, Cleco, and LUS customers.

As was shown in the results for Factor #3 every station was shown to have power flowing in and out. Therefore, it can be concluded that all of the stations have power flowing through them that would be transported on the MISO market and used to serve multiple entities, and, accordingly, fail Factor #4.

Factor 5: Power entering a local distribution system is consumed in a comparatively restricted geographical area

For Factor #5 the real power flowing through the station is examined. Using the power flow analysis completed for Factor #3, the direction of the through flow was determined for each of the stations and scenarios. When the through flow occurs in opposite directions under different conditions, it indicates that power is being consumed across a broad geographic region. Additionally, the overall configuration and connections of the stations to the transmission system are considered to identify whether the power goes beyond SLEMCO's service territory. The tables below show the directional flow for each station under different loading conditions and contingencies showing power flowing through the stations to serve customers beyond SLEMCO.

Crowley

The results of the directional flow analysis for the Crowley 138 kV station can be found in Table 14. The typical flow through Crowley is from east to west which means power is flowing into Crowley from Entergy's Richard 138 kV station and out of Crowley to Entergy's Scott 138 kV station. The results show that this directional flow is seen under all contingency events. This shows that the power flowing into Crowley is not only consumed on the 25 kV distribution system, but, also, continues to Entergy's Scott station. Thus, the Crowley station demonstrates power being consumed in a broad geographical area that spans multiple service territories, and, therefore, it fails Factor #5.

Table 14: Directional Flow Results for Crowley

Season	Crowley	
	Events w/ West to East Flow	Events w/ East to West Flow
25SLL	0	6288
25SPR	0	6288
25SSH	0	6329
25SUM	0	6329
25FAL	0	6346
26WIN	0	6396

East Opelousas

The results of the directional flow analysis for the East Opelousas 138 kV station can be found in Table 15. The typical flow through East Opelousas is from west to east which means power is flowing into East Opelousas from Entergy's Colton 138 kV station and out of East Opelousas to Entergy's Champagne 138 kV station. The results show that this directional flow is seen under most contingency events, however, there are certain events where the flow reverses and Entergy's Colton station would be fed through East Opelousas. This shows that the power flowing into East Opelousas is not only consumed on the 25 kV distribution system, but, also, continues to Entergy's Champagne and Colton stations. Thus, the East Opelousas station demonstrates power being consumed in a broad geographical area that spans multiple service territories, and, therefore, it fails Factor #5.

Table 15: Directional Flow Results for East Opelousas

Season	East Opelousas	
	Events w/ West to East Flow	Events w/ East to West Flow
25SLL	6223	30
25SPR	6280	12
25SSH	6300	26
25SUM	6325	7
25FAL	6338	12
26WIN	6384	12

Hebert

The results of the directional flow analysis for the Hebert 138 kV station can be found in Table 16. The typical flow through Hebert is from west to east which means power is flowing into Hebert from Entergy's Henning 138 kV station and out of Hebert to Entergy's Bayou Cove 138 kV station. The results show that this directional flow is seen under most contingency events, however, there are certain events where the flow reverses and Entergy's Henning station would be fed through Hebert. This shows that the power flowing into Hebert is not only consumed on the 25 kV distribution system, but, also, continues to Entergy's Henning and Bayou Cove stations. Thus, the Hebert station demonstrates power being consumed in a broad geographical area that spans multiple service territories and, therefore, it fails Factor #5.

Table 16: Directional Flow Results for Hebert

Season	Hebert	
	Events w/ West to East Flow	Events w/ East to West Flow
25SLL	6290	4
25SPR	6235	21
25SSH	6275	19
25SUM	6326	5
25FAL	6330	8
26WIN	6393	5

Judice

The results of the directional flow analysis for the Judice 138 kV station can be found in Table 17. The typical flow through Judice is from south to north which means power is flowing into Judice from Entergy's Meaux 138 kV station and out of Judice to Entergy's Scott 138 kV station. The results show that this directional flow is seen under most contingency events, however, there are certain events where the flow reverses and Entergy's Meaux station would be fed through Judice. This shows that the power flowing into Judice is not only consumed on the radial 138 kV lines that serve SLEMCO customers, but, also, continues to Entergy's Meaux and Scott stations. Thus, the Judice station demonstrates power being consumed in a broad geographical area that spans multiple service territories, and, therefore, it fails Factor #5.

Table 17: Directional Flow Results for Judice

Season	Judice	
	Events w/ North to South Flow	Events w/ South to North Flow
25SLL	4	6273
25SPR	5	6233
25SSH	2	6310
25SUM	4	6297
25FAL	2	15
26WIN	1	42

Krotz Springs

The results of the directional flow analysis for the Krotz Springs 138 kV station can be found in Table 18. The typical flow through Krotz Springs is from west to east which means power is flowing into Krotz Springs from Entergy's Bobcat 138 kV station and out of Krotz Springs to Entergy's Colonial Springs 138 kV station. The results show that this directional flow is seen under most contingency events, however, there are certain events where the flow reverses and Entergy's Bobcat station would be fed through Krotz Springs. This shows that the power flowing into Krotz Springs is not only consumed on the radial 138 kV lines and 25 kV distribution system that serve SLEMCO customers, but, also, continues to Entergy's Bobcat and Colonial Springs stations. Thus, it can be concluded that the Krotz Springs station demonstrates power being consumed in a broad geographical area that spans multiple service territories and, therefore, fails it Factor #5.

Table 18: Directional Flow Results for Krotz Springs

Season	Krotz Spring	
	Events w/ West to East Flow	Events w/ East to West Flow
25SLL	6282	4
25SPR	6281	4
25SSH	6323	4
25SUM	6318	4
25FAL	6312	4
26WIN	6118	20

LeBlanc Bulk

The results of the directional flow analysis for the LeBlanc Bulk 138 kV station can be found in Table 19. The typical flow through LeBlanc Bulk is from west to east which means power is flowing into LeBlanc Bulk from Entergy's Abbeville 138 kV station and out of LeBlanc Bulk to Entergy's Delcambre Rural 138 kV station. The results show that this directional flow is seen under numerous contingency events, however, there are certain events where the flow reverses and Entergy's Abbeville station would be fed through LeBlanc Bulk. This shows that the power flowing into LeBlanc Bulk is not only consumed on Entergy's Conrad station, and the radial 138 kV lines and 25 kV distribution system that serve SLEMCO customers, but, also, continues to Entergy's Abbeville and Delcambre Rural stations. Thus, it can be concluded that the LeBlanc Bulk station demonstrates power being consumed in a broad geographical area that spans multiple service territories, and, therefore, it fails Factor #5.

Table 19: Directional Flow Results for LeBlanc Bulk

Season	LeBlanc Bulk	
	Events w/ West to East Flow	Events w/ East to West Flow
25SLL	267	26
25SPR	21	1
25SSH	6180	4
25SUM	14	1
25FAL	3	0
26WIN	10	1

Scanlan

The results of the directional flow analysis for the Scanlan 138 kV station can be found in Table 18. The typical flow through Scanlan is from west to east which means power is flowing into Scanlan from Entergy's Acadia 138 kV station and out of Scanlan to Entergy's Bosco 138 kV station. The results show that this directional flow is seen under most contingency events, however, there are certain events where the flow reverses and Entergy's Acadia station would be fed through Scanlan. This shows that the power flowing into Scanlan is not only consumed on the 25 kV distribution system that serves SLEMCO customers, but, also, continues to Entergy's Acadia and Bosco stations. Thus, it can be concluded that the Scanlan station demonstrates power being consumed in a broad geographical area that spans multiple service territories, and, therefore, it fails Factor #5.

Table 20: Directional Flow Results for Scanlan

Season	Scanlan	
	Events w/ West to East Flow	Events w/ East to West Flow
25SLL	6286	7
25SPR	6286	7
25SSH	6327	7
25SUM	6327	7
25FAL	6344	7
26WIN	6394	7

Semere Road

The results of the directional flow analysis for the Semere Road 138 kV station can be found in Table 19. The typical flow through Semere Road is from west to east which means power is flowing into Semere Road from Entergy's Scott 138 kV station and out of Semere Road to Entergy's Cecilia 138 kV station. The results show that this directional flow is seen under most contingency events, however, there are certain events where the flow reverses and Entergy's Scott station would be fed through Semere Road. This shows that the power flowing into Semere Road is not only consumed on the radial 138 kV line that serves SLEMCO customers but also continues on to Entergy's Scott and Cecelia stations. Therefore, it can be concluded that the Semere Road station demonstrates power being consumed in a broad geographical area that spans multiple service territories and would fail Factor #5.

Table 21: Directional Flow Results for Semere Road

Season	Semere Road	
	Events w/ West to East Flow	Events w/ East to West Flow
25SLL	6289	3
25SPR	5841	109
25SSH	6305	6
25SUM	6157	7
25FAL	7	3
26WIN	4	2

Vatican

The results of the directional flow analysis for the Vatican 138 kV station can be found in Table 20. The typical flow through Vatican is from north to south which means power is flowing into Vatican from Entergy's Bloomfield and Cleco's Plaisance 138 kV stations and out of Vatican to Entergy's Scott and LUS's Bonin 138 kV stations. The results show that this directional flow is seen under most contingency events, however, there are certain events where the flow reverses and Entergy's Bloomfield and Cleco's Plaisance stations would be fed through Vatican. This shows that the power flowing into Vatican is not only consumed on the radial 138 kV lines and 25 kV distribution system that serve SLEMCO customers, but, also, continues to Entergy's Bloomfield, Cleco's Plaisance and LUS's Bonin stations. Thus, it can be concluded that the Vatican station demonstrates power being consumed in a broad geographical area that spans multiple service territories, and, therefore, it fails Factor #5.

Table 22: Directional Flow Results for Vatican

Season	Vatican	
	Events w/ North to South Flow	Events w/ South to North Flow
25SLL	32	13
25SPR	42	1
25SSH	26	13
25SUM	78	0
25FAL	20	1
26WIN	3	9

Factor 6: Meters are based at the transmission/local distribution interface to measure flows into the local distribution system

Facilities with meters at the transmission to the local distribution interface are the meters used by the distribution provider to document loads at a distribution substation. These meters are typically unidirectional. Local distribution meters are not tie line meters used on the transmission system to determine interchange between Balancing Areas or Local Balancing Areas. If the metering in place for the facilities under determination are primarily to monitor flows to retail load from the existing transmission, the facilities would fail this factor. The location of the meter is a strong indication of where the boundary of the transmission and distribution systems exist.

Based on the one-line diagrams, which are provided in Appendix B: SLEMCO Station One-line Diagrams, the stations can be categorized into two groups:

1. GLL ownership extends up to and includes the metering
2. GLL ownership extends slightly beyond the metering

For five of the Transmission Assets (Judice, LeBlanc, Scanlan, Semere Road, and Vatican), GridLiance ownership extends up to and includes the single meter in each station. Beyond the meter, there are either SLEMCO 138/25 kV step-down transformers connected to their distribution system or radial 138 kV lines feeding other SLEMCO stations, which eventually step down to serve SLEMCO's retail customers. For instance, at the Judice substation, GridLiance's ownership extends up to and includes the meter shown in Appendix B4: Judice Station One-Line. Beyond the meter, there are two radial 138 kV lines. The meter serves as a clear boundary to distinguish power flowing through the station to serve Entergy, Cleco, and LUS customers from the power that flows only to serve SLEMCO's retail customers.

For the remaining four Transmission Assets (Crowley, East Opelousas, Hebert and Krotz Springs), GridLiance ownership will extend beyond the meter. The key difference is that they all have two parallel meters which allow for an alternate path for power to flow under outage conditions within the station. Under normal operations, power flows from the transmission system through one or more meters directly to SLEMCO's retail customers. However, when parts of the station are in a outage, power flows through one meter with a portion directed to SLEMCO's customers and another portion rerouted through another meter back to the transmission system. For instance, in Krotz Springs, GridLiance owns three switches beyond the two meters as depicted in Appendix B5: Krotz Springs One-Line. The meter linked to the normally open switch J0181 acts as a backup to the meter connected to J0182. For GridLiance to switch between these [redacted]

[redacted]
Hence, despite these switches being beyond the meters, they should be considered part of the transmission system due to their functionality. The other three stations (Crowley, East Opelousas, and Hebert) have a similar configuration, and, therefore, fail Factor #6.

For both categories of the stations, GLL ownership only extends to equipment that would have network flows from the transmission system. Therefore, it was concluded that the assets are based on the transmission side of the meters, and, therefore, fail Factor #6.

Factor 7: Local distribution systems are of reduced voltage

For Factor 7 the operating voltage of the transmission assets are examined and compared to the operating voltages of the transmission and distribution facilities in the area. The highest and lowest operating voltage for each of the stations is provided in Table 23. GLL's ownership will be limited to equipment that is operated at 138 kV. All nine stations operate at 138 kV, with most stepping down to a reduced voltage of 25 or 13.8 kV to provide power to SLEMCO's retail customers. Notably, Judice, LeBlanc, and Semere Road only have 138 kV equipment and no step-down transformers, strongly indicating that 138 kV is not considered a reduced voltage in the area. Additionally, Entergy's Attachment O filing with MISO contains transmission assets with an operating voltage from 69 kV to 500 kV. The facilities included in the Attachment O filing document what Entergy and MISO consider to be transmission. As such, 138 kV would not be considered a reduced voltage for the area and since all nine stations are operated at 138 kV, and, therefore the Transmission Assets fail Factor #7.

Table 23: Transmission Assets Operating Voltage

Asset Name	Highest Voltage (kV)	Lowest Voltage (kV)
Crowley	138	25
East Opelousas	138	25
Hebert	138	25
Judice	138	138
Krotz Springs	138	13.8
LeBlanc	138	13.8
Scanlan	138	25
Semere Road	138	138
Vatican	138	25

Totality of Circumstances

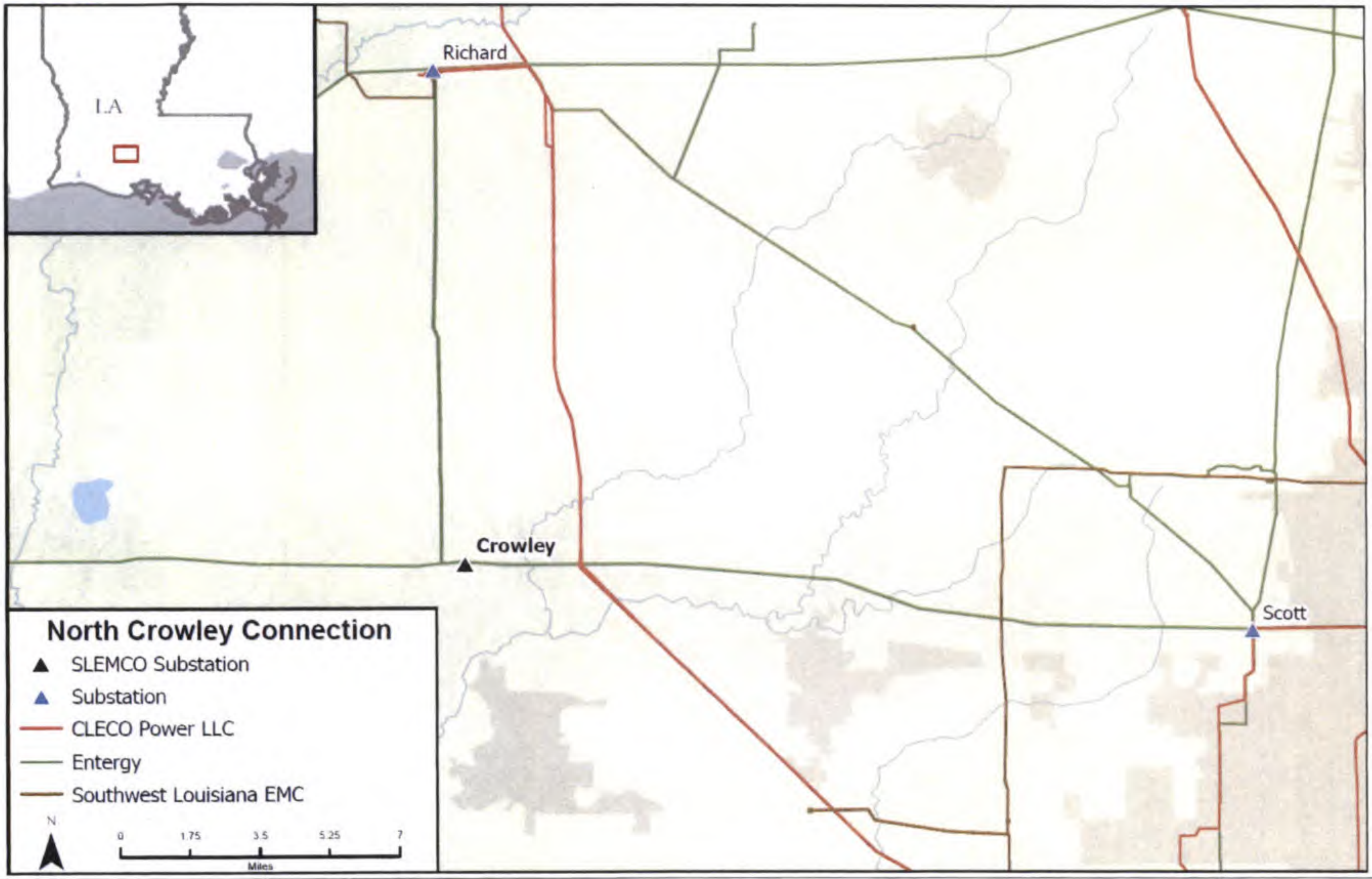
A summary of the determination for each of the factors from the seven-factor test for each station is provided in Table 24. The fact that the stations are integrated into the existing transmission system and through flow is often observed makes it clear the stations are a critical part of the transmission system. For all nine stations they fail all seven factors which demonstrates that these stations should be classified as transmission.

Table 24: Summary of FERC 7 Factor Determination

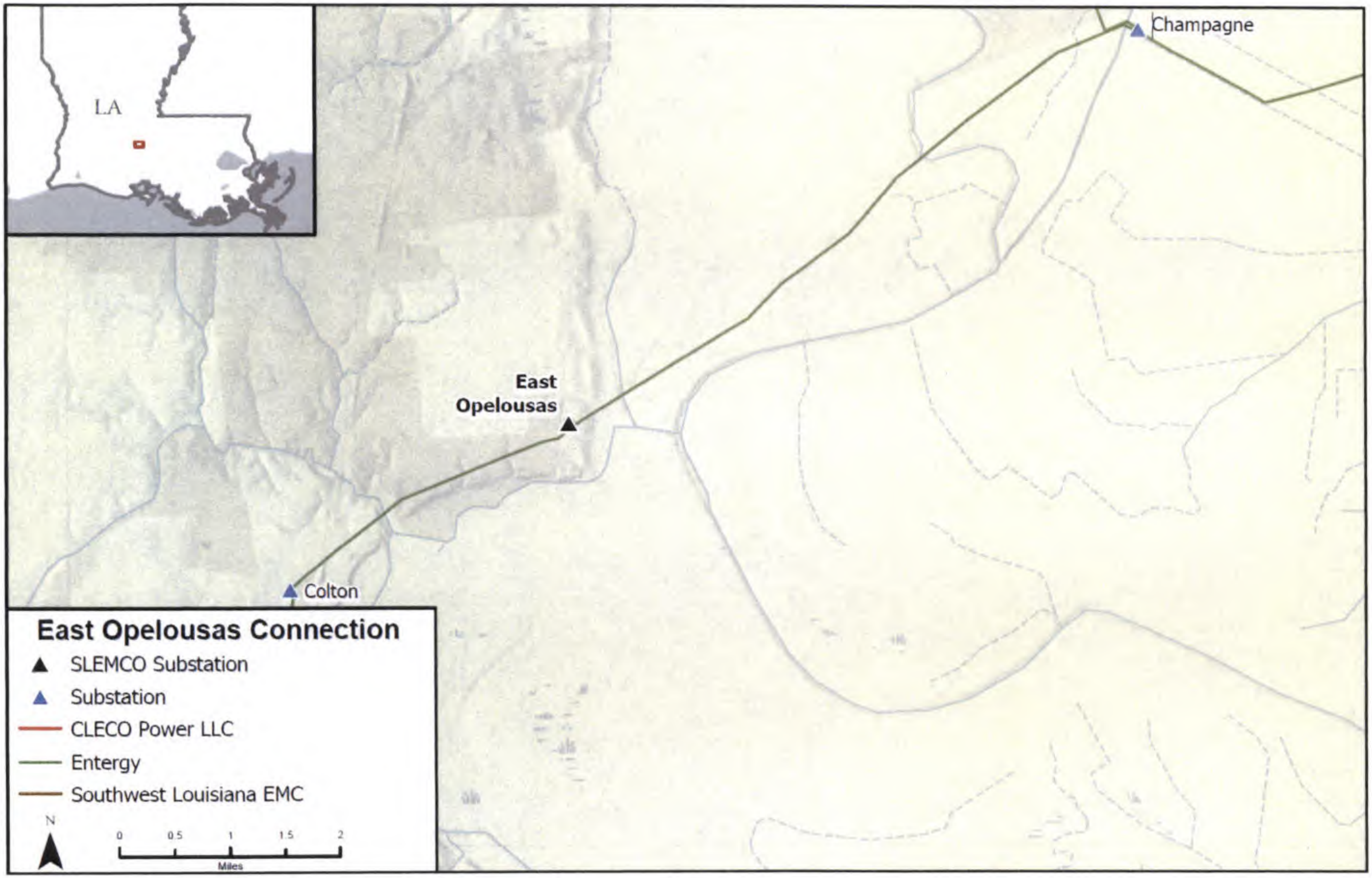
Station	FERC 7 Factor Determination						
	1	2	3	4	5	6	7
Crowley	Fail	Fail	Fail	Fail	Fail	Fail	Fail
East Opelousas	Fail	Fail	Fail	Fail	Fail	Fail	Fail
Hebert	Fail	Fail	Fail	Fail	Fail	Fail	Fail
Judice	Fail	Fail	Fail	Fail	Fail	Fail	Fail
Krotz Springs	Fail	Fail	Fail	Fail	Fail	Fail	Fail
LeBlanc Bulk	Fail	Fail	Fail	Fail	Fail	Fail	Fail
Scanlan	Fail	Fail	Fail	Fail	Fail	Fail	Fail
Semere Road	Fail	Fail	Fail	Fail	Fail	Fail	Fail
Vatican	Fail	Fail	Fail	Fail	Fail	Fail	Fail

Appendix A: SLEMCO Station Geographic Location

A1: Crowley



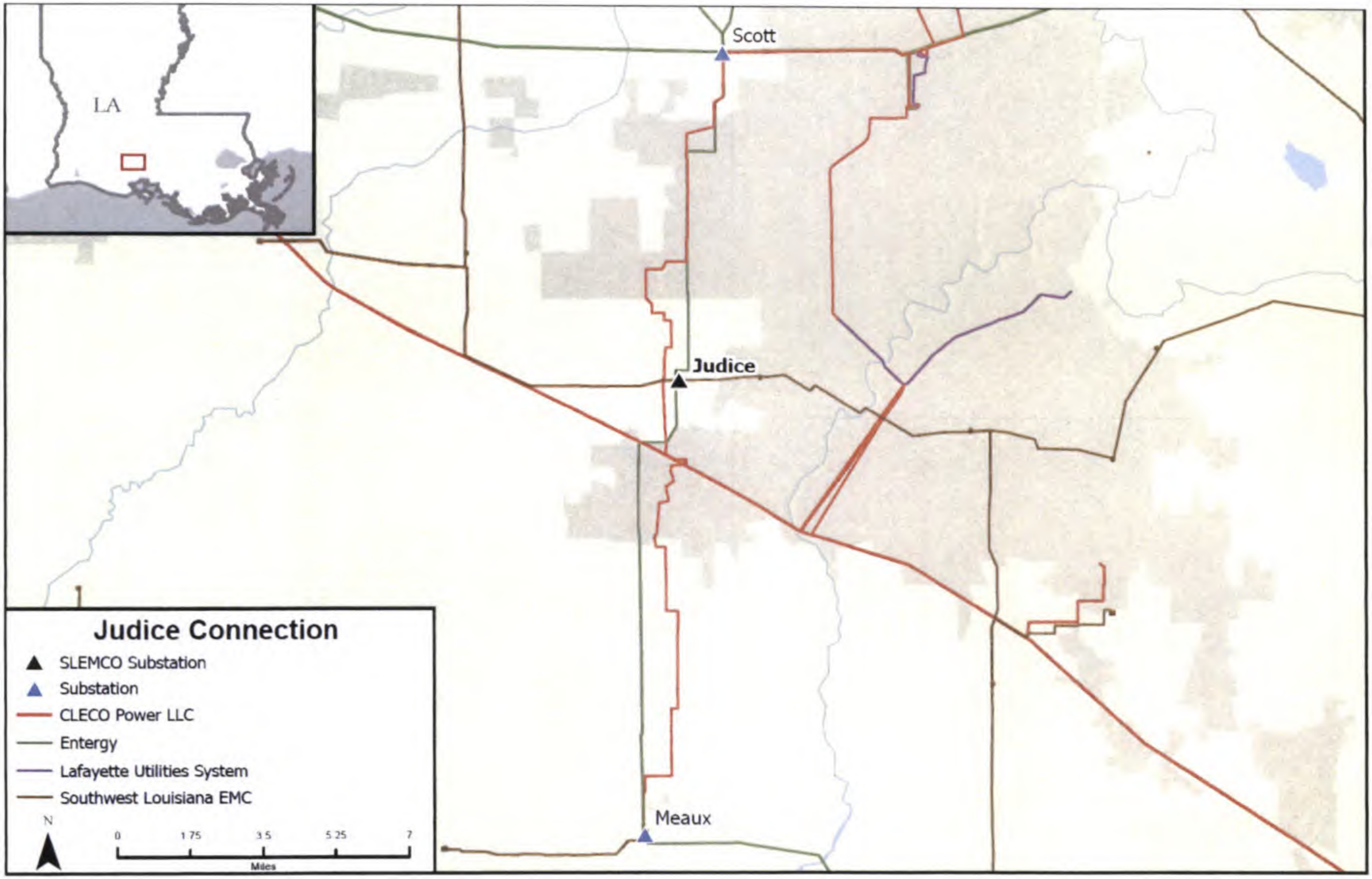
A2: East Opelousas



A3: Hebert

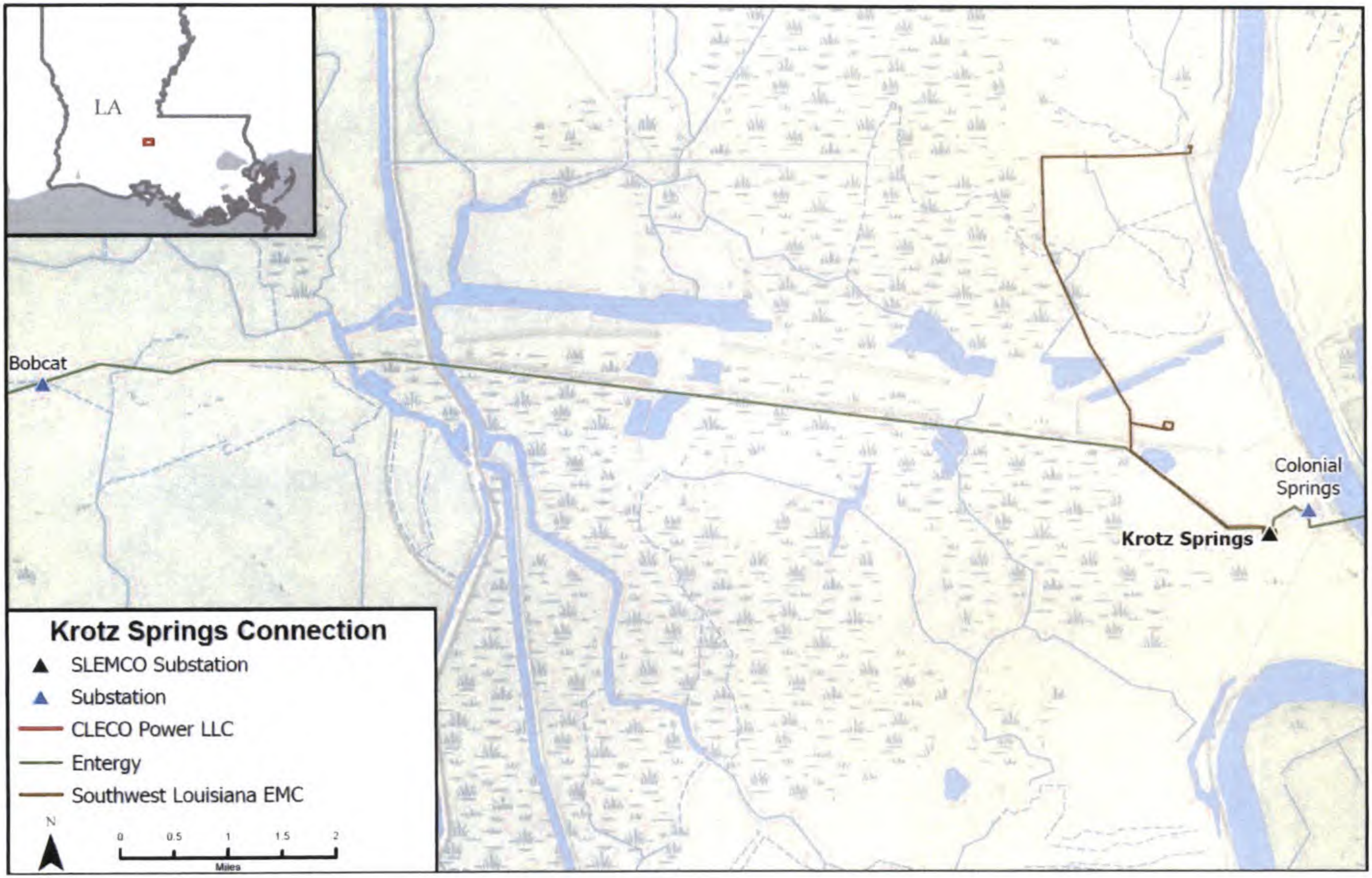

LA
Bayou Cove
Hebert
Henning
Hebert Connection
SLEMCO Substation
Substation
Entergy
Southwest Louisiana EMC
N
0
0.75
1.5
2.25
3
Miles

A4: Judice

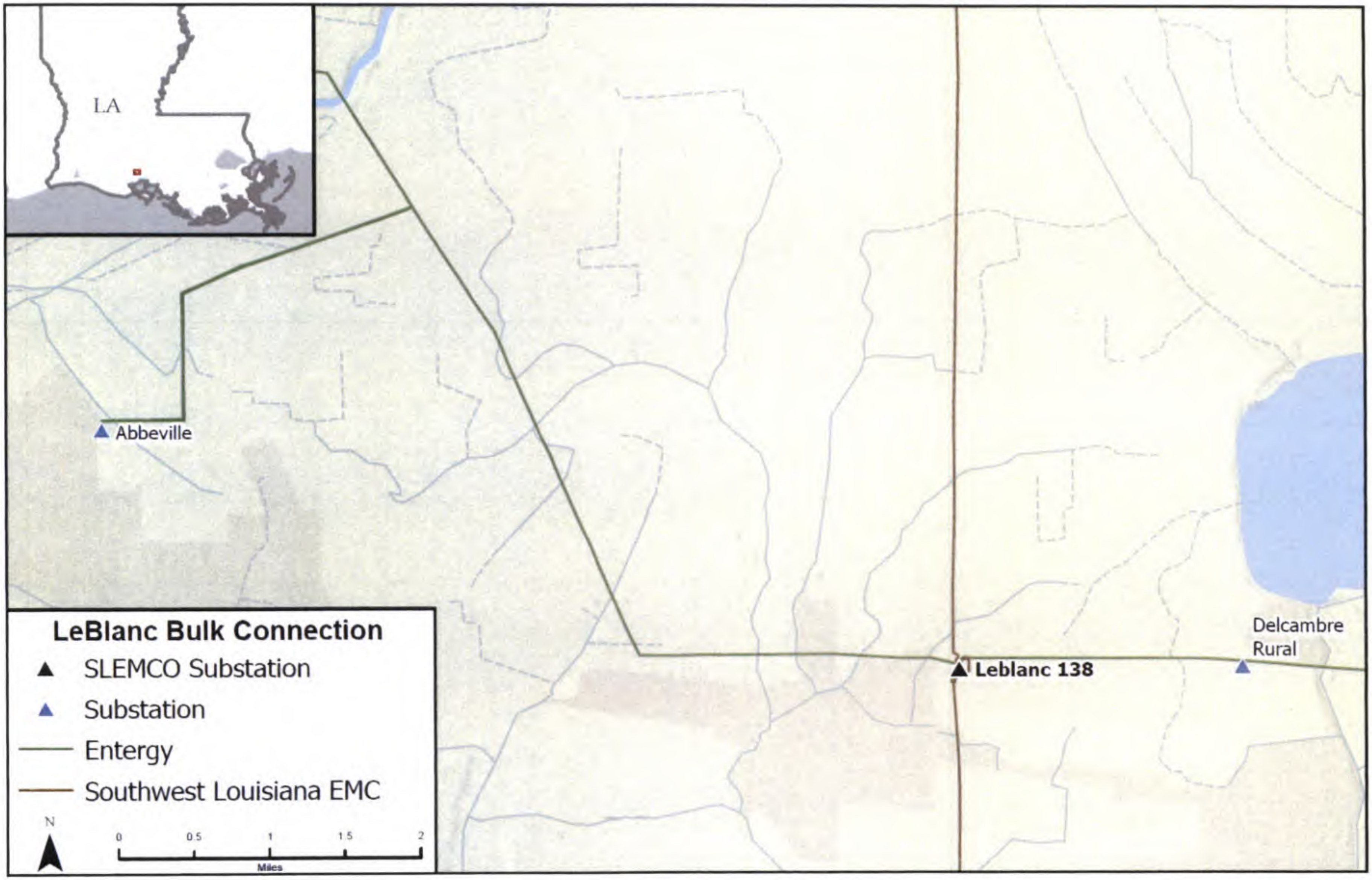


LA
Scott
Judice
Meaux
Judice Connection
SLEMCO Substation
Substation
CLECO Power LLC
Entergy
Lafayette Utilities System
Southwest Louisiana EMC
N
0
1.75
3.5
5.25
7
Miles

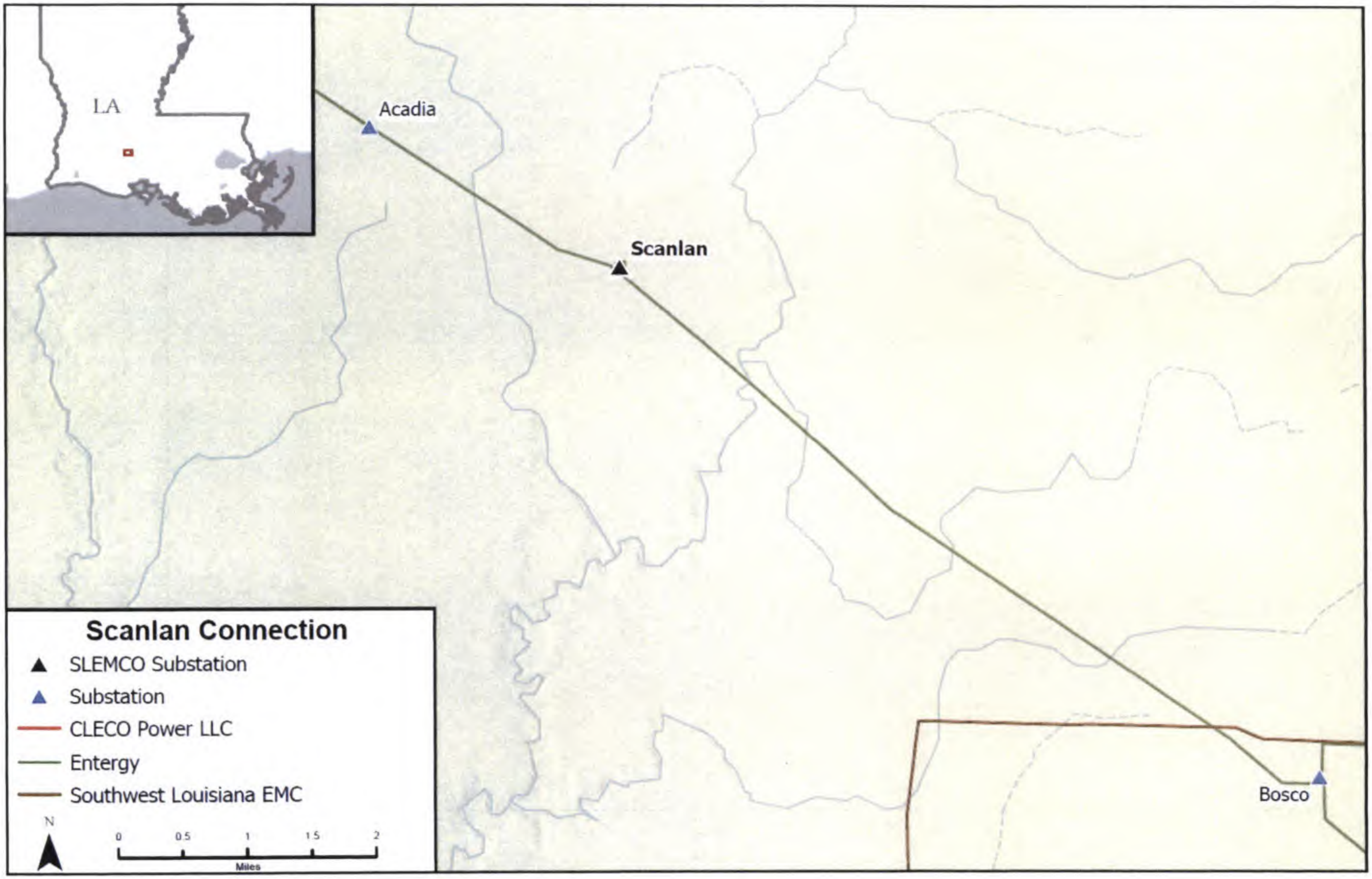
A5: Krotz Springs



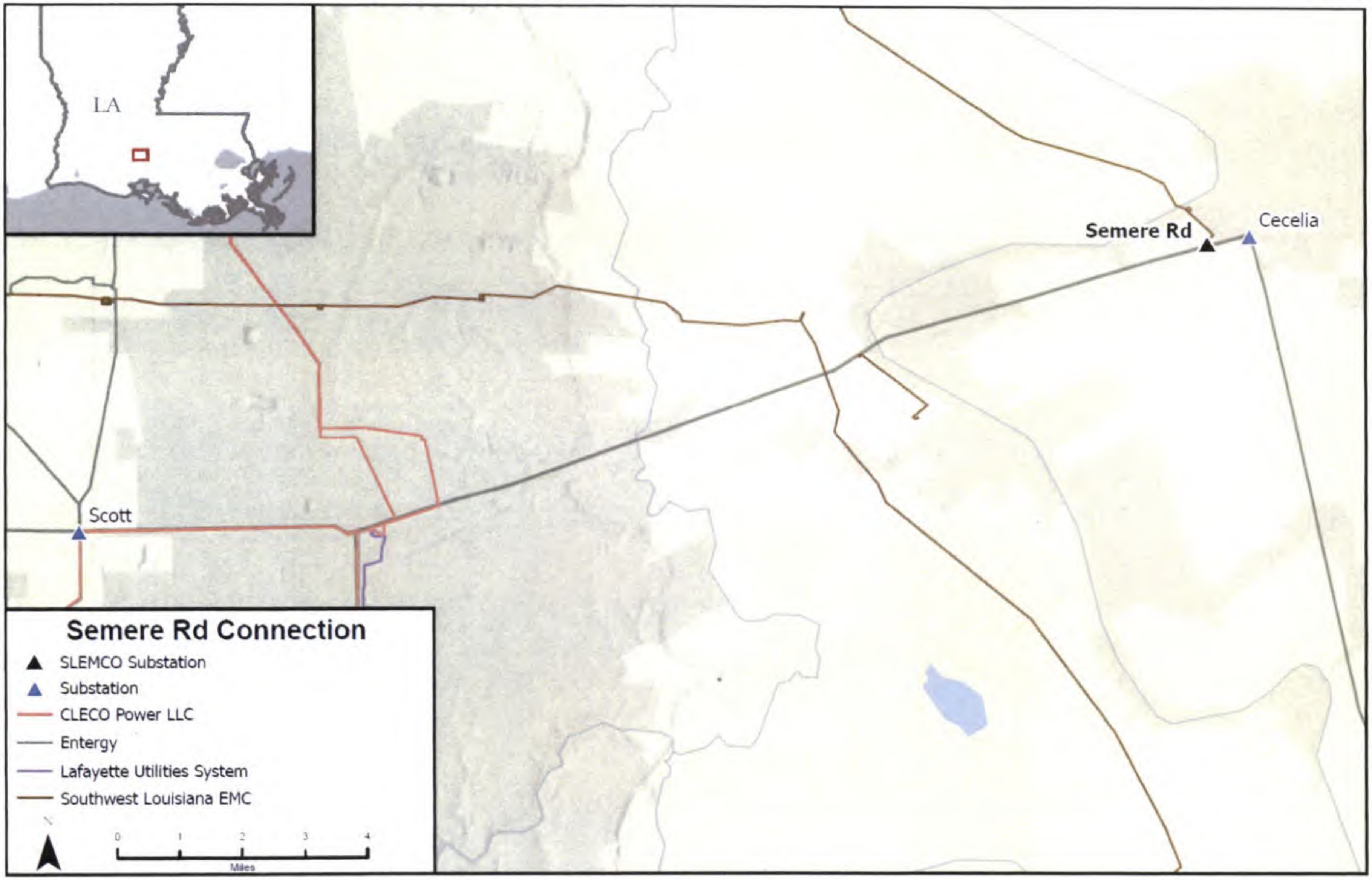
A6: LeBlanc Bulk



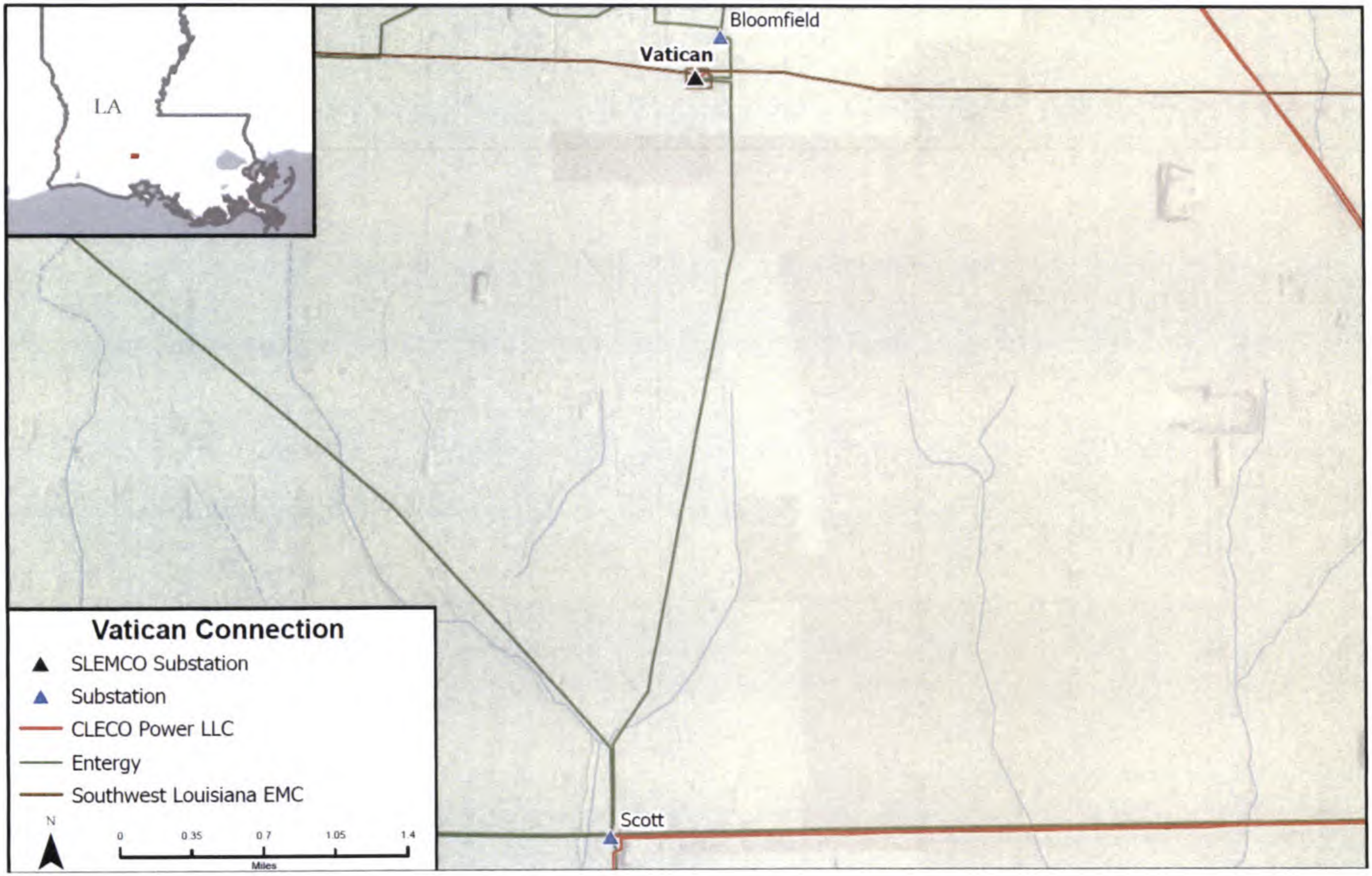
A7: Scanlan


LA
Acadia
Scanlan
Bosco
Scanlan Connection
SLEMCO Substation
Substation
CLECO Power LLC
Entergy
Southwest Louisiana EMC
N
0
0.5
1
1.5
2
Miles

A8: Semere Road



A9: Vatican


Bloomfield
Vatican
LA
Scott
Vatican Connection
SLEMCO Substation
Substation
CLECO Power LLC
Entergy
Southwest Louisiana EMC
N
0
0.35
0.7
1.05
1.4
Miles

[redacted]

[redacted]

B2: East Opelousas Station One-line

[redacted]

B3: Hebert Station One-line

[redacted]

GridLiance

A NEXTERA ENERGY TRANSMISSION COMPANY

B4: Judice Station One-line

[redacted]

B5: Krotz Springs Station One-line

[redacted]