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April 29, 2022

RECEIVED

APR 29 2022

VIA HAND DELIVERY

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

LA Public Service Commission

Re: *In Re: Application of Entergy Louisiana, LLC for Recovery in Rates of Costs Related to Hurricane Ida and for Related Relief*
(LPSC Docket No. U-_____)

Dear Mr. Frey:

I have enclosed the original and three copies of the Application of Entergy Louisiana, LLC ("ELL"), for Recovery in Rates of Costs Related to Hurricane Ida and for Related Relief (the "Application"). With this Application, ELL seeks the Commission's determination of the restoration costs for ELL's response to Hurricane Ida that are eligible for recovery of ELL's customers. This filing is supported by the Direct Testimony and Exhibits of Phillip R. May, Sarah M. Marcus, John W. Hawkins, Jr., Michelle P. Bourg, Jason E. Willis, Amy M. Parker, and Barry D. Keim, Ph.D. Please retain the original and two copies for your files and return a date-stamped copy to our courier.

Also, enclosed, please find five CDs which include Sarah Marcus's Highly Sensitive Protected Materials Exhibit 3, which is being provided to you under seal pursuant to the provisions of the LPSC General Order dated August 31, 1992, and Rules 12.1 and 26 of the Commission's Rules of Practice and Procedures. The confidential materials included in the filing consist of competitively sensitive information. For this reason, this material is confidential and commercially sensitive. The disclosure of the information contained herein would subject not only the Company, but also its customers and vendors, to a substantial risk of harm. Accordingly, it is critical that this information remain confidential.

Please retain the Highly Sensitive CDs for your files and return to the courier a date-stamped copy. Any additional copies of the Highly Sensitive Protected Materials will be made available to appropriate reviewing representatives upon receipt of an executed copy of a suitable Confidentiality Agreement and/or Non-Disclosure Certificate adopted in this matter.

Because of the need for timely approval of the relief requested in this application, ELL respectfully requests that a fifteen-day period be established for interventions. Rule 19 of the Commission's Rules of Practice and Procedure allows the standard twenty-five-day intervention

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Mr. Brandon Frey

April 29, 2022

Page Two

period to be modified. A fifteen-day intervention period will facilitate a timely review of the application.

If you have any questions, please do not hesitate to call me. Thank you for your courtesy and assistance with this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Rosenbloom', with a long horizontal flourish extending to the right.

D. Skylar Rosenbloom

DSR/lp
Enclosure

cc: LPSC Commissioners (*via e-mail*)

RECEIVED

APR 29 2022

BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

LA Public Service Commission

**IN RE: APPLICATION OF ENTERGY)
LOUISIANA, LLC FOR RECOVERY)
IN RATES OF COSTS RELATED TO)
HURRICANE IDA AND FOR)
RELATED RELIEF)**

DOCKET NO. U- _____

**APPLICATION OF ENTERGY LOUISIANA, LLC FOR
RECOVERY IN RATES OF COSTS RELATED TO
HURRICANE IDA AND FOR RELATED RELIEF**

Pursuant to the Rules of Practice and Procedure of the Louisiana Public Service Commission (“LPSC” or the “Commission”), Entergy Louisiana, LLC (“ELL” or the “Company”) respectfully submits this Application relative to the recoverable costs incurred and to be incurred by the Company to restore its facilities following the damage caused by Hurricane Ida, among other things.

In particular, with this Application, ELL requests that the Commission determine the prudence of its restoration efforts for this storm and certify the resulting costs as eligible for recovery. The Company is also seeking Commission approval of the functionalization of the restoration costs between Generation, Transmission, and Distribution and determination of how these costs will be allocated among customer classes. In addition, the Company intends to file supplemental applications regarding the financing of and matters ancillary to its restoration costs. Those supplemental applications will be filed in time to permit the Commission to issue orders simultaneously addressing both the amount of the restoration costs that may be recovered and the method of financing and recovery from customers.

As further described herein, the relief sought by the Company in this Application, as supported by the accompanying witness testimony and exhibits thereto, is necessary and essential

to ensure the Company's continued financial stability and to permit the Company to continue providing safe and reliable service to its customers at reasonable rates.

OVERVIEW OF THE APPLICATION

I

ELL is a limited liability company duly authorized and qualified to do and doing business in the State of Louisiana, created and organized for the purposes, among others, of generating, transmitting, distributing, and selling electricity for power, lighting, heating, and other such uses; and ELL is engaged in the business thereof in fifty-eight (58) of the sixty-four (64) parishes of the State of Louisiana.

II

ELL provides electric service to approximately 1.1 million customers. A significant portion of ELL's service area in Louisiana is comprised of communities that are regularly exposed to extreme weather and flooding.

III

In this proceeding, as discussed by Company witness Phillip R. May and others, the Company seeks a determination that the costs incurred to rebuild its electric infrastructure and restore power to customers in connection with Hurricane Ida were prudently incurred and are, therefore, eligible for recovery from customers.

IV

On August 29, 2021, Southeast Louisiana was devastated by Hurricane Ida, a strong Category 4 hurricane with sustained winds of 150 miles per hour. Although tying Hurricane Laura in terms of strength, Hurricane Ida's unorthodox behavior resulted in unprecedented damage which far surpassed Hurricane Laura. Company witness Barry D. Keim, Ph.D, discusses Hurricane Ida's strength, intensity, and unusual behavior.

V.

As explained by Mr. May, and company witnesses Michelle P. Bourg, John W. Hawkins, Jr., and Jason E. Willis, the Company sustained unprecedented damage and destruction from Hurricane Ida. Nevertheless, when coupled with the additional burdens imposed by COVID-19 safety precautions, among other things, ELL worked tirelessly and creatively to minimize interruptions and restore power to its customers and did so with remarkable speed under the circumstances.

VI.

In responding to Hurricane Ida, the Company took all actions reasonably available to restore service as quickly and safely as possible for the benefit of its customers and the regional economy. In doing so, ELL coordinated its preparation and restoration efforts for Hurricane Ida with government officials, including the LPSC and its Staff, the Governor of Louisiana, and officials from local municipalities and parishes as well as the Department of Energy.

VII.

As discussed by Company witness Sarah M. Harcus and others, ELL's gross storm costs attributable to Hurricane Ida, including estimates of restoration work not completed as of March 31, 2022, but excluding carrying costs, are \$2.543 billion. After adding carrying costs through December 2022, the total Hurricane Ida related storm costs for which ELL is requesting approval is \$2.60 billion. Additionally, the Company is seeking approval of additional costs associated with Hurricanes Laura, Delta, and Zeta and Winter Storm Uri in the amount of \$31.9 million. After adding carrying costs for those amounts through December 2022 of \$2.9 million, ELL is seeking recovery of an additional \$34.8 million. Some of these amounts were not recorded on the Company's books at the time the Company filed its Supplemental Direct Testimony relating to the

quantification of storm costs in LPSC Docket U-35991. The remaining amounts were originally included as estimates in that docket for which actual costs are now available.

VIII.

In the case of Hurricane Ida, ELL does not have a total amount of final storm costs because certain storm-related projects remain to be completed and some vendors have yet to submit invoices, but these types of costs represent a small percentage of all storm costs.

IX.

Consistent with prior storms, ELL is including in its requests estimated costs for Hurricane Ida so that it may move forward with the regulatory approval process and potentially finance or securitize while rates remain attractive. Any estimated costs will be subject to true-up and reconciliation after the actual costs are known. ELL will provide the actual cost information for these projects as they are completed.

X.

As explained by Mr. May, Ms. Bourg, Mr. Hawkins, and Mr. Willis, all of the costs incurred by the Company were necessary to restore service to customers and to reconstruct the transmission, distribution, and generation systems promptly and safely in the wake of the damage caused by Hurricane Ida in ELL's service area.

XI.

While the amounts expended on materials, labor, and the other cost categories were substantial, the public interest required that ELL restore service as quickly as reasonably and safely possible. Had ELL not acquired these resources in the manner that it did, the restoration of ELL's systems to provide power to essential facilities, such as water plants, sewage-treatment plants, hospitals, nursing homes, and law enforcement facilities, as well as industries critical to the regional, state, and national economies, would have taken substantially longer, as would the time

period for restoring power to other customers. Thus, under the circumstances, the costs incurred were necessary to restore power safely, timely, and efficiently.

XII.

In order to ensure that costs for each storm were appropriate and properly recorded, as described by Ms. Marcus and others, the Company maintained a strong system of internal controls. The Company will make available all documentation supporting the costs for which the Company is seeking recovery.

XIII.

The majority of storm costs for Hurricane Ida were also subject to an external attestation examination, as described in the direct testimony of Amy M. Parker, a partner with Deloitte and Touche LLP (“D&T”) to verify that the Company has presented a complete and accurate representation of valid storm costs. The mutual assistance costs associated with Hurricane Ida that were incurred, but not yet invoiced, by March 31, 2022 were excluded from D&T’s engagement scope because the Company determined that it had not received sufficient documentation from external contractors to allow for a meaningful review of these amounts. Mutual assistance costs associated with Hurricane Ida for which invoices had been received by March 31, 2022 were included in D&T’s review.

XIV.

The relief sought in this Application would affect all of the Company’s retail customers.

Hurricane Ida

XV.

On August 29, 2021, Hurricane Ida made landfall near Port Fourchon, Louisiana, as a strong Category 4 hurricane with sustained winds of 150 miles per hour. An instantaneous peak

wind gust of 172 miles per hour was clocked by instruments on a ship in Port Fourchon as the eyewall of the storm pummeled the Louisiana coast.

XVI.

Hurricane Ida tied 2020's Hurricane Laura as the most intense hurricane to make landfall in Louisiana since 1856. Most hurricanes rapidly weaken following landfall, limiting the most extensive damages to at or near the coastline. Hurricane Ida did not follow this pattern. Instead, Hurricane Ida maintained its catastrophic Category 4 strength for six hours after landfall, inflicting extensive damage well inland of the Louisiana gulf coastline.

XVII.

Despite its tying Hurricane Laura in terms of strength, Hurricane Ida's unorthodox behavior resulted in unprecedented damage to ELL's utility system in southeast Louisiana that far surpassed the damages that Hurricane Laura inflicted in southwest Louisiana in 2020. The magnitude of the damage caused by Hurricane Ida, particularly to the Company's distribution infrastructure in the coastal communities in southeast Louisiana, presented several challenges that the Company had to overcome in restoring service to its customers.

XVIII.

The storm damaged or destroyed more than double the number of distribution poles as Hurricane Laura destroyed in 2020 and more than Hurricanes Katrina, Ike, Delta, and Zeta combined. In all, Hurricane Ida's damage to ELL's distribution system included nearly 30,000 poles, over 5,500 transformers, nearly 35,000 spans of conductor, and over 21,000 cross-arms. Mr. Hawkins details the distribution damage in his testimony and discusses the necessary restoration costs incurred by the Company.

XIX.

Hurricane Ida also affected five generating plant sites owned and operated by ELL. These plants, located near Montz, Westwego, and Killona are the J. Wayne Leonard Power Station, Little Gypsy, Ninemile Point (Units 4 and 5), Ninemile (Unit 6) and Waterford (Units 1, 2, 3, and 4). These generating sites experienced moderate to significant wind and water damage as a result of Hurricane Ida and its effects. Mr. Willis further discusses this damage, and the necessary restoration costs incurred, in his testimony.

XX.

Furthermore, the path that Hurricane Ida took was directly over critical transmission corridors in the region, bisecting two major areas of the state (the New Orleans and Baton Rouge metropolitan areas), ultimately resulting in the disconnection of the greater New Orleans region from the Eastern Interconnection with all eight transmission ties into that region rendered out of service. Although those lines went out of service in the wake of strong hurricane-force winds, the lines incurred damage to less than 2% of their structures and were restored to service within a few days of the storm's exit from the area. As a whole, the transmission system performed well in Hurricane Ida, with more recently installed facilities that were designed and constructed under current standards largely remaining intact and requiring repairs as opposed to full scale replacement. Ms. Bourg discusses the transmission damage in her testimony and discusses the necessary restoration costs incurred by the Company.

XXI.

Despite the challenges presented by Hurricane Ida, ELL restored service to 90% of Louisiana customers affected by Hurricane Ida by September 14, 2021 (after 15 days of restoration work). Power to nearly all customers who were able to safely accept service (*i.e.*, customers who

did not require reconstruction of their personal property) was restored by September 27, 2021 (29 days after Hurricane Ida made landfall).

SUMMARY OF STORM COSTS

XXII.

As noted above, ELL's gross storm costs, including estimates of restoration work not completed as of March 31, 2022, but excluding carrying costs, are \$2.543 billion. After adding carrying costs through December 2022, the total Hurricane Ida related storm costs for which ELL is requesting approval is \$2.60 billion. Additionally, the Company is seeking approval of additional costs associated with Hurricanes Laura, Delta, and Zeta and Winter Storm Uri in the amount of \$31.9 million. After adding carrying costs for those amounts through December 2022 of \$2.9 million, ELL is seeking recovery of an additional \$34.8 million. In total, ELL is requesting a Commission determination that a total of \$2.637 billion was prudently incurred and, therefore, is eligible for recovery from customers.

XXIII.

At a summary level, and as further discussed by Ms. Harcus in her testimony, the Company presents its storm costs both by "class" of cost and by "category" of cost. In this Application and supporting testimony, a class of cost is a distinct operational or functional grouping. The three cost classes are Generation, Transmission, and Distribution. Within each of the three functional classes of costs, direct costs are further assigned to one of five major cost categories. The five cost categories are: Materials, Contract Work, Labor, Employee Expenses, and Other. Affiliate costs are assigned one of two major cost categories – ESL Billings or Loaned Resources. The final cost category is Uninvoiced Mutual Assistance.

XXIV.

The following Table 1 shows the Company's storm costs, exclusive of carrying costs, by class and category:

Table 1: Hurricane Ida Storm Costs

Description	Distribution	Generation	Transmission	Total
Direct Costs				
Contract Work	\$ 1,791,458,722	\$ 46,267,385	\$ 207,826,363	\$ 2,045,552,470
Employee Expenses	88,515,044	240,852	130,293	88,886,188
Labor	20,920,630	978,023	1,777,775	23,676,427
Materials	117,896,594	5,816,394	12,335,736	136,048,723
Other	5,898,683	9,718,577	6,281,989	21,899,249
Affiliated Costs				
ESL Billings	23,757,972	4,619,278	2,109,589	30,486,840
Loaned Resources	6,819,934	388,379	1,445,362	8,653,674
Uninvoiced Mutual Assistance	36,239,080		1,025,640	37,264,720
Total Costs Through 3/31/22	\$ 2,091,506,659	\$ 68,028,888	\$ 232,932,746	\$ 2,392,468,292
Estimated Cost to Complete	124,320,478	26,463,197	-	150,783,675
Total Gross Storm Costs	\$ 2,215,827,137	\$ 94,492,085	\$ 232,932,746	\$ 2,543,251,967

THE FINANCIAL EFFECT OF HURRICANE IDA

XXV.

As discussed by Mr. May and Ms. Harcus, the cost of restoration for a single storm, let alone four hurricanes in two years, in the middle of the COVID-19 pandemic (which required the use of significant safety and health protocols) places a serious financial burden on the Company because it is required to expend large sums very quickly, which reduces ELL's liquidity and can affect the financial metrics supporting its current credit ratings, which are regularly examined by the investment community.

XXVI.

To provide the Company with liquidity until it could plan for the financing of Hurricane Ida, ELL, with the Commission's support and approval, issued approximately \$1 billion in shorter-term debt to finance storm costs until permanent financing for those storm costs could occur. The

Commission also approved ELL's request to finance a dedicated \$1 billion Hurricane Ida escrow account, funds from which the Company may only draw to cover actual Hurricane Ida system restoration costs. As discussed in detail in the Company's testimony in support of these measures in LPSC Docket No. U-35991, financing the Company's storm costs in this manner also will offer significant cost savings to ELL's customers relative to the alternative of traditional utility recovery methods.

XXVII.

It is also essential, as discussed in this Application, that the Commission, in as expeditious a manner as possible, determine the prudence of the Company's restoration costs and certify them as eligible for recovery. ELL is also seeking Commission approval of the functionalization of the restoration costs between Generation, Transmission, and Distribution and how these costs should be allocated among customer classes.

XXVIII.

As previously noted, the Company intends to file supplemental applications regarding the financing of and matters ancillary to its recoverable storm costs. Those supplemental applications will be filed in time to permit the Commission to issue orders simultaneously addressing both the amount of the storm costs that may be recovered and the method of recovery. ELL recommends that the Commission utilizes the same allocation methodology that has been approved in the last few storm recovery filings made by the Company, including Docket No. U-35991.

REGULATORY APPROVAL PLAN

XXIX.

The Company asks the Commission to review the prudence of its storm restoration efforts and approve the resulting costs as eligible for recovery from customers and to determine the

manner in which the costs may be financed and recovered, with all such relief to be ordered simultaneously.

XXX.

However, in this initial filing, ELL presents the costs for which it seeks recovery, and asks that the Commission review these costs and approve them as eligible for recovery, as well as related rate issues.

XXXI.

ELL intends to supplement this filing with a request regarding the financing and recovery of the recoverable storm restoration costs. The Commission previously has approved the use of tariff monetization bonds or securitization bonds as a means to recover storm costs, finding that it lowered costs to customers. ELL expects to request that the Commission approve the use of tariff monetization bonds in this instance as well. In the supplemental filing, which is expected to be made within approximately thirty to forty-five days of this initial filing, ELL will address the financing of the costs associated with Hurricane Ida.

XXXII.

The Company requests that the approvals requested herein and those to be requested in the supplemental applications be issued by the Commission no later than the September 2022 Business & Executive Session. Approval by this date would permit the Company to issue approved financing in December 2022 and commence recovery from customers in early 2023, although the Commission may wish to consider approvals prior to September 2022 which could have the effect of reducing carrying costs and accessing lower bond interest rates.

COMPANY WITNESS TESTIMONY

XXXIII.

As previewed herein, the Company's Application is much more than simply cost figures. The Company's witnesses provide detailed explanations regarding:

- why Hurricane Ida was so destructive and, thus, costly;
- the unique issues faced by the Company during the restoration; and
- the systems and practices in place or implemented in response to the storm and the COVID-19 pandemic to monitor, control, and reduce costs, while also expediting restoration in a safe and organized manner.

XXXIV.

The Direct Testimony and associated exhibits for the following ELL witnesses supporting the requested relief are attached hereto and filed herewith as part of this Application. It is anticipated that these witnesses, as well as any necessary rebuttal witnesses, will be called to testify at the hearing of this matter on the subjects indicated below:

- Phillip R. May, President and Chief Executive Officer of ELL. As the overall policy witness, Mr. May provides an overview of the relief the Company seeks and the damage caused by the hurricane and the Company's response thereto. He also describes the Company's interaction with its customers, and discusses the financial impact of the storm on the Company. Finally, Mr. May introduces the other witnesses who support the Company's Application.
- Sarah M. Harcus, Director of Finance for ELL. Ms. Harcus presents the Company's total storm costs for Hurricane Ida and describes ELL's procedures for approving and accounting for these costs. Ms. Harcus also presents additional storm costs for

Hurricanes Laura, Delta, and Zeta and Winter Storm Uri. Ms. Marcus calculates the carrying charges on the storm costs through December 2022 and details ELL's intent to finance amounts incurred in connection with the storms. Finally, Ms. Marcus discusses considerations for allocating these costs across ELL's various rate classes.

- John W. Hawkins, Jr., Vice President, Distribution Operations – Louisiana. Mr. Hawkins provides an overview of ELL's distribution system and describes the Distribution Operations Organization. He also provides details about the Company's restoration plans and the implementation of those plans. He summarizes the impact of Hurricane Ida on ELL's distribution system and discusses the significant restoration work done by the Company following the storm, including the Company's interaction with stakeholders before, during, and after the storm. Mr. Hawkins also presents the distribution-related storm costs incurred by the Company.
- Michelle P. Bourg, Vice President, Asset Management for Entergy Services, LLC ("ESL"). Ms. Bourg describes ELL's transmission system as well as the Entergy Transmission Organization. She also describes the damage suffered by the Company's transmission system from Hurricane Ida; the work that was undertaken to restore the system; and the resources used to restore service. Finally, Ms. Bourg presents the total transmission-related costs necessary to restore ELL's transmission system.
- Jason E. Willis, Vice President, Power Plant Operations for ESL. Mr. Willis summarizes the effect of Hurricane Ida on ELL's power generation assets and the

Company's efforts to restore the generating capability of its generation facilities following the storm. Mr. Willis also presents the generation-related storm costs incurred by the Company.

- Amy M. Parker, Certified Public Accountant and Partner at D&T. Ms. Parker discusses the results of an independent attestation examination of the Company's summary of storm costs.
- Dr. Barry Keim, Ph.D., State Climatologist for the State of Louisiana and the Richard J. Russell Professor in the Department of Geography & Anthropology at Louisiana State University in Baton Rouge, Louisiana. Dr. Keim provides information about Hurricane Ida and its place in history among storms that have impacted Louisiana.

SERVICE OF NOTICE AND PLEADINGS

XXXV.

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

Mark Kleehammer
Elizabeth Ingram
Stacy Castaing
Patrick Sullivan
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4809 Jefferson Highway
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W. Raley Alford, III
Alison N. Palermo
STANLEY, REUTER, ROSS,
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New Orleans, Louisiana 70112
Telephone: (504) 523-1580
Facsimile: (504) 524-0069
wra@stanleyreuter.com
anp@stanleyreuter.com

ELL requests that the foregoing persons be placed on the Official Service List for this proceeding, and respectfully requests that the Commission permit the designation of more than one person to be placed on the Official Service List for service in this proceeding.

REQUEST FOR CONFIDENTIAL TREATMENT

XXXVI.

Portions of the Company's evidence supporting this Application contain information considered by the Company to be proprietary and confidential. Disclosure of certain of this information may expose the Company and its customers to an unreasonable risk of harm. Therefore, in light of the commercially sensitive nature of such information, the Company has submitted two versions of each of the affected documents, one marked "Non-Confidential

Redacted Version” and the other marked “Confidential Version.” In anticipation of the execution of a suitable confidentiality agreement in this docket, the Confidential Versions bear the designation “Highly Sensitive Protected Materials” or words of similar import. Although the confidential information and documents included with this Application may be reviewed by appropriate representatives of the LPSC Staff and intervenors pursuant to the terms and conditions of a suitable confidentiality agreement once such an agreement has been executed in this Docket, this confidential information also is being provided pursuant to, and shall be exempt from public disclosure pursuant to, the Commission’s General Order dated August 31, 1992 and Rule 12.1 of the Rules of Practice and Procedure of the Commission.

PRAYER FOR RELIEF

XXXVII.

WHEREFORE, for the foregoing reasons, Entergy Louisiana, LLC respectfully requests that, after due and lawful proceedings are held, its Application be approved. In particular, the Company requests that the Commission:

1. find ELL’s restoration costs relating to Hurricane Ida of \$2,392,468,292 in actual costs incurred through March 31, 2022 and \$150,783,675 in estimated costs relating to projects not yet complete, to be reasonable and necessary and, therefore, eligible for recovery from customers, with the manner of such recovery to be approved simultaneously with the approval of these costs;
2. find ELL’s restoration costs relating to Hurricanes Laura, Delta, and Zeta and Winter Storm Uri of \$31,949,864 in actual costs as reasonable and necessary and, therefore, eligible for recovery from customers, with the manner of such recovery to be approved simultaneously with the approval of these costs;

3. authorize the Company to recover the applicable interest and debt expense on the shorter-term debt issued as interim storm financing until repaid;
4. authorize the Company to recover carrying costs on the approved storm costs, net of escrow amounts to be withdrawn when available and the shorter-term debt issued and outstanding as interim financing, at its weighted average cost of capital from the date on which the storm costs were incurred until the date that permanent financing as approved by the Commission is issued or until the storm costs are otherwise recovered, as discussed in the testimony of Ms. Harcus attached to this Application;
5. approve the functionalization of cost set forth in the Company's testimony and determine how those costs should be allocated among customer rate classes;
6. direct the procedural steps necessary to ensure that a decision may be made by the Commission simultaneously approving the Company's requested orders, including its proposed Financing Order, no later than the September 2022 Business and Executive Meeting;
7. establish a fifteen-day period for interventions in this proceeding;
8. provide for appropriate protection for any confidential information to be produced in this proceeding;
9. direct that notice of all matters in these proceedings be sent to Mark Kleehammer, Elizabeth Ingram, Stacy Castaing, and Patrick Sullivan, as well as to Lawrence J. Hand, Jr., D. Skylar Rosenbloom, W. Raley Alford, III, and Alison Palermo, as representatives of Entergy Louisiana, LLC; and
10. grant such other relief to which the Company shows itself to be entitled.

Respectfully submitted,

By: 

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and

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Alison N. Palermo, La. Bar #31276
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**ATTORNEYS FOR ENTERGY
LOUISIANA, LLC**