

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**ENTERGY LOUISIANA, LLC'S
NOTICE OF EXEMPTION
REGARDING THE AUDUBON
SUBSTATION AND RELATED
TRANSMISSION FACILITIES
CONSISTENT WITH LOUISIANA
PUBLIC SERVICE COMMISSION
GENERAL ORDER DATED
OCTOBER 10, 2013**

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DOCKET NO. _____

**AFFIDAVIT
OF
LAURA K. BEAUCHAMP**

**ON BEHALF OF
ENTERGY LOUISIANA, LLC**

PUBLIC REDACTED VERSION

January 2024

TABLE OF CONTENTS

	Page
I. BACKGROUND.....	1
II. PURPOSE OF AFFIDAVIT	2
III. OTHER AFFIDAVITS.....	3
IV. OVERVIEW OF THE CUSTOMER COMPLEX AND COMPANY'S PROJECT REQUIRED TO SERVE THE COMPLEX	5
A. Circumstances Encouraging Industrial Development Such as the Customer's Complex	5
B. The Customer's Complex.....	6
C. The Company's Project is Necessary to Reliably Serve the Customer's Complex.	6
V. Basis for Exemption	7

EXHIBIT LIST

Exhibit LKB-1 Prior Testimony of Laura K. Beauchamp

AFFIDAVIT OF LAURA K. BEAUCHAMP

SUPPORTING NOTICE OF EXEMPTION OF ENTERGY LOUISIANA, LLC

STATE OF LOUISIANA §

PARISH OF ORLEANS §

Before me, the undersigned authority, on this day appeared LAURA K. BEAUCHAMP, who having been placed under oath by me, did depose as follows:

“My name is Laura K. Beauchamp. I am over the age of 18 years of age and a resident of the State of Louisiana. I am competent to make this Affidavit. Based upon my 24 years of experience described below, I have personal knowledge of the matters addressed in this Affidavit, and my statements concerning these matters are true and correct.

I present this Affidavit before the Louisiana Public Service Commission (“LPSC” or the “Commission”) on behalf of Entergy Louisiana, LLC (“ELL” or the “Company”) in support of the Company’s Notice of Exemption in the above-styled docket.

I. BACKGROUND

I am employed by Entergy Louisiana, LLC (“ELL” or the “Company”) as the Director, Resource Planning and Market Operations. As the Director of Resource Planning and Market Operations for ELL, I am responsible for managing the planning of generation, transmission, and wholesale power activities for ELL. This involves working closely with Entergy Services, LLC’s (“ESL”) generation and transmission planning organizations on these activities.

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1 from certification under the Siting Order and to afford the Commission an opportunity to
2 inquire further about the Project details and the Company's plans if it determines it appropriate
3 to do so.³ In order to meet the Customer's timing needs and in light of the contractual deadlines
4 to provide new service to the Customer's Complex, ELL intends to commence construction of
5 the Project in April of this year.

6 This Affidavit provides certain factual information to support the application of the
7 exemption established at section VIII(6) of the Siting Order. In particular, my Affidavit:

- 8 • summarizes the content of the other affidavits submitted with and in support of
9 the Company's Notice of Exemption;
- 10 • provides an overview of Customer's Complex and the Company's Project
11 required to serve the Complex; and
- 12 • identifies and establishes the facts necessary to demonstrate that, pursuant to
13 the terms of the Siting Order, a Certificate of Convenience and Necessity
14 ("CCN") is not required for the Company's construction of the components
15 that constitute the Project.

16 III. OTHER AFFIDAVITS

17 In addition to my affidavit, the Company's Notice is supported by the following
18 affidavits:

- 19 • Bradley D. Skok – Mr. Skok is the Manager, Transmission Planning, within the
20 Power Delivery Planning ("PDP") group of ESL's Power Delivery
21 Organization and is responsible for the analysis and identification of new

³ The Company is amenable to answering reasonable discovery from the Commission Staff regarding the facts presented in this Notice of Exemption and attached affidavits.

1 transmission facilities needed to reliably serve the Customer Complex. Mr.
2 Skok explains the role of Midcontinent Independent System Operator, Inc.
3 (“MISO”) and both the Company’s and MISO’s analyses that identified the new
4 transmission facilities included in the Project as necessary for service to the
5 Complex.

- 6 • Catherine Ward – Ms. Ward is the Director, Project Management – Capital
7 Projects in ESL’s Capital Projects organization and is responsible for
8 developing and delivering large transmission projects in the areas served by the
9 Entergy Operating Companies, including ELL. Ms. Ward discusses the
10 Company’s plan for designing and constructing the new transmission facilities
11 that make up the Project, along with a schedule outlining the Project’s
12 milestones. She further provides the currently estimated cost of the Project, the
13 location of the proposed new facilities that make up the Project, and a general
14 description, maps, and illustrations of the new transmission facilities that make
15 up the Project.

- 16 • Ryan Jones – Mr. Jones is the Manager, Regulatory Affairs, for ELL. Mr. Jones
17 describes the requirements of the Siting Order and how the affidavits and
18 exhibits included with the Company’s Notice provide the information necessary
19 to establish that the new transmission facilities that comprise the Project qualify
20 for an exemption to the CCN requirement under the Siting Order. In addition,
21 Mr. Jones discusses certain terms of the ESA and Reimbursement Agreement
22 executed by the Customer for the Customer Complex that address the new

1 revenue the Company will receive from serving the Customer and recovery of
2 the costs of the Project.

3 **IV. OVERVIEW OF THE CUSTOMER COMPLEX AND COMPANY'S**
4 **PROJECT REQUIRED TO SERVE THE COMPLEX**

5 **A. Circumstances Encouraging Industrial Development Such as the Customer's**
6 **Complex**

7 The Customer's Complex is part of the unprecedented industrial growth ongoing in the
8 Amite South region of the Company's service area.⁴ This projected load growth is a major
9 driver of the transmission projects submitted by the Company to MISO in the 2023
10 Transmission Expansion Plan ("MTEP23") process. Indeed, the Company's Project presented
11 in this filing has been approved by MISO as a component part of a larger project on the East
12 Bank of the Mississippi River that the Company submitted to MISO in the MTEP23 process.⁵

13 The development of the Customer's Complex is the benefit of a unique and historic set
14 of circumstances which have converged to give the State of Louisiana the opportunity to
15 develop and grow its economy further and substantially. Of particular significance is the
16 transition to clean energy. Recently enacted Inflation Reduction Act ("IRA") regulations have
17 improved the economics of producing low/zero carbon products, e.g., hydrogen and ammonia,
18 through clean energy tax credits. The IRA tax credits were established to spur domestic
19 investment in industrial production sectors to enable economic viability for such projects.

⁴ The Amite South planning region is generally described as the area from east of the Baton Rouge metropolitan area to the Mississippi state line and south from the Amite Substation to the Gulf of Mexico.

⁵ The larger project referenced was submitted to MISO, and approved, as "Amite South Reliability Project – Phase 2 ("Phase 2 Project"). As noted, the Company is moving forward with the Project at issue in this filing in order to meet the Customer's timing needs and in light of the contractual deadlines to provide new service to the Customer's Complex. The Company will be addressing the balance of the Phase 2 Project as well as certain other projects that were approved in MTEP23 and that are necessary to serve the projected load growth in Amite South, in filings that are expected to be made later, as appropriate, in 2024.

1 Additionally, the Amite South region, the area in which the Project will be developed, has
2 characteristics that are highly attractive to customers who are evaluating locations for new
3 industrial facilities – namely, infrastructure in terms of existing production facilities, technical
4 and human expertise, potential off take customers, carbon sequestration reservoirs to be able
5 to sequester the carbon, and finally, access to ports to be able to export these clean products
6 globally to address worldwide demand.

7 **B. The Customer's Complex**

8 In October 2021, the Customer announced the planned construction of the Customer
9 Complex. The Customer has requested [REDACTED]
10 [REDACTED] to support the Complex. The Customer has requested permanent
11 service to be supplied at 230 kV. Initial service is requested in [REDACTED], with
12 an overall project in-service-date ("ISD") of [REDACTED]. The Customer's board gave final
13 investment approval to build the Complex in November 2023, and the Customer signed an
14 Electric Service Agreement in December 2023. [REDACTED]

15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 **C. The Company's Project is Necessary to Reliably Serve the Customer's Complex**

20 As explained by Mr. Skok, transmission studies show that Company's facilities in the
21 area in which the Complex is located are constrained and, without new additions and upgrades
22 to existing facilities, are incapable of providing reliable electric service to the Customer's
23 Complex. While there have been no violations of North American Electric Reliability

1 Corporation (“NERC”) Reliability Standards identified in the area’s transmission system under
2 current system conditions, there is very little incremental capacity available to serve block
3 additions of industrial load, such as the Customer’s Complex, without creating a NERC
4 violation. The referenced studies indicate that, absent additions and upgrades to the existing
5 transmission system, the electrical requirements associated with the Customer’s Complex will
6 overload various transmission facilities and low voltages will occur, as a result of various
7 transmission contingency events. Based on the Company’s evaluation of the overload/low
8 voltage conditions identified, and as reflected in subsequent studies, the incorporation of the
9 Project’s new and upgraded components into the transmission system is necessary to resolve
10 the violations that arise with the addition of the Customer’s Complex that are indicated in the
11 initial studies. As Mr. Skok explains, MISO also performed an independent evaluation of the
12 assumptions and inputs modeled in the Company’s studies, and the results of MISO’s evaluation
13 confirm the necessity of the Project to reliably serve the Customer’s Complex.

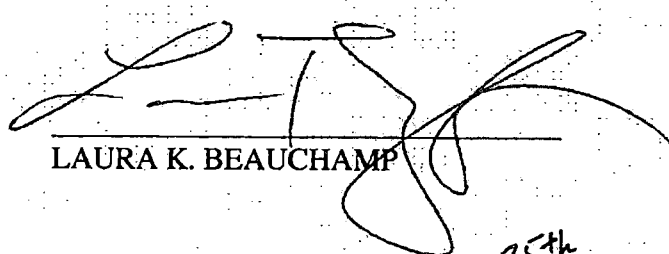
14 **V. Basis for Exemption**

15 As further discussed by Mr. Jones, Section VIII(6) of the Siting Order exempts new
16 transmission point-to-point facilities, including radial lines, loop flow lines, switching stations,
17 substations, and any other transmission projects undertaken for the primary purpose of
18 accommodating the needs of a new or expanding industrial load or set of industrial loads
19 located in Louisiana. As further described by Mr. Skok and Ms. Ward, the construction and
20 upgrade of the component facilities that constitute the Project are necessary for ELL to provide
21 the electric service requested to the Customer’s Complex and are undertaken primarily for that
22 purpose, which forms the basis of the exemption provided in Section VIII(6).

23 Further affiant sayeth not.”

Entergy Louisiana, LLC
Affidavit of Laura K. Beauchamp
LPSC Docket No. U-_____

Highly Sensitive
Protected Materials


LAURA K. BEAUCHAMP

SWORN AND SUBSCRIBED TO before me, the undersigned authority, on this 25th day
of January, 2024.


Notary Public

Sean D. Moore-La. Bar No. 20303
Notary Public for the State of Louisiana
My commission expires upon death

Listing of Previous Testimony Filed by Laura K. Beauchamp

<u>DATE</u>	<u>TYPE</u>	<u>SUBJECT MATTER</u>	<u>REGULATORY BODY</u>	<u>DOCKET NO.</u>
06/03/2011	Settlement	Little Gypsy Securitization	LPSC	U-31894
07/07/2011	Direct	Carville-Calpine 2011 PPA	LPSC	U-32031
09/16/2011	Settlement	EGSL Fuel Adjustment Clause (1995-2004)	LPSC	U-27103
12/21/2011	Rebuttal	Carville-Calpine 2011 PPA	LPSC	U-32031
01/26/2012	Settlement	Retail Effects of FERC Opinion Nos. 468 and 468-A and Related Orders	LPSC	U-31099
03/02/2012	Settlement	Carville-Calpine 2011 PPA	LPSC	U-32031
02/15/2013	Direct	EGSL Base Rate Case	LPSC	U-32707
02/15/2013	Direct	ELL Base Rate Case	LPSC	U-32708
03/28/2013	Direct	ELL-Algiers 2013 Rate Case	CCNO	UD-13-01
09/27/2013	Settlement	MISO Implementation	LPSC	U-32675
02/18/2014	Rebuttal	ELL-Algiers 2013 Rate Case	CCNO	UD-13-01
03/22/2019	Adopting	ENOL 2018 Rate Case	CCNO	UD-18-07
06/06/2022	Adopting	ELL Solar Portfolio and Green Tariff	LPSC	U-36190
02/28/2023	Direct	ELL Solar CCN Application	LPSC	U-36685
03/13/2023	Direct	ELL 3,000 MW Solar Application	LPSC	U-36697
08/30/2023	Direct	ELL Regulatory Blueprint	LPSC	U-36959
12/18/2023	Direct	ELL 2023 Solar Application	LPSC	U-37071