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April 17, 2025

RECEIVED

APR 21 2025

LA Public Service Commission

VIA UPS OVERNIGHT DELIVERY

Ms. Krys (Kris) Abel
Business Technology Supervisor
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North Fifth Street
Baton Rouge, Louisiana 70802

Re: Application of Entergy Louisiana, LLC for Certification of the Adams Creek-Robert 230kV Project in Accordance with Louisiana Public Service Commission General Order Dated September 10, 2024 (LPSC Docket No. U-_____)

Dear Ms. Abel:

I have enclosed, on behalf of Entergy Louisiana, LLC (“ELL” or the “Company”), the original and three copies of the Company’s Application for Certification of the Adams Creek - Robert 230kV Project in Accordance with Louisiana Public Service Commission General Order Dated September 10, 2024. The Application is supported by the Direct Testimony and Exhibits of Laura K. Beauchamp, Daniel Kline, Bradley D. Skok, Catherine R. Ward, and Ryan D. Jones. Please retain the original and two copies for your files and return a date-stamped copy to me in the enclosed, self-addressed envelope.

I have also enclosed five copies of the Confidential Version of the referenced filing, which is being provided 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 Procedure. The confidential materials included in the filing consist of competitively sensitive market information or sensitive infrastructure information, the disclosure of which may create an artificial target for suppliers/vendors or create physical security risks. 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, to a substantial risk of harm. Accordingly, it is critical that this information remain confidential.

Please retain the appropriately marked Confidential Version for your files and return a date-stamped copy to me in the enclosed, self-addressed envelope. Additional copies of the Confidential Version of this filing will be provided to appropriate representatives of the LPSC Staff and made available to other interested parties once a suitable Confidentiality Agreement has been executed.

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

Sincerely,

Meta C. Danzey

ROUTE FROM

MCD/jlc
Enclosures

cc: LPSC Commissioners (public version only via electronic mail)
Phillip R. May
Lawrence J. Hand, Jr.

DEPT. <u>Bull</u>	DATE <u>4/21</u>	DEPT. _____
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APR 21 2025

LA Public Service Commission

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**APPLICATION OF ENTERGY)
LOUISIANA, LLC FOR CERTIFICATION)
OF THE ADAMS CREEK – ROBERT)
230KV PROJECT IN ACCORDANCE)
WITH LOUISIANA PUBLIC SERVICE)
COMMISSION GENERAL ORDER)
DATED SEPTEMBER 10, 2024)**

DOCKET NO. U-_____

**APPLICATION
OF
ENTERGY LOUISIANA, LLC**

APRIL 2025

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**APPLICATION OF ENTERGY LOUISIANA, LLC
FOR CERTIFICATION OF THE
ADAMS CREEK – ROBERT 230KV PROJECT IN ACCORDANCE
WITH LOUISIANA PUBLIC SERVICE COMMISSION
GENERAL ORDER DATED SEPTEMBER 10, 2024**

Entergy Louisiana, LLC (“ELL” or the “Company”) respectfully submits this Application, consistent with the Commission’s 2024 Siting Order,¹ seeking certification by the Louisiana Public Service Commission (the “Commission” or “LPSC”) that the public convenience and necessity would be served by the completion and siting of the following transmission project on the North Shore of Lake Pontchartrain, as part of the larger Amite South Transmission Project (“ASTP”) in ELL’s Amite South Planning Region (“Amite South”),² in Tangipahoa, St. Tammany, and Washington Parishes, in Louisiana, including (1) the construction of a new 41-mile 230 kilovolt (“kV”) transmission line from the Adams Creek Substation to the Robert Substation and (2) substation expansions and upgrades at the Adams Creek Substation, Robert Substation, Fairview Substation, and Madisonville Substation, including the installation of additional breakers to accommodate the new transmission lines (together, the “Adams Creek – Robert 230kV Project” or the “Project”).³

The Company’s Application, including its supporting Direct Testimonies and exhibits, provides the information required pursuant to Section V of the 2024 Siting Order for timely certification that the public convenience and necessity will be served by the completion and siting

¹ See General Order (September 10, 2024), *In re: Review and Possible Modification of the Commission’s General Order dated October 10, 2013 Governing Transmission Certification and General Siting* (“2024 Siting Order”), Docket No. R-36199.

² The Amite South planning region is generally described as the area from east of the Baton Rouge metropolitan area extending east to the Mississippi state line and extending south from the Amite Substation to the Gulf of Mexico.

³ For the sake of completeness and context, I include a description of the work to be done at the substations in conjunction with the Project, even though the 2024 Siting Order expressly excludes substations from the definition of “Transmission Facility” to which the Commission’s certification requirement applies. See 2024 Siting Order at Section II(a) (definition of “Transmission Facility”).

of the Project. In addition to the requested certification, the Company respectfully requests a finding that the actual retail revenue requirement associated with the prudently incurred costs of the Adams Creek – Robert 230kV Project is deemed eligible for recovery by the Company through the appropriate recovery mechanism at the time that the components of the Project are placed in service. The Company further requests the development of a schedule and procedures to permit this Application to be considered on a timely basis. The Company shows as follows:

I. INTRODUCTION AND PURPOSE OF PROJECT AND APPLICATION

ELL is a limited liability company duly authorized and qualified to do business in the State of Louisiana, created and organized for the purposes, among others, of manufacturing, generating, transmitting, distributing, and selling electricity for power, lighting, heating, and other such uses.

This Adams Creek – Robert 230kV Project filing is the last of five filings before the Commission presenting the three-phased ASTP. As noted in prior ASTP-related filings, the Amite South region is undergoing substantial industrial growth. An exciting example of this growth is the recent announcement by Hyundai Motor Group, in March 2025, that it will invest \$5.8 billion in a new ultra-low carbon steel production facility on the West Bank in Ascension Parish, creating more than 1,300 direct new jobs. Additionally, in April 2025, CF Industries Holdings, Inc. announced its plan to invest \$4 billion in a low-carbon ammonia facility in the Amite South area. The Company's existing transmission system in Amite South is unable to serve the anticipated incremental load without increasing the Company's load-serving capability through additional facilities or upgrades to its transmission system. The ASTP is a multi-phased transmission construction plan to ensure the Company has adequate transmission and generation capacity to

accommodate the anticipated growth in Amite South in a timely and efficient manner.⁴ In a series of filings before the Commission, including this Application, the Company seeks the Commission’s approval to move forward with (or provides the Commission with notice of) the necessary and comprehensive portfolio of transmission projects in Amite South required to accommodate the significant load growth.⁵ Each of the Company’s transmission projects being presented to the Commission in this series of filings has been approved by the Midcontinent Independent System Operator, Inc. (“MISO”). The Company’s four previous ASTP-related filings dealt with Phases 1 and 2, which provide for transmission construction and improvements on the West Bank and East Bank of the Mississippi River. This filing seeks LPSC certification of Phase 3—a transmission project on the North Shore of Lake Pontchartrain—as part of the larger ASTP. The Phase 3 Adams Creek – Robert 230kV Project, currently estimated to cost \$197.7 million (Class 3 estimate), will provide needed load-serving capability and other needed planning and operational benefits for Amite South, including the North Shore of Lake Pontchartrain.

⁴ In addition to its Company-wide transmission construction plan (of which the ASTP is a vital part), ELL will also be moving forward with other strategic projects that include its generation portfolio expansion and grid resilience plan, all of which will be needed to accommodate the industrial growth that results from this generational opportunity.

⁵ The ASTP includes transmission projects in Amite South. Summarizing the major parts, Phase 1 of the ASTP includes (1) the West Bank 230kV Project, which provides a new substation and new 60-mile 230kV transmission line and was the subject of ELL’s Application in Docket No. U-37143, *Application of Entergy Louisiana, LLC for Exemption and/or Certification of the West Bank 230kV Transmission Project in Accordance with Louisiana Public Service Commission General Order Dated October 10, 2013*; and (2) the West Bank 500kV Project, which provides a new 84-mile 500kV line, a new substation, and the expansion and conversion of two existing substations and is the subject of ELL’s Application in Docket No. U-37467, *Application of Entergy Louisiana, LLC for Certification of the West Bank 500kV Transmission Project in Accordance with Louisiana Public Service Commission General Order Dated September 10, 2024*. On March 26, 2025, the Commission voted to approve the Uncontested Stipulated Agreement in Docket U-37143, thereby granting certification of the West Bank 230kV Project. Phase 2 of the ASTP includes (1) a new substation (the Audubon Substation), which was the subject of ELL’s Notice of Exemption filed in Docket No. S-37113, *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*; and (2) the East Bank Geismar 230kV Project, which provides a new 21-mile 230kV line and substation upgrades and is the subject of ELL’s Application in Docket No. U-37527, *Application of Entergy Louisiana, LLC for Certification of the East Bank Geismar 230kV Project in Accordance with Louisiana Public Service Commission General Order Dated September 10, 2024*. This Application is for Phase 3 of the ASTP, which provides a new 41-mile 230kV line and substation expansions and upgrades.

Importantly, the window of time in which to act is limited. Transmission projects of the scope and scale of the ASTP and the Adams Creek – Robert 230kV Project require significant lead time to develop, including time to complete right-of-way (“ROW”) acquisition (including judicial expropriation proceedings, where required), obtain required materials, and complete construction. It is important that ELL and the Commission prepare now to facilitate needed load-serving capability and other needed planning and operational benefits for Amite South, including the North Shore of Lake Pontchartrain. Doing so will benefit communities across southeast Louisiana and the state as a whole.

As explained by Company witnesses Bradley D. Skok and Laura K. Beauchamp, all components of the ASTP—including the Adams Creek – Robert 230kV Project—are necessary for ELL to provide reliable electric service to the anticipated load growth. The Project will enable the economic growth associated with these load additions and thus help support job creation in Amite South. Accordingly, the Adams Creek – Robert 230kV Project is an essential step to facilitate a generational opportunity in the larger Amite South region and make possible the economic and reliability benefits it provides. Without the addition of the Adams Creek – Robert 230kV Project, the Company will not have transmission capacity to facilitate reliable service. Such a result would forfeit a significant economic development opportunity for the State.

Accordingly, the Company requests that the Commission find, pursuant to the 2024 Siting Order, that the construction of the Adams Creek – Robert 230kV Project is in the public interest and can proceed expeditiously so that the Company can undertake the significant construction and investment necessary to ensure the Amite South region, including the North Shore of Lake Pontchartrain, and the State of Louisiana benefit from this generational opportunity to create

economic development, jobs for Louisiana citizens, and expansion of the tax base for the State and local government.

II. COMPANY WITNESSES

With this Application, the Company submits the Direct Testimonies of Ms. Beauchamp, Company witness Daniel Kline, Mr. Skok, and Company witnesses Catherine Ward, and Ryan D. Jones. The purpose of the Direct Testimony of each witness is as follows:

- **Laura K. Beauchamp** – Ms. Beauchamp is the Vice President, Business Operations and Strategy, for the Company. She describes the importance of this filing to the growth in the Amite South planning region. She also describes the Commission’s important role in overseeing and facilitating the expansion of the Company’s infrastructure to accommodate and foster the anticipated growth. She provides an overview of the ASTP and explains how this filing and the other filings by the Company relate to the various projects that make up the ASTP. She also identifies the other ELL witnesses whose Direct Testimony support this filing, and she provides a summary of their Direct Testimony.
- **Daniel Kline** – Mr. Kline is the Director, Power Delivery Planning, within the Project and Portfolio Development group of Entergy Services, LLC’s (“ESL”) Power Delivery Organization and is responsible for the analysis and identification of transmission projects that are needed to reliably serve the customers of the Entergy Operating Companies (“EOCs”). He provides an overview of the Entergy Transmission System and ELL’s Transmission System. He also provides an overview of the various steps in the transmission planning process employed to develop transmission projects such as the Adams Creek – Robert 230kV Project, including the role of MISO.
- **Bradley D. Skok** – Mr. Skok is the Manager, Transmission Planning, within the Power Delivery Planning group of ESL’s Power Delivery Organization and is responsible for the analysis and identification of new transmission facilities needed to reliably serve new electrical load. He explains the Company’s and MISO’s analyses that demonstrate the necessity of the Adams Creek – Robert 230kV Project for ELL to reliably serve load in Amite South, including on the North Shore of Lake Pontchartrain, and he includes a discussion of the supporting documentation. Mr. Skok further explains that all components of the ASTP, including the Adams Creek – Robert 230kV Project, are necessary for ELL to provide electric service to the block load additions incorporated in the studies that led to the development of the ASTP. Finally, Mr. Skok explains the objectives and benefits addressed by the Project.

- **Catherine Ward** – Ms. Ward is the Director, Project Management – Capital Projects in ESL’s Capital Projects organization and is responsible for developing and delivering large transmission projects in areas served by the EOCs, including ELL. Ms. Ward describes the different components of the Company’s proposed construction of the Adams Creek – Robert 230kV Project, including a general summary description and illustrations of the components of the Project, as well as the designs, proposed locations, siting, right-of-way plans, construction timelines, and estimated costs of the Project components.
- **Ryan D. Jones** – Mr. Jones is the Manager, Regulatory Affairs, for ELL. He describes the requirements of the 2024 Siting Order and how the Direct Testimony and exhibits included with the Company’s Application provide the information required for the Commission to certify that the Adams Creek – Robert 230kV Project serves the public convenience and necessity and is in the public interest in compliance with the 2024 Siting Order. In addition, Mr. Jones provides the estimated revenue requirement of the Project as well as a discussion of the potential bill effects associated with the Project.

Through this Application, along with the Direct Testimonies and accompanying exhibits, the Company provides the information necessary to establish and support a Commission determination that the public convenience and necessity will be served by the completion and siting of the Adams Creek – Robert 230kV Project.

III. THE ADAMS CREEK – ROBERT 230KV PROJECT

A. Components of the Project

As described by Ms. Ward, the Adams Creek – Robert 230kV Project includes the following components:

- **New Adams Creek – Robert 230kV Transmission Line**
 - A new 230 kV transmission line will be installed from the Robert Substation to the Adams Creek Substation.
 - The line will be a single-circuit, monopole design, with direct embedment and drilled pier foundations.
 - The new line coming out of Robert Substation will be adjacent to the existing Line Number (“LN”) 286 - Fairview to Robert transmission line. The new line will parallel the existing line to minimize the ROW required.
 - The Adams Creek – Robert line will require new ROW to be acquired across three separate parishes once LN 286 splits off from the proposed routing of Adams Creek to Robert.

- **Expansion of Adams Creek Substation**
 - Install (1) new 230 kV switch with associated structure, add ground switch
 - Install (1) new 230 kV dead-end structure
 - Install (2) Coupling Capacitor Voltage Transformers (“CCVTs”) and (3) arresters
 - Install (1) line panel
 - Remove the (2) East bus differential panels

- **Expansion of Robert Substation**
 - Install (1) new 230 kV breakers
 - Install (3) new 230 kV switches with associated structures
 - Install (1) new 230 kV deadend structure
 - Install (3) new 230 kV arresters, (1) CCVT
 - Install (1) new line/Breaker (“BKR”) combo panel
 - Replace (2) existing line/BKR combo panels

- **Upgrades at Fairview Substation**
 - Replace (3) existing line/BKR combo panels

- **Upgrades at Madisonville Substation (owned by Cleco)**
 - Replace (1) existing line/BKR combo panel

- **Distribution Lines**
 - Distribution lines located in the Project location are under evaluation to determine if they meet required clearances with the installation of the new facilities.
 - The distribution scope includes modification/relocation of existing distribution lines and crossings to accommodate the new 230kV transmission lines.

B. Project Costs and Schedule

In her Direct Testimony, Ms. Ward explains that the current cost estimate for the Adams Creek – Robert 230kV Project is \$197.7 million (Class 3 estimate), which is the amount for which the Company has approved funding and is comprised of preliminary estimates of project costs

based on the information currently available. Ms. Ward’s Direct Testimony also summarizes the Project costs by component (in Exhibit CRW-6, which contains highly sensitive protected materials (“HSPM”)) and by category (in Exhibit CRW-7 (HSPM)). Cost estimates will be updated and refined as the Project is executed.

The timelines for each component of the Adams Creek – Robert 230kV Project are detailed below (as included in Table 1 of Ms. Ward’s Direct Testimony):

Event	Start Date	Completion
Board of Directors Approval for Project	N/A	February 2025
Adams Creek – Robert 230kV Line – ROW Acquisition	August 2024	May 2026
Adams Creek – Robert 230kV Line – Permitting	January 2025	February 2026
Adams Creek – Robert 230kV Line – Construction	May 2026	October 2027
Adams Creek – Robert 230kV Line – In-Service Date	N/A	December 2027
Expansion of Adams Creek and Robert Substations	March 2027	September 2027
Upgrades to Fairview and Madisonville Substations	September 2027	September 2027

IV. PUBLIC INTEREST DETERMINATION

A. The Commission’s Transmission Siting Order

The Commission’s 2024 Siting Order defines a Transmission Facility as:

[A] system of structures, wires, insulators and associated hardware, but not including switching or substations, that carry electric energy over distances and that are located in whole or in part within the State of Louisiana, regardless of whether the line provides electric service to customers within the state, and that would be constructed and operated at or above a nominal 100kV, exceeds one mile in length, and the estimated cost to construct exceeds \$20 million. A Transmission Facility shall include the construction of any projects, or group/portfolio of projects, designed to resolve a common transmission-related concern.⁶

The 2024 Siting Order generally provides that any utility seeking to construct a transmission project meeting the definition of Transmission Facility must first obtain LPSC certification that

⁶ See 2024 Siting Order at Section II.A.

the project serves the public convenience and necessity unless it qualifies for certain enumerated exemptions.⁷ Mr. Jones addresses the development of the 2024 Siting Order and the Company's compliance with that Order.

B. The Adams Creek – Robert 230kV Project Will Serve the Public Convenience and Necessity

The Company requests that the Commission find that the public convenience and necessity would be served by the construction of the Project and that the Project is therefore in the public interest. As Mr. Jones explains in his Direct Testimony, in issuing the 2024 Siting Order, the Commission acknowledged that it would certify a project it finds “to be in the public interest and the interests of affected ratepayers.”⁸ In making a determination that a project is in the public interest and the interests of affected ratepayers, “the Commission may consider the expected impact of such Transmission Facility on costs, retail rates, service reliability, reduction of congestion, material economic benefits, the interstate or intrastate benefits expected to be achieved, and whether the proposed Transmission Facility is consistent with public policy, including policy goals of the Commission.”⁹ In addition, the Commission may consider “whether construction of this Transmission Facility (as opposed to construction of another transmission facility or construction of generation, or non-transmission alternative, for example) is a reasonable and cost-effective solution to the problem being addressed by the Transmission Facility proposed in the Application.”¹⁰

⁷ *Id.* at Section I (Applicability) and Section VIII (Exemptions). As noted above, for the sake of completeness and context, the Company also includes in its Application and Direct Testimony descriptions of the construction and/or expansion of three substations that are part of the Project, even though the 2024 Siting Order expressly excludes substations from the definition of “Transmission Facility” to which the Commission’s certification requirement applies under Section II.A.

⁸ *Id.* at Section IV.

⁹ *Id.*

¹⁰ *Id.*

The Adams Creek – Robert 230kV Project meets or surpasses these standards. As explained by Ms. Beauchamp and Mr. Skok, the Project will provide needed load-serving capability and import capability on the North Shore of Lake Pontchartrain by providing a new 230kV pathway from the Adams Creek Substation to the Robert Substation. As more fully discussed by Mr. Skok, transmission studies conducted by both ESL and MISO led to the determination that substantial additional transmission infrastructure is necessary to accommodate electric service to anticipated block load additions in Amite South and to address planning, resilience, and operational needs identified by the Company. The block load additions modeled in the studies consisted of a representative sample of twelve (12) new industrial block load customers that total 2,190 megawatts (“MW”). Mr. Skok explains that all components of the ASTP, including the Adams Creek – Robert 230kV Project, were deemed necessary for ELL to provide electric service to the block load additions incorporated in the studies that led to the development of the ASTP. Of note, the Company anticipates that newly developing block loads in the Amite South area will be greater than the 2,190 MW modeled in the studies. As of April 2025, the Company’s pipeline includes total industrial block load growth of over 3,700 MW in the Amite South area on the West Bank and East Bank of the Mississippi River.

As further explained by Mr. Skok, the major factor underlying the need for the Adams Creek – Robert 230kV Project is the significant load growth—both growth that has materialized and forecasted growth—in the Amite South region, including block load growth on the West Bank and East Bank as well as organic load growth occurring in the North Shore area. This load growth has created and will continue to create an increased demand on existing facilities on the North Shore of Lake Pontchartrain that serve the area. The Project will provide the additional load-serving capability necessary to accommodate service to that load growth and add 100 MW of

incremental load-serving capability in the area. Additionally, considering the planned deactivation of existing generation, as discussed by Ms. Beauchamp and Mr. Skok, the new 230kV transmission line in the area will provide a needed increase in import capability, offering flexibility in future resource planning. The Project also improves extreme event resilience as the addition of a hardened 230kV transmission path on the North Shore of Lake Pontchartrain can be useful in restorations during events like Hurricanes Laura and Ida.

As explained by Mr. Skok, the Project resulted from ELL's detailed and thorough analysis indicating that the Project, as part of the ASTP, is the most effective method of providing the additional transmission capacity needed to address reliability issues projected to occur in the Amite South area of the ELL Transmission System. In addition, MISO's planning staff independently evaluated the system performance for its ability to meet applicable reliability standards without the proposed ASTP projects and found that the ASTP, including this Project, is needed to meet applicable reliability standards. As Mr. Skok and Mr. Kline describe, like the Company, MISO also evaluated other alternatives to the Project and concluded that the Project is the best alternative to address the projected reliability issues in the North Shore area of the region

Based on all these factors, the Project is firmly in the public interest and should be certified as such by the Commission.

C. Information Required in Certification Filing

As summarized by Mr. Jones, and through the Direct Testimonies of ELL's other witnesses, the Company has provided the information required by the 2024 Siting Order as follows:

- Requirement V(a): ELL is the Applicant in this proceeding and the only entity participating in the construction of the Project.

- Requirement V(b): Ms. Ward provides a description of each component of the Project.
- Requirement V(c): Ms. Beauchamp, Mr. Kline, and Mr. Skok provide detailed explanations of the justification for the Project. In addition, Mr. Skok describes the analyses performed by ELL and MISO to determine that the Project is needed to improve reliability, accommodate projected load growth, and increase load-serving capability in a transmission-constrained region of the area served by ELL.
- Requirement V(d-e): Mr. Kline explains that the proposed Transmission Facilities do not involve any designated National Interest Electric Transmission Corridor and, as such, federal backstop siting authority is not a factor with respect to the Project.
- Requirement V(f): Ms. Ward provides the general proposed location of each component of the Project.
- Requirement V(g): Ms. Ward discusses the anticipated source of funding for the Project.
- Requirement V(h): Ms. Ward provides the Company's current best estimate of the cost of each component of the Project, which she explains is a Class 3 estimate and will be updated and refined as the Project is executed.
- Requirement V(i): Mr. Jones provides a discussion of the effect that the Project will have on customer rates.
- Requirement V(j): As exhibits to her Direct Testimony, Ms. Ward provides a map detailing the routing and location of the Project (HSPM Exhibit CRW-1), a scoping diagram of the Project facilities (Exhibit CRW-2), drawings of the typical

structures anticipated to be used in constructing the Project (Exhibit CRW-3), and diagrams of the Project facilities (HSPM Exhibit CRW-4).

- Requirement V(k): Ms. Ward discusses the current schedule and timeline for completing construction of each component of the Project and placing them in service.
- Requirement V(l): Ms. Ward explains the Company's current plans for ROW acquisition.
- Requirement V(m): Ms. Beauchamp provides other information that the Company considers relevant to support a public interest determination (*e.g.*, the need to expand the Company's infrastructure and transmission capacity to accommodate the significant industrial expansion underway in the Amite South region).

V. REVENUE REQUIREMENT AND ESTIMATED BILL EFFECTS

The 2024 Siting Order requires that a certification application include “[a]n analysis, with supporting data, of the estimated effects on costs to ratepayers attributable to the proposed Transmission Facility, including an estimate of the impact of the cost of the Transmission Facility on rates of all the entity’s customers within Louisiana.”¹¹ To comply with this requirement, Mr. Jones provides the estimated revenue requirement of the Project, based on the current estimated cost of the Project, as well as the estimated effect on a residential customer bill for a customer using 1,000 kilowatt hours (“kWh”) per month in the area served by ELL, assuming for purposes of this presentation only that the Project revenue requirement will be recovered on a dollar-for-dollar basis. Mr. Jones’s calculations produce a total retail revenue requirement of \$20.942 million for the Project, prior to consideration of any offsets for other revenue received from transmission

¹¹ See 2024 Siting Order at Section V(i).

wholesale customers.¹² Assuming the revenue requirement for the Project is reflected in rates on a dollar-for-dollar basis over Test Year 2023 billing determinants, a residential customer using 1,000 kWh per month would experience a bill increase of approximately \$0.60.

As Mr. Jones explains, the Company is not requesting any specific rate treatment of the costs of the Project at this time, as that will ultimately be addressed in the context of a rate proceeding such as an annual Formula Rate Plan (“FRP”) Evaluation Report Filing, a filing to extend the FRP or some other base rate proceeding. Accordingly, the Company is not asking for Commission approval of specific recovery of the Project revenue requirement outside of the normal course of ratemaking. In this proceeding, the Company is only requesting that, by virtue of a Commission finding that construction of the Adams Creek – Robert 230kV Project is in the public interest, the costs of the Project be deemed eligible for recovery through the FRP to the extent the Company remains subject to one, or that the Commission authorize the creation of a regulatory asset which shall accrue carrying charges on the next of tax balance at the then-effective weighted average cost of capital until such time that the costs can be reflected in rates in order to mitigate the effects of regulatory lag in the alternative where there is no FRP. In other words, if the Company’s FRP is still effective at the time that the Project is placed in service, and the Company has not received approval of some specific alternative recovery for the Project, the Company would recover the revenue requirement of the Project through the normal FRP recovery mechanisms. If instead the Company is not subject to an FRP and the costs have been recorded to

¹² As Mr. Jones explains, it is important to note that the estimated revenue requirement is based on a Class 3 estimate, which reflects a range of accuracy of -20% to +30%. The Class 3 estimate aligns with the project development at this stage of a large transmission project. As Ms. Ward explains, the Class 3 estimate will be refined as the Project development progresses and is executed. Therefore, while the estimated revenue requirement provided here is based on the best information currently available to the Company, it is expected to change; and it will be the final prudently incurred costs of the project that the Company seeks to recover in customer rates. The Commission should not view the Company’s preliminary estimate as a cap or yardstick to assess the prudence of the Company’s final project costs, as costs can deviate from estimates made at this stage for many reasons unrelated to the Company’s prudence in executing the Project.

an approved regulatory asset, it would seek separate Commission approval for any recovery of the proposed regulatory asset through a future rate proceeding. Since no specific recovery is being requested at this time, the estimated bill effects provide by Mr. Jones may not reflect precisely the actual customer impact that will be seen, through an FRP or otherwise, associated with the Project, although they are reasonable estimates of those effects.

VI. REQUEST FOR TIMELY TREATMENT

As Ms. Beauchamp and Mr. Jones explain, the Company is not seeking expedited consideration of this Application by the Commission. The Company is, however, respectfully requesting a decision that will enable the Company to commence construction of the components of the Project by May 2026 and to achieve an in-service date by December 2027 (under the Project timeline presented in Section VII of Ms. Ward's Direct Testimony).

To the extent the Company's Application is uncontested by LPSC Staff or Intervenors, the Company respectfully requests that the Commission exercise its authority under the 2024 Siting Order such that the Commission may consider and issue a ruling on the Company's certification request within 90 days of the filing of the Application. If the Company's Application is contested, then the Company respectfully requests that the Commission consider and issue a ruling on the Company's certification request within 180 days of the filing of the Application as contemplated by the 2024 Siting Order. The requested approval time frames provide for adequate review by all parties under the 2024 Siting Order, and approval of the certification request by the Commission within the review period established by the 2024 Siting Order (*i.e.*, within 90 days of filing if the Application is uncontested, or within 180 days of filing if the Application is contested) would be sufficient to enable the Company to (1) timely accommodate electric service to the new block loads developing in Amite South and (2) provide the needed benefits associated with Phase 3 of the ASTP to existing and new customers in the region.

VII. SERVICE OF NOTICES AND PLEADINGS

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

Lawrence J. Hand, Jr.
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The Company 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.

VIII. REQUEST FOR CONFIDENTIAL TREATMENT

Portions of the Direct Testimonies and exhibits supporting this Application contain information considered by the Company to be proprietary and confidential. Disclosure of certain portions of this information may expose the Company and its customers to an unreasonable risk of harm, including creating an artificial target for suppliers/vendors or creating physical security risks. Therefore, in light of the nature of such information, which includes commercially or competitively sensitive market information and sensitive infrastructure information, the Company has submitted two versions of the Direct Testimonies of Mr. Skok and Ms. Ward, one marked

“Public Redacted Version” and the other marked “Highly Sensitive Protected Materials 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 interested parties 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 LPSC.

IX. PRAYER FOR RELIEF

WHEREFORE, for the foregoing reasons, Entergy Louisiana, LLC respectfully requests that, after due and lawful proceedings are held, the Commission, subject to the fullest extent of its jurisdiction, grant relief and give its approval of the Application. In particular, the Company requests that the Commission:

1. Find that, under the 2024 Siting Order, the construction, completion, and siting of the components of the Adams Creek – Robert 230kV Project will serve the public convenience and necessity and be in the public interest and are therefore approved, including principally the following Project components:
 - a. the construction of a new 41-mile 230kV transmission line from the Adams Creek Substation to the Robert Substation;
 - b. the expansion of the Adams Creek 230kV Substation and the Robert 230kV Substation; and
 - c. upgrades at the Fairview 230kV Substation and the Madisonville 230kV Substation;

and further find that undertaking the construction of each those Project components would therefore be prudent and in accordance with the 2024 Siting Order and other applicable Commission orders;

2. Find that under the circumstances described in the Company's Application, the Commission's public interest determination prior to ELL's construction of the Adams Creek – Robert 230kV Project would be beneficial to the Commission and ultimately to customers;
3. Find that the generalized siting of the Adams Creek – Robert 230kV Project is appropriate and that its construction is a reasonable and cost-effective solution to provide reliable electric service to the anticipated load growth in the Amite South region as described in the Company's Application;
4. Find that the actual retail revenue requirement associated with the prudently incurred costs of the Adams Creek – Robert 230kV Project, an estimate of which is provided by Mr. Jones in his Direct Testimony, is deemed eligible for recovery by the Company at the time that the components of the Adams Creek – Robert 230kV Project are placed in service through the FRP to the extent the Company remains subject to one, or that the Commission authorize the creation of a regulatory asset which shall accrue carrying charges on the net of tax balance at the then-effective weighted average cost of capital until such time that the costs can be reflected in rates in order to mitigate the effects of regulatory lag in the alternative where there is no FRP;
5. Find that, as provided in the Commission's Special Order No. 7-2000, dated March 22, 2000, the confidential Direct Testimony, exhibits, and other materials referenced in this Application 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 Louisiana Public Service Commission;
6. Direct that the period for interventions and protests be shortened to 15 days;
7. Direct the procedural steps necessary to facilitate a Commission decision on the Company's Application within 180 days of the filing of the Application (consistent with Section X of the Commission's 2024 Siting Order);
8. Direct that notice of all matters in these proceedings be sent to Lawrence J. Hand, Jr., Ryan Jones, Matthew T. Brown, Meta C. Danzey, Mark Strain, and L. Richard Westerburg, Jr. as representatives of the Company; and
9. Grant such other relief to which the Company is entitled.

Respectfully submitted,

By: Meta C. Danzey

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