

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

***IN RE:* APPLICATION OF ENTERGY)
LOUISIANA, LLC FOR APPROVAL TO)
CONSTRUCT WATERFORD 6 POWER)
STATION AND WESTLAKE POWER)
STATION, AND FOR COST RECOVERY)**

DOCKET NO. U-_____

**DIRECT TESTIMONY
OF
MICHAEL J. PLAISANCE**

**ON BEHALF OF
ENTERGY LOUISIANA, LLC**

PUBLIC REDACTED VERSION

FEBRUARY 2026

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EXHIBIT LIST

Exhibit MJP-1 (HSPM)	Business Plan 26, Load and Capacity
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I. INTRODUCTION AND QUALIFICATIONS

Q1. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

A. My name is Michael J. Plaisance. I am the Senior Manager, Resource Planning for Entergy Louisiana, LLC ("ELL" or the "Company"). My business address is 4809 Jefferson Highway, Jefferson, Louisiana 70121.

Q2. ON WHOSE BEHALF ARE YOU FILING THIS DIRECT TESTIMONY?

A. I am filing this Direct Testimony on behalf of ELL.

Q3. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

A. In 2000, I earned a Bachelor of Arts degree in English Writing from Loyola University New Orleans. That same year, I began working as a natural gas accountant for Engage Energy, which was consolidated into El Paso Merchant Energy, L.P. I left that position in 2001 to join the real-time power trading desk at BP Energy Company, in which role I traded and scheduled power transactions on a daily and monthly basis throughout the Western Interconnection and with the Electric Reliability Council of Texas for the North America Gas & Power Business Unit. In addition, I scheduled and developed the daily resource plan for two plants totaling 2,000 megawatts ("MW") per day.

I left BP to seek a Juris Doctor degree from Loyola University New Orleans, from which I graduated in 2007. Upon graduation, I practiced law as a regulatory attorney for

1 Entergy Services, LLC (“ESL”)¹ during which I served as counsel for numerous matters
2 before the Louisiana Public Service Commission (“LPSC” or “Commission”) including
3 matters concerning integrated resource plans, transmission certifications, resource
4 procurements, fuel audits, and a variety of rulemakings. In 2019, I left ESL to create the
5 legal and risk function at Ampirical Solutions, LLC, an engineering firm focusing on the
6 electric utility industry. I returned to ESL in 2023 as a Commercial Originator, Senior
7 Advisor in the System Planning & Operations organization. In 2024, I earned a Master of
8 Laws in Compliance and Enterprise Risk Management from Loyola University Chicago.
9 In 2025, I transitioned to my present role as Senior Manager, Resource Planning for ELL.

10
11 Q4. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.

12 A. As the Senior Manager, Resource Planning for ELL, I am responsible for managing the
13 planning of generation for the Company. This involves working closely with the
14 generation planning organizations of ESL on these activities.

15
16 Q5. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE LPSC?

17 A. Yes. I submitted Direct Testimony in support of ELL’s Application in LPSC Docket No.
18 U-37800, *In re: Application of Entergy Louisiana, LLC for Approval to Construct Votaw*
19 *and Segno Solar Facilities, and for Cost Recovery.*

20

¹ ESL is an affiliated service company that provides engineering, planning, accounting, legal, technical, regulatory, and other administrative support services to each of the Entergy Operating Companies (“EOCs”). The EOCs are ELL, Entergy Arkansas, LLC, Entergy Mississippi, LLC, Entergy New Orleans, LLC, and Entergy Texas, Inc.

1 Q6. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

2 A. My Direct Testimony supports the Application of ELL for, among other things, approval
3 of ELL's proposal to construct two new, gas-fired Combined Cycle Combustion Turbine
4 ("CCCT") units—the Waterford 6 Power Station ("WF6") near Killona, Louisiana, and the
5 Westlake Power Station ("Westlake") in Westlake, Louisiana. I refer at times in my
6 testimony to WF6 and Westlake collectively as the "Proposed Generators." If approved,
7 the Proposed Generators would add approximately 1,500 MW of CCCT capacity and
8 energy to ELL's generating portfolio—and importantly would add such capacity and
9 energy in certain load pockets referred to by the Company as the Amite South Planning
10 Area and the West of the Atchafalaya Basin ("WOTAB") Planning Area, both of which
11 are currently served (in part) by aging generation and are experiencing substantial
12 industrial load growth, as discussed further below.

13 I provide an overview of the Company's Application and request for relief as well
14 as a description of the Request for Proposals ("RFP") issued in 2024 from which the
15 Proposed Generators were selected (the "2024 CCCT RFP"). I further discuss the
16 Company's current plans to meet the long-term supply needs of its customers, anticipated
17 load growth in Louisiana (including within the Amite South and WOTAB Planning Areas),
18 and the Company's current resource portfolio and identified needs. I also describe the
19 manner in which construction of the Proposed Generators is significant to fulfilling the
20 Company's supply plan and resource needs, including in particular the Company's urgent
21 need for capacity and energy to meet projected load requirements and reliably serve
22 customers. Moreover, I discuss how the Proposed Generators will provide benefits to
23 customers, including by mitigating the exposure of customers to high-capacity prices and

1 to spikes in the market price for energy. Finally, I conclude my testimony by describing
2 the Company's proposed Monitoring Plan that would be implemented during construction
3 of the Proposed Generators.

4
5 Q7. DO YOU SPONSOR ANY EXHIBITS?

6 A. Yes, I sponsor the exhibit listed in the Table of Contents.
7

8 **II. OVERVIEW OF PROJECT AND APPLICATION**

9 Q8. PLEASE PROVIDE AN OVERVIEW OF THE PROJECTS AT ISSUE IN THE
10 APPLICATION.

11 A. This Application seeks certification of WF6 and Westlake, both of which are proposed 1x1
12 CCCT generating facilities with ISO² capacities of 754 MW. If approved, each of these
13 modern, high-efficiency units will provide reliable, flexible, and dispatchable generation
14 that will enable ELL to meet future customer demand, satisfy planning reserve margins,
15 and reduce long-term exposure to volatile market capacity and energy costs. Moreover,
16 the two units are strategically situated to provide generation within the Amite South and
17 WOTAB load pockets, respectively—a particularly important consideration given the
18 geographical constraints, economic growth, and age of other generators in those regions.
19

² ISO refers to the applicable standard set by the International Organization for Standardization. Company witness Nicholas D. Pressler discusses the ISO standard in his Direct Testimony.

1 Q9. HOW WERE THE PROPOSED GENERATORS SELECTED?

2 A. The Proposed Generators were selected along with a tolling agreement³ from the 2024
3 CCCT RFP, which was conducted by ESL on behalf of ELL. As I explain further below,
4 the 2024 CCCT RFP targeted up to 2,000 MW of capacity, capacity-related benefits,
5 energy, other electric products, and environmental attributes from CCCT generation
6 resources located in the region referenced by the Midcontinent Independent System
7 Operator, Inc. ("MISO") as Local Resource Zone 9 ("LRZ 9"). The 2024 CCCT RFP
8 further specified that the resources sought by the RFP should have a service
9 commencement date no later than January 1, 2031,⁴ and should provide a minimum of 600
10 MW (and up to 800 MW), summer rating, of capacity, energy, and related products from a
11 single new-build CCCT. The Proposed Generators were selected as economic choices that
12 complied with the requirements of the RFP and that would provide the desired benefits to
13 ELL's customers at the lowest reasonable cost.

14
15 Q10. PLEASE PROVIDE AN OVERVIEW OF ELL'S APPLICATION.

16 A. ELL's Application is supported by six witnesses. In addition to my Direct Testimony, the
17 Company is submitting testimony from the following witnesses in support of its application
18 for approval to construct WF6 and Westlake and its proposed method for cost recovery:

³ As I explain further below, the tolling agreement was selected because of ELL's overarching need for additional capacity. Commercial negotiations with respect to the tolling agreement were unsuccessful.

⁴ As Company witness Phong D. Nguyen explains, the RFP provided that the Guaranteed Commercial Operation Date for any PPA or Tolling Agreement was required to occur no later than January 31, 2031. The Guaranteed Substantial Completion date for any Build-Own-Transfer proposals was required to occur no later than December 31, 2030.

- 1 • Nicholas D. Pressler, who is employed by ESL as Director, Power Development,
2 provides details concerning the Proposed Generators, including CCCT technology
3 generally and the proposals to construct the Proposed Generators that were
4 submitted in response to the 2024 CCCT RFP, as well as the current cost estimates
5 for completing the Proposed Generators, the estimated non-fuel operation and
6 maintenance (“O&M”) costs for the Proposed Generators, the process for selecting
7 the Engineering, Procurement, and Construction (“EPC”) contractors chosen to
8 construct the Proposed Generators, and certain characteristics of the EPC contracts.
- 9 • Chad J. Ladner, who is employed by ESL as Senior Manager, Power Delivery
10 Planning, provides an overview of the Company’s transmission system in
11 Louisiana, including facilities relevant to the Proposed Generators, as well as a
12 general description of the facilities proposed to interconnect the Proposed
13 Generators to the Company’s transmission system, the upgrades currently
14 anticipated by the Company that will be required by MISO to obtain Network
15 Resource Interconnection Service (“NRIS”) rights at Westlake, and the proposed
16 MISO interconnection process for both WF6 and Westlake.
- 17 • Jeremy Halland, who is employed by ESL as Manager, Environmental Project
18 Services, testifies concerning the federal and state environmental regulations
19 applicable to the construction and operation of the Proposed Generators as well as
20 the permitting plans (and environmental due diligence and initial permitting
21 performed at my direction) for the Proposed Generators.

- 1 • Phong D. Nguyen, who is employed by ESL as Director, Advanced Economic
2 Planning, testifies concerning the conduct and results of the 2024 CCCT RFP and
3 provides a net economic benefits analysis for each of the Proposed Generators.
- 4 • Patrick A. Sullivan, who is employed by ELL as Manager, Regulatory Affairs,
5 presents the Company's proposed cost-recovery methodology for the construction
6 of the Proposed Generators and associated, transmission-related projects and
7 discusses the rationale for seeking such cost recovery through the Additional
8 Capacity Mechanism ("ACM") and Transmission Recovery Mechanism ("TRM")
9 contained within the Company's Formula Rate Plan ("FRP"). Mr. Sullivan further
10 provides the first-year revenue requirement associated with the Proposed
11 Generators, identifies the regulatory approvals required under Commission General
12 Orders, and explains the reasons for which the Commission should find that ELL
13 has complied with the LPSC's Orders and for which the Proposed Generators
14 should be found to be in the public interest.

15
16 Q11. DOES ELL REQUEST A PARTICULAR TIMELINE FOR CONSIDERATION OF THIS
17 APPLICATION?

18 A. Yes. As Company witness Nicholas D. Pressler explains in his Direct Testimony, the
19 Company must issue final notices to proceed ("FNTP") in 2027 to its EPC contractors in
20 order to keep the current project schedule, with the first FNTP scheduled to be issued in
21 February 2027 for Westlake. A delay in the project schedule could lead to additional costs
22 for constructing the Proposed Generators, including additional EPC costs, and could also
23 delay the additional capacity and energy from the Proposed Generators, which could

1 potentially lead to additional costs in the MISO marketplace. The Company therefore asks
2 that the Commission consider ELL's Application at or before its December Business &
3 Executive Session meeting scheduled for December 16, 2026, in order that, if the
4 Commission certifies construction of the Proposed Generators, the Commission's Order
5 will be final by the February 2027 FNTF date for Westlake.

6
7 **III. DESCRIPTION OF 2024 CCCT RFP**

8 Q12. PLEASE DESCRIBE THE 2024 CCCT RFP.

9 A. As mentioned briefly above, the 2024 CCCT RFP was a request for proposals issued by
10 ESL on behalf of ELL soliciting proposals for up to 2,000 MW of CCCT generation to be
11 constructed in MISO LRZ 9, with individual resource capacity required to be in the range
12 of 600 MW to 800 MW (summer rating). The RFP indicated that ESL would market-test
13 one or more self-build alternatives including (1) a unit to be built at or near ELL's Roy S.
14 Nelson site in the Company's WOTAB Planning Area, and (2) a facility that would be built
15 at or near the site of the Little Gypsy generation facilities in the Company's Amite South
16 Planning Area.

17 In accordance with the requirements of the Order dated October 29, 2008 in LPSC
18 Docket No. R-26172, Sub-Docket C (the "MBM Order"),⁵ ESL issued a notice to the LPSC

⁵ See LPSC Docket No. R-26172, Sub-Docket C, *In re: Possible suspension of, or amendments to, the Commission's General Order dated November 3, 2006 (Market Based Mechanisms Order) to make the process more efficient and to consider allowing the use of on-line auctions for competitive procurement*, as amended October 29, 2008. As Company witness Patrick A. Sullivan also discusses in his Direct Testimony, and as I explain further below, the MBM Order was amended in October 2024, but those amendments applied prospectively and thus did not apply to the 2024 CCCT RFP, which was initiated before the amendments were approved by the Commission. See generally General Order 10-14-2024 (R-34247) (Oct. 14, 2024), LPSC Docket No. R-34247, *In re: Rulemaking to consider changes to Commission General Order dated October 29, 2008 (Docket No. R-26172 Subdocket C) ("Market Based Mechanisms Order") to incorporate formal complaint procedures*.

1 on July 23, 2024, of the Company's intent to issue a Request for Proposals for Long-Term
2 Developmental Combined-Cycle Combustion Turbine Resources. The Commission
3 assigned Docket No. X-37450 to the proposed RFP. On November 11, 2024, ELL posted
4 draft RFP documents that included the above requirements for the proposals and that
5 further specified that the resources would be required to have a quantity of energy resource
6 interconnection service ("ERIS") and NRIS that met certain thresholds included in the draft
7 documents.

8 The final RFP documents were posted on January 27, 2025, after which the RFP
9 followed the following schedule:

- 10 • Bidder Registration Period: February 3, 2025, to February 6, 2025;
- 11 • Self-Build Option Proposal Submission Period: March 14, 2025, to March
12 20, 2025;
- 13 • Proposal Submission Period (other than for Self-Build Option Proposals):
14 March 21, 2025, to March 27, 2025; and
- 15 • Selections Announced: August 25, 2025.

16 Other than the two self-build resources that are at issue in this Application, [REDACTED]

17 [REDACTED]
18 [REDACTED]. As I explain further below, the Company selected [REDACTED] the two
19 self-build proposals at issue in this Application and the tolling agreement proposal—but
20 ELL was unable to reach commercial terms for the tolling agreement.
21

1 Q13. WERE THE PROPOSALS SUBMITTED IN RESPONSE TO THE RFP EVALUATED
2 BY ESL?

3 A. Yes. ESL evaluated the proposals submitted in response to the 2024 CCCT RFP using a
4 process that was designed to be fair, impartial, and consistently applied. In addition, as
5 required by the MBM Order for RFPs in which self-build options are allowed, the
6 Company arranged for an Independent Monitor—the Merrimack Energy Group, Inc.—to
7 monitor the evaluation process. Company witness Phong D. Nguyen provides additional
8 detail on the 2024 CCCT RFP, including the evaluation that was performed for the
9 proposals submitted in response to the RFP and the selection of the Proposed Generators
10 from the 2024 CCCT RFP.

11
12 Q14. YOU MENTIONED THAT THE 2024 CCCT RFP WAS LIMITED TO NEW-BUILD
13 CCCT RESOURCES. HAS THE COMPANY MADE EFFORTS TO PROCURE
14 RESOURCES OTHER THAN NEW-BUILD CCCT FACILITIES?

15 A. Yes. The 2024 CCCT RFP was preceded by both (1) an RFP that was issued in 2024 (and
16 assigned LPSC Docket No. X-37158) seeking power purchase agreements (“PPAs”),
17 tolling agreements, asset acquisitions, and capacity-only purchase agreements totaling up
18 to 2,000 MW from existing CCCT, simple-cycle gas turbine (“CT”), and steam unit
19 generation resources, as well as (2) Order Number U-36697 (Corrected) issued on June 14,
20 2024⁶ (the “3 GW Order”) in LPSC Docket No. U-36697,⁷ pursuant to which the

⁶ The corrected version of the Order was mailed on July 9, 2024.

⁷ See LPSC Docket No. U-36697, *Application of Entergy Louisiana, LLC for Approval of Alternative Process to Secure up to 3,000 MW of Solar Resources, Certification of those Resources, Expansion of the Geaux Green Option, Approval of a New Renewable Tariff, and Related Relief*.

1 Commission approved of an alternative, streamlined process for the Company to procure
2 up to 3,000 MW of solar and/or solar plus storage (“hybrid”) resources. With respect to
3 the 3 GW Order, the Company has since conducted (and evaluated the results of) three
4 Procurement Windows pursuant to the terms of that Order and has received certification of
5 one of the procured resources.⁸ The Company has also recently filed for certification of
6 the Cypress Harvest solar facility pursuant to the terms of the 3 GW Order.

7 In addition, after the July 2024 notice for the 2024 CCCT RFP was issued, the
8 Company issued a public Notice of Release on September 13, 2024, of its 2024 Demand
9 Response (“DR”) RFP, which sought proposals for a wide range of DR offerings. The
10 results from the 2024 DR RFP are the subject of the proceeding in LPSC Docket No. U-
11 37595, *In re: Application of Entergy Louisiana, LLC for Approval of Demand Response*
12 *Programs and Associated Cost Recovery*.⁹

13
14 Q15. IN OCTOBER 2024, AFTER THE COMPANY ISSUED ITS NOTICE OF INTENT TO
15 ISSUE THE 2024 CCCT RFP AND DOCKET X-37450 WAS OPENED, THE
16 COMMISSION AMENDED THE MBM ORDER TO REQUIRE GENERALLY,
17 AMONG OTHER THINGS, THAT REQUESTS FOR PROPOSALS SOLICIT ALL

⁸ See Order Number U-36697-A (Nov. 14, 2025), LPSC Docket No. U-36697, *Application of Entergy Louisiana, LLC for Approval of Alternative Process to Secure up to 3,000 MW of Solar Resources, Certification of those Resources, Expansion of the Geaux Green Option, Approval of a New Renewable Tariff, and Related Relief* (certifying the Bogalusa West Solar Facility in accordance with the terms of the 3 GW Order).

⁹ The parties in LPSC Docket No. U-37595 have negotiated a resolution of the issues in that proceeding and are seeking Commission approval of the parties’ stipulated settlement.

1 AVAILABLE GENERATION OPTIONS.¹⁰ WHY DID THE COMPANY NOT SOLICIT
2 ALL AVAILABLE OPTIONS TO ADD GENERATING CAPACITY THROUGH THE
3 2024 CCCT RFP?

4 A. As mentioned briefly above, Company witness Patrick A. Sullivan discusses the
5 Company's compliance with the MBM Order in greater detail in his Direct Testimony,
6 including the fact that the Company initiated the 2024 CCCT RFP before the effective date
7 of the amendments to the MBM Order. Further, as set forth above, at the time the 2024
8 CCCT RFP was issued, the Company had already begun (and made significant progress
9 toward) pursuing a variety of existing generation resources as well as solar resources.
10 Moreover, soon after the 2024 CCCT RFP was initiated in July 2024, the Company issued
11 its 2024 DR RFP seeking a variety of potential DR offerings. Further, in December 2025,
12 the Company issued a Notice of Release of Draft RFP Documents for its 2025 Request for
13 Proposals for Battery Energy Storage System Resources (the "2025 BESS RFP"). The
14 Company has issued a series of RFPs that sought (and, as to the 2025 BESS RFP, continue
15 to seek), collectively, a diverse array of potential generation options; thus, although the
16 Company was not required to adhere to the requirements of the amended MBM Order for
17 purposes of the 2024 CCCT RFP, the Company has nevertheless cast a wide net to evaluate
18 available resource options, as contemplated by the amended Order.

¹⁰ See § 3, Attachment A to General Order 10-14-2024 (R-34247), *In re: Rulemaking to consider changes to Commission General Order dated October 29, 2008 (Docket No. R-26172 Subdocket C) ("Market Based Mechanisms Order")* to incorporate formal complaint procedures.

1 Q16. YOU REFERENCED ABOVE THAT A TOLLING AGREEMENT WAS ORIGINALLY
2 SELECTED FROM THE 2024 CCCT RFP. IS THE COMPANY SEEKING
3 CERTIFICATION OF THAT AGREEMENT?

4 A. No, because the Company was not able to reach commercial terms with the counterparty
5 to that proposed agreement.

6 As mentioned above, [REDACTED]
7 [REDACTED]. The proposed
8 agreement was [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]

18 After selections were made in August 2025, ELL began commercial negotiations
19 concerning the tolling agreement. ELL was ultimately unable to reach mutually acceptable
20 commercial terms with the counterparty to that agreement, and the negotiations were
21 terminated in November 2025.

1
2 Q17. IS IT YOUR OPINION THAT THE 2024 CCCT RFP RESULTED IN SELECTION OF
3 NEW CCCT GENERATION THAT WILL BE CONSTRUCTED AT THE LOWEST
4 REASONABLE COST FOR ELL'S CUSTOMERS?

5 A. Yes. ELL tested the market for new CCCT options within MISO LRZ 9 by issuing the
6 2024 CCCT RFP, and the two Proposed Generators were selected as resources that are far
7 more cost-effective than [REDACTED]

8 [REDACTED] The results of the RFP, alongside the net economic benefits
9 analysis explained more fully by Mr. Nguyen in his Direct Testimony and the Company's
10 efforts to solicit a wide variety of other resources that I discuss above, support that the
11 Proposed Generators will provide a sizeable amount of much-needed capacity for ELL's
12 customers at the lowest reasonable cost.

13
14 **IV. DESCRIPTION OF THE AMITE SOUTH AND WOTAB PLANNING AREAS**

15 Q18. THE WF6 POWER STATION IS PROPOSED TO BE LOCATED IN AMITE SOUTH,
16 AND WESTLAKE IS PROPOSED TO BE LOCATED IN WOTAB. WHAT ARE
17 AMITE SOUTH AND WOTAB?

18 A. Amite South and WOTAB are two of the five overarching planning areas used by ELL for
19 planning resource needs in Louisiana. Amite South is included within a broader planning
20 area referred to as the Southeast Louisiana Planning Area ("SELPA") and also incorporates
21 a smaller planning area known as Downstream-of-Gypsy ("DSG"). A map of Louisiana
22 reflecting the five planning areas is reproduced in Figure 1 below.

Figure 1



As set forth above, WF6 is proposed to be located in Killona, Louisiana, which is within the green-shaded Amite South region in Figure 1, while Westlake is proposed to be located in Westlake, Louisiana, which is in the orange-shaded WOTAB region.

Q19. YOU REFERENCED ABOVE THAT AMITE SOUTH AND WOTAB ARE LOAD POCKETS. PLEASE EXPLAIN THE CONCEPT AND SIGNIFICANCE OF LOAD POCKETS FOR RESOURCE-PLANNING PURPOSES.

A. Load pockets are regions of high load concentration in which the capability of the transmission system is inadequate to import sufficient energy and capacity to serve all the load at all times, such that ELL must rely in part on local generation to meet demand and reliably maintain system stability within the load pocket. The set of facilities and operational procedures necessary to maintain reliable service in load pockets is influenced largely by changes in the generation fleet, load levels and locations, and transmission topology in the region.

1 In addition to my discussion below concerning efforts by the Company to build
2 generation and transmission facilities within Amite South and WOTAB to assist with the
3 constraints associated with those two load pockets, Company witness Chad J. Ladner also
4 provides additional detail concerning transmission needs in those areas in his Direct
5 Testimony.

6
7 Q20. PLEASE PROVIDE ADDITIONAL INFORMATION CONCERNING THE AMITE
8 SOUTH LOAD POCKET.

9 A. Amite South contains the state's largest metropolitan area as well as a significant amount
10 of existing and potential high load factor industrial customers, and it relies substantially on
11 local generation and imports to serve the region's peak load and transmission requirements.
12 Because of its unique circumstances and needs, the Company has continually evaluated,
13 analyzed, and studied the transmission and generation and other resource planning needs
14 of the Amite South region for decades. Over the past ten years, these efforts have focused
15 on studying the viability of adding generation to the existing fleet in advance of the
16 retirement of ELL's legacy gas-fired generating units. As a result of this assessment, ELL
17 has constructed two new generating units in Amite South: (1) the J. Wayne Leonard Power
18 Station, a 926 MW CCCT, which began commercial operation in 2019, and (2) the
19 Washington Parish Energy Center, a 363 MW combustion turbine, which began
20 commercial operation in 2020.

21 In addition, the Company is pursuing the development of significant transmission
22 projects to support load growth and economic development in southeast Louisiana and
23 increase the load serving capability in Amite South. These projects, collectively known as

the Amite South Transmission Project (“ASTP”), and individually known as ASTP Phases 1, 2, and 3, were brought before the Commission through five individual filings. In general, Phases 1 and 2 of the ASTP provide for transmission construction and improvements on the West Bank and East Bank of the Mississippi River, respectively. ASTP Phase 3 provides for a new transmission line in the area north of Lake Pontchartrain. MISO approved all three phases as part of the 2023 MISO Transmission Expansion Plan. Table 1 below is a chart identifying the filing dates and docket numbers for each filing:

Table 1

ASTP Phase	Project	Docket No.	Filing Date at LPSC
Phase 2	Audubon Substation and Related Transmission Facilities	S-37113	1/31/2024 (Docket closed on 10/22/2024)
Phase 1	West Bank 230kV Project	U-37143	3/22/2024 (Approved by LPSC on 4/25/2025)
Phase 1	West Bank 500kV Project	U-37467	12/23/2024 (Approved by LPSC on 12/17/2025)
Phase 2	Willow Glen – Conway – Audubon 230kV Transmission Line	U-37527	2/26/2025 ¹²
Phase 3	Adams Creek – Robert 230kV Transmission Line	U-37563	4/17/2025

Q21. PLEASE PROVIDE ADDITIONAL DETAIL CONCERNING THE WOTAB LOAD POCKET.

A. Similar to Amite South, WOTAB is home to a population center—Lake Charles, Louisiana—and has seen, and continues to see, significant load growth due to ramping of

¹² On December 15, 2025, ELL filed an Unopposed Motion to Suspend Procedural Schedule in Docket No. U-37527, explaining that the Company requested suspension of all remaining procedural deadlines so that ELL could complete a thorough reevaluation of the needs, drivers, and timing of the relevant project and determine appropriate next steps. Later that day, the Administrative Hearings Division granted the Unopposed Motion, and thus this docket has been suspended.

1 large Liquefied Natural Gas (“LNG”), chemical, and other industrial projects. As a result
2 (and as it has done with Amite South), the Company has continually evaluated, analyzed,
3 and studied the transmission and generation and other resource planning needs of the
4 WOTAB region, and has constructed facilities to assist with the region’s constraints,
5 including by completing the Lake Charles Power Station, which is a 2x1 CCCT located
6 near Westlake, Louisiana, that entered commercial operation in 2020. In addition, the
7 Company has invested heavily in constructing an extra-high voltage (“EHV”) transmission
8 line corridor to allow for load growth and to assist with integrating new generators in
9 WOTAB—a corridor that runs a short distance north of, and parallel to, Interstate 10 and
10 includes the Hartburg – Rhodes, Rhodes – Nelson, Nelson – Richard, Richard – Wells, and
11 Webre – Wells 500 kV EHV transmission lines. Moreover, the Company also recently
12 filed on December 23, 2025, an application¹³ for certification of the new Babel – Webre
13 500 kV line, which, among various other benefits, will further enhance the ELL
14 transmission system’s ability to integrate new generation to assist with load growth in
15 Amite South and WOTAB (and South Louisiana more generally).

16
17 Q22. ARE THERE ANY AGING GENERATORS IN AMITE SOUTH AND WOTAB THAT
18 SUPPORT THE NEED FOR NEW GENERATION LIKE THE PROPOSED
19 GENERATORS?

20 A. Yes. ELL has several aging generation units in these areas that have exceeded their original
21 useful lives and that ELL is accordingly considering replacing. In particular, Little Gypsy

¹³ See LPSC Docket No. U-37812, *In re: Application for Certification of the Babel – Webre 500 kV Transmission Project in Accordance with General Order Dated September 10, 2024 (R-36199)*.

1 2 is a 415 MW Boiler-Steam Turbine unit that began commercial operation in 1966, and
2 Little Gypsy Unit 3 is a 517 MW Boiler-Steam Turbine unit that began commercial
3 operation in 1982. Both of these Little Gypsy units are in Amite South. As to WOTAB,
4 the Company operates Nelson Station, Unit 6 (“N6”), which is a 550 MW coal unit that
5 began commercial operation in 1982. Given the age of each of these plants, the Company
6 is evaluating options with respect to operations and has further identified a need to
7 construct additional, new generation in both Amite South and WOTAB.

8
9 Q23. DO THE AMITE SOUTH AND WOTAB PLANNING AREAS CONTINUE TO SEE
10 LOAD GROWTH SUCH THAT ADDITIONAL TRANSMISSION AND
11 GENERATION FACILITIES, SUCH AS THE PROPOSED GENERATORS, ARE
12 NEEDED?

13 A. Yes. Overarchingly, and as I discuss in additional detail below, ELL has a systemwide
14 need for additional capacity, and that need will be satisfied, in part, by the additions of the
15 Proposed Generators. Absent certification and construction of these two resources, the
16 Company anticipates that it (and its customers) will begin to face significant exposure to
17 both the MISO energy and capacity markets within the next several years.

18 More locally, the conditions that have long established Amite South and WOTAB
19 as load pockets—areas of significant industrial and other load in a transmission-constrained
20 region—continue to intensify. In the Amite South region, Hyundai Motor Group
21 announced a decision in March 2025 to construct a \$5.8 billion, ultra-low carbon steel

1 production mill to be located on approximately 1,700 acres in Donaldsonville, Louisiana,¹⁴
2 while CF Industries, Inc. (the world's largest producer of ammonia) and its partners
3 announced in April 2025 an approximately \$4 billion final investment decision to establish
4 a low-carbon ammonia facility on the West Bank of Ascension Parish, Louisiana—an
5 ammonia facility that will be the largest facility of its kind in the world.¹⁵ In the WOTAB
6 region, Woodside Energy Group recently announced its \$17.5 billion final investment
7 decision to establish a new LNG production and export facility in Calcasieu Parish,
8 Louisiana (the same parish in which Lake Charles is located).¹⁶

9 The Company needed additional capacity (both systemwide and in Amite South
10 and WOTAB specifically) before these recent, substantial economic-development
11 announcements. These projects—each of which is significant to the state and is a testament
12 to (and the result of) Louisiana's leadership in creating a strong foundation for economic
13 development—represent [REDACTED] of incremental growth for ELL and further
14 demonstrate the critical need for additional generation resources like the Proposed
15 Generators. Moreover, given that there is such a large amount of load growth in the Amite
16 South and WOTAB load pockets, and considering the operational limits on imports into

¹⁴ See March 24, 2025, Louisiana Economic Development, "Louisiana Wins Again," Governor Jeff Landry & LED Secure \$5.8 Billion Hyundai Steel Mill, available at <https://www.opportunitylouisiana.gov/news/louisiana-wins-again-governor-jeff-landry-led-secure-5-8-billion-hyundai-steel-plant>.

¹⁵ See April 8, 2025, Louisiana Economic Development, *Another Louisiana Win: CF Industries, JERA and Mitsui Announce \$4 Billion Final Investment Decision to Construct World's Largest Ammonia Facility in Ascension Parish*, available at <https://www.opportunitylouisiana.gov/news/another-louisiana-win-cf-industries-jera-and-mitsui-announce-4-billion-final-investment-decision-to-construct-worlds-largest-ammonia-facility-in-ascension-parish>.

¹⁶ See April 27, 2025, Louisiana Economic Development, *Historic Investment Woodside Energy Announces \$17.5 Billion Final Investment Decision for LNG Facility in Southwest Louisiana; Becomes Largest Foreign Direct Investment in State History*, available at <https://www.opportunitylouisiana.gov/news/historic-investment-woodside-energy-announces-17-5-billion-final-investment-decision-for-lng-facility-in-southwest-louisiana-becomes-largest-foreign-direct-investment-in-state-history>.

1 these regions, there is a compelling need to locate generation within the load pockets—and
2 thus to construct WF6 within Amite South and Westlake within WOTAB.

3
4 Q24. IN ADDITION TO FACILITATING THE INDUSTRIAL GROWTH DESCRIBED
5 ABOVE, ARE THE PROPOSED GENERATORS EXPECTED TO RESULT IN OTHER
6 LOCAL BENEFITS?

7 A. Yes. Loren C. Scott & Associates, Inc., recently studied the effects that construction and
8 operation of the Proposed Generators are expected to have on the economies of the State
9 of Louisiana; St. Charles Parish and the New Orleans Metropolitan Statistical Area for
10 WF6; and Calcasieu Parish for Westlake. Those studies concluded that the construction
11 and operation of the Proposed Generators will produce significant economic benefits—
12 totaling billions of dollars—in terms of new business sales, household earnings, jobs, and
13 tax revenue in both the State and regional economies. Benefits result not only from one-
14 time capital or construction expenditures, but also from ongoing operational expenditures
15 that will continue to accrue to the benefit of residents in the regions and state as long as the
16 Proposed Generators are in operation. Notably, the economic benefits estimated in the
17 studies are for the construction and operation of the Proposed Generators alone and do not
18 account for the substantial economic impacts that will result from the industrial projects
19 that the Proposed Generators will help serve.

1 V. **RESOURCE PLANNING NEEDS MET BY THE PROPOSED**
2 **GENERATORS**

3 Q25. HAVING DESCRIBED THE AMITE SOUTH AND WOTAB LOAD POCKETS, LET'S
4 DISCUSS THE COMPANY'S RESOURCE PLANNING PROCESS. WHAT IS THE
5 GOAL OF ELL'S RESOURCE PLANNING?

6 A. ELL's resource planning is driven by the fundamental goal to deliver a resource portfolio
7 that is centered on customer outcomes and the safe, reliable delivery of electricity at the
8 lowest reasonable cost. Building a robust portfolio of resources requires that ELL carefully
9 balance three key objectives: reliability, affordability, and environmental stewardship.
10 This balance looks at both the near-term and long-term benefits and risks associated with
11 each key objective.

12 ELL's portfolio development places an emphasis on customer needs and
13 preferences. ELL recognizes that customer expectations for electric service will continue
14 to change alongside advancements in technology and evolving market and policy
15 considerations. Accordingly, ELL aims to meet customers' needs for reliable, reasonably
16 priced electric services and energy solutions both today and in the future.

17
18 Q26. PLEASE ELABORATE ON THE THREE KEY OBJECTIVES YOU MENTIONED FOR
19 BUILDING A SUSTAINABLE PORTFOLIO.

20 A. Reliability as a planning objective means ensuring that the stability of the grid is
21 maintained through adequate resources to meet capacity and energy needs along with
22 adequate transmission and distribution systems to ensure that power is reliably delivered
23 to customers. Ensuring that there are adequate resources to meet forecasted future

1 customer demand is more than just supplying a certain number of megawatts or Zonal
2 Resource Credits (“ZRCs”) with respect to the MISO wholesale market. Resource
3 adequacy must also consider the diversity of the supply portfolio—both in technology type
4 and operational characteristics—combined with customer-targeted energy efficiency and
5 demand-side resources. Planning also must consider the location of resources, proximity
6 of those resources to customer load, and the availability of those resources under various
7 conditions. The ability of the transmission and distribution system to deliver those
8 resources to customers also is a key aspect of maintaining reliability, and the careful
9 integration of generation, transmission, and distribution ensures that adequate reliability
10 can be delivered at the lowest reasonable cost.

11 Affordability as a planning objective means keeping customer costs reasonable,
12 considering current and expected cost impacts of infrastructure improvements made on
13 behalf of ELL’s customers and taking advantage of scale to provide cost synergies. ELL
14 recognizes the importance of maintaining affordable rates for customers and prides itself
15 on the ability to maintain rates well below the national average. Maintaining affordable
16 rates requires a balancing of various cost components such as capital investment,
17 operations and maintenance expenses, and sometimes-volatile fuel and purchased power
18 costs. Maintaining cost stability over time requires that ELL examine its portfolio over a
19 variety of futures to ensure that long-term supply will adequately meet future customer
20 needs.

21 Environmental stewardship as a planning objective refers to the use and protection
22 of the natural environment, ensuring compliance with existing and likely regulations,
23 adaptability of resources, and paths toward a lower-carbon intensity economy. Portfolios

1 of supply-side and demand-side resources that are capable of adapting and remaining
2 sustainable over the long-term horizon bring customers increased benefits and help to
3 manage long-term cost stability. When considering ELL's environmental stewardship
4 objective, the Company also monitors customers' desire for decarbonization through lower
5 emission generation, investment in cost-effective renewable energy resources, and a broad
6 range of offerings that allow customers to meet their own, unique sustainability goals in
7 partnership with their utility. Many of ELL's larger customers have publicly stated their
8 intent to reduce the carbon intensity of their businesses and operations. With the
9 Company's ability to provide broad access to renewable energy and other options for
10 customers, ELL stands in a unique position to enable and extend a lower carbon economy
11 to customers and the communities it serves.

12 Appropriately balancing these three objectives with consideration of the near-term
13 and long-term risks associated with each should result in the lowest reasonable cost
14 portfolios of resources to meet customers' needs.

15
16 Q27. PLEASE DESCRIBE ELL'S LONG-TERM RESOURCE PLANNING PROCESS.

17 A. The core elements of ELL's resource planning process are: (1) a determination of the
18 capability of the Company's current resources, (2) a forecast of the peak load plus reserve
19 margin and energy that the Company expects to serve over the planning horizon, and (3) a
20 determination of the amount and types of additional supply-side and demand-side resources
21 that will be needed to meet the Company's future load and energy requirements.

22 As part of its resource-planning efforts, ELL has developed and continues to refine
23 an Integrated Resource Plan ("IRP"), which is periodically filed at the LPSC pursuant to

1 the Commission's IRP rules.¹⁷ ELL's most recent submission of a final IRP to the
2 Commission was on May 22, 2023 (ELL's "Final 2023 IRP") and reflects inputs and
3 assumptions that were established based on ELL's Business Plan 2022.¹⁸ The Final 2023
4 IRP was the IRP in place when the 2024 CCCT RFP was conducted. Given the uncertainty
5 and fluidity inherent in long-term resource planning, ELL's IRP provides a framework for
6 the Company to plan for resources over the next several years but does not and cannot
7 reasonably serve as a prescriptive plan to address ELL's long-term resource needs and
8 potential options for meeting those needs. Circumstances will necessarily change, and to
9 be reasonable and prudent, resource-procurement decisions must be made based on the best
10 information reasonably available at the time those decisions are made. ELL presents those
11 decisions and the support for them to the Commission when seeking resource certifications
12 required under applicable General Orders and does not seek certification via the IRP (nor,
13 per my understanding of the Commission's IRP rules, does the Commission's
14 acknowledgement of an IRP confer such approval).

15 Further, an overarching consideration in ELL's long-term resource-planning
16 process is the current expectation with respect to load growth and the generation portfolio.

¹⁷ See Corrected General Order No. R-30021 (April 20, 2012), *Ex Parte, In re: Development and Implementation of Rule for Integrated Resource Planning for Electric Utilities*, Docket No. R-30021.

¹⁸ See ELL's IRP Final Report (May 22, 2023), *Ex Parte: In re: 2021 Integrated Resource Planning Process for Entergy Louisiana, LLC pursuant to the General Order No. R-30021*, Docket No. I-36181. The Final 2023 IRP was acknowledged by the LPSC on February 21, 2024. The Company has recently initiated the fourth full cycle of its IRP process and expects to submit an updated, final IRP report in 2027. See LPSC Docket I-37764, *In re: Integrated Resource Planning ("IRP") Process for Entergy Louisiana, LLC pursuant to the Corrected General Order No. R-30021, dated April 20, 2012*.

1 As described in ELL's Final 2023 IRP¹⁹ and the record of Docket Nos. U-36697, U-37071,
2 U-37425, and U-37801 (among others), ELL is projected to need additional long-term
3 capacity over the course of the long-term planning horizon to replace deactivated capacity
4 and address load growth in order to reliably serve customers—considerations that are
5 especially pertinent for the Proposed Generators.

6 ELL has also presented the Commission with results of certain aspects of its
7 continuous resource-planning efforts outside of the formal IRP process. For example, ELL
8 received approvals in 2024 from the Commission in Docket No. U-37071 (which
9 concerned ELL's 2023 Solar Application, specifically the Power Purchase Agreement for
10 the Mondu Solar Facility), and Docket No. U-36697 (which was ELL's 3 GW filing).²⁰

11 Finally, there are instances in which ELL's resource-planning process addresses
12 (but the IRP may not contemplate) unique load-serving issues and solutions that arise from
13 time to time—an issue that arose, for example, with the proposed resources at issue in
14 Docket No. U-37425, in which Laidley, LLC requested service to a large new load (its data
15 center), and the request was received by ELL after the latest, final IRP was filed. Under
16 the circumstances present in that Application, ELL was unable to include the proposed load
17 (or the corresponding solution) in its IRP and instead fulfilled the Commission's planning
18 requirements by seeking certification of certain resources in the application itself.

¹⁹ As noted, ELL recently submitted its January 21, 2026, ELL 2027 IRP Data Filing in LPSC Docket I-37764, in which the Company demonstrated that its peak load forecast—consisting of MISO Summer Season coincident peak estimates from the Company's Business Plan 2026 ("BP26")—includes an expectation of 13,915 MW of peak load in 2030 and 14,740 MW in 2035—a significant increase from the load forecasts included in the Final 2023 IRP. As also noted, the final version of the next iteration of the Company's IRP will be submitted in 2027.

²⁰ See Order No. U-37071 (September 6, 2024), *In re: Application for Approval of the Mondu Solar Power Purchase Agreement, Expansion of the Geaux Green Tariff, and Cost Recovery*, Docket No. U-37071; see also generally 3 GW Order.

Q28. PLEASE DESCRIBE THE COMPANY'S CURRENT RESOURCE PORTFOLIO.

A. ELL currently controls approximately 11 GW of in-service capacity through direct ownership, capacity contracts with third parties, life-of-unit contracts with other EOCs, and DR resources. Over the last twenty years, ELL has transformed and modernized its generation portfolio to support customers' evolving needs and address significant current and expected industrial load growth in Louisiana by adding reliable and more efficient CT and CCCT generating units to meet its supply needs. More recently, ELL has also pursued additional renewable resources. Table 2 below shows ELL's current (as of 2025) resources by fuel type, including demand-side resources and supply-side resources owned by ELL and under contract through PPAs.²¹

Table 2

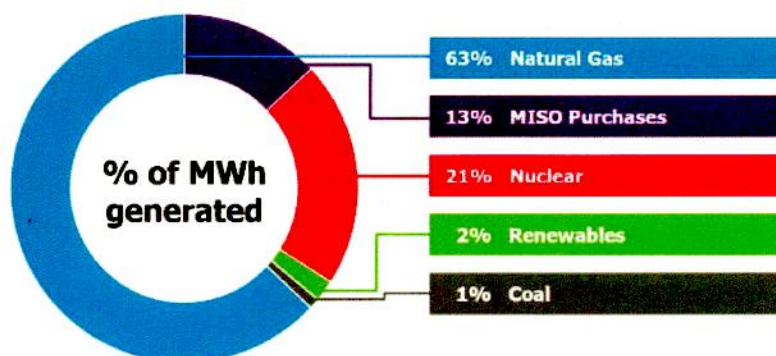
2025 ELL Resource Portfolio		
	Summer Seasonal Accredited Capacity ("SAC")	SAC %
Coal	343	3.1%
Nuclear	1,581	14.5%
CCCT	5,331	49.0%
CT and Other	773	7.1%
Legacy Gas	2,332	21.4%
Renewable	247	2.3%
Load Modifying Resources ("LMRs")	272	2.5%
Total	10,879	100.0%

²¹ The amount of Summer SAC for LMRs does not include any amounts associated with the DR programs at issue in the Company's pending DR proceeding in Docket No. U-37595.

Figure 2 below shows ELL's energy mix in 2024 by generation type.²²

Figure 2

Entergy Louisiana's 2024 Power Generation Mix



Approximately 21% of the capacity in the Company's resource portfolio is composed of legacy fossil generation units that have been in service for more than 50 years, with the oldest having been in operation for approximately 59 years. While the company has made and will continue to make investments to maintain these legacy generators when economical to do so, many of these generators are expected to reach the end of their economically useful lives and be deactivated in the near term.²³

²² Figure 2 includes all generation used to serve ELL's load (including both owned and contracted resources) as well as purchases made from MISO's energy market.

²³ For example, ELL deactivated Waterford 1 during the first quarter of 2021. See ELL's Compliance Filing (March 30, 2022), *In re: Notification of Deactivation and Retirement Decisions pursuant to Louisiana Public Service Commission's Deactivation General Order (Docket No. R-34407)*, Docket No. X-35751; see also, e.g., ELL's IRP Final Report (May 22, 2023), *Ex Parte: In re: 2021 Integrated Resource Planning Process for Entergy Louisiana, LLC pursuant to the General Order No. R-30021 Dated April 20, 2012*, Docket No. I-36181, p. 27.

1 Q29. HOW DO MISO RESOURCE ADEQUACY REQUIREMENTS INFLUENCE THE
2 COMPANY'S RESOURCE NEEDS?

3 A. ELL's resource planning efforts are primarily focused on the planning objectives I noted
4 above that seek to deliver the right type and amount of capacity to reliably serve ELL's
5 customers in Louisiana. In doing so, ELL must also account for the resource adequacy
6 requirements set out by MISO for the Planning Year to ensure that the results of ELL's
7 planning efforts reasonably meet those requirements.

8 While MISO has no responsibility to build or provide capacity, it nevertheless
9 assigns resource adequacy requirements to load-serving entities in its footprint, including
10 ELL. MISO historically provided annual resource adequacy requirements but in recent
11 years has implemented its SAC construct, which began with the 2023-2024 Planning Year.
12 Under this revised resource adequacy construct, MISO conducts seasonal assessments to
13 evaluate potential resource adequacy risks for the various seasons. These assessments
14 evaluate seasonal loss-of-load risk by modeling near-term capacity in the face of historic
15 outage conditions and by modeling a wide range of potential load-forecast and weather
16 scenarios, including extreme weather scenarios. The assessments performed by MISO also
17 highlight potential issues in the upcoming seasons to help MISO, load-serving entities,
18 regulators, and other stakeholders prepare for potentially strained system conditions and
19 develop preventative actions.²⁴

20 As part of its resource adequacy requirements, MISO also determines Local
21 Clearing Requirements ("LCRs")—the amount of capacity that must be physically located

²⁴ MISO Energy, *Resource Adequacy*, Midcontinent Independent System Operator, Inc., available at <https://www.misoenergy.org/planning/resource-adequacy2/resource-adequacy>.

1 within each LRZ (as defined by MISO) accounting for how much load is present within
2 each LRZ and how much capacity can be “imported” from other LRZs. In the event a load-
3 serving entity’s resources fall short of its seasonal requirements, that load-serving entity is
4 exposed to the zonal clearing price for MISO’s annual capacity Planning Resource Auction
5 (“PRA”) for the shortfall. The clearing price can approach and ultimately reach the cost of
6 new entry (“CONE”)²⁵ multiplied by four if an individual LRZ cannot meet its LCR, which
7 may occur as market conditions tighten across MISO’s footprint. Notably, LRZs 1 through
8 7 cleared at or near CONE, or \$236.66/MW-day, in the 2022-2023 MISO PRA.²⁶

9 As I noted above, MISO has recently implemented various changes to the design
10 of the PRA, and these have had an impact on the PRA results. The PRA results for the
11 2023-2024 MISO Planning Year, released in the Spring of 2023, represented the first time
12 MISO released PRA results based on its new SAC construct. Results for the 2025-2026
13 MISO Planning Year (the PRA for the current Planning Year that commenced on June 1,
14 2025) represented the first time MISO included its Reliability-Based Demand Curve
15 (“RBDC”), which resulted in an amount of capacity clearing in the PRA that exceeded the
16 seasonal Planning Reserve Margin (“PRM”) targets published in MISO’s 2025-2026
17 LOLE Study report. Across the MISO region as a whole, declining surplus capacity,
18 coupled with emerging risks due to fleet transition and new load additions, continue to
19 pressure resource adequacy. While LRZ 9 (in which Louisiana and the Proposed

²⁵ The “cost of new entry” represents the regional, annualized capital cost of building a new CT.

²⁶ MISO Energy, *2022/2023 Planning Resource Auction (PRA) Results*, Midcontinent Independent System Operator, Inc. (April 14, 2022), available at <https://cdn.misoenergy.org/2022%20PRA%20Results624053.pdf>. The same 2022-2023 MISO PRA yielded a clearing price for LRZ 9—the LRZ in which ELL’s load and generation (including the Proposed Generators) are sited—of \$2.88/MW-day.

1 Generators sit), did not clear at CONE in any season, its Summer season cleared at the
2 highest value to date, which was \$666.50/MW-day, and the remaining seasons cleared at
3 their highest values since MISO began seasonal accreditation.²⁷ In the Fall, LRZ 9 cleared
4 at \$74.09/MW-day, in the Winter it cleared at \$33.20/MW-day, and in the Spring it cleared
5 at \$69.88/MW-day.²⁸ LRZ 9 has experienced elevated pricing in the most recent MISO
6 PRAs and is expected to continue to see elevated pricing in the coming years.²⁹

7 The significantly tightening supply of capacity within LRZ 9 is evident from the
8 detailed results underlying the elevated Summer season clearing prices in the 2025-2026
9 PRA. Those results show that, in Summer, the quantity of supply offered into the auction
10 (20,499 MW) exceeded the LCR for LRZ 9 (19,615 MW) by only 884 MW.³⁰ In other
11 words, if the amount of capacity offered in LRZ 9 in the Summer season had been roughly
12 4% lower, then LRZ 9 would have cleared at four times CONE for that season.³¹ Ensuring
13 adequate capacity in LRZ 9 is thus crucial, especially at a time when certain Louisiana
14 Load Serving Entities are relying on approximately 600 MW of capacity outside of LRZ 9
15 (and in jurisdictions as far away as Michigan) to fulfill their planning needs.³²

²⁷ See MISO Energy, *Planning Resource Auction Results for Planning Year 2025-26* (April 2025), available at https://cdn.misoenergy.org/2025%20PRA%20Results%20Posting%2020250529_Corrections694160.pdf.

²⁸ See *id.*

²⁹ See *id.*

³⁰ See *id.*, at 18.

³¹ It warrants noting that CONE is now approximately \$322.49/MW-day, which is higher than it was at the time of the 2022-2023 PRA mentioned above. See *id.*, at p. 26.

³² See October 1, 2025, LPSC Staff MCO Compliance Report, LPSC Docket No. X-37566, at p. 11 (noting that approximately 14% of Concordia Electric Cooperative, Inc.'s total resources are located in Michigan); December 15, 2025, LPSC Staff Annual Report on Louisiana Resource Adequacy, LPSC Docket No. X-37566, at p. 15 ("For the 25/26 Planning Year, approximately 600 MW of Qualifying Capacity identified by jurisdictional LLSEs participating in MISO was located outside MISO LRZ 9.").

1 As I noted, ELL's planning efforts carefully consider the location of resources and
2 the proximity of those resources to customer load and therefore are aligned with these
3 MISO zonal requirements. This alignment serves to help mitigate ELL customers' level
4 of exposure to capacity shortfalls and places an emphasis on securing adequate in-zone
5 resources.

6
7 Q30. DOES THE COMPANY NEED ADDITIONAL LONG-TERM GENERATING
8 CAPACITY, LIKE THE PROPOSED GENERATORS, TO SATISFY ITS PLANNING
9 OBJECTIVES?

10 A. Yes. ELL's projected load (plus a planning reserve margin) exceeds the capacity of ELL's
11 existing and LPSC-approved resources, which indicates a need for additional long-term
12 capacity—a need that is further pronounced with the addition of several new high-profile
13 loads that have been announced over the last twelve months, a few examples of which are
14 described above. Exhibit MJP-1, which contains Highly Sensitive Protected Material
15 ("HSPM") and is designated as such, reflects ELL's resources relative to the forecasted
16 load for 2025-2035, with the red line depicting ELL's load requirement with those new
17 loads. HSPM MJP-1 takes into account currently owned and contracted resources and
18 those future resources that have been approved by or are pending before the Commission,
19 and the underlying data is drawn from ELL's BP26.³³

20 The resource surplus/deficit from year to year with the anticipated new loads is the
21 difference between the red line and the bar for each year on the X-axis, which represents

³³ HSPM Exhibit MJP-1 does not include the DR resources that are the subject of the Application in Docket No. U-37595, *In re: Request for approval of Demand Response Programs, and cost recovery*.

1 ELL's existing resources, approved resources, conditionally approved resources, and
2 resources pending LPSC approval.

3 In terms of resource availability, HSPM Exhibit MJ-1 also reflects slight
4 modifications to unit-deactivation assumptions from BP24 that were discussed in ELL's
5 most recent IRP, as well as existing PPAs that are expected to expire on their stated
6 expiration dates. Certain unit-deactivation dates have been modified to balance ELL's
7 ability to meet its energy and capacity needs with achieving customer affordability, the
8 time needed to build new resources, and the ability to ramp to serve certain customer loads.
9 As seen in HSPM Exhibit MJ-1, assuming all pending resources are approved by the
10 Commission and using ELL's Summer SAC, ELL will need [REDACTED]

11 [REDACTED].

12
13 Q31. YOU MENTIONED ABOVE THAT THERE IS ANTICIPATED INDUSTRIAL LOAD
14 GROWTH IN LOUISIANA. PLEASE DESCRIBE WHY SUCH GROWTH IS
15 ANTICIPATED.

16 A. There are many reasons for which industrial load growth is anticipated. The Commission
17 is well-aware of significant economic wins that the State of Louisiana has recently been
18 able to achieve, including the announcement that a wholly owned subsidiary of Meta
19 Platforms, Inc. (Laidley, LLC) is constructing a large data center in Richland Parish,
20 Louisiana. The resources needed to serve that project were certified by the Commission in
21 Docket No. U-37425, thus enabling the continued progress of Laidley's transformational
22 new development in Northeast Louisiana.

1 In addition to the new technological sector arriving in Richland Parish, however,
2 Louisiana is also facing significant industrial growth in other sectors. Louisiana has long
3 been one of the most attractive locations in the world for energy-intensive industrial and
4 manufacturing operations, owing primarily to the low rates ELL's customers pay as well
5 as the natural geographical advantages Louisiana offers. In Louisiana and across the Gulf
6 South, world-class infrastructure, favorable commodity spreads, workforce availability,
7 and access to deepwater ports put Louisiana and the region at the forefront for the United
8 States to compete globally for new and expansion of its industrial customer base. In fact,
9 as mentioned above, several major companies including CF Industries, Hyundai, and
10 Woodside, among others, have announced near-term plans to build large manufacturing
11 and other facilities across Louisiana. Through construction of the Proposed Generators
12 and other investments, ELL is well-positioned to reliably serve the anticipated load growth,
13 as well as to continue to reliably serve its existing customers.

14
15 Q32. WHAT ARE ELL'S CURRENT PLANS TO MEET ITS LONG-TERM CAPACITY
16 NEEDS AND LOAD SERVING CAPABILITY NEEDS OF ITS CUSTOMERS?

17 A. As noted above, the Company has developed and continues to refine its resource plan that
18 considers generation, demand response, energy efficiency, and transmission and that plans
19 to meet customer needs at the lowest reasonable cost. Just to mention a few examples:

- 20 • ELL recently received Commission approval for a Capacity Credit Purchase
21 Agreement for 290 MW of capacity-related benefits from the Magnolia Power
22 Generating Station that will be located in Iberville Parish (LPSC Docket No. U-37193);

- 1 • As set forth above, ELL is pursuing the ASTP, which is the development of significant
2 transmission projects to support load growth and economic development in southeast
3 Louisiana, enhance reliability and operational flexibility in the Amite South load
4 pocket, and increase the load serving capability in the Amite South Planning Area. The
5 various individual projects comprising the ASTP are set forth above in Table 1.
- 6 • The Company is continuing its efforts to add solar generation to its portfolio, which
7 efforts are represented in the Company's most recent, final IRP filing as well as recent,
8 and ongoing, certification dockets including Docket Nos. U-36190,³⁴ U-36685,³⁵ U-
9 37071,³⁶ U-36997 (which includes the Company's recent application for certification
10 of the Cypress Harvest Solar Facility),³⁷ and U-37800;³⁸
- 11 • In 2024, as set forth above, the Company issued an RFP for additional dispatchable
12 capacity from existing generation resources, as reflected in LPSC Docket No. X-
13 37158;³⁹
- 14 • In May of 2025, the Company filed an application seeking, among other things,
15 authorization to implement, over a five-year period, a suite of proposed demand

³⁴ See LPSC Docket No. U-36190 (November 9, 2021), *Ex Parte: Application of Entergy Louisiana, LLC for Approval of the 2021 Solar Portfolio, The Geaux Green Option, Cost Recovery and Related Relief*.

³⁵ See LPSC Docket No. U-36685 (February 28, 2023), *Ex Parte: Application of Entergy Louisiana, LLC for Approval of the 2022 Solar Portfolio, Expansion of the Geaux Green Option, Cost Recovery and Related Relief*.

³⁶ See LPSC Docket No. U-37071 (December 18, 2023), *Ex Parte: Application of Entergy Louisiana, LLC for Approval of the Mondu Solar Power Purchase Agreement, Expansion of the Geaux Green Option, Cost Recovery and Related Relief*.

³⁷ See LPSC Docket No. U-36697 (March 13, 2023), *Ex Parte: Application of Entergy Louisiana, LLC for Approval of Alternative Process to Secure up to 3,000 MW of Solar Resources, Certification of those Resources, Expansion of the Geaux Green Option, Approval of a New Renewable Tariff, and Related Relief*.

³⁸ See LPSC Docket No. U-37800 (November 30, 2025), *In re: Application of Entergy Louisiana, LLC for Approval to Construct Votaw and Segno Solar Facilities, and for Cost Recovery*.

³⁹ See LPSC Docket No. X-37158 (February 14, 2024), *In Re: Request for Proposals for Existing Energy and Capacity Resources*.

1 response offerings, consisting of (1) for residential customers, smart thermostat DR,
2 battery energy storage DR, and an electric vehicle behavioral charging offering, (2) for
3 agricultural customers, an agricultural irrigation load control program, and (3) for
4 commercial and industrial customers, an aggregated capacity DR offering;⁴⁰

- 5 • In December 2025, the Company filed an application seeking approval from the LPSC
6 for ELL to acquire the Cottonwood generating facility, which would provide
7 approximately 1,263 MW (nominal) of CCCT capacity and energy to ELL's generating
8 portfolio;⁴¹ and

- 9 • Also in December 2025, the Company issued a Notice of Release of Draft RFP
10 Documents for the Company's 2025 Request for Proposals for Battery Energy Storage
11 System Resources, which will seek up to 1,100 MW of Capacity, Energy, Capacity-
12 Related Benefits (such as ZRCs and capacity credits), Other Electric Products, and
13 Environmental Attributes from eligible new-build and existing battery energy storage
14 systems, for service commencing between January 1, 2028, and March 31, 2030, with
15 a preference for resources that will be online by March 31, 2029.⁴²

16 The Company continues to need long-term capacity over the planning horizon, and
17 ELL will meet this need from a diverse set of resources that will provide efficient operating
18 flexibility to serve evolving customer demands. Moreover, as I discussed above, resource
19 planning is a dynamic process, and ELL's plans accordingly must be updated regularly—

⁴⁰ See LPSC Docket No. U-37595 (May 30, 2025), *In re: Application of Entergy Louisiana, LLC for Approval of Demand Response Programs and Associated Cost Recovery*. As mentioned above, the parties in this docket have entered into a stipulated settlement agreement to resolve the issues in this docket.

⁴¹ See LPSC Docket No. U-37801 (December 2, 2025), *In re: Application of Entergy Louisiana, LLC for Approval to Acquire Cottonwood Generation Facility and for Cost Recovery*.

⁴² See <https://rfp.entergy.com/ENTRFP/SEND/2025ELLBESSRFP/index.htm>.

1 a fact that is especially important currently, when ELL is updating certain generator-
2 retirement dates and fielding varying levels of responses to ongoing RFPs.

3
4 Q33. DOES CONSTRUCTION OF THE PROPOSED GENERATORS SUPPORT ELL'S
5 THREE KEY PLANNING OBJECTIVES FOR BUILDING A SUSTAINABLE
6 PORTFOLIO?

7 A. Yes. As set forth above, the three key planning objectives for resource planning are
8 reliability, affordability, and environmental stewardship. The relief sought in this
9 Application—and, specifically, certification of the Proposed Generators—satisfies each of
10 these planning objectives. First, with respect to reliability, the Proposed Generators would
11 provide approximately 1,500 MW of additional capacity at a time when ELL's forecasts
12 show an urgent need for such capacity, as I discuss above. Moreover, as discussed by Mr.
13 Ladner in his Direct Testimony, industrial load concentrations, such as those described
14 above in the Amite South and WOTAB Planning Areas, require reactive power, which is
15 more efficiently served by generation proximate to industrial loads—a feature that will be
16 provided by the Proposed Generators. Moreover, as Mr. Ladner also discusses, the
17 Proposed Generators will provide operational flexibility during emergency operating
18 conditions arising from a combination of factors, such as the recent load shed event that
19 occurred in Amite South in May 2025—an event that was caused in part (and in
20 combination with other factors, including transmission facility outages) by significant
21 planned and forced outages on generation within and bordering the Amite South load
22 pocket. With respect to affordability, as I explain below, construction of the Proposed
23 Generators is consistent with the principles of planning to meet customers' needs at a

1 reasonable cost and will mitigate the exposure of ELL's customers to high-capacity prices
2 and to spikes in the market price for energy. In addition, both WF6 and Westlake are highly
3 efficient CCCT units that can be expected to displace legacy generation that is more
4 expensive to operate and, as Company witness Phong D. Nguyen explains, are expected to
5 result in net economic benefits for ELL's customers. With respect to sustainability, as
6 Company witness Nicholas D. Pressler explains, these CCCTs are capable of adding
7 hydrogen co-firing and CCS, which could bring customers increased benefits and help with
8 managing long-term risk and cost stability while also preserving ELL's ability to operate
9 its system more reliably and with greater resilience in the face of effects from climate
10 change. Moreover, as mentioned above, the CCCTs are highly efficient units and can
11 accordingly be expected to be dispatched before—and therefore displace some or all of the
12 need for—legacy generation units, which are less efficient and entail higher emissions.

13 In sum, the Proposed Generators are two highly efficient CCCTs that will provide
14 critical reliability benefits in the Amite South and WOTAB regions at a reasonable cost
15 and mitigate the risk of excessive dependence upon the spot markets for capacity and
16 energy, thereby facilitating the continued development of key industrial load throughout
17 southeast Louisiana.

18
19 Q34. DOES CONSTRUCTION OF THE PROPOSED GENERATORS COMPORT WITH
20 THE CONCLUSIONS IN THE COMPANY'S FINAL 2023 IRP?

21 A. Yes. As set forth in the 2023 Final IRP, Portfolio 1 that was evaluated in the 2023 Final
22 IRP was determined to be the planned portfolio that offered the most economic and reliable

1 combination of resources satisfying the forecasted load requirements.⁴³ Portfolio 1 notably
2 included, among other potential resource additions, the addition of new CCCTs when large
3 legacy dispatchable gas units were assumed to deactivate.⁴⁴ As I discussed above, the
4 Proposed Generators are proposed to be located in Amite South (as to WF6) and WOTAB
5 (as to Westlake), both of which are load pockets in which legacy dispatchable gas units
6 have exceeded their original useful lives. The Company continues to evaluate the
7 operations of those legacy gas units, but the 2024 CCCT RFP, selection of the Proposed
8 Generators, and construction of the Proposed Generators align with the conclusions
9 included in the 2023 Final IRP.

10 In addition, it bears emphasizing again that, since the time that the 2023 Final IRP
11 was submitted and the 2024 CCCT RFP was conducted, the need for the Proposed
12 Generators has only grown. As explained above, market conditions in LRZ 9 have
13 tightened considerably,⁴⁵ and there is a significant need for additional capacity that the
14 Proposed Generators can assist with satisfying.

⁴³ See 2023 Final IRP, LPSC Docket No. I-36181, at p. 95.

⁴⁴ See *id.*, at p. 87.

⁴⁵ See also MISO Energy, *Planning Resource Auction Results for Planning Year 2025-26* (April 2025), available at https://cdn.misoenergy.org/2025%20PRA%20Results%20Posting%2020250529_Corrections694160.pdf, at p. 22 (Summer Supply Offered and Cleared Comparison Trend).

1 Q35. DOES CONSTRUCTION OF THE PROPOSED GENERATORS FACILITATE ELL'S
2 COMPLIANCE WITH THE MINIMUM CAPACITY OBLIGATIONS SET BY THE
3 LPSC?

4 A. Yes. In 2024, the LPSC issued its General Order imposing minimum capacity obligations
5 on Load Serving Entities in Louisiana, stating the "purpose of the rule is for every utility
6 to prudently plan to supply 100%" of its Applicable Planning Reserve Margin Requirement
7 with Qualified Capacity Resources, and noting "there are clear concerns regarding the
8 future of resource adequacy" in Louisiana.⁴⁶ ELL shares the Commission's desire to
9 ensure adequate resources exist to serve customers into the future, accounting for resource
10 development lead times, load forecast uncertainty, and other factors. The proposed
11 construction of the Proposed Generators will add approximately 1,500 MW (ISO) of
12 capacity in Louisiana (and thus in MISO LRZ 9) to ELL's supply mix to help facilitate
13 ELL's compliance with the minimum capacity obligations set by the LPSC in the MCO
14 Order.⁴⁷
15

⁴⁶ See General Order (July 16, 2024) (the "MCO Order"), *In re: Consideration of Whether the Commission Should Adopt Minimum Physical Capacity Threshold Requirements for Load Serving Entities*, LPSC Docket No. R-36263, pp. 4-5.

⁴⁷ ELL cites to the MCO Order to highlight that the Proposed Generators will facilitate ELL's compliance with the Order's requirements, which exist to ensure that jurisdictional utilities are planning appropriate resources to ensure resource adequacy in Louisiana, and considering that violations entail Commission-imposed penalties. Consistent with the MCO Order, ELL does not cite it as the basis for or in support of the selection of a particular type of resource. *See id.*, Attachment A, § 100.

1 Q36. WOULD IT BE ECONOMICAL FOR ELL TO ADDRESS ITS CAPACITY NEEDS
2 THROUGH THE PURCHASE OF CAPACITY CREDITS IN THE MISO SEASONAL
3 PRA RATHER THAN BY BUILDING NEW GENERATION?

4 A. No. As a preface to this response, it bears emphasizing again that market conditions in
5 MISO LRZ 9 are tightening, and there is a significant need for resource planning that
6 reasonably accounts for long-term resource adequacy issues—a need acknowledged by the
7 Commission in issuing the MCO Order, as discussed above. To that end, while the MISO
8 PRA provides an avenue to correct short-term imbalances, over-reliance on the short-term
9 market in lieu of long-term resource-planning strategy is an unreasonably risky practice—
10 especially at a time when market conditions are tightening. The MISO PRA is a one-year-
11 ahead mechanism that is not designed to ensure that an adequate amount (or appropriate
12 types) of resources will be available in the long term. As a result, relying on the MISO
13 PRA involves significantly greater risk to ELL customers as compared to constructing
14 long-term resources such as the Proposed Generators.

15 Unlike a long-term resource, purchasing capacity credits in the MISO PRA does
16 not provide any additional capacity and provides no energy benefits or local area benefits.
17 Rather, purchasing capacity credits through the PRA satisfies only the financial
18 requirement of the MISO PRA construct. Long-term resource planning is essential to
19 ensure reliable electric service at the lowest reasonable cost. Physical generation, like the
20 Proposed Generators, is necessary to generate electricity that can be transported for
21 consumption. Therefore, even if ELL could be assured that sufficient capacity was
22 available to meet ELL's current needs through the MISO PRA (which it cannot), this would
23 still not address the local voltage issues or the anticipated load growth in the region.

1 Consequently, reliance upon the MISO PRA to meet the needs of the region would place
2 the reliability of service to all customers of ELL, cooperatives, and municipal systems in
3 the region at risk, while also exposing all ELL customers to financial risk associated with
4 tightening conditions in the MISO PRA, particularly in the MISO LRZ in which ELL is
5 located (LRZ 9).

6 Further, these risks have been compounded recently because, as discussed in greater
7 detail above in response to Q29, MISO's data show that the capacity surplus LRZ 9
8 previously enjoyed has significantly decreased.⁴⁸ Indeed, significant tightening has been
9 noted in LRZ 9 since MISO implemented the seasonal PRA—and the potential risks
10 associated with inadequate capacity in LRZ 9 only continue to grow, especially given that,
11 as set forth in the LPSC Staff's reports issued in connection with the MCO Docket, certain
12 Louisiana Load Serving Entities are relying significantly on capacity outside LRZ 9 (and
13 as far away as Michigan) to meet their load-serving needs.⁴⁹

14 Finally, while the precise timing of market equilibrium is unknown, there is an
15 expectation that market conditions in the MISO market will continue their trend of
16 tightening in the coming years, which is expected to lead to higher capacity prices.
17 Moreover, unlike reliance on the capacity auction, the construction of the Proposed
18 Generators can be expected to result in other benefits for ELL's existing customers,

⁴⁸ Staff has previously acknowledged, and expressed corresponding concerns regarding, the decrease noted by MISO in the capacity surplus in LRZ 9. See Staff's Final Report and Recommendation of Final Rule (May 6, 2024), *In re: Consideration of Whether the Commission Should Adopt Minimum Physical Capacity Threshold Requirements for Load Serving Entities*, Docket No. R-36263, at pp. 34-47.

⁴⁹ See October 1, 2025, LPSC Staff MCO Compliance Report, LPSC Docket No. X-37566, at p. 11 (noting that approximately 14% of Concordia Electric Cooperative, Inc.'s total resources are located in Michigan); December 15, 2025, LPSC Staff Annual Report on Louisiana Resource Adequacy, LPSC Docket No. X-37566, at p. 15 ("For the 25/26 Planning Year, approximately 600 MW of Qualifying Capacity identified by jurisdictional LLSEs participating in MISO was located outside MISO LRZ 9.").

1 including (for example) the fact that the Proposed Generators will provide customers with
2 highly flexible resources that produce energy revenues to offset the cost of purchasing
3 energy in the MISO day-ahead energy market and serve as a physical hedge, thereby
4 protecting customers from increasing energy prices in the market—a benefit that does not
5 exist with capacity credits, which provide no such energy revenues.
6

7 Q37. WHAT CAPACITY BENEFITS WILL BE RECOGNIZED AS A RESULT OF ADDING
8 THE PROPOSED GENERATORS?

9 A. As relevant here, the Proposed Generators, if approved, will be offered to MISO as system
10 resources, meaning ELL will make the capacity from the Proposed Generators available in
11 MISO's capacity markets. This has the dual benefit of (1) ensuring that the energy and
12 ancillary services supplied by the CCCTs are available to serve loads across MISO each
13 day of the year (unless a unit is unavailable) and, in turn, that the Proposed Generators are
14 dispatched only when they are the most cost-effective options at the time they are
15 dispatched, and (2) rendering ELL eligible to receive capacity credits for the Proposed
16 Generators, which will inure to the benefit of all of ELL's customers.
17

18 Q38. WHAT ENERGY BENEFITS WOULD THE PROPOSED GENERATORS PROVIDE?

19 A. In the MISO markets, portfolio balance means, among other things, having resources
20 capable of supplying energy into the day-ahead and real-time markets at roughly the same
21 volumes and same times as is expected to be purchased from those markets to serve
22 customers. A generator in MISO, then, provides energy benefits when MISO determines
23 that the variable cost of running the unit is lower than other available units on the system.

1 The Proposed Generators would be quick-start and fast-ramping resources. In addition,
2 the Proposed Generators would be available and quickly dispatchable by MISO to help
3 ensure system reliability that could be impacted by the variability in intermittent renewable
4 resources. Finally, as highly efficient resources, the Proposed Generators will provide cost-
5 effective energy to all customers. Therefore, the Proposed Generators will provide energy
6 benefits when they are the lowest variable cost available resources on the system.

7
8 Q39. PLEASE EXPLAIN THE DIFFERENT SUPPLY ROLES FOR WHICH ELL NEEDS
9 CAPACITY.

10 A. In conducting long-term resource planning, ELL analyzes its overall capacity needs as well
11 as its need for capacity that serves specific supply roles, such as base load, core and
12 seasonal load-following, and peaking and reserve. Having the right amount of capacity
13 suitable to serve each of these supply roles enables the Company to most efficiently, cost-
14 effectively, and reliably serve the time-varying level of customer loads it experiences.

15 Each supply resource has its own unique cost and performance characteristics that
16 make it functionally and economically suited to serve certain supply roles. Base-load
17 resources typically cost more to construct per MW of available capacity, but operate with
18 relatively low variable cost, and, because the resource is expected to operate in most hours
19 at high utilization levels, the total supply cost is often relatively low on a dollars per
20 megawatt-hour (\$/MWh) basis. Conversely, a peaking or reserve unit is expected to
21 operate at low utilization levels and higher variable costs but typically has a relatively
22 lower capital cost per MW of available capacity and, therefore, is the most economical

1 alternative when utilized in a peaking or reserve role. Load-following units generally have
2 moderate capital cost and variable cost.

3 Peaking and reserve resources can be called upon to respond to peak usage events
4 and grid emergencies. For example, a peaking and reserve resource may be called upon to
5 fill in for an otherwise more economic resource that has tripped offline or is otherwise
6 unavailable until that resource can be returned to service or other arrangements can be
7 made.

8
9 Q40. HOW DO THE PROPOSED GENERATORS HELP WITH THOSE SUPPLY ROLES?

10 A. CCCT resources, like the Proposed Generators, are technologically and economically well-
11 suited for base load and load-following roles at current long-term forecasts for natural gas
12 prices and emissions cost. Moreover, CCCT technology is a reasonable choice for load-
13 following purposes under most assumptions regarding key uncertainties (*e.g.*, fuel prices,
14 and emissions cost). Consequently, CCCT resources can support planning objectives
15 under a range of assumptions. The Proposed Generators contribute to the reliability of the
16 system by adding much needed capacity to the ELL supply plan, while also covering some
17 of ELL's considerable energy needs. Without the Proposed Generators, ELL would have
18 a significant capacity deficit of [REDACTED].

19 Should ELL leave this capacity deficit unaddressed, its customers would face significant
20 reliability and economic risks during this near-term period—risks that, in the exercise of
21 reasonable resource planning, should be and can be avoided through the construction of
22 the Proposed Generators. The Proposed Generators bolster the Company's capacity
23 position and contribute to ELL's resource adequacy. Furthermore, the forecasted addition

1 of large industrial load to the Company's system in the near future has heightened the need
2 for energy producing resources that are able to serve these high-load factor loads. The
3 Proposed Generators will provide valuable energy coverage for the Company, reducing
4 ELL's customers' exposure to wholesale energy market prices. The Proposed Generators
5 also provide a source of dispatchable generation and a source of inertia-based energy;
6 having resources such as these that can be called upon when needed has increasing value
7 considering the increasing volume of intermittent resources being deployed on the grid.
8

9 Q41. HOW DO THE PROPOSED GENERATORS REDUCE ELL CUSTOMERS'
10 EXPOSURE TO WHOLESALE ENERGY MARKET PRICES?

11 A. As I explained earlier, as efficient, dispatchable CCCT resources, the Proposed Generators
12 are capable of being committed and dispatched in the markets to align with the energy
13 consumption of ELL customers, including high-load factor industrial customers whose
14 energy usage remains at a largely consistent level around the clock. Especially during
15 times of relatively high load and tight generation supply, energy prices tend to rise, and
16 ELL customers must pay the resulting higher cost. During these periods, the Proposed
17 Generators will be capable of generating energy, and ELL will receive compensation in the
18 wholesale markets for the output of the Proposed Generators at the same higher prices; the
19 revenues from these energy sales will flow back to ELL customers and offset the costs.
20 The Proposed Generators thus provide a physical hedge that insulates ELL customers from
21 exposure to higher energy prices during times of scarcity.
22

1 Q42. IN THE EVENT THAT ALL OF THE POTENTIAL RESOURCES YOU MENTIONED
2 IN RESPONSE TO Q30 AND Q32 MATERIALIZE AND RECEIVE COMMISSION
3 APPROVAL, ARE THE PROPOSED GENERATORS STILL NEEDED TO ADDRESS
4 THE COMPANY'S RESOURCE NEEDS?

5 A. Yes. As I alluded to above, even upon approval and completion of the other planned
6 additions referenced in response to Q30 and Q32 (and shown on HSPM MJP-1), ELL will
7 still be facing an overall capacity deficit [REDACTED]

8 [REDACTED]

9 [REDACTED]

10
11 **VI. MONITORING PLAN**

12 Q43. WHAT MONITORING PROCEDURES AND REPORTS HAVE BEEN PROPOSED IN
13 CONNECTION WITH THE APPLICATION FOR THE PROPOSED GENERATORS?

14 A. ELL proposes a Monitoring Plan patterned after the monitoring plans approved by the
15 Commission relating to Lake Charles Power Station, LPSC Docket No. U-34283,⁵⁰ and the
16 generators that were approved in LPSC Docket No. U-37425.⁵¹ I have attached an outline
17 of the proposed plan as Exhibit MJP-2. The Monitoring Plan contemplates a quarterly
18 report providing detailed information on the status of the Proposed Generators, their costs,
19 and other activities that are critical to completing the Proposed Generators in a timely
20 manner. ELL does not anticipate litigation concerning these reports and there would be no

⁵⁰ See LPSC Docket No. U-34283, *In re: Application for Approval to Construct Lake Charles Power Station and for Cost Recovery*.

⁵¹ See LPSC Docket No. U-37425, *In re: Application for approval of generation and transmission resources in connection with service to a single customer for a project in North Louisiana*.

1 formal discovery process. As Exhibit MJP-2 reflects, the Monitoring Plan includes
2 appropriate confidentiality restrictions designed to address any competitive concerns that
3 would arise with respect to intervenors who are also participants in the power market.
4

5 Q44. WOULD THE PROPOSED MONITORING PLAN PROVIDE THE COMMISSION, ITS
6 STAFF, AND OTHER PARTIES INFORMATION CONCERNING WHETHER THE
7 PROPOSED GENERATORS SHOULD BE COMPLETED?

8 A. Yes. Once the Commission has approved construction of the Proposed Generators, any
9 issues regarding the propriety of the continuation of that construction would be a result of
10 a subsequent change in circumstances. The Monitoring Plan will serve as an “early
11 warning system,” and the Company will include in the quarterly monitoring reports an
12 affirmation as to whether continuing the Proposed Generators are, in its opinion, in the
13 public interest. The Company requests that the Commission require the Staff to use its best
14 efforts to acknowledge receipt of the report, in writing, and submit any questions regarding
15 the report within thirty (30) days. In the event the Company believes it to be in the public
16 interest to cease construction and cancel either or both of the Proposed Generators, it will
17 make a filing in this proceeding seeking Commission approval of that recommendation. In
18 that filing, the Company would seek a decision on that matter as soon as is practical. The
19 Company’s instant Application seeks approval of this procedure.
20

1 Q45. WHAT CHANGE IN CIRCUMSTANCES MIGHT SUGGEST CANCELLATION OF
2 EITHER OF THE TWO PROPOSED GENERATORS?

3 A. In my opinion, there are four primary areas in which a change in circumstances might
4 suggest the cancellation of either Proposed Generators. These are: (1) a well-founded,
5 systematic increase in the forecasted cost of natural gas such that proven alternative
6 technologies would be more cost-effective (while maintaining reliability) over the life of
7 the Proposed Generators; (2) the discovery of a new technology that provides benefits that
8 would outweigh the completion of the Proposed Generators; (3) a change in the cost to
9 complete or operate the Proposed Generators that renders them as no longer in the public
10 interest; or (4) a material incremental change in the cost of environmental compliance or
11 other legislative mandates rendering the Proposed Generators as no longer in the public
12 interest. In all cases, a decision to continue or to cancel WF6 or Westlake would be
13 dependent on an analysis of the incremental cost to complete and operate the Proposed
14 Generators as of that point in time versus the incremental cost of available alternatives. The
15 Monitoring Plan will allow ELL, Commission Staff, and the Commission a full opportunity
16 to conduct this analysis
17

18 **VII. CONCLUSION**

19 Q46. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

20 A. Yes, at this time.

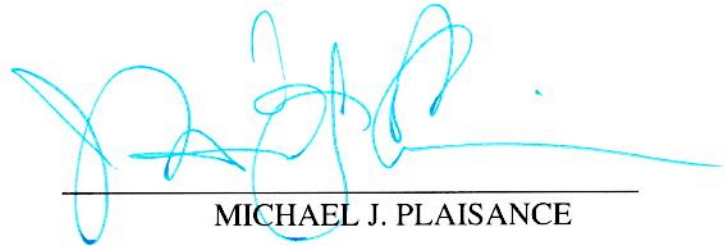
AFFIDAVIT

STATE OF LOUISIANA

PARISH OF JEFFERSON

NOW BEFORE ME, the undersigned authority, personally came and appeared, **MICHAEL J. PLAISANCE**, who after being duly sworn by me, did depose and say:

That the above and foregoing is his sworn testimony in this proceeding and that he knows the contents thereof, that the same are true as stated, except as to matters and things, if any, stated on information and belief, and that as to those matters and things, he verily believes them to be true.


MICHAEL J. PLAISANCE

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 4th DAY OF FEBRUARY 2026



NOTARY PUBLIC

My commission expires: A+ Death

