

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**APPLICATION OF ENTERGY)
LOUISIANA, LLC FOR APPROVAL OF)
REGULATORY BLUEPRINT)
NECESSARY FOR COMPANY TO)
STRENGTHEN THE ELECTRIC GRID)
FOR STATE OF LOUISIANA)**

DOCKET NO. U-_____

**DIRECT TESTIMONY
OF
DANE A. WATSON, PE, CDP
ON BEHALF OF
ENTERGY LOUISIANA, LLC**

AUGUST 2023

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EXHIBITS

Exhibit DAW-1	Dane A. Watson Testimony Appearances
Exhibit DAW-2	Depreciation Study for Entergy Louisiana, LLC as of December 31, 2022 (HSPM)

I. INTRODUCTION

1
2 Q1. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

3 A. My name is Dane A. Watson. My business address is 101 E. Park Blvd., Suite 220,
4 Plano, Texas 75074.

5

6 Q2. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

7 A. I am a Partner in Alliance Consulting Group ("Alliance"), which provides consulting
8 and expert services to the utility industry.

9

10 Q3. ON WHOSE BEHALF ARE YOU FILING THIS DIRECT TESTIMONY?

11 A. I am testifying on behalf of Entergy Louisiana, LLC ("ELL" or "the Company").

12

13 Q4. PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL
14 QUALIFICATIONS.

15 A. I hold a Bachelor of Science degree in Electrical Engineering from the University of
16 Arkansas at Fayetteville and a Master's Degree in Business Administration from
17 Amberton University. Since graduation from college in 1985, I have worked in the
18 area of depreciation and valuation. I founded Alliance Consulting Group in 2004 and
19 am responsible for conducting depreciation, valuation, and certain other accounting-
20 related studies for utilities in various regulated industries. My duties related to
21 depreciation studies include the assembly and analysis of historical and simulated data,
22 conducting field reviews, determining service life and net salvage estimates,

1 calculating annual depreciation, presenting recommended depreciation rates to utility
2 management for its consideration, and supporting such rates before regulatory bodies.

3 My prior employment from 1985 to 2004 was with Texas Utilities ("TXU").
4 During my tenure with TXU, I was responsible for, among other things, conducting
5 valuation and depreciation studies for the domestic TXU companies. During that time,
6 I also served as Manager of Property Accounting Services and Records Management
7 in addition to my depreciation responsibilities.

8

9 Q5. PLEASE DESCRIBE THE DUTIES OF YOUR PRESENT POSITION.

10 A. My current responsibilities with Alliance Consulting Group revolve around the
11 preparation and support of depreciation studies for various entities across the United
12 States.

13

14 Q6. DO YOU HOLD ANY SPECIAL CERTIFICATION AS A DEPRECIATION
15 EXPERT?

16 A. Yes. The Society of Depreciation Professionals (the "Society") has established
17 national standards for depreciation professionals. The Society administers an
18 examination and requires certain qualifications to become certified in this field. I have
19 met all requirements and am a Certified Depreciation Professional ("CDP"). I
20 maintain my certification through the Society's Certification renewal program.

21

1 Q7. PLEASE DESCRIBE YOUR INVOLVEMENT WITH ANY PROFESSIONAL
2 SOCIETIES OR COMMITTEES.

3 A. I have twice been Chair of the Edison Electric Institute (“EEI”) Property Accounting
4 and Valuation Committee and have been Chairman of EEI’s Depreciation and
5 Economic Issues Subcommittee. I am a Registered Professional Engineer (“PE”) in
6 the State of Texas and a CDP. I am a Senior Member of the Institute of Electrical and
7 Electronics Engineers (“IEEE”) and have held numerous offices on the Executive
8 Board of the Dallas Section of IEEE as well as national and worldwide offices. I have
9 twice served as President of the Society, most recently in 2015. I also teach
10 depreciation seminars on an annual basis for EEI and the American Gas Association
11 (both basic and advanced levels), and I develop and teach the advanced training for the
12 Society and other venues.

13

14 Q8. HAVE YOU PREVIOUSLY TESTIFIED BEFORE OTHER REGULATORY
15 BODIES?

16 A. Yes. I have conducted depreciation studies, filed written testimony, and appeared
17 before numerous other state and federal agencies in my 38-year career in performing
18 depreciation studies. A listing of my testimony appearances is found in Exhibit
19 DAW-1.

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II. PURPOSE

Q9. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. Alliance Consulting Group was retained by ELL to conduct a depreciation rate study for its depreciable tangible assets subject to the Commission's jurisdiction. The purpose of my testimony is to sponsor and explain the recent Depreciation Study completed for ELL and to support and justify the recommended depreciation rate changes for ELL's facilities based on the results of the Depreciation Study.

Q10. WHEN WAS THE LAST TIME THAT THE LPSC APPROVED A CHANGE IN THE COMPANY'S COMPREHENSIVE DEPRECIATION RATES?

A. The Company's comprehensive depreciation rates were last approved more than thirty years ago in the 1980s. The Company has filed other depreciation studies over the years, but the cases ended up in settlement agreements that retained rates from the 1980s study.

Q11. DO YOU SPONSOR ANY EXHIBITS?

A. Yes. I am sponsoring the Depreciation Study conducted by Alliance Consulting Group for ELL. The Depreciation Study is attached to my testimony as highly sensitive Exhibit DAW-2.

Q12. WERE THE EXHIBITS YOU ARE SPONSORING PREPARED BY YOU OR UNDER YOUR DIRECT SUPERVISION?

A. Yes, they were.

1 **III. OVERVIEW OF DEPRECIATION STUDY METHODOLOGY**

2 Q13. WHAT DEFINITION OF DEPRECIATION HAVE YOU USED FOR THE
3 PURPOSES OF CONDUCTING THE DEPRECIATION STUDY AND PREPARING
4 YOUR TESTIMONY?

5 A. The term “depreciation,” as used herein, is considered in the accounting sense; that is,
6 a system of accounting that distributes the cost of assets, less net salvage (if any), over
7 the estimated useful life of the assets in a systematic and rational manner. Depreciation
8 is a process of allocation, not valuation. Depreciation expense is systematically
9 allocated to accounting periods over the life of the properties. The amount allocated to
10 any one accounting period does not necessarily represent the loss or decrease in value
11 that will occur during that particular period. Thus, depreciation is considered an
12 expense or cost, rather than a loss or decrease in value. ELL accrues depreciation based
13 on the value of all property included in each depreciable plant account. On retirement,
14 the full cost of depreciable property, less the net salvage amount, if any, is charged to
15 the depreciation reserve.

16
17 Q14. PLEASE DESCRIBE YOUR DEPRECIATION STUDY APPROACH.

18 A. I conduct a depreciation study in four phases as shown in my Exhibit DAW-2. The
19 four phases are: Data Collection, Analysis, Evaluation, and Calculation. During the
20 initial phase of the study, I collect historical data to be used in the analysis. After the
21 data is assembled, I perform analyses to determine the life and net salvage percentage
22 for the different property groups being studied. The information obtained from field
23 personnel, engineers, and/or managerial personnel, combined with the study results,

1 are then evaluated to determine how the results of the historical asset activity analysis,
2 in conjunction with the Company's expected future plans, should be applied. Using all
3 of these resources, I then calculate the depreciation rate for each depreciable plant
4 account for each function.

5

6 Q15. WHAT PROCESS HAVE YOU UNDERTAKEN TO GIVE EFFECT TO BOTH
7 HISTORICAL DATA AND THE COMPANY-SPECIFIC EXPECTATIONS IN
8 DEVELOPING YOUR SERVICE LIFE RECOMMENDATIONS FOR THE
9 COMPANY'S DEPRECIABLE PLANT?

10 A. In order to achieve a reasonable balance between these critical components of the life
11 analysis, I evaluated the statistical historical data and then applied informed judgment
12 to make the most appropriate service life selections. The objective in any depreciation
13 study is to project the remaining cost (installation, material, and removal cost) to be
14 recovered and the remaining periods in which to recover the costs. This necessarily
15 requires that the service life selections reflect both the Company's historic experience
16 and its current expectations of asset lives. In order to understand the Company's
17 expectations regarding asset lives, I interviewed Company engineers working in both
18 operations and maintenance to confirm the historical activity and indications, current
19 and future plans, expectations and their applicability to the future surviving assets. The
20 interview process provides important information regarding changes in materials,
21 operation and maintenance, as well as the Company's current expectations regarding
22 the service life of the assets currently in use. This information is then considered along
23 with the historical statistical data to develop the most reasonable and representative

1 expected service lives for the Company's assets.¹ The result of all of this analysis is
2 reflected in the service life recommendations set forth in my Depreciation Study.
3

4 Q16. WHAT DEPRECIATION SYSTEM DID YOU USE?

5 A. The straight-line method, Average Life Group ("ALG") procedure, and remaining-life
6 technique comprise the depreciation system that was employed to calculate the annual
7 accrual for depreciation expense in the study.
8

9 Q17. HOW ARE DEPRECIATION RATES DEVELOPED UNDER THE ALG SYSTEM?

10 A. In the ALG system, the annual depreciation expense for each account is computed by
11 dividing the original cost of the asset, less allocated depreciation reserve, less estimated
12 net salvage, by its respective remaining life. The resulting annual accrual amount of
13 depreciable property within an account is divided by the original cost of the depreciable
14 property in the account to determine the depreciation rate. The calculated remaining
15 lives and annual depreciation accrual rates were based on attained ages of plant in
16 service and the estimated service life and salvage characteristics of each depreciable
17 group. The comparison of the current and recommended annual depreciation rates is
18 shown in my Exhibit DAW-2, Appendix B. The remaining life calculations are
19 discussed below and are shown in Exhibit DAW-2, Appendix F.
20

¹ For production facilities, the Company provided terminal deactivation dates.

A. Service Lives

2 Q18. WHAT IS THE SIGNIFICANCE OF AN ASSET'S USEFUL LIFE IN YOUR
3 DEPRECIATION STUDY?

4 A. An asset's useful life was used to determine the remaining life over which the
5 remaining cost (original cost plus or minus net salvage, minus accumulated
6 depreciation) can be allocated to normalize the asset's cost and spread it ratably over
7 future periods.

9 Q19. HOW DID YOU DETERMINE THE AVERAGE SERVICE LIVES FOR EACH
10 ACCOUNT?

A. The establishment of an appropriate average service life for each account within a functional group was determined by using actuarial analysis. Specifically, the actuarial analysis was performed to help determine the service life for each account within the Transmission, Distribution, and General functional groups. Graphs and tables supporting the actuarial analysis and the chosen Iowa Curves used to determine the average service lives for each account are found in Exhibit DAW-2 and my Depreciation Study workpapers.

19 Q20. DOES YOUR DEPRECIATION STUDY REFLECT THE CHANGES IN THE
20 USEFUL LIVES OF THE COMPANY'S DEPRECIABLE ASSETS?

21 A. Yes. My study strikes a reasonable balance between the historical statistical indications
22 seen in the analysis and Company-specific expectations for the use of the assets to serve
23 its customers.

1 Q21. HAVE YOU PREPARED A SUMMARY OF THE LIFE RECOMMENDATIONS
2 BY ACCOUNT?

3 A. Yes. Figure 1 below provides the proposed life by account for all six functions; Steam
4 Production, Nuclear Plant, Other Production, Transmission, Distribution, and General
5 Plant.

6 **Figure 1**

		Proposed	
		Life	Iowa Curve
Account	Description		
Steam Production			
310.2	Land Rights	100	SQ
311.0	Structures & Improvements	80	R1
312.0	Boiler Plant Equipment	60	R2
314.0	Turbogenerator Units	55	R1
315.0	Accessory Electric Equipment	55	R1
316.0	Miscellaneous Power Plant Equipment	30	R1
Nuclear Production			
320.2	Land Rights	100	SQ
321.0	Structures & Improvements	80	R1
322.0	Reactor Plant Equipment	65	R1
323.0	Turbogenerator Units	55	R1.5
324.0	Accessory Electric Equipment	55	R1
325.0	Miscellaneous Power Plant Equipment	50	R2
Other Production			
340.2	Land Rights	100	SQ
341.0	Structures & Improvements	70	R1
342.0	Fuel Holders, Producers & Accessories	70	R2
343.0	Prime Movers	45	R2
344.0	Generators	40	R2
345.0	Accessory Electric Equipment	50	R1
346.0	Miscellaneous Power Plant Equipment	25	R1
350.2	Land Rights High Voltage	70	R1
350.3	Land Rights Low Voltage	70	R1
352.0	Structure & Improvements	70	R2.5

Account	Description	Proposed	
		Life	Iowa Curve
353.0	Station Equipment	55	R1.5
354.0	Towers & Fixtures	70	R3
355.0	Poles & Fixtures	60	R2
356.0	Overhead Conductors & Devices	70	R1.5
357.0	Underground Conduit	50	S2.5
358.0	Underground Conductors & Devices	40	S2.5
359.0	Roads & Trails	50	R1.5
Distribution Plant			
360.2	Land Rights	70	R1
361.0	Structures & Improvements	70	R1
362.0	Station Equipment	57	R0.5
364.0	Poles, Towers & Fixtures	35	R1
365.0	Overhead Conductors & Devices	42	L0
366.0	Underground Conduit	50	R3
367.0	Underground Conductors & Devices	44	R3
368.1	Line Transformers	34	S0
369.1	Services - Overhead	36	R2.5
369.2	Services - Underground	41	R4
370.0	Meters (Customer)	30	R2
370.1	Meters (Substation)	30	R2
370.1	Smart Meters	15	SQ
370.15	Meters and Devices	15	SQ
371.0	Installations on Customer Premises	45	R1.5
373.0	Street Lighting & Signal Systems	27	L0.5
373.2	Non Roadway Lighting	45	R1.5
General Plant			
390.0	Structures & Improvements	40	L0
392.0	Transportation Equipment	12	L2
396.0	Power Operated Equipment	12	L2
General Amortized Plant			
390.1	Amortized Over Lease Term		
391.1	Office Furniture & Equipment	20	SQ
391.2	Information Systems	5	SQ
391.3	Data Handling Equipment	15	SQ

Account	Description	Proposed	
		Life	Iowa Curve
393.0	Stores Equipment	15	SQ
394.0	Tools, Shop & Garage Equip	15	SQ
395.0	Laboratory Equipment	10	SQ
397.1	Communication Equipment	10	SQ
397.2	Communication Equipment - Microwave	25	SQ
398.0	Miscellaneous Equipment	10	SQ
399.0	Other Tangible Property	10	SQ

B. Net Salvage

Q22. WHAT IS NET SALVAGE?

A. While discussed more fully in the study itself, net salvage is the difference between the gross salvage (what is received in scrap value for the asset when retired) and the removal cost (cost to remove and dispose of the asset). Salvage and removal cost percentages are calculated by dividing the current cost of salvage or removal by the original installed cost of the asset.

Q23. DOES ELL HAVE ANY NET SALVAGE REFLECTED IN ITS EXISTING DEPRECIATION RATES?

A. Yes. Both the Company's statistical data and input from Company engineers confirms that the net salvage reflected in the Company's current depreciation rates is no longer representative of the costs incurred to retire some of ELL's assets. These retirement costs continue to increase and require that net salvage rates be adjusted to reflect this reality, which I have done in my study.

1 Q24. HOW DID YOU DETERMINE THE NET SALVAGE PERCENTAGES FOR EACH
2 ASSET GROUP?

3 A. I examined the experience realized by the Company by observing the actual net salvage
4 for various bands (or combinations) of years. Using averages (such as the three-year
5 and five-year bands) allows the smoothing of the timing differences between when
6 retirements, removal cost, and salvage are booked. By looking at successive average
7 bands ("rolling bands"), an analyst can see trends in the data that would indicate the
8 future net salvage in the account. This examination, in combination with the feedback
9 of Company engineers related to any changes in operations or maintenance that would
10 affect the future net salvage of the asset, allowed the selection of the best estimate of
11 future net salvage for each account. The net salvage parameter is derived from
12 historical data as a percent of retirements for various bands (i.e., groupings of years
13 such as the five-year average) for each account are shown in my Exhibit DAW-2,
14 Appendix E. As with any analysis of this type, expert judgment was applied in order
15 to select a net salvage percentage reflective of the future expectations for each account.

16
17 Q25. IS THIS A REASONABLE METHOD FOR DETERMINING NET SALVAGE
18 RATES?

19 A. Yes. The method used to establish appropriate net salvage percentages for each
20 account was determined by using the same methodology that was approved by the
21 Commission in prior cases that I have been involved in as shown in Exhibit DAW-1.
22 It is also a methodology commonly employed throughout the industry and is a method
23 recommended in authoritative texts.

1 Q26. WHAT FACTORS CAN CAUSE PLANT ASSETS TO EXPERIENCE
2 SIGNIFICANT LEVELS OF NEGATIVE NET SALVAGE?

3 A. Some plant assets can experience significant negative removal cost percentages due to
4 the timing of the addition versus the retirement. For example, a Transmission asset in
5 FERC Account 355 with a current installed cost of \$500 (2022) would have had an
6 installed cost of \$42.90² in 1962. A removal cost of \$50 for the asset calculated
7 (incorrectly) on current installed cost would only have a -10 percent removal cost
8 (\$50/\$500). However, a correct removal cost calculation would show a -116 percent
9 removal cost for that asset (\$50/\$42.90). Inflation from the time of installation of the
10 asset until the time of its removal must be taken into account in the calculation of the
11 removal cost percentage because the depreciation rate, which includes the removal cost
12 percentage, will be applied to the original installed cost of assets. Other factors such
13 as the synchronization of net salvage data can also affect the level of net salvage.

14

15 Q27. YOU MENTIONED EARLIER THAT THE CHANGE IN NET SALVAGE
16 CONTINUES. CAN YOU ELABORATE?

17 A. Yes. The primary reason for the change in net salvage rates is that the Company
18 continues to experience an increase in removal cost for the Transmission and
19 Distribution functions and gross salvage proceeds have declined for all functions.
20 Increased environmental rules and regulations are a big driver for these changes. In
21 addition, ELL is requesting terminal net salvage for Steam Production, Nuclear, and

² Using the Handy-Whitman Bulletin No. 198, E-4, line 36, $\$42.90 = \$500 \times 55/641$.

Other Production facilities based on information provided by Entergy Services, LLC's ("ESL") Power Generation group. Figure 2 below provides the proposed net salvage percentages for each account. More detail can be found in the Salvage Analysis section of Exhibit DAW-2 and in Exhibit DAW-2, Appendix D.

Figure 2

Account	Description	Net Salvage
Steam Production		
310.2	Land Rights	0%
311.0	Structures & Improvements	-15%
312.0	Boiler Plant Equipment	-15%
314.0	Turbogenerator Units	-15%
315.0	Accessory Electric Equipment	-15%
316.0	Miscellaneous Power Plant Equipment	-15%
Nuclear Production		
320.2	Land Rights	0%
321.0	Structures & Improvements	-5%
322.0	Reactor Plant Equipment	-5%
323.0	Turbogenerator Units	-5%
324.0	Accessory Electric Equipment	-5%
325.0	Miscellaneous Power Plant Equipment	-5%
Other Production		
340.2	Land Rights	0%
341.0	Structures & Improvements	-5%
342.0	Fuel Holders, Producers & Accessories	-5%
343.0	Prime Movers	-5%
344.0	Generators	-5%
345.0	Accessory Electric Equipment	-5%
346.0	Miscellaneous Power Plant Equipment	-5%
350.2	Land Rights High Voltage	0%
350.3	Land Rights Low Voltage	0%
352.0	Structure & Improvements	-70%
353.0	Station Equipment	-25%
354.0	Towers & Fixtures	-100%
355.0	Poles & Fixtures	-110%
356.0	Overhead Conductors & Devices	-90%
357.0	Underground Conduit	0%
358.0	Underground Conductors & Devices	0%

Account	Description	Net Salvage
359.0	Roads & Trails	0%
Distribution Plant		
360.2	Land Rights	0%
361.0	Structures & Improvements	-30%
362.0	Station Equipment	-15%
364.0	Poles, Towers & Fixtures	-35%
365.0	Overhead Conductors & Devices	-35%
366.0	Underground Conduit	-30%
367.0	Underground Conductors & Devices	-25%
368.1	Line Transformers	-30%
369.1	Services - Overhead	-25%
369.2	Services - Underground	-25%
370.0	Meters (Customer)	-5%
370.1	Meters (Substation)	-5%
370.1	Smart Meters	-5%
370.15	Meters and Devices	-5%
371.0	Installations on Customer Premises	-25%
373.0	Street Lighting & Signal Systems	-20%
373.2	Non Roadway Lighting	-25%
General Plant		
390.0	Structures & Improvements	-5%
392.0	Transportation Equipment	10%
396.0	Power Operated Equipment	10%
General Amortized Plant		
390.1	Amortized Over Lease Term	
391.1	Office Furniture & Equipment	0%
391.2	Information Systems	0%
391.3	Data Handling Equipment	0%
393.0	Stores Equipment	0%
394.0	Tools, Shop & Garage Equip	0%
395.0	Laboratory Equipment	0%
397.1	Communication Equipment	0%
397.2	Communication Equipment - Microwave	0%
398.0	Miscellaneous Equipment	0%
399.0	Other Tangible Property	0%

1 **IV. DEPRECIATION STUDY RESULTS**

2 Q28. WHAT DEPRECIATION RATES ARE BEING USED TO CALCULATE
3 DEPRECIATION EXPENSE IN THIS CASE?

4 A. Exhibit DAW-2, Appendix A shows the computation of the proposed depreciation
5 rates.

6
7 Q29. HAVE YOU PREPARED A SUMMARY OF THE RATE CHANGES BY
8 ACCOUNT?

9 A. Yes. A comparison of the annual depreciation accrual rates in the Depreciation Study
10 compared with the rates currently in effect is shown in Exhibit DAW-2, Appendix B,
11 which demonstrates the changes in depreciation expense for the various accounts when
12 the proposed depreciation rates are applied to plant balances on December 31, 2022.
13 In summary, the study supports my proposal of the following relative changes in annual
14 depreciation expense:

TABLE 1- SUMMARY OF DEPRECIATION EXPENSE CHANGE

Steam Production	Increase	\$31,590,490
Nuclear	Increase	\$43,782,190
Other Production	Increase	\$13,906,927
Transmission	Increase	\$9,712,948
Distribution	Increase	\$43,569,593
General	Increase	\$11,208,622
General Plant Reserve Deficiency	Increase	\$12,418,981
Total	Increase	\$166,189,750

1 These figures are based on plant balances on December 31, 2022 and are provided to
2 show the relative change in annual accrual associated with the proposed rates as
3 reflected in Appendix B of Exhibit DAW-2.

4

5 Q30. ARE THE RESULTS OF YOUR DEPRECIATION STUDY REFLECTED IN THE
6 TEST YEAR ENDING DECEMBER 31, 2022 COST OF SERVICE
7 CALCULATION?

8 A. Yes. The direct testimony of Company witness Chris E. Barrilleaux addresses how the
9 proposed depreciation rates are reflected in ELL's cost of service.

10

11 Q31. DO YOU HAVE ANY PRO FORMA AMOUNTS TO BE CONSIDERED BY THE
12 COMMISSION?

13 A. Yes. There is a small reclassification of assets from Account 390 Structures and
14 Improvements to 3901 Leasehold Improvements. Upon review, a small amount of
15 investment was determined to be leasehold improvements. That \$4.8 million out of
16 total plant in Account 390 of \$227 million was transferred. The accumulated
17 depreciation associated with those assets was also transferred.

18

19 Q32. WHAT ARE THE PRINCIPAL REASONS FOR THE \$166.2 MILLION
20 DIFFERENCE IN THE AMOUNT OF ANNUAL DEPRECIATION EXPENSE AT
21 DECEMBER 31, 2022?

22 A. \$89.3 million of the increase in the annual depreciation expense is directly attributable
23 to generation plant and is the result of changes in the terminal retirement dates of the

1 plants, the most recently estimated dismantlement costs, and the need to fully fund
2 assets which are due to retire before this case is adjudicated. Approximately 49 percent
3 of that amount is attributable to the under-recovery of ELL's investment in two nuclear
4 plants.

5 \$53.3 million of the increase in the annual depreciation expense is directly
6 attributable to transmission and distribution plant changes in the life parameters and
7 net salvage estimates from the 1980s depreciation studies. \$23.6 million of the increase
8 is related to general plant, which has had depreciation rates that are too low for an
9 extended period of time.

10

11 Q33. WHAT IS THE BASIS FOR ELL'S EXISTING DEPRECIATION RATES?

12 A. ELL's depreciation rates for Steam Production, Other Production, Transmission,
13 Distribution, and General Plant assets are based upon a study of ELL assets as of
14 December 31, 1986 and were approved by the Commission in LPSC Docket No. U-
15 17906. The depreciation rate for the Waterford 3 nuclear power plant was determined
16 based upon a study of the plant balance as of December 31, 2003, and was approved
17 by the Commission in LPSC Docket No. U-20925 (2004 RRF). The depreciation rates
18 for ELL's newer non-nuclear generating units were determined in proceedings related
19 to the certification of those assets.

20

1 Q34. HAS THE COMPANY PRESENTED DEPRECIATION STUDIES FOR
2 CONSIDERATION BY THE LPSC SINCE THE DATES DISCUSSED ABOVE?

3 A. Yes. It is my understanding that Legacy ELL and Legacy Entergy Gulf States
4 Louisiana, L.L.C.³ presented the study of depreciation rates prepared by Gannett
5 Fleming on plant balances as of December 31, 2008, in certain annual Formula Rate
6 Plan ("FRP") filings. See LPSC Docket Nos. U-31369 and U-31388. To my
7 knowledge, those rates were not acted upon by this Commission. Updated depreciation
8 studies were also proposed by the legacy companies in their last rate cases, Docket Nos.
9 U-32707 and U-32708, but the updated depreciation rates were not adopted in the
10 settlement agreements approved by the Commission to conclude those proceedings.

11

12 Q35. WHAT ARE STORM-RELATED CONTRA ASSETS?

13 A. Storm-related contra assets reflect costs related to storm damage that were recovered
14 through securitization and are an offset to plant in service in rate base.

15

16 Q36. HOW DID YOU SET THE DEPRECIATION RATES FOR THESE ASSETS?

17 A. The depreciation rates for the storm contra assets were set equal to the rates developed
18 for the corresponding depreciable groups in the plant in service accounts.

19

³ On October 1, 2015, pursuant to Commission Order No. U-33244-A, Entergy Gulf States Louisiana, L.L.C. ("Legacy EGSL") and Entergy Louisiana, LLC ("Legacy ELL") combined substantially all of their respective assets and liabilities into a single operating company, Entergy Louisiana Power, LLC, which subsequently changed its name to Entergy Louisiana, LLC ("ELL"). Upon consummation of the business combination, ELL became the public utility that was subject to LPSC regulation and is the successor of Legacy EGSL and Legacy ELL.

1 Q37. IS THIS AN APPROPRIATE TREATMENT OF THESE OFFSETS TO PLANT IN
2 SERVICE?

3 A. Yes. In the Company's accounting system, the storm contra assets are linked and will
4 have the same service life as the underlying plant in service assets when they are retired.
5 As such, it is reasonable to use the same depreciation rates.
6

7 Q38. HOW HAVE GENERATION INVESTMENT AND RESERVE, WHICH IS THE
8 BASIS OF THE CURRENT DEPRECIATION RATES, CHANGED SINCE THE
9 1980S?

10 A. The first change is that there were substantial interim retirements over the period shown
11 in Exhibit DAW-2, Appendix D between 1997 and 2022.⁴

12 The second change that occurred was substantial interim removal cost was
13 incurred between 1997 and 2022 related to the retirements mentioned above.

14 The third change is that the Company has made significant capital expenditures
15 in order to allow its production units to remain in service. Those capital expenditures
16 will need to be recovered over the remaining lives of the production facilities. Given
17 the recent changes to the generating retirement unit schedule, this additional investment
18 must be recovered over a shorter period than the original investment in the plants.
19

⁴ All terminal retirements of a generating unit and the ensuing gross salvage and removal cost were excluded from the net salvage analysis.

1 V. ADJUSTMENT OF DEPRECIATION RESERVE

2 Q39. AS PART OF YOUR DEPRECIATION ANALYSIS, HAVE YOU TAKEN ANY
3 ACTION TO PROPERLY ALIGN THE COMPANY'S DEPRECIATION RESERVE
4 WITH THE LIFE CHARACTERISTICS OF THE STEAM PRODUCTION,
5 NUCLEAR, OTHER PRODUCTION, TRANSMISSION, DISTRIBUTION, AND
6 GENERAL PLANT FUNCTIONS?

7 A. Yes. In the process of analyzing the Company's depreciation reserve, I observed that
8 the depreciation reserve positions of a number of accounts were generally not in line
9 with the life characteristics found in the analysis of the Company's assets. For the
10 steam production, nuclear production, other production, transmission, distribution, and
11 general plant accounts, the reserves were reallocated within each function based on the
12 theoretical reserves for each account to allow the relative reserve positions of each
13 account within a function to mirror the life characteristics of the underlying assets. This
14 is most evidenced by the fact that ELL is updating retirement dates for its production
15 units. Reserve reallocation reduces the impact of recovering these investments by
16 allocating the recovery across the remaining life of the generation still in service.

17
18 Q40. DOES THE REALLOCATION OF THE DEPRECIATION RESERVE CHANGE
19 THE TOTAL RESERVE?

20 A. No. The depreciation reserve represents the amounts that customers have contributed
21 to the return of the investment. The reallocation process does not change the total
22 reserve for each function; it simply reallocates the reserve between accounts in the
23 function.

1 Q41. IS DEPRECIATION RESERVE REALLOCATION A SOUND DEPRECIATION
2 PRACTICE?

3 A. Yes. The practice of depreciation reserve reallocation is endorsed in the 1968
4 publication of "Public Utility Depreciation Practices," National Association of
5 Regulatory Utility Commissioners ("NARUC"), which explains that reallocation of the
6 depreciation reserve is appropriate "...where the change in the view concerning the life
7 of property is so drastic as to indicate a serious difference between the theoretical and
8 the book reserve." Additionally, the 1996 edition of the NARUC publication states
9 that "theoretical reserve studies also have been conducted for the purpose of allocating
10 an existing reserve among operating units or accounts." With respect to ELL, my
11 Depreciation Study demonstrates that there have been significant changes in the life of
12 the property since the last study. These changes have created differences between the
13 theoretical and the book reserve in each functional group that make the reallocation of
14 the depreciation reserve appropriate in this instance.

15

16 Q42. WHY IS IT IMPORTANT FOR THE DEPRECIATION RESERVE TO CONFORM
17 TO THE THEORETICAL RESERVE?

18 A. This is important because it sets the reserve at a level necessary to sustain the regulatory
19 concept of intergenerational equity among ELL's customers, as well as set the
20 depreciation rates at the appropriate level based on current parameters and
21 expectations.

22

1 Q43. HAS THE COMMISSION APPROVED DEPRECIATION RESERVE
2 REALLOCATION IN OTHER RATE PROCEEDINGS?

3 A. Yes. The Commission approved a reserve reallocation within each functional group in
4 the two cases that I have testified to before this Commission. Those cases were Dockets
5 U-30689 and U-35951 on behalf of CLECO and Atmos Louisiana, respectively.
6

7 Q44. HOW WILL THE COMPANY IMPLEMENT THE REALLOCATION OF ITS
8 DEPRECIATION RESERVES IF THE PROPOSED DEPRECIATION RATES ARE
9 APPROVED?

10 A. If the proposed depreciation rates are approved, the Company will reallocate the
11 reserves on its books to match the allocation performed in this study using investment
12 and depreciation reserve information at the time the new rates are implemented.
13

14 VI. CONCLUSION

15 Q45. PLEASE SUMMARIZE THE CONCLUSIONS YOU HAVE REACHED AS A
16 RESULT OF YOUR ANALYSIS.

17 A. The Depreciation Study and analysis performed by me and under my supervision fully
18 supports setting depreciation rates for ELL at the level I have indicated in my testimony
19 and in Exhibit DAW-2. In this way, all customers are charged for their appropriate
20 share of the capital expended for their benefit. The Depreciation Study of ELL
21 depreciable property as of December 31, 2022 describes the extensive analysis
22 performed and the resulting rates that are now appropriate for its respective property
23 classes. ELL's depreciation rates should be set at the levels I recommend in order to

1 recover the Company's total investment in property over the estimated remaining life
2 of the assets.

3

4 Q46. DOES THIS CONCLUDE YOUR TESTIMONY?

5 A. Yes.


AFFIDAVIT

STATE OF TEXAS

COUNTY OF COLLIN

NOW BEFORE ME, the undersigned authority, personally came and appeared, **DANE A. WATSON**, 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.

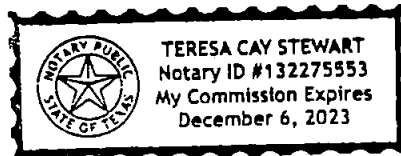

Dane A. Watson

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 14 DAY OF AUGUST 2023


NOTARY PUBLIC

My commission expires: Dec 6, 2023



Dane A. Watson
Testimony Appearances

Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
Florida	Florida Public Service Commission	20230023	People Gas System	2023	Gas Depreciation Study
Texas	Public Utility Commission of Texas	54565	Central States Water Resources (CSWR Texas)	2023	Water Depreciation Study
New York	New York State Public Service Commission	23-W-0111	Veolia New York	2023	Water Depreciation Study
Arkansas	Arkansas Public Service Commission	22-085-U	Empire District Electric Company	2023	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	TA50-733 (U-21-058)	Cook Inlet Natural Gas Storage Alaska	2023	Focused Study - Communication Equipment
Manitoba Canada	Manitoba Public Utilities Board		Manitoba Hydro Electric	2022	Electric Depreciation Study
Tennessee	Tennessee Public Utility Commission	20-00086	Piedmont Natural Gas	2022	Gas Depreciation Study - 3 State
Texas	Public Utility Commission of Texas	54634	Southwestern Public Service Company	2023	Electric Technical Update
Arkansas	Arkansas Public Service Commission	22-085-U	Liberty Empire Electric Arkansas	2023	Electric Depreciation Study
Florida	Florida Public Service Commission	20220219	People Gas System	2022	Gas Depreciation Study
Michigan	Michigan Public Service Commission	U-21329	Michigan Gas Utilities Corporation	2022	Gas Depreciation Study
Dominica	Independent Regulatory Commission		Dominica Electricity Services LTD	2022	Electric Depreciation Study
New Mexico	New Mexico Public Regulation Commission	22-00270-UT	Public Service of New Mexico	2022	Electric Depreciation Study
New Mexico	New Mexico Public Regulation Commission	22-00286-UT	Southwestern Public Service Company	2022	Electric Technical Update
Minnesota	Minnesota Public Utilities Commission	22-299	Northern States Power-Minnesota	2022	Electric Gas and Common Depreciation Study
California	California Public Utilities Commission	A.22-08-010	Bear Valley Electric	2022	Electric Depreciation Study
Michigan	Michigan Public Service Commission	U-21294	SEMCO Gas	2022	Gas Depreciation Study
Arkansas	Arkansas Public Service Commission	22-064-U	Liberty Pine Bluff Water	2022	Water Depreciation Study
Colorado	Colorado Public Utilities Commission	22AL-0348G	Atmos Energy	2022	Gas Depreciation Study

Dane A. Watson
Testimony Appearances

Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
New York	FERC	ER22-2581-000	New York Power Authority	2022	Transmission and General Depreciation Study
South Carolina	South Carolina Public Service Commission	2022-89-G	Piedmont Natural Gas	2022	Natural Gas Depreciation Study
California	California Public Utilities Commission	A.22-007-001	California American Water	2022	Water and Waste Water Depreciation Study
Alaska	Regulatory Commission of Alaska	U-22-034	Chugach Electric Association	2022	Electric Depreciation Study
Georgia	Georgia Public Service Commission	44280	Georgia Power Company	2022	Electric Depreciation Study
Texas	Public Utility Commission of Texas	53719	Entergy Texas	2022	Electric Depreciation Study
California	California Public Utilities Commission	22-005-xxx	San Diego Gas and Electric	2022	Electric Gas and Common Depreciation Study
California	California Public Utilities Commission	22-005-xxx	Southern California Gas	2022	Gas Depreciation Study
Colorado	Colorado Public Utilities Commission	22AL-0046G	Public Service of Colorado	2022	Gas Depreciation given potential for climate change
Texas	Public Utility Commission of Texas	53601	Oncor Electric Delivery	2022	Electric Depreciation Study
New Jersey	New Jersey Board of Public Utilities	GR2222040253	South Jersey Gas	2022	Gas Depreciation Study
Oklahoma	Corporation Commission of Oklahoma	PUD 202100163	Empire District Electric Company	2022	Electric Depreciation Study
Michigan	Michigan Public Service Commission	U-21176	Consumers Gas	2021	Gas Depreciation Study
New Jersey	New Jersey Board of Public Utilities	GR21121254	Elizabethtown Natural Gas	2021	Gas Depreciation Study
Ontario Canada	Ontario Energy Board	EB-2021-0110	Hydro One	2021	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	TA116-118, TA115-97, TA160-37 and TA110-290	Fairbanks Water and Wastewater	2021	Water and Waste Water Depreciation Study
Colorado	Public Utilities Commission of Colorado	21AL-0317E	Public Service of Colorado	2021	Electric and Common Depreciation Study
Alaska	Regulatory Commission of Alaska	U-21-025	Golden Valley Electric Association	2021	Electric Depreciation Study
Wisconsin	Public Service Commission of Wisconsin	5-DU-103	WE Energies	2021	Electric and Gas Depreciation Study

Dane A. Watson
Testimony Appearances

Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
Kentucky	Public Service Commission of Kentucky	2021-00214	Atmos Kentucky	2021	Gas Depreciation Study
Missouri	Missouri Public Service Commission	ER-2021-0312	Empire District Electric Company	2021	Electric Depreciation Study
Wisconsin	Public Service Commission of Wisconsin	4220-DU-111	Northern States Power Wisconsin	2021	Transmission, Distribution General and Common Depreciation Study
Louisiana	Louisiana Public Service Commission	U-35951	Atmos Energy	2021	Statewide Gas Depreciation Study
Minnesota	Minnesota Public Utilities Commission	E015-D-21-229	Allete Minnesota Power	2021	Intangible, Transmission, Distribution, and General Depreciation Study
Michigan	Michigan Public Service Commission	U-20849	Consumers Energy	2021	Electric and Common Depreciation Study
Texas	Texas Public Utility Commission	51802	Southwestern Public Service Company	2021	Electric Technical Update
MultiState	FERC	RP21-441-000	Florida Gas Transmission	2021	Gas Depreciation Study
New Mexico	New Mexico Public Regulation Commission	20-00238-UT	Southwestern Public Service Company	2021	Electric Technical Update
Yukon Territory Canada	Yukon Energy Board	2021 General Rate Application	Yukon Energy	2020	Electric Depreciation Study
MultiState	FERC	ER21-709-000	American Transmission Company	2020	Electric Depreciation Study
Texas	Texas Public Utility Commission	51611	Sharyland Utilities	2020	Electric Depreciation Study
Texas	Texas Public Utility Commission	51536	Brownsville Public Utilities Board	2020	Electric Depreciation Study
New Jersey	New Jersey Board of Public Utilities	WR20110729	Suez Water New Jersey	2020	Water and Waste Water Depreciation Study
Idaho	Idaho Public Service Commission	SUZ-W-20-02	Suez Water Idaho	2020	Water Depreciation Study
Texas	Texas Public Utility Commission	50944	Monarch Utilities	2020	Water and Waste Water Depreciation Study
Michigan	Michigan Public Service Commission	U-20844	Consumers Energy/DTE Electric	2020	Ludington Pumped Storage Depreciation Study

Dane A. Watson
Testimony Appearances

Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
Mexico	Comision Reguladora de Energia	G/352/TRA/2015 UH-250/125738/2019	Arguelles Depreciation Study	2020	Gas Depreciation Study
Tennessee	Tennessee Public Utility Commission	2000086	Piedmont Natural Gas	2020	Gas Depreciation Study
Texas	Railroad Commission of Texas	OS-00005136	CoServ Gas	2020	Gas Depreciation Study
Texas	Railroad Commission of Texas	GUD 10988	EPCOR Gas Texas	2020	Gas Depreciation Study
Florida	Florida Public Service Commission	20200166-GU	People Gas System	2020	Gas Depreciation Study
Mississippi	Federal Energy Regulatory Commission	ER20-1660-000	Mississippi Power Company	2020	Electric Depreciation Study
Texas	Public Utility Commission of Texas	50557	Corix Utilities	2020	Water and Waste Water Depreciation Study
Georgia	Georgia Public Service Commission	42959	Liberty Utilities Peach State Natural Gas	2020	Gas Depreciation Study
Texas	Public Utility Commission of Texas	50734	Oncor Electric Delivery	2020	Life of Intangible Plant
New Jersey	New Jersey Board of Public Utilities	GR20030243	South Jersey Gas	2020	Gas Depreciation Study
Kentucky	Kentucky Public Service Commission	2020-00064	Big Rivers	2020	Electric Depreciation Study
Colorado	Colorado Public Utilities Commission	20AL-0049G	Public Service of Colorado	2020	Gas Depreciation Study
Texas	NA	NA	Pedernales Electric Coop	2019	Electric Depreciation Study
New York	Federal Energy Regulatory Commission	ER20-716-000	LS Power Grid New York, Corp.	2019	Electric Transmission Depreciation Study
Mississippi	Mississippi Public Service Commission	2019-UN-219	Mississippi Power Company	2019	Electric Depreciation Study
Texas	Public Utility Commission of Texas	50288	Kerrville Public Utility District	2019	Electric Depreciation Study
Texas	Railroad Commission of Texas	GUD 10920	CenterPoint Gas	2019	Gas Depreciation Study and Propane Air Study
Texas, New Mexico	Federal Energy Regulatory Commission	ER20-277-000	Southwestern Public Service Company	2019	Electric Production and General Plant Depreciation Study
New Mexico	New Mexico Public Regulation Commission		New Mexico Gas	2019	Gas Depreciation Study
Alaska	Regulatory Commission of Alaska	U-19-086	Alaska Electric Light and Power	2019	Electric Depreciation Study

Dane A. Watson
Testimony Appearances

Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
Texas	Railroad Commission of Texas	GUD 10900	Atmos Energy West Texas Division - Triangle	2019	Depreciation Rates for Natural Gas Property
Delaware	Delaware Public Service Commission	19-0615	Suez Water Delaware	2019	Water Depreciation Study
California	California Public Utilities Commission	A.19-08-015	Southwest Gas Northern California	2019	Gas Depreciation Study
California	California Public Utilities Commission	A.19-08-015	Southwest Gas Southern California	2019	Gas Depreciation Study
Texas	Railroad Commission of Texas	GUD 10895	CenterPoint Propane Air	2019	Depreciation Rates for Propane Air Assets
Texas	Public Utility Commission of Texas	49831	Southwestern Public Service Company	2019	Electric Depreciation Study
New Mexico	New Mexico Public Regulation Commission	19-00170-UT	Southwestern Public Service Company	2019	Electric Depreciation Study
Georgia	Georgia Public Service Commission	42516	Georgia Power Company	2019	Electric Depreciation Study
Georgia	Georgia Public Service Commission	42315	Atlanta Gas Light	2019	Gas Depreciation Study
Arizona	Arizona Corporation Commission	G-01551A-19-0055	Southwest Gas Corporation	2019	Gas Removal Cost Study
New Hampshire	New Hampshire Public Service Commission	DE 19-064	Liberty Utilities	2019	Electric Distribution and General
New Jersey	New Jersey Board of Public Utilities	GR19040486	Elizabethtown Natural Gas	2019	Gas Depreciation Study
Texas	Public Utility Commission of Texas	49421	CenterPoint Houston Electric LLC	2019	Electric Depreciation Study
North Carolina	North Carolina Utilities Commission	Docket No. G-9, Sub 743	Piedmont Natural Gas	2019	Gas Depreciation Study
Minnesota	Minnesota Public Utilities Commission	E-015/D-18-226	Allete Minnesota Power	2018	Electric Compliance Filing
Colorado	Colorado Public Utilities Commission	19AL-0063ST	Public Service of Colorado	2019	Steam Depreciation Study
Texas	NA	NA	CenterPoint Texas	2019	Propane Air Depreciation Study
Various	NA	NA	Enable Midstream Partners	2019	Gas Depreciation Study
Alaska	Regulatory Commission of Alaska	U-18-121	Municipal Power and Light City of Anchorage	2018	Electric Depreciation Study
Various	NA	NA	Pattern Energy	2018	Renewable Asset Capital Accounting

Dane A. Watson
Testimony Appearances

Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
New York	NA	NA	Long Island Electric Utility Servco LLC	2018	Electric Depreciation Study
Various	FERC	RP19-352-000	Sea Robin	2018	Gas Depreciation Study
Texas New Mexico	Federal Energy Regulatory Commission	ER19-404-000	Southwestern Public Service Company	2018	Electric Transmission Depreciation Study
California	Federal Energy Regulatory Commission	ER19-221-000	San Diego Gas and Electric	2018	Electric Transmission Depreciation Study
Kentucky	Kentucky Public Service Commission	2018-00281	Atmos Kentucky	2018	Gas Depreciation Study
Texas	Public Utility Commission of Texas	48500	Golden Spread Electric Coop	2018	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	U-18-054	Matanuska Electric Coop	2018	Electric Generation Depreciation Study
California	California Public Utilities Commission	A17-10-007	San Diego Gas and Electric	2018	Electric and Gas Depreciation Study
Texas	NA	NA	Lower Colorado River Authority	2018	Electric Transmission and General Study
Texas	Public Utility Commission of Texas	48401	Texas New Mexico Power	2018	Electric Depreciation Study
Nevada	Public Utility Commission of Nevada	18-05031	Southwest Gas	2018	Gas Depreciation Study
Texas	Public Utility Commission of Texas	48231	Oncor Electric Delivery	2018	Depreciation Rates
Texas	Public Utility Commission of Texas	48371	Entergy Texas	2018	Electric Depreciation Study
Kansas	Kansas Corporation Commission	18-KCPE-480-RTS	Kansas City Power and Light	2018	Electric Depreciation Study
Louisiana	Louisiana Public Service Commission	U-34803	Atmos LGS	2018	Gas Depreciation Study
Arkansas	Arkansas Public Service Commission	18-027-U	Liberty Pine Bluff Water	2018	Water Depreciation Study
Minnesota	Minnesota Public Utilities Commission	E-015/D-18-226	Allete Minnesota Power	2018	Electric Depreciation Rate
Kentucky	Kentucky Public Service Commission	2017-00349	Atmos KY	2018	Gas Depreciation Rates
Tennessee	Tennessee Public Utility Commission	18-00017	Chattanooga Gas	2018	Gas Depreciation Study
Texas	Railroad Commission of Texas	10679	Si Energy	2018	Gas Depreciation Study
Texas	City of Dallas Statement of Intent	NA	Atmos Mid-Tex	2017-2018	Gas Depreciation Study

Dane A. Watson
Testimony Appearances

Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
Alaska	Regulatory Commission of Alaska	U-17-104	Anchorage Water and Wastewater	2017	Water and Waste Water Depreciation Study
Michigan	Michigan Public Service Commission	U-18488	Michigan Gas Utilities Corporation	2017	Gas Depreciation Study
New Mexico	FERC	ER18-228-000	Southwestern Public Service Company	2017	Electric Production Depreciation Study
Texas	Railroad Commission of Texas	10669	CenterPoint South Texas	2017	Gas Depreciation Study
New Mexico	New Mexico Public Regulation Commission	17-00255-UT	Southwestern Public Service Company	2017	Electric Production Depreciation Study
Arkansas	Arkansas Public Service Commission	17-061-U	Empire District Electric Company	2017	Depreciation Rates for New Wind Generation
Kansas	Kansas Corporation Commission	18-EPDE-184-PRE	Empire District Electric Company	2017	Depreciation Rates for New Wind Generation
Oklahoma	Oklahoma Corporation Commission	PUD 201700471	Empire District Electric Company	2017	Depreciation Rates for New Wind Generation
Missouri	Missouri Public Service Commission	EO-2018-0092	Empire District Electric Company	2017	Depreciation Rates for New Wind Generation
Michigan	Michigan Public Service Commission	U-18457	Upper Peninsula Power Company	2017	Electric Depreciation Study
Florida	Florida Public Service Commission	20170179-GU	Florida City Gas	2017	Gas Depreciation Study
Iowa	NA		Cedar Falls Utility	2017	Telecommunications, Water, and Cable Utility
Michigan	FERC	ER18-56-000	Consumers Energy	2017	Electric Depreciation Study
Missouri	Missouri Public Service Commission	GR-2018-0013	Liberty Utilities	2017	Gas Depreciation Study
Michigan	Michigan Public Service Commission	U-18452	SEMCO	2017	Gas Depreciation Study
Texas	Public Utility Commission of Texas	47527	Southwestern Public Service Company	2017	Electric Production Depreciation Study
Minnesota	Minnesota Public Utilities Commission	17-581	Minnesota Northern States Power	2017	Electric, Gas and Common Transmission, Distribution and General

Dane A. Watson
Testimony Appearances

Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
Colorado	Colorado Public Utilities Commission	17AL-0363G	Public Service of Colorado-Gas	2017	Gas Depreciation Study
MultiState	FERC	ER17-1664	American Transmission Company	2017	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	U-17-008	Municipal Power and Light City of Anchorage	2017	Generating Unit Depreciation Study
Louisiana	Louisiana Public Service Commission	U-34343	Atmos Trans Louisiana	2017	Gas Depreciation Study
Mississippi	Mississippi Public Service Commission	2017-UN-041	Atmos Energy	2017	Gas Depreciation Study
New York	FERC	ER17-1010-000	New York Power Authority	2017	Electric Depreciation Study
Oklahoma	Oklahoma Corporation Commission	PUD 201700078	CenterPoint Oklahoma	2017	Gas Depreciation Study
Texas	Railroad Commission of Texas	GUD 10580	Atmos Pipeline Texas	2017	Gas Depreciation Study
Texas	Public Utility Commission of Texas	46957	Oncor Electric Delivery	2017	Electric Depreciation Study
Alabama	FERC	ER16-2312-000	Alabama Power Company	2016	Electric Depreciation Study
Alabama	FERC	ER16-2313-000	SESCO	2016	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	U-16-067	Alaska Electric Light and Power	2016	Generating Unit Depreciation Study
Arizona	Arizona Corporation Commission	G-01551A-16-0107	Southwest Gas	2016	Gas Depreciation Study
California	California Public Utilities Commission	A 16-07-002	California American Water	2016	Water and Waste Water Depreciation Study
Colorado	Colorado Public Utilities Commission	16A-0231E	Public Service Company of Colorado	2016	Electric Depreciation Study
Mississippi	Mississippi Public Service Commission	2016 UN 267	Willmut Gas	2016	Gas Depreciation Study
Florida	Florida Public Service Commission	160170-EI	Gulf Power	2016	Electric Depreciation Study
Georgia	N/A	N/A	Dalton Utilities	2016	Electric, Gas, Water, Wastewater & Fiber Depreciation Study
Georgia	NA	NA	Oglethorpe Power	2016	Electric Depreciation Study
Illinois	Illinois Commerce Commission	GRM #16-208	Liberty-Illinois	2016	Natural Gas Depreciation Study
Iowa	Iowa Utilities Board	RPU-2016-0003	Liberty-Iowa	2016	Natural Gas Depreciation Study

Dane A. Watson
Testimony Appearances

Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
Kentucky	FERC	RP16-097-000	KOT	2016	Natural Gas Depreciation Study
Michigan	Michigan Public Service Commission	U-18195	Consumers Energy/DTE Electric	2016	Ludington Pumped Storage Depreciation Study
Michigan	Michigan Public Service Commission	U-18127	Consumers Energy	2016	Natural Gas Depreciation Study
MultiState	FERC	ER17-191-000	American Transmission Company	2016	Electric Depreciation Study
Hawaii			Hawaii American Water	2015	Wastewater and Water Depreciation Study
New Jersey	New Jersey Board of Public Utilities	GR16090826	Elizabethtown Natural Gas	2016	Gas Depreciation Study
New York	NA		New York Power Authority	2016	Electric Transmission and General Study
North Carolina	North Carolina Utilities Commission	Docket G-9 Sub 77H	Piedmont Natural Gas	2016	Gas Depreciation Study
Texas	Railroad Commission of Texas	GUD 10567	CenterPoint Texas	2016	Gas Depreciation Study
Texas	Public Utility Commission of Texas	45414	Sharyland	2016	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	U-15-089	Fairbanks Water and Wastewater	2015	Water and Waste Water Depreciation Study
Arkansas	Arkansas Public Service Commission	15-098-U	CenterPoint Arkansas	2015	Gas Depreciation Study and Cost of Removal Study
Arkansas	Arkansas Public Service Commission	15-031-U	Source Gas Arkansas	2015	Underground Storage Gas Depreciation Study
Hawaii			Hawaii American Water	2015	Wastewater and Water Depreciation Study
Arkansas	Arkansas Public Service Commission	15-011-U	Source Gas Arkansas	2015	Gas Depreciation Study
Atmos Energy Corporation	Tennessee Regulatory Authority	14-00146	Atmos Tennessee	2015	Natural Gas Depreciation Study
Colorado	Colorado Public Utilities Commission	15-AL-0299G	Atmos Colorado	2015	Gas Depreciation Study
Kansas	Kansas Corporation Commission	16-ATMG-079-RTS	Atmos Kansas	2015	Gas Depreciation Study
Kansas	Kansas Corporation Commission	15-KCPE-116-RTS	Kansas City Power and Light	2015	Electric Depreciation Study

Dane A. Watson
Testimony Appearances

Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
Montana	NA	NA	Energy Keepers	2015	Property Units/ Depreciation Rates Hydro Facility
Multi-State NE US	FERC	16-453-000	Northeast Transmission Development, LLC	2015	Electric Depreciation Study
New Mexico	New Mexico Public Regulation Commission	15-00261-UT	Public Service Company of New Mexico	2015	Electric Depreciation Study
New Mexico	New Mexico Public Regulation Commission	15-00296-UT	Southwestern Public Service Company	2015	Electric Depreciation Study
New Mexico	New Mexico Public Regulation Commission	15-00139-UT	Southwestern Public Service Company	2015	Electric Depreciation Study
Texas	Railroad Commission of Texas	GUD 10432	CenterPoint- Texas Coast Division	2015	Gas Depreciation Study
Texas	Public Utility Commission of Texas	44704	Entergy Texas	2015	Electric Depreciation Study
Texas	Public Utility Commission of Texas	44746	Wind Energy Transmission Texas	2015	Electric Depreciation Study
Texas, New Mexico	FERC	ER15-949-000	Southwestern Public Service Company	2015	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	U-14-120	Alaska Electric Light and Power	2014- 2015	Electric Depreciation Study
Alabama	State of Alabama Public Service Commission	U-5115	Mobile Gas	2014	Gas Depreciation Study
Alaska	Regulatory Commission of Alaska	U-14-045	Matanuska Electric Coop	2014	Electric Generation Depreciation Study
Alaska	Regulatory Commission of Alaska	U-14-054	Sand Point Generating LLC	2014	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	U-14-055	TDX North Slope Generating	2014	Electric Depreciation Study
California	California Public Utilities Commission	A.14-07-006	Golden State Water	2014	Water and Waste Water Depreciation Study
Colorado	Public Utilities Commission of Colorado	14AL-0660E	Public Service Company of Colorado	2014	Electric Depreciation Study
Louisiana	Louisiana Public Service Commission	U-28814	Atmos Energy Corporation	2014	Gas Depreciation Study
Michigan	Michigan Public Service Commission	U-17653	Consumers Energy Company	2014	Electric and Common Depreciation Study

Dane A. Watson
Testimony Appearances

Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
Multi State – SE US	FERC	RP15-101	Florida Gas Transmission	2014	Gas Transmission Depreciation Study
Nebraska	Nebraska Public Service Commission	NG-0079	Source Gas Nebraska	2014	Gas Depreciation Study
New Mexico	New Mexico Public Regulation Commission	14-00332-UT	Public Service of New Mexico	2014	Electric Depreciation Study
Texas	Public Utility Commission of Texas	43950	Cross Texas Transmission	2014	Electric Depreciation Study
Texas	NA	NA	Hughes Natural Gas	2014	Gas Depreciation Study
Texas	Public Utility Commission of Texas	42469	Lone Star Transmission	2014	Electric Depreciation Study
Texas	Public Utility Commission of Texas	43695	Southwestern Public Service Company	2014	Electric Depreciation Study
Wisconsin	Wisconsin	05-DU-102	WE Energies	2014	Electric, Gas, Steam and Common Depreciation Studies
Texas, New Mexico	Public Utility Commission of Texas	42004	Southwestern Public Service Company	2013-2014	Electric Production, Transmission, Distribution and General Plant Depreciation Study
Virginia	Virginia Corporation Commission	PUE-2013-00124	Atmos Energy Corporation	2013-2014	Gas Depreciation Study
Arkansas	Arkansas Public Service Commission	13-078-U	Arkansas Oklahoma Gas	2013	Gas Depreciation Study
Arkansas	Arkansas Public Service Commission	13-079-U	Source Gas Arkansas	2013	Gas Depreciation Study
California	California Public Utilities Commission	Proceeding No.: A.13-11-003	Southern California Edison	2013	Electric Depreciation Study
Kentucky	Kentucky Public Service Commission	2013-00148	Atmos Energy Corporation	2013	Gas Depreciation Study
Minnesota	Minnesota Public Utilities Commission	13-252	Allete Minnesota Power	2013	Electric Depreciation Study
New Hampshire	New Hampshire Public Service Commission	DE 13-063	Liberty Utilities	2013	Electric Distribution and General
New Jersey	New Jersey Board of Public Utilities	GR13111137	South Jersey Gas	2013	Gas Depreciation Study
North Carolina/South Carolina	FERC	ER13-1313	Progress Energy Carolina	2013	Electric Depreciation Study
Oklahoma and TX Panhandle	NA	NA	Enable Midstream Partners	2013	Gas Depreciation Study
Texas	Public Utility Commission of Texas	41474	Sharyland	2013	Electric Depreciation Study

Dane A. Watson
Testimony Appearances

Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
Texas	Railroad Commission of Texas	10235	West Texas Gas	2013	Gas Depreciation Study
Various	FERC	RP14-247-000	Sea Robin	2013	Gas Depreciation Study
Wisconsin	Public Service Commission of Wisconsin	4220-DU-108	Northern States Power Company - Wisconsin	2013	Electric, Gas and Common Transmission, Distribution and General
Alaska	Regulatory Commission of Alaska	U-12-154	Alaska Telephone Company	2012	Telecommunications Utility
Alaska	Regulatory Commission of Alaska	U-12-141	Interior Telephone Company	2012	Telecommunications Utility
Alaska	Regulatory Commission of Alaska	U-12-149	Municipal Power and Light City of Anchorage	2012	Electric Depreciation Study
Colorado	Colorado Public Utilities Commission	12AL-1269ST	Public Service Company of Colorado	2012	Gas and Steam Depreciation Study
Colorado	Colorado Public Utilities Commission	12AL-1268G	Public Service Company of Colorado	2012	Gas and Steam Depreciation Study
Kansas	Kansas Corporation Commission	12-ATMG-564-RTS	Atmos Kansas	2012	Gas Depreciation Study
Kansas	Kansas Corporation Commission	12-KCPE-764-RTS	Kansas City Power and Light	2012	Electric Depreciation Study
Michigan	Michigan Public Service Commission	U-17104	Michigan Gas Utilities Corporation	2012	Gas Depreciation Study
Minnesota	Minnesota Public Utilities Commission	12-858	Northern States Power Company - Minnesota	2012	Electric, Gas and Common Transmission, Distribution and General
Nevada	Public Utility Commission of Nevada	12-04005	Southwest Gas	2012	Gas Depreciation Study
New Mexico	New Mexico Public Regulation Commission	12-00350-UT	Southwestern Public Service Company	2012	Electric Depreciation Study
North Carolina	North Carolina Utilities Commission	E-2 Sub 1025	Progress Energy Carolina	2012	Electric Depreciation Study
North Dakota	North Dakota Public Service Commission	PU-12-0813	Northern States Power	2012	Electric, Gas and Common Transmission, Distribution and General

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Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
South Carolina	Public Service Commission of South Carolina	Docket 2012-384-E	Progress Energy Carolina	2012	Electric Depreciation Study
Texas	Railroad Commission of Texas	10170	Atmos Mid-Tex	2012	Gas Depreciation Study
Texas	Railroad Commission of Texas	10147, 10170	Atmos Mid-Tex	2012	Gas Depreciation Study
Texas	Railroad Commission of Texas	10174	Atmos West Texas	2012	Gas Depreciation Study
Texas	Railroad Commission of Texas	10182	CenterPoint Beaumont/ East Texas	2012	Gas Depreciation Study
Texas	Texas Public Utility Commission	40604	Cross Texas Transmission	2012	Electric Depreciation Study
Texas	Texas Public Utility Commission	40020	Lone Star Transmission	2012	Electric Depreciation Study
Texas	Texas Public Utility Commission	40606	Wind Energy Transmission Texas	2012	Electric Depreciation Study
Texas	Texas Public Utility Commission	40824	Xcel Energy	2012	Electric Depreciation Study
California	California Public Utilities Commission	A1011015	Southern California Edison	2011	Electric Depreciation Study
Colorado	Public Utilities Commission of Colorado	11AL-947E	Public Service Company of Colorado	2011	Electric Depreciation Study
Michigan	Michigan Public Service Commission	U-16938	Consumers Energy Company	2011	Gas Depreciation Study
Michigan	Michigan Public Service Commission	U-16536	Consumers Energy Company	2011	Wind Depreciation Rate Study
Mississippi	Mississippi Public Service Commission	2011-UN-184	Atmos Energy	2011	Gas Depreciation Study
MultiState	FERC	ER12-212	American Transmission Company	2011	Electric Depreciation Study
MultiState			Atmos Energy	2011	Shared Services Depreciation Study
MultiState			CenterPoint	2011	Shared Services Study
MultiState			CenterPoint	2011	Depreciation Reserve Study (SAP)
Pennsylvania	NA	NA	Safe Harbor	2011	Hydro Depreciation Study
Texas	Texas Public Utility Commission	39896	Entergy Texas	2011	Electric Depreciation Study
Texas	Public Utility Commission of Texas	38929	Oncor	2011	Electric Depreciation Study

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Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
Texas	Texas Commission on Environmental Quality	Matter 37050-R	Southwest Water Company	2011	WasteWater Depreciation Study
Texas	Texas Commission on Environmental Quality	Matter 37049-R	Southwest Water Company	2011	Water Depreciation Study
Alaska	Regulatory Commission of Alaska	U-10-070	Inside Passage Electric Cooperative	2010	Electric Depreciation Study
Georgia	Georgia Public Service Commission	31647	Atlanta Gas Light	2010	Gas Depreciation Study
Maine/ New Hampshire	FERC	10-896	Granite State Gas Transmission	2010	Gas Depreciation Study
Multi State – SE US	FERC	RP10-21-000	Florida Gas Transmission	2010	Gas Depreciation Study
Multistate	NA	NA	Constellation Energy	2010	Fossil Generation Depreciation Study
Multistate	NA	NA	Constellation Energy Nuclear	2010	Nuclear Generation Depreciation Study
Texas	Texas Railroad Commission	10041	Atmos Amarillo	2010	Gas Depreciation Study
Texas	Texas Railroad Commission	10000	Atmos Pipeline Texas	2010	Gas Depreciation Study
Texas	Railroad Commission of Texas	10038	CenterPoint South TX	2010	Gas Depreciation Study
Texas	Public Utility Commission of Texas	36633	City Public Service of San Antonio	2010	Electric Depreciation Study
Texas	Public Utility Commission of Texas	38339	CenterPoint Electric	2010	Electric Depreciation Study
Texas	Public Utility Commission of Texas	38147	Southwestern Public Service Company	2010	Electric Technical Update
Texas	Public Utility Commission of Texas	38480	Texas New Mexico Power	2010	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	U-09-015	Alaska Electric Light and Power	2009-2010	Electric Depreciation Study
Alaska	Regulatory Commission of Alaska	U-10-043	Utility Services of Alaska	2009-2010	Water Depreciation Study
California	California Public Utility Commission	A10071007	California American Water	2009-2010	Water and Waste Water Depreciation Study
Michigan	Michigan Public Service Commission	U-16054	Consumers Energy	2009-2010	Electric Depreciation Study
Michigan	Michigan Public Service Commission	U-16055	Consumers Energy/DTE Energy	2009-2010	Ludington Pumped Storage Depreciation Study
Wyoming	Wyoming Public Service Commission	30022-148-GR10	Source Gas	2009-2010	Gas Depreciation Study

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Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
Colorado	Colorado Public Utilities Commission	09AL-299E	Public Service of Colorado	2009	Electric Depreciation Study
Iowa	NA		Cedar Falls Utility	2009	Telecommunications, Water, and Cable Utility
Michigan	Michigan Public Service Commission	U-15963	Michigan Gas Utilities Corporation	2009	Gas Depreciation Study
Michigan	Michigan Public Service Commission	U-15989	Upper Peninsula Power Company	2009	Electric Depreciation Study
Michigan	Michigan Public Service Commission	In Progress	Edison Sault	2009	Electric Depreciation Study
Mississippi	Mississippi Public Service Commission	09-UN-334	CenterPoint Energy Mississippi	2009	Gas Depreciation Study
New York	New York Public Service Commission		Key Span	2009	Generation Depreciation Study
North Carolina	North Carolina Utilities Commission		Piedmont Natural Gas	2009	Gas Depreciation Study
South Carolina	Public Service Commission of South Carolina		Piedmont Natural Gas	2009	Gas Depreciation Study
Tennessee	Tennessee Regulatory Authority	09-000183	AGL – Chattanooga Gas	2009	Gas Depreciation Study
Tennessee	Tennessee Regulatory Authority	11-00144	Piedmont Natural Gas	2009	Gas Depreciation Study
Texas	Railroad Commission of Texas	9869	Atmos Energy	2009	Shared Services Depreciation Study
Texas	Railroad Commission of Texas	9902	CenterPoint Energy Houston	2009	Gas Depreciation Study
Arizona	NA	NA	Arizona Public Service	2008	Fixed Asset Consulting
Louisiana	Louisiana Public Service Commission	U-30689	Cleco	2008	Electric Depreciation Study
Multiple States	NA	NA	Constellation Energy	2008	Generation Depreciation Study
New Mexico	New Mexico Public Regulation Commission	07-00319-UT	Southwestern Public Service Company	2008	Testimony – Depreciation
North Dakota	North Dakota Public Service Commission	PU-07-776	Northern States Power Company - Minnesota	2008	Net Salvage
Texas	Public Utility Commission of Texas	35717	Oncor	2008	Electric Depreciation Study

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Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
Texas	Public Utility Commission of Texas	35763	Southwestern Public Service Company	2008	Electric Production, Transmission, Distribution and General Plant Depreciation Study
Wisconsin	Wisconsin	05-DU-101	WE Energies	2008	Electric, Gas, Steam and Common Depreciation Studies
Colorado	Colorado Public Utilities Commission	Filed – no docket to date	Public Service Company of Colorado	2007-2008	Electric Depreciation Study
Colorado	Colorado Public Utilities Commission	10AL-963G	Public Service Company of Colorado	2007-2008	Gas Depreciation Study
Minnesota	Minnesota Public Utilities Commission	E015/D-08-422	Minnesota Power	2007-2008	Electric Depreciation Study
Multiple States	Railroad Commission of Texas	9762	Atmos Energy	2007-2008	Shared Services Depreciation Study
Multiple States	None		Tennessee Valley Authority	2007-2008	Electric Generation and Transmission Depreciation Study
Michigan	Michigan Public Service Commission	U-15629	Consumers Energy	2006-2009	Gas Depreciation Study
Multiple States	NA	NA	Constellation Energy	2007	Generation Depreciation Study
Texas	Public Utility Commission of Texas	34040	Oncor	2007	Electric Depreciation Study
Arkansas	Arkansas Public Service Commission	06-161-U	CenterPoint Energy – Arkla Gas	2006	Gas Distribution Depreciation Study and Removal Cost Study
Colorado	Colorado Public Utilities Commission	06-234-EG	Public Service Company of Colorado	2006	Electric Depreciation Study
Multiple States	Multiple	NA	CenterPoint Energy	2006	Shared Services Depreciation Study
Nevada	NA	NA	Nevada Power/Sierra Pacific	2006	ARO Consulting
Pennsylvania	NA	NA	Safe Harbor	2006	Hydro Depreciation Study
Utah, Nevada, California	NA	NA	Intermountain Power Authority	2006	Generation Depreciation Study
Texas	Railroad Commission of Texas	9670/9676	Atmos Energy Corp	2005-2006	Gas Distribution Depreciation Study

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Testimony Appearances

Asset Location	Commission	Docket (If Applicable)	Company	Year	Description
Texas, New Mexico	Public Utility Commission of Texas	32766	Southwestern Public Service Company	2005-2006	Electric Production, Transmission, Distribution and General Plant Depreciation Study
Texas	Railroad Commission of Texas	9400	TXU Gas	2003-2004	Gas Distribution Depreciation Study
Texas	Railroad Commission of Texas	9313	TXU Gas	2002	Gas Distribution Depreciation Study
Texas	Railroad Commission of Texas	9225	TXU Gas	2002	Gas Distribution Depreciation Study
Texas	Public Utility Commission of Texas	24060	TXU	2001	Line Losses
Texas	Public Utility Commission of Texas	23640	TXU	2001	Line Losses
Texas	Public Utility Commission of Texas	22350	TXU	2000-2001	Electric Depreciation Study, Unbundling
Texas	Railroad Commission of Texas	9145-9148	TXU Gas	2000-2001	Gas Distribution Depreciation Study
Texas	Public Utility Commission of Texas	20285	TXU	1999	Fuel Company Depreciation Study
Texas	Railroad Commission of Texas	8976	TXU Pipeline	1999	Pipeline Depreciation Study
Texas	Public Utility Commission of Texas	18490	TXU	1998	Transition to Competition
Texas	Public Utility Commission of Texas	16650	TXU	1997	Customer Complaint
Texas	Public Utility Commission of Texas	15195	TXU	1996	Mining Company Depreciation Study
Texas	Public Utility Commission of Texas	12160	TXU	1993	Fuel Company Depreciation Study
Texas	Public Utility Commission of Texas	11735	TXU	1993	Electric Depreciation Study

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

APPLICATION OF ENTERGY)
LOUISIANA, LLC FOR APPROVAL OF)
REGULATORY BLUEPRINT)
NECESSARY FOR COMPANY TO)
STRENGTHEN THE ELECTRIC GRID)
FOR STATE OF LOUISIANA)

DOCKET NO. U-_____

EXHIBIT DAW-2

HIGHLY SENSITIVE
PROTECTED MATERIAL

INTENTIONALLY OMITTED

AUGUST 2023