

PUBLIC VERSION

EXHIBIT 9

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DIRECT TESTIMONY OF CHRISTOPHER THIBODEAUX LA Public Service Commission

ON BEHALF OF CLECO POWER LLC

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TO RULE 12.1 OF THE COMMISSION'S
RULES OF PRACTICE AND PROCEDURE

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

**EX PARTE: APPLICATION OF)
CLECO POWER LLC FOR)
AUTHORIZATION OF: (I) SITE)
SPECIFIC CONTRACT FOR LARGE)
LOAD CUSTOMER;)
(II) BRIDGE CAPACITY CONTRACT;)
(III) CONSTRUCTION OF NEW)
TRANSMISSION)
INTERCONNECTION;)
(IV) CONSTRUCTION OF NEW)
GENERATION; (V) ASSOCIATED)
WAIVERS; AND (VI) EXPEDITED)
TREATMENT.)**

DOCKET NO. U-_____

DIRECT TESTIMONY
OF
CHRISTOPHER THIBODEAUX
ON BEHALF OF
CLECO POWER LLC

JULY 1, 2026

**CLECO POWER LLC
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LPSC DOCKET NO. U-_____**

EXHIBITS

EXHIBIT NO.	DESCRIPTION
CRT-1 (HSPM)	Peninsula 430 MW Project Load Addition Customer Study
CRT-2 (HSPM)	Generation Study

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I. INTRODUCTION AND BACKGROUND

Q1: PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.

A: My name is Christopher Thibodeaux. I am the Director of Transmission Operations and EMS Support for Cleco Power LLC ("Cleco Power" or the "Company"). My business address is 2030 Donahue Ferry Road, Pineville, Louisiana, 71360.

Q2: PLEASE DESCRIBE YOUR JOB RESPONSIBILITIES.

A: I provide leadership and oversight for Transmission Operations, Energy Management System ("EMS") Support, and Transmission Strategy. I am responsible for keeping the Company's management informed of events on Cleco Power's transmission system. I am also responsible for coordination with neighboring transmission owners ("TOs") and the Midcontinent Independent System Operator, Inc. ("MISO"), regarding transmission planning and operational issues. My group handles the day-to-day operations of the Cleco Power transmission network. This includes both staff for Operation and EMS support. The Transmission Strategy organization is responsible for all the near-term and long-term transmission planning studies. I oversee the results of these studies and propose needed projects to the MISO Transmission Expansion Plan ("MTEP") and Cleco Power's internal processes.

Q3: PLEASE DESCRIBE YOUR PROFESSIONAL AND EDUCATIONAL HISTORY.

A: I received a Bachelor of Science degree in Electrical Engineering from Louisiana State University in Baton Rouge, Louisiana in 2001. That same year, I accepted a full-time position at Cleco Power as a Transmission Planning engineer. My entire career of 25 years has been in the Transmission Planning department. Prior to my current role, I served as Manager of Transmission Planning and EMS Support. I moved into the Director position

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1 over Operations, Planning, and EMS Support in September 2025. I am a licensed
2 Professional Engineer in Louisiana, and my license number is 32530.

3 **Q4: HAVE YOU PREVIOUSLY PRESENTED TESTIMONY BEFORE THE**
4 **LOUISIANA PUBLIC SERVICE COMMISSION (“LPSC” OR THE**
5 **“COMMISSION”)?**

6 **A:** No, I have not.

7 **Q5: WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

8 **A:** My testimony supports the Company’s application (the “Application”) in this proceeding.
9 The Application seeks, among other things, the approval of an Electric Service Agreement
10 (“ESA”) that is a Site Specific Contract and related agreements with Applied Digital
11 Corporation (the “Customer”); approval to enter into a capacity agreement with Tenaska
12 Frontier Partners, Ltd. (the “Capacity Agreement”); approval of or exemption for
13 construction of transmission interconnection infrastructure to serve the load required by a
14 new \$3.6 billion hyperscale data center to be developed by the Customer in Rapides Parish,
15 Louisiana (the “Project”);¹ and the certification and approval of the Company’s
16 construction of new generation infrastructure and transmission facilities to serve Cleco
17 Power’s existing and future customer load.

18 Cleco Power’s Application describes its prayers for relief; however, my direct testimony
19 will focus on Cleco Power’s transmission-related needs more broadly, as well as the
20 transmission investments necessary to reliably serve the Project. Specifically, I will:
21 provide an overview of Cleco Power’s transmission system and facilities that are relevant

¹ See <https://www.opportunitylouisiana.gov/news/central-louisiana-secures-3-6-billion-applied-digital-ai-factory-campus>.

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1 to the Project; discuss the new transmission-related facilities necessary to serve the Project;
2 describe how Cleco Power evaluated the need for the transmission-related facilities and
3 why Cleco Power believes these facilities are a reasonable solution for providing service
4 to the Customer; describe the MISO transmission interconnection process as it relates to
5 the Company's proposed new generator; and provide relevant generator siting information.
6 Company witness Shannon Jenkins discusses the transmission infrastructure that is
7 necessary to directly interconnect the Project as well as the related estimated costs and
8 construction timeline.

9 **II. CLECO POWER'S TRANSMISSION SYSTEM**

10 **Q6: PLEASE DESCRIBE CLECO POWER'S TRANSMISSION SYSTEM,**
11 **INCLUDING ANY TRANSMISSION FACILITIES NEAR THE PROJECT**
12 **LOCATION.**

13 **A:** Cleco Power serves approximately 298,000 customers in 24 of Louisiana's 64 parishes.²
14 Cleco Power owns approximately 1,386 miles of transmission lines comprised of 29 miles
15 of 69 kV line, 680 miles of 138 kV line, 610 miles of 230 kV line, and 67 miles of 500 kV
16 line. The Company's retail customers are served through 91 bulk transmission substations.
17 Cleco Power does not own any 500 kV substations and is only a partial owner of Entergy
18 Louisiana, LLC's ("ELL") Webre-to-Wells 500 kV and Hartburg-to-Layfield 500 kV
19 transmission lines. The Cleco Power transmission system serves mostly rural Louisiana,
20 with major load centers in Slidell, New Iberia, Pineville, Mandeville, and Covington.

² Cleco Power serves customers in the following Louisiana parishes: Acadia, Allen, Avoyelles, Beauregard, Calcasieu, Catahoula, DeSoto, Evangeline, Grant, Iberia, Jefferson Davis, LaSalle, Natchitoches, Rapides, Red River, Sabine, St. Landry, St. Martin, St. Mary, St. Tammany, Tangipahoa, Vermilion, Vernon, and Washington.

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1 The Project will be located in Rapides Parish and will be supported by Cleco Power's 230
2 kV system in the area. The area in the vicinity of the Project is currently supported by 230
3 and 138 kV transmission and local generation at the Brame Energy Center. Currently, the
4 largest load centers in the region served by the Company are Pineville and Marksville. The
5 City of Alexandria is also in this area but is served by a municipal electric utility. The
6 transmission infrastructure needed to reliably serve the Project involves an expansion of
7 the 230 kV system by bringing multiple 230 kV lines to the Project. Mr. Jenkins discusses
8 the direct transmission interconnection, the related costs, and the anticipated construction
9 timeline.

10 **Q7: HOW HAS CLECO POWER UPGRADED AND EXPANDED ITS**
11 **TRANSMISSION SYSTEM IN RECENT YEARS?**

12 **A:** Most upgrades to the Company's transmission system over the past five years have been
13 driven by the North American Electric Reliability Corporation's ("NERC") updated
14 Transmission Planning standards including TPL-001 requirements regarding P3 (loss of a
15 transmission line and a generator) and P6 (loss of any two transmission or generation
16 elements) contingencies. Generally, these transmission upgrade projects are solutions to
17 problems that fall into one of the following categories:

- 18 1) Generation retirements and associated impacts to Cleco Power's system.
- 19 2) Generation deliverability as the transmission topology continues to change, along
20 with constantly evolving additions of new loads and generation to the system.
- 21 3) Elimination of load shed for P6 contingencies.

22 Along the South Central Louisiana coast, the Segura-Caneland-Bayou Vista 230 kV project
23 completed a 230 kV loop connecting Eunice, Louisiana, to Terrebonne Parish, Louisiana.

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1 In the same area, the Sellers Road Expansion was a joint project with ELL. Together, these
2 two projects significantly improved local reliability and load serving capability in South
3 Central Louisiana. Projects between St. Landry Parish, Louisiana, and the City of
4 Lafayette were recently completed to mitigate P3 contingencies and to improve the
5 deliverability of Cleco Power's units in Central Louisiana. Lastly, Cleco Power has
6 improved load serving capability and maintenance flexibility with projects like the Flagon
7 Substation and the Belmont Substation, with the Belmont Substation being the most
8 recently completed expansion, which was placed in service in June 2025.

9 **Q8: ARE TRANSMISSION UPGRADES REQUIRED TO SERVE THE PROJECT?**

10 **A:** Yes. As discussed in detail below and in Mr. Jenkins' direct testimony, the additional
11 transmission capacity necessary to serve the Project will require new transmission
12 infrastructure and upgrades to existing equipment. Below is a summary of the substation,
13 point-of-delivery projects, and other upgrades that will be required to supply the
14 Customer's power requirements and reliably serve the Project (collectively, the "Project
15 Transmission Upgrades"):

- 16 • **Peninsula Substation:** The Customer's premises are located approximately 2.5 miles
17 from Cleco Power's Rodemacher Substation and are adjacent to the existing
18 Rodemacher-to-Rapides 230 kV transmission line. Cleco Power will construct the new
19 Peninsula Substation on the Customer's premises. The substation will include a
20 breaker-and-a-half 230 kV station and three 230 kV – 34.5 kV, 250 MVA power
21 transformers to serve the Project. Additionally, the Company will install two (2) 28.8
22 MVAR capacitor banks for voltage support.

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- 1 • **Rodemacher-to-Peninsula 230 kV Transmission Line #1:** Cleco Power's existing
2 Rodemacher-to-Rapides 230 kV line will be cut into and out of the new Peninsula
3 Substation, creating two lines: (i) a Rodemacher-to-Peninsula transmission line, and
4 (ii) a Peninsula-to-Rapides transmission line. The Rodemacher-to-Peninsula
5 transmission line will be rebuilt to increase line capacity.
- 6 • **Peninsula-to-Rapides 230 kV Transmission Line:** The Peninsula-to-Rapides
7 transmission line will be created by cutting into the existing Rodemacher-to-Rapides
8 transmission line at the Peninsula Substation, and this transmission line will be rebuilt
9 to increase line capacity.
- 10 • **Rodemacher Substation:** Cleco Power will upgrade equipment and relaying and add
11 a new terminal to support the Rodemacher-to-Peninsula 230 kV Transmission Line #2.
- 12 • **Rodemacher-to-Peninsula 230 kV Transmission Line #2:** Cleco Power will
13 construct a second 2.4-mile, 230 kV transmission line between the Rodemacher and
14 Peninsula Substations, along with the additional terminal at the Rodemacher
15 Substation.
- 16 • **Rapides Substation:** Cleco Power will install equipment and relaying upgrades at the
17 Rapides Substation.

18 **Q9: WHY IS NEW TRANSMISSION INFRASTRUCTURE NEEDED TO SERVE THE**
19 **PROJECT?**

20 **A:** Cleco Power does not currently have adequate transmission capacity to serve the Project
21 and will need to construct new transmission infrastructure to interconnect the Project.
22 Due to the size of the Project's load, the Company's current transmission system needs to
23 be expanded locally to meet the NERC TPL-001 requirements for this location. Mr.

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Jenkins describes the transmission infrastructure and upgrades that are necessary to reliably serve the Project while it is being constructed and ramping up to full capacity, which is expected to occur in 2028. Company witness Richard Sharp discusses the Company's long-term planning and integrated resource plan ("IRP") process, which identifies a need for new capacity to meet the Company's obligations. Company witness Robert Breedlove discusses the Company's proposed combined cycle gas turbine ("CCGT") generator, which will be located near the Project. With the addition of the proposed CCGT generator, Cleco Power's internal analysis identified issues south of the Company's Coughlin CCGT generator that may need to be mitigated. Later in my testimony, I discuss the potential cost necessary to interconnect the proposed CCGT generator at a new substation and the potential cost to mitigate the issues identified south of the Company's Coughlin CCGT generator that may need to be addressed. I also address the fact that there may be additional costs identified by MISO for network upgrades that will be incurred for the new CCGT generator to receive network transmission service.

Q10: COULD CLECO POWER SERVE THE CUSTOMER WITH A TRANSMISSION-ONLY SOLUTION?

A: No. A transmission-only solution would not provide a reliable, long-term means of serving the Project. Although the transmission system is planned and operated in accordance with applicable NERC standards, there are circumstances, such as extended or unplanned generation outages or prolonged transmission outages, in which the system must be operated beyond normal planning assumptions. In the absence of additional local generation near the Project, Cleco Power would have limited operational flexibility to manage these conditions and maintain reliable service. Additionally, as discussed below

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1 and by Mr. Sharp and Mr. Breedlove in more detail, Cleco Power's future retirement plans
2 will require additional generation resources in the Central Louisiana area regardless.
3 Accordingly, to reliably serve the Company's customers, and comply with Cleco Power's
4 planning reserve margin obligations, additional generation capacity and energy resources
5 will be required in addition to the necessary transmission facilities. Mr. Sharp discusses
6 the Company's capacity obligations in the MISO market and Mr. Breedlove addresses the
7 specifics of the Company's proposed CCGT generator. As Company witness Jonathan
8 Long discusses, there are significant challenges in the generation construction market. Mr.
9 Long describes how these challenges place pressure on the availability of equipment and
10 labor, require significant investments much earlier in the construction process, and may
11 shift risks on both timing and costs away from Original Equipment Manufacturers
12 ("OEMs") and Engineering, Procurement, and Construction ("EPC") firms. While the
13 Company is constructing the proposed CCGT generator, which is expected to come online
14 as early as 2032, the Company will also need to carefully manage planned outages for the
15 transmission system and Cleco Power's existing generators.

16 As I noted earlier, Mr. Sharp discusses the Company's resource planning efforts and the
17 need for the proposed CCGT generator to address load growth, the planned retirements of
18 several existing generators within the next 10 years, as well as MISO- and Commission-
19 imposed requirements. Mr. Breedlove discusses the Company's current generation fleet
20 and the risks and uncertainties posed by aging generators and looming environmental
21 requirements. As far as the location the Company selected for the proposed CCGT
22 generator, local generation in Central Louisiana near existing transmission infrastructure
23 and the Project is essential for two primary reasons: (1) to effectively and reliably serve the

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1 region considering the imminent planned retirement of several existing generators that are
2 reaching the end of their operating lives and are also facing environmental compliance
3 obligations and (2) to reliably serve the Company's existing and future customers.
4 Constructing new generation capacity at its planned location is expected to minimize the
5 cost of interconnection and related upgrades, take advantage of existing transmission
6 infrastructure, help address planned unit retirements in the area including at the nearby
7 Brame Energy Center, and help enhance operational flexibility.

8 **III. TRANSMISSION PLANNING FOR LOAD**

9 **Q11: PLEASE DESCRIBE THE TRANSMISSION PLANNING PROCESS.**

10 **A:** The Cleco Power transmission planning process is guided by NERC standards. The
11 Company performs both long-term planning as well as next-day operational planning,
12 consistent with NERC's TPL-001 and Transmission Operations ("TOP") standards. For
13 long-term planning, Cleco Power uses the annual MTEP models developed by MISO.
14 These models are evaluated based on contingency criteria established in the TPL-001
15 standard. Reliability issues identified through modeling are addressed using approved
16 mitigation measures consistent with TPL-001 requirements. When mitigation requires new
17 transmission facilities, Cleco Power evaluates multiple alternatives designed to address
18 reliability needs for the foreseeable future, considering load growth, generation plans,
19 operational flexibility, and potential costs. The solution advanced through Cleco Power's
20 internal review process is typically the alternative that meets long-term reliability needs at
21 the lowest reasonable cost. Cleco Power's Transmission Planning group also evaluates
22 near-term system conditions in which operational considerations are incorporated into the
23 development of long-term solutions to ensure sufficient flexibility under a range of

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1 operating scenarios. All qualifying Cleco Power transmission projects are required to be
2 submitted to MISO for review through the annual MTEP process. Through this process,
3 MISO performs independent studies and presents proposed solutions to external
4 stakeholders for review. The MISO Board of Directors approves justified proposed
5 transmission projects at the end of each year. If the transmission project in question also
6 requires Commission approval, the Company would make a filing seeking regulatory
7 approval. Cleco Power also conducts new load studies for customers seeking to connect
8 to the Company's transmission system to take electric service. These studies use the same
9 models as the TPL-001 planning analyses and similar contingencies. For large loads, such
10 as the Project, Cleco Power evaluates additional operational contingencies due to the high
11 load factor associated with the load. Given the size of the Project's load and the need for
12 new generation regardless of the Project as discussed by Mr. Sharp, these studies were
13 updated with close coordination with Cleco Power's Resource Planning team to develop a
14 solution that meets both transmission reliability requirements and the Company's long-
15 term capacity and energy needs.

16 **Q12: PLEASE DESCRIBE MISO'S ROLE AND HOW IT AFFECTS THE PROJECT.**

17 **A:** MISO is the transmission planner for the entire MISO region, which extends across all or
18 part of 15 states in the central United States, including most of Louisiana. As transmission
19 planner, MISO administers two processes that are pertinent to Cleco Power serving its
20 customers: (1) the transmission planning process and (2) the generator interconnection
21 process. New substations must be studied through the transmission planning process, and
22 new generators must be studied through the generator interconnection process.

23 **Q13: PLEASE DESCRIBE THE MISO TRANSMISSION PLANNING PROCESS.**

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1 **A:** A MISO member, such as Cleco Power, must submit a request to MISO to connect a new
2 load-serving substation to the system. MISO studies that request by adding the proposed
3 substation to its system models and simulating outages of facilities across the system to
4 determine whether the system can support the request and whether any system upgrades
5 are needed to accommodate the new substation reliably. Most such requests are studied
6 through the MTEP process. The MTEP process has a deadline in September of each year
7 for the submission of proposed new transmission facilities, including new load-serving
8 substations. MISO then evaluates and analyzes the proposed new facilities and decides
9 whether to recommend them for approval by MISO's Board of Directors. Such approval
10 occurs in December of the year following the year of submission.

11 MISO also administers a process called Expedited Project Review ("EPR") that allows
12 members to submit proposed new transmission projects that require faster approvals, for
13 example, because a project is needed to serve new load, at any time of the year and typically
14 obtain approval within 30 to 90 days after submission.³ Cleco Power plans to use the EPR
15 process to obtain MISO approvals for the transmission projects discussed by Mr. Jenkins
16 that are required to serve the Project, because an expedited approval is needed to meet the
17 Customer's speed-to-market needs. EPRs are approved by MISO on an expedited timeline
18 and then formally incorporated into the MTEP in the following December's MTEP report.

19 **Q14: WHEN DO YOU ANTICIPATE THE EPR PROCESS FOR THE TRANSMISSION**
20 **FACILITIES NEEDED TO INTERCONNECT THE PROJECT WOULD BEGIN?**

³ On June 18, 2026, FERC issued a show cause order to MISO under section 206 of the Federal Power Act directing MISO to justify or reform its rules governing how data centers, manufacturing facilities, and other large energy users interconnect to the electric grid. The Company is aware of this FERC order and will be monitoring MISO's response to determine if there may be any effect on this proceeding; *see* FERC Docket No. EL26-70-000 and <https://www.ferc.gov/media/e-8-el26-70-000>.

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1 **A:** Cleco Power submitted its EPR request on May 29, 2026, to be entered into the MISO June
2 EPR process, which is now a bi-monthly process. This study is expected to take place over
3 the following two to three months.

4 **Q15: PLEASE DESCRIBE THE TRANSMISSION PLANNING STANDARDS AND**
5 **GUIDELINES APPLIED IN ANALYZING THE PROJECT.**

6 **A:** Cleco Power evaluated the Project using applicable NERC reliability standards and Cleco
7 Power's transmission planning process and established internal engineering guidelines to
8 ensure the transmission system can reliably serve the Project while maintaining reliable
9 service to the Company's other customers. The analysis was designed to comply with
10 NERC Transmission Planning Standard TPL-001, which governs long-term system
11 performance under normal and contingency conditions, as well as NERC FAC-002
12 requirements related to the interconnection of new or modified facilities.

13 In addition to considering mandatory NERC standards, Cleco Power evaluated local
14 operational contingencies that reflect the specific characteristics of its system; in certain
15 respects, these local operational contingencies are more conservative than NERC minimum
16 requirements, as explained below. Cleco Power's planning approach recognizes that
17 compliance with NERC standards alone may not always be sufficient as load patterns
18 evolve. Therefore, the Company also relies on good utility planning practices and sound
19 engineering judgment to confirm that the proposed transmission facilities provide a reliable
20 and flexible solution that is consistent with the Company's long-term system planning
21 objectives.

22 **Q16: WHY ARE THESE STANDARDS AND GUIDELINES IMPORTANT TO CLECO**
23 **POWER'S WORK CONNECTED TO THE PROJECT?**

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1 **A:** These standards and guidelines are important because they provide a consistent and
2 disciplined framework for evaluating how the Project could be reliably integrated into
3 Cleco Power's transmission system without adversely affecting existing customers or users
4 of the Company's transmission system. Applying NERC reliability standards ensures that
5 the analysis addressed required system performance under normal and contingency
6 conditions. However, the Company evaluated additional contingencies around potential
7 planned outages in the local area to account for the specific operating characteristics and
8 constraints of the Company's transmission system.

9 Together, the NERC standards and operational contingencies allowed Cleco Power to
10 assess the Project using good utility planning practices and sound engineering judgment,
11 recognizing that compliance with minimum reliability standards alone may not be
12 sufficient as large new loads like the Project are added. This approach ensures that the
13 proposed Project Transmission Upgrades provide a reliable, flexible, and forward-looking
14 solution consistent with Cleco Power's long-term system planning objectives.

15 **Q17: WHAT TRANSMISSION PLANNING ASSESSMENTS DID CLECO POWER**
16 **UNDERTAKE IN CONNECTION WITH THE PROJECT?**

17 **A:** Cleco Power performed transmission planning assessments that included steady state,
18 voltage, and other reliability analyses to identify the transmission facilities necessary to
19 reliably serve the Project. These assessments evaluated system performance under normal
20 operating conditions and reasonable contingency scenarios to ensure continued compliance
21 with applicable reliability standards and to maintain reliable service to existing customers

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1 as the Project is added to the system.⁴ The analyses were conducted consistent with
2 applicable NERC reliability standards and Cleco Power's transmission planning process
3 and considered thermal loading, voltage performance, and overall system operability
4 across relevant operating conditions. Through this process, Cleco Power identified the
5 transmission configuration required to reliably integrate the Project—the Project
6 Transmission Upgrades—and confirmed that the proposed facilities represent a prudent,
7 technically sound solution aligned with the Company's long-term transmission planning
8 objectives. Given the magnitude of the Project, Cleco Power also considered a broader
9 range of operating conditions and system impacts to confirm that the transmission system
10 could reliably serve the Project without adversely affecting existing customers or other
11 users of the Company's transmission system. Overall, the assessments were thorough,
12 followed established planning practices, and were consistent with sound engineering
13 judgment and prudent utility planning principles. As I previously stated, MISO will also
14 review the Project Transmission Upgrades planned by the Company to interconnect the
15 Project through MISO's EPR process, which should be occurring given the Company's
16 May 29, 2026, submission to MISO.

17 **Q18: WHY ARE THE PROPOSED PROJECT TRANSMISSION UPGRADES**
18 **DISCUSSED BY MR. JENKINS THE OPTIMAL SOLUTION TO MEET THE**
19 **RELIABILITY AND SPEED-TO-MARKET REQUIREMENTS OF THE**
20 **CUSTOMER?**

⁴ See Exhibit CRT-1, Peninsula 430 MW Project Load Addition Customer Study. Exhibit CRT-1 contains Highly Sensitive Protected Materials ("HSPM").

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1 **A:** The proposed Project Transmission Upgrades described by Mr. Jenkins are the optimal
2 solution because they will provide a reliable and timely means of serving the Project, while
3 also protecting existing customers and supporting Cleco Power's long-term system needs.
4 The planned transmission facilities needed to interconnect the Project will satisfy system
5 reliability requirements as well as the Customer's speed-to-market requirements using
6 proven infrastructure. The planned transmission infrastructure needed to interconnect the
7 Project avoids unnecessary or duplicative investments, while being fully funded by the
8 Customer through Contribution in Aid of Construction ("CIAC") payments, ensuring that
9 the proposed facilities are placed in service with no cost responsibility borne by Cleco
10 Power's other customers or users of the transmission system. Company witnesses Austin
11 Finn and Vincent Sipowicz discuss the various terms of the ESA, with the Customer and
12 the provisions relevant to the CIAC payments.

13 **Q19: HOW WILL CLECO POWER INCORPORATE THE PROJECT INTO ITS**
14 **EMERGENCY LOAD-SHED PLANS?**

15 **A:** Cleco Power will incorporate the Project's load into its emergency load-shed planning in a
16 manner consistent with applicable reliability standards, established operating procedures,
17 and system conditions at the time of an emergency. Cleco Power will coordinate across its
18 operations, transmission, and generation functions to ensure that the Project is
19 appropriately reflected in emergency protocols, including load-shedding and
20 demand-reduction actions implemented to preserve system integrity.
21 The treatment of the Project during emergencies or other abnormal conditions will be
22 implemented in a manner consistent with certain terms of the ESA. The ESA and related
23 agreements establish the operational framework governing how the Project is integrated

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1 into Cleco Power's system and addressed during emergencies and other abnormal
2 circumstances. Consistent with that framework, the specific actions taken during an
3 emergency will depend on the nature and location of the emergency event and will be
4 executed in accordance with Cleco Power's standard emergency procedures and applicable
5 regulatory requirements, ensuring that system reliability is maintained while also
6 protecting existing customers.

7 **Q20: HOW WILL THE PROJECT BE IMPACTED DURING AN EMERGENCY OR**
8 **OTHER ABNORMAL EVENT?**

9 **A:** The impact to the Project during an emergency or other abnormal event will depend on the
10 nature, severity, and location of the event affecting Cleco Power's system as well as the
11 larger MISO transmission system. Certain emergencies or other abnormal conditions may
12 have little or no impact on the Customer, while others may require temporary reductions
13 in service, up to a full curtailment, to preserve system integrity and maintain reliable
14 service for the broader system.

15 Consistent with the terms of the ESA, the Customer's facility will be treated in accordance
16 with Cleco Power's established emergency procedures and applicable reliability
17 requirements, including emergency load-shed protocols, when necessary. These
18 procedures are designed to balance system reliability and safety considerations while
19 minimizing the duration and scope of any impacts, and to ensure that emergency actions
20 are implemented in a fair and non-discriminatory manner consistent with how similarly
21 situated loads are treated.

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**Q21: IS THE COMPANY AWARE OF NEW NERC REQUIREMENTS AND
GUIDELINES RELATED TO LARGE LOADS AND THE NEED TO MAINTAIN
GRID RELIABILITY?**

A: Yes. The Company is aware that NERC issued a Level 3 Alert on May 4, 2026, which outlines certain actions that must be taken to address potential risks posed by existing and new “computational loads” interacting with the bulk power system.⁵ NERC has also issued non-binding guidelines⁶ and has indicated that it plans to update its formal Reliability Standards to address new large loads like data centers.⁷ The Company will continue to monitor NERC’s and MISO’s efforts in this area to ensure that Cleco Power’s operations and infrastructure will be in compliance with any future requirements that may affect service to the Project.

**Q22: WHAT HAS YOUR TEAM’S LONG-TERM PLANNING ANALYSIS SHOWN
REGARDING HOW THE NEW TRANSMISSION NEEDED FOR THE PROJECT
WILL IMPACT LOAD SERVING CAPABILITY IN CLECO POWER’S
FOOTPRINT?**

A: Cleco Power’s long-term transmission planning analysis shows that the proposed Project Transmission Upgrades will reliably serve the Project. The analysis indicates that the

⁵ See NERC, *Essential Action to Industry: Computational Load Modeling, Studies, Instrumentation, Commissioning, Operations, Protection, and Control* (May 4, 2026), at <https://www.nerc.com/globalassets/programs/bpsa/alerts/level-3-computational-load-alert.pdf>. The alert notes that NERC is currently working to create a “Computational Load Entity” registration that would include loads that are 20 MW and greater, that are connected at 60 kV and higher, and that contain more than 1 MW of information technology (“IT”) load.

⁶ See NERC, *Risk Mitigation for Emerging Large Loads: Large Loads Working Group Reliability Guideline* (May 2026), at https://www.nerc.com/globalassets/our-work/guidelines/reliability/RG_Risk-Mitigation-For-Emerging-Large-Loads.pdf.

⁷ See NERC, *NERC Issues Level 3 Alert, Reliability Guideline Focused on Large Load Challenges* (May 4, 2026), at <https://www.nerc.com/newsroom/nerc-issues-level-3-alert-reliability-guideline-focused-on-large-load-challenges>.

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1 Project Transmission Upgrades will provide sufficient capacity and operational flexibility
2 to accommodate the Project's load without degrading reliability for existing customers.
3 Building new transmission infrastructure to serve the Project will improve the robustness
4 and durability of Cleco Power's transmission system in the immediate area, enabling the
5 Company to meet evolving load requirements while also maintaining reliable service on a
6 long-term basis.

7 **Q23: WHAT OTHER TRANSMISSION SOLUTIONS DID CLECO POWER**
8 **CONSIDER?**

9 **A:** The Company evaluated alternative transmission lines within close geographic proximity
10 to the Project, including an additional source line to the Project's planned substation from
11 other 230 kV transmission lines like Rodemacher-to-Hineston or Rodemacher-to-
12 Sherwood. Given the Project's location, its proximity to existing generation, and the speed-
13 to-market required by the Customer, the proposed solution leveraging existing 230 kV
14 infrastructure and the Rodemacher Substation provides the optimal solution, meeting the
15 needs of the Customer at the lowest reasonable cost.

16 **Q24: DID CLECO POWER UNDERTAKE A COST-BENEFIT ANALYSIS FOR EACH**
17 **POTENTIAL TRANSMISSION SOLUTION?**

18 **A:** No, and I would add it is not customary to perform a cost-benefit or similar type of analysis
19 once a solution is identified that achieves the Company's planning objectives at a
20 reasonable cost. Cleco Power evaluated potential transmission solutions for the Project
21 and selected the infrastructure that could meet the Customer's timeline, support reliability
22 in the area, and provide operational flexibility at a reasonable cost. Note again that the
23 Customer has agreed to and will bear all interconnection costs via CIAC payments.

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**Q25: HOW ARE THE PROPOSED PROJECT TRANSMISSION UPGRADES
CLASSIFIED UNDER THE MISO TARIFF?**

A: Cleco Power expects that the proposed transmission lines, the 230 kV portion of the new Peninsula Substation, and substation upgrades at Rodemacher and Rapides would be classified as Other-Load Growth.

**Q26: HOW WILL THE COST OF THE PROPOSED PROJECT TRANSMISSION
UPGRADES BE ALLOCATED UNDER THE MISO TARIFF?**

A: As Mr. Finn and Mr. Sipowicz discuss in more detail in their respective direct testimonies, the costs of the Project Transmission Upgrades to interconnect the Project will be entirely funded by the Customer's CIAC payments and, as such, will not be recovered from other customers or other users of the Company's transmission system.

**Q27: WILL THE PROPOSED PROJECT TRANSMISSION UPGRADES SUPPLANT
OTHER TRANSMISSION PROJECTS NEEDED TO IMPROVE CLECO
POWER'S TRANSMISSION SYSTEM RELIABILITY NOW OR IN THE
FUTURE?**

A: No. The proposed Project Transmission Upgrades described by Mr. Jenkins are not intended to supplant other transmission projects needed to maintain or improve Cleco Power's system reliability but rather to address the specific reliability and operational needs associated with interconnecting and serving the Project.

**Q28: IS COMMISSION APPROVAL NECESSARY TO CONSTRUCT THE PROPOSED
PROJECT TRANSMISSION UPGRADES?**

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A: No. Company witness D. Andrew Owens discusses applicable Commission General Orders and describes why the Project Transmission Upgrades, for which the Customer will pay the full costs, are exempt from the Commission's Transmission Siting Order.⁸

Q29: IS CLECO POWER SEEKING CERTIFICATION OF THE PROJECT TRANSMISSION UPGRADES IN THIS APPLICATION?

A: No. However, Cleco Power is seeking Commission affirmation that the Project Transmission Upgrades are exempt under the Transmission Siting Order, which Mr. Owens discusses further in his direct testimony.

IV. TRANSMISSION PLANNING FOR GENERATION

Q30: DOES THE MISO GENERATOR INTERCONNECTION PROCESS DIFFER FROM TRANSMISSION PLANNING FOR NEW LOAD IN MISO?

A: Yes. MISO has several processes for submitting, reviewing, and ultimately approving transmission projects that interconnect new generators. As discussed in this section and as covered by Company witness Richard Leon Sharp in his direct testimony, the Company is pursuing MISO's Expedited Resource Addition Study ("ERAS") for Network Resource Interconnection Service ("NRIS") for the proposed CCGT generator.⁹ The Company anticipates that MISO will provide results from the ERAS process modeling in early 2027. Mr. Sharp addresses the MISO ERAS process in more detail including the anticipated timing of the Company executing a Generator Interconnection Agreement ("GIA"). From an evaluation perspective, MISO considers all generator interconnection requests in

⁸ LPSC General Order in Docket No. R-36199 (September 10, 2024); *In re: Review and Possible Modification of the Commission's General Order dated October 10, 2013 Governing Transmission Certification and General Siting* (the "Transmission Siting Order"); Attachment A, at p. 9 Exemptions.

⁹ Cleco Power submitted the proposed 756 MW CCGT generator into MISO's ERAS process on September 19, 2025, as Project Number E0048.

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1 coordination with affected MISO TOs and includes existing and pending generator
2 interconnection requests across all of MISO dating back to 2019 through 2025. By
3 comparison, when the Company evaluates a new large load and submits proposed
4 transmission solutions to MISO via the EPR process, the Company and MISO are not
5 solving for MISO systemwide solutions that are directly impacted by the generator
6 interconnection queue and contiguous system conditions and requirements (*e.g.*, seams
7 analysis with adjacent wholesale markets).

8 **Q31: HOW DID CLECO POWER DETERMINE THAT NEW GENERATION IS**
9 **NEEDED TO RELIABLY SERVE THE CUSTOMER AND THE COMPANY'S**
10 **OTHER CUSTOMERS?**

11 **A:** Mr. Sharp's direct testimony discusses the Company's long-term planning and current IRP
12 process, while Mr. Breedlove discusses the Company's aging generation fleet and the need
13 to mitigate near- and long-term risks. From the transmission planning perspective, the
14 Company looked at several options to interconnect and serve the Customer's load with new
15 transmission infrastructure given the Project's size and expected operating characteristics.
16 Given existing customer load and anticipated growth, along with the aging generation fleet
17 issues discussed by Mr. Breedlove, Mr. Sharp describes why new generation is needed that
18 can provide dependable capacity, sustained energy output, and operational flexibility to
19 respond to system conditions within Central Louisiana.

20 As discussed further by Mr. Sharp and Mr. Breedlove, the proposed CCGT generator is
21 well suited to meet the Company's long-term needs, because a CCGT generator can provide
22 efficient baseload energy, load-following capability, and essential reliability attributes,
23 including reactive power support and system inertia. As Mr. Sharp explains, Cleco Power's

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1 Resource Planning team evaluated available resource options, including other
2 technologies, and determined that a CCGT generator best aligns with Cleco Power's
3 long-term needs. As discussed further by Mr. Sharp and Mr. Breedlove, Cleco Power's
4 long-term plan includes retirement of Nesbitt 1 and Rodemacher 2, both of which are
5 located at the Brame Energy Center. It is my understanding that, at some point, the
6 Company may construct new generation at the Brame Energy Center to replace generators
7 that are planned to be retired in the next 10 years. With the potential replacement of two
8 units at the Brame Energy Center by a single new unit, the total number of generators at
9 the site would be reduced from three to two. When the Company plans the system under
10 this P6 contingency scenario, the loss of both generators at the Brame Energy Center,
11 without additional generation in Central Louisiana, could result in borderline voltage and
12 line loading issues under peak conditions. This scenario would affect the Company's
13 ability to serve load growth in the area and drives the need for additional new generation,
14 which the Company proposes to address by constructing the proposed CCGT generator.

15 **Q32: ARE THERE TIMING CONSTRAINTS ASSOCIATED WITH CONSTRUCTING**
16 **NEW GENERATION?**

17 **A:** Yes. Mr. Breedlove and Mr. Long discuss the various challenges involved with securing
18 equipment and vendors to construct new generation in their respective direct testimonies.

19 **Q33: HOW DOES CLECO POWER PLAN TO SERVE THE CUSTOMER'S LOAD**
20 **WHILE NEW GENERATION IS BEING CONSTRUCTED?**

21 **A:** The current planned Project Transmission Upgrades are discussed in detail by Mr. Jenkins.
22 The Company does not expect to experience any local reliability or other issues in serving
23 the Customer's load while the proposed CCGT generator is being constructed.

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1 Additionally, Mr. Sharp discusses a capacity agreement to meet the Project's needs while
2 the proposed CCGT generator is being constructed.

3 **Q34: HOW DOES CLECO POWER PLAN TO MANAGE ITS EXISTING**
4 **GENERATION RESOURCES PRIOR TO CONSTRUCTION OF NEW**
5 **GENERATION TO AVOID SYSTEM RELIABILITY CONCERNS?**

6 **A:** As Mr. Breedlove discusses, while the proposed CCGT generator is being constructed,
7 Cleco Power will manage its existing generation resources through good utility practices,
8 disciplined outage planning, and coordinated system oversight to avoid reliability
9 concerns. For example, Cleco Power will continue to schedule maintenance and outages
10 in a manner that preserves system operability, considering forecasted load, available
11 resources, and transmission capabilities. In parallel, Cleco Power has undertaken extensive
12 transmission reliability studies to confirm that the system configuration and proposed
13 transmission infrastructure provide flexibility to serve the Project, while also sufficiently
14 protecting existing customers from adverse reliability events.¹⁰ These measures will help
15 ensure that Cleco Power can reliably manage its system using established planning
16 practices and sound engineering judgment during the timeframe when the proposed CCGT
17 generator is being constructed.

18 **Q35: HAVE ANY TRANSMISSION INTERCONNECTION COSTS BEEN IDENTIFIED**
19 **FOR THE PROPOSED CCGT GENERATOR?**

20 **A:** Yes. As I noted earlier, the Company's proposed CCGT generator will be interconnected
21 at a new substation that will connect to the Peninsula-to-Rapides 230 kV line, which

¹⁰ See Exhibit CRT-1 (HSPM).

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1 crosses the site where the CCGT generator will be located. As discussed further by Mr.
2 Breedlove and Mr. Sharp, the Company initiated MISO's review of the new generator
3 through ERAS in September 2025. MISO's ERAS process will identify any transmission
4 upgrades needed along with the associated costs for NRIS. Cleco Powers's internal
5 preliminary analysis¹¹ estimated the cost of the new substation as well as directly related
6 costs to interconnect the proposed CCGT generator at approximately [REDACTED], which
7 includes contingency and estimated Allowance for Funds Using During Construction
8 ("AFUDC"). These generation interconnection upgrades include the following:

- 9 • [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]

16 **Q36: DOES THE COMPANY HAVE AN ESTIMATE OF WHAT MISO MAY**
17 **DETERMINE REGARDING TRANSMISSION SYSTEM UPGRADES FOR THE**
18 **NEW CCGT GENERATOR TO RECEIVE NRIS?**

19 **A.** No. As I noted earlier, the Company expects MISO to release the results of its ERAS
20 modeling in early 2027. That said, the Company has identified one potential upgrade that
21 may be triggered, [REDACTED]

¹¹ See Exhibit CRT-2 (HSPM).

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1 [REDACTED]. If MISO identifies this project as a needed solution as part of its
2 ERAS review, [REDACTED]

3 [REDACTED]
4 [REDACTED]
5 [REDACTED]. As far as other potential
6 network upgrades, there are too many different scenarios as well as potential solutions that
7 MISO will consider in its modeling for the Company to estimate the entirety of possible
8 network upgrade costs, if any. Once the ERAS study results are available, the Company
9 will work with MISO and other affected TOs, if there are any, to mitigate the projected
10 network upgrade costs, which may affect the estimated costs that I just described.

11 **Q37: IS THE COMPANY SEEKING COMMISSION CERTIFICATION OF THE**
12 **GENERATOR INTERCONNECTION AND ASSOCIATED TRANSMISSION**
13 **NETWORK UPGRADE COSTS IN THIS APPLICATION?**

14 **A:** The Company is only seeking approval in its Application of the estimated [REDACTED]
15 that the Company has estimated for the direct and related costs of the substation needed to
16 interconnect the new CCGT generator. As discussed in Mr. Breedlove's direct testimony,
17 the Company's total estimated costs for the proposed CCGT generator reflects the
18 estimated [REDACTED] in generator interconnection costs. It is my understanding that
19 those estimated costs are also included in the revenue requirements developed by Company
20 witness Christina C. McDowell. Mr. Owens' direct testimony outlines the Company's
21 certification request for the new substation needed to interconnect the CCGT generator and
22 the associated costs.

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1 Because the Company does not yet know what network upgrades MISO may identify in
2 the ERAS process modeling, the Company's Application is not seeking approval for those
3 yet-to-be-known costs. In the event any of those network upgrades, which the Company
4 will attempt to mitigate, trigger the need for LPSC approval under the Transmission Siting
5 Order, the Company will seek such certification in a different proceeding.

6 **V. CONCLUSION**

7 **Q38: PLEASE SUMMARIZE YOUR TESTIMONY.**

8 **A:** The key points of my direct testimony are as follows:

- 9 • Cleco Power conducted a comprehensive and meticulous evaluation of potential
10 solutions to serve the Project, adhering to applicable NERC standards, MISO tariff and
11 processes, and established engineering, planning, and economic principles to address
12 the Customer's load requirements, reliability, and the Customer's timeline, as well as
13 reliability for Cleco Power's existing customers.
- 14 • The Project Transmission Upgrades necessary for the Company to provide electric
15 service to the Project will be fully funded by the Customer via CIAC payments, with
16 no cost recovery from other customers or other users of the Company's transmission
17 system.
- 18 • Consistent with the Company's long-term planning for reliability, affordability, and
19 sustainability for its customers, the proposed CCGT generator is required to reliably
20 serve existing and future customers.

21 **Q39: DOES THIS CONCLUDE YOUR TESTIMONY?**

22 **A:** Yes, at this time.

STATE OF LOUISIANA

PARISH OF RAPIDES

AFFIDAVIT

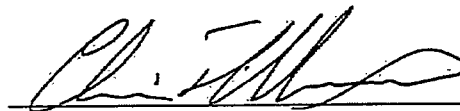
BE IT KNOWN, that before me, the undersigned Notary Public, duly commissioned and qualified for the state and parish/county aforesaid, personally came and appeared:

CHRISTOPHER THIBODEAUX

("Affiant"), who after being duly sworn did depose and say:

1. Affiant has prepared Direct Testimony on behalf of Cleco Power LLC in support of the Application of Cleco Power LLC for Authorization of: (I) Site Specific Contract for Large Load Customer; (II) Bridge Capacity Contract; (III) Construction of New Transmission Interconnection; (IV) Construction of New Generation; (V) Associated Waivers; and (VI) Expedited Treatment.

2. To the best of Affiant's knowledge, information, and belief, Affiant's Direct Testimony is true, accurate, and complete in all material respects as of the date of this Affidavit.



Christopher Thibodeaux
Cleco Power LLC
2030 Donahue Ferry Road
Pineville, LA 71360

SWORN TO AND SUBSCRIBED
BEFORE ME, NOTARY PUBLIC,
THIS 29th DAY OF JUNE 2026.



Catina L. Ivey
NOTARY PUBLIC

BAR ROLL/NOTARY ID NO.: 51231
MY COMMISSION EXPIRES: at dawn

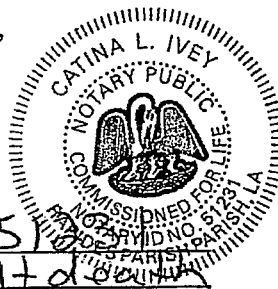


EXHIBIT CRT-1

PENINSULA 430 MW PROJECT LOAD ADDITION CUSTOMER STUDY

REDACTED TO OMIT CONFIDENTIAL,
COMPETITIVELY SENSITIVE, TRADE SECRET,
AND PROPRIETARY INFORMATION PURSUANT
TO RULE 12.1 OF THE COMMISSION'S
RULES OF PRACTICE AND PROCEDURE

EXHIBIT CRT-2

GENERATION STUDY

REDACTED TO OMIT CONFIDENTIAL,
COMPETITIVELY SENSITIVE, TRADE SECRET,
AND PROPRIETARY INFORMATION PURSUANT
TO RULE 12.1 OF THE COMMISSION'S
RULES OF PRACTICE AND PROCEDURE