

LOUISIANA PUBLIC SERVICE COMMISSION

DOCKET NO. R-36241

LOUISIANA PUBLIC SERVICE COMMISSION, EX PARTE

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*In re: Rulemaking to revise the Commission's Rules of Practice and Procedure.*

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**NOTICE OF FINAL PROPOSED RULES FOR PART 2- "PARTIES" OF  
THE COMMISSION'S RULES OF PRACTICE AND PROCEDURE**

The instant rulemaking was initiated in January 2022 as a result of Louisiana Public Service Commission ("LPSC" or "Commission") Staff recognizing an imminent need to rectify issues surrounding service and in particular Rule 7 of the Commission's Rules of Practice and Procedure ("Rules"). In addition to this imminent need, Staff also determined the need for a complete review and revision of the Rules given it had been almost 20 years they were last updated. Since that time, Staff has been working to review and substantially revise the Rules to not only clarify specific components, but also to ensure the Rules are up-to-date.

At the Commission's April 15, 2026 Business and Executive ("B&E") Session, the Commission directed Staff to implement an interim Rule 10a for mandatory disclosure of foreign and outside funding sources by intervenors in Commission proceedings.<sup>1</sup> Specifically, Staff was directed to:

[P]repare, for consideration at the earliest practicable B&E, but no later than June, a proposed Interim Rule 10a, or other appropriate placement in the Commission's Rules of Practice and Procedure, that would require all intervenors in every docket, proceeding, or matter before the Commission to publicly disclose and certify all sources of funding for their organization that originate, directly or indirectly, from individuals or entities located outside of Louisiana, including without limitation the following foreign nations: the People's Republic of China (PRC), the Democratic People's Republic of Korea (DPRK), the Russian Federation, and the Islamic Republic of Iran (or any entities, agents, or intermediaries controlled by or

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<sup>1</sup> The directive passed 4:1 with Commissioner Lewis opposed.

substantially funded by those governments). The proposed rule shall apply to both existing and future intervenors and shall include, at a minimum:

- A requirement for a sworn affidavit or certification filed with every intervention pleading (and updated annually or upon any material change in funding);
- A statement of the percentage of annual funding from individuals or entities located or domiciled outside the state of Louisiana;
- Full disclosure of any grants, donations, contracts, or other financial support received, directly or indirectly, from the listed foreign nations or their state-linked entities during the preceding five (5) years;
- Identification of the ultimate source(s) of funds, including any pass-through foundations, nonprofits, or intermediaries;
- Public filing of the disclosure in the docket (subject to any narrowly tailored protections for truly proprietary non-funding information);
- A clear statement that failure to comply may result in denial or revocation of intervenor status, sanctions, or other remedies as determined by the Commission; and
- An effective date no later than sixty (60) days after adoption of any proposed rule.

Staff shall model this proposed disclosure requirement rule on analogous transparency provisions in Louisiana law (e.g., recent third-party litigation funding disclosure statutes) while tailoring the Commission's rule to the administrative context of Commission proceedings. Further, any proposed rule should emphasize that this is a transparency measure to protect the integrity of the Commission's regulatory process, Louisiana ratepayers, and the public interest, not a bar to participation.

In proposing an Interim Rule pursuant to this directive, Staff shall also include any such proposed rule within Staff's proposed revisions to the Commission's Rules of Practice and Procedure currently being reviewed in Docket No. R-36241 in order to allow stakeholder comment.

This Directive is issued in furtherance of the Commission's mission and the broader goal of achieving Louisiana Energy Dominance.

Staff is still working on a complete revision of the Rules, but given the Commission's directive at the April 2026 B&E, Staff files this Notice of Final Proposed Rules to address not only the Commission's April 2026 directive regarding an Intervenor funding disclosure, but also the entire

section of the Rules on parties in Commission proceedings - Part 2, which is attached hereto as Attachment A (clean version) and Attachment B (redline version). **Staff requests comments on the attached proposed rules, including specific redline proposals no later than September 23, 2026. Staff anticipates these Final Proposed Rules-Part 2 will be considered at the Commission's October 2026 Business and Executive Session.**

### **COMMISSION JURISDICTION**

Article IV, Section 21 (B) of the Louisiana Constitution of 1974 grants the LPSC constitutional jurisdiction over common carriers, and specifically provides as follows:

“The [public service] commission shall regulate all common carriers and public utilities and have such other regulatory authority as provided by law. It shall adopt and enforce reasonable rules, regulations, and procedures necessary for the discharge of its duties, and shall have other powers and perform other duties as provided by law.”

The Commission's power is as complete in every respect as the regulatory power that would have been vested in the legislature absent Article IV, Section 21. Consequently, “the Commission is vested explicitly and implicitly with the constitutional power necessary to the performance of its function of regulating common carriers and public utilities through the adoption and enforcement of reasonable rules and orders requisite to these purposes.” *Louisiana Consumers' League Inc. v. LPSC*, 351 So.2d 128, 131 (La. 1977); *Central Louisiana Electric Co. v. LPSC*, 373 So. 2d 123, 128 (La. 1979); *South Central Bell Telephone Co. v. LPSC*, 412 So. 2d 1069, 1070 (La. 1982).

### **OVERVIEW OF PART 2 REVISIONS**

As indicated in the Commission's April 15, 2026 directive, the funding disclosure is to further the Commission's mission to impartially, equitably, and efficiently regulate the rates and services of public utilities and common carriers within Louisiana, as well as strive to maintain existing

business and industry, promote economic development, and protect consumers within the state. The Commission's directive also indicated the funding disclosure requirement was for the broader goal of achieving Louisiana Energy Dominance. Based upon the Commission's directive, Staff conducted research on funding disclosure mandates, had meetings/discussions with several intervenors, proposed two sets of draft rules, received and considered comments thereon, and now issues these Final Proposed Rules for final comment and revision.

As Staff began revising Part 2, it became clear the entire section needed to be revised to portray the Commission's long-standing policies related to the various parties within Commission proceedings. In prior comments, the majority of intervenors tended to agree with Staff's assessment. While the Commission directed a change to Rule 10a related to funding disclosures, such rule is being proposed as Rule 11 due to general restructuring. Based upon comments received, Staff further reorganized Part 2 to preserve rules 9-11 as the Commission's rules that pertain to parties. This preservation of Part 2 also maintains the Commission's current well-known rule 12.1. The restructuring also includes definitions of the various parties to a Commission proceeding, including the respective roles and level of participation.

While the attached Final Proposed Rules ("Final Proposed Rules") have been revised, Staff maintains that the majority of changes to rules 9-10 throughout this process codify the Commission's long-standing practice for the various parties in Commission proceedings. Further, the Final Proposed Rules include only one additional minor change to Rule 9 to clarify a point raised by 1803 Electric Cooperative regarding an interested party's right to discovery. The substantive changes contained in the Final Proposed Rules still relate to the funding disclosure requirement for intervenors, which is still proposed as Rule 11. Staff submits the Final Proposed Rules for additional comment as proposed Rule 11 has been revised from the last iteration

commented on by intervenors. Given Staff's revisions to Rule 11, Staff seeks one last round of comments and proposed revisions for any additional clarification needed to the proposed funding disclosure rules. For clarification, Staff is seeking comments on Rule 11 alone as no revisions were made to Rules 9-10.

### **INTERVENOR COMMENTS & STAFF'S ANALYSIS**

Staff filed its first *Notice of Proposed Rules for Part 2-Parties* on May 22, 2026 seeking comments thereon ("May 26, 2026 Proposed Rules"). Comments were timely filed by: Southwestern Electric Power Company ("SWEPCO"); Entergy Louisiana, LLC ("ELL"); Alliance for Affordable Energy ("AAE"); Environmental Defense Fund ("EDF"); CTIA-the Wireless Association ("CTIA"); Association of Louisiana Electric Cooperatives, Inc. ("ALEC"); Cleco Power ("Cleco Power"); Southern Energy Renewable Energy Association ("SERA"); Louisiana Energy Users Group ("LEUG"); and Sierra Club.<sup>2</sup>

After reviewing all comments filed, Staff filed its second *Notice of Proposed Rules for Part 2 – "Parties"* on July 27, 2026 providing a revised draft proposed rule that addressed a majority of the comments, and clarifications, filed in response to Staff's May 22, 2026 Proposed Rules ("July 27, 2026 Proposed Rules"). Comments were timely filed by: Cleco Power; CTIA; 1803 Electric Cooperative, Inc. ("1803"); EDF; ELL; SWEPCO; AAE; Sierra Club; ALEC; LEUG; and the Pelican Institute for Public Policy ("Pelican Institute").<sup>3</sup>

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<sup>2</sup> Only a portion of Sierra Club's comments were accepted by the Commission given the party's failure to adhere to the Commission's Rules of Practice and Procedure regarding fax filings.

<sup>3</sup> Concurrently with its comments, the Pelican Institute for Public Policy also requested to intervene out of time, which was subsequently granted on August 12, 2026. As such, Staff did review and consider the Pelican Institute's comments and proposed redlines to the July 27, 2026 Proposed Rules.

ELL, SWEPCO, LEUG, and CTIA all provided comments in response to Staff's July 27, 2026 Proposed Rules indicating no additional revisions were necessary. Cleco Power, AAE, ALEC, 1803, EDF, Sierra Club, and the Pelican Institute all filed substantive comments.

#### Cleco Power Comments

Cleco Power maintained its position submitted in its original comments that all jurisdictional utilities should be exempt from the proposed Rule 11. Cleco Power reiterated that given jurisdictional utilities already provide the Commission access to its funding information via various Commission proceedings and reporting requirements, there is no additional information a jurisdictional utility can submit that the Commission is not already privy to. Staff is not persuaded by Cleco Power's comments because, as discussed more fully below, the Final Proposed Rules seek different financial information than what is traditionally requested by the Commission from its jurisdictional utilities. Therefore, proposed Rule 11 is applicable to all intervenors, even jurisdictional utilities seeking to intervene in a Commission proceeding. Staff also reiterates that for the majority of jurisdictional utilities, if not all under the Proposed Final Rules, the disclosure should be simple – none.

#### AAE, ALEC, and 1803 Comments

The AAE, ALEC, and 1803 all had some clarifications and minor modifications for Staff to consider, such as the AAE requesting that the threshold for publicly traded companies to disclose funding should be reduced from 10% to 5% ownership of shares. Staff does not want to diminish these comments as they would have been considered had Staff maintained the structure of the funding disclosure rules as proposed in the July 27, 2026 Proposed Rules; however, given the Final Proposed Rules are considerably different, the majority of the comments provided by these

Intervenors are no longer applicable to the Final Proposed Rules. Should AAE, ALEC, or 1803 disagree with Staff's assessment, Staff requests those clarifications and/or modifications be raised in this round of comments.

#### EDF, Sierra Club, and Pelican Institute Comments

The EDF, Sierra Club, and the Pelican Institute all raised concerns with proposed Rule 11 in the July 27, 2026 Proposed Rules arguing that components of the funding disclosure requirements did not overcome constitutional barriers related to freedom of association. Specifically, all three Intervenors opined that the requirement to disclose a percentage breakdown of funding sources from within Louisiana versus outside Louisiana could not overcome exacting scrutiny to link the disclosure to a sufficiently important government interest.

The EDF raised an interesting point regarding proposed Rule 11 in that, as written, the proposed rule requires sweeping, complex, and burdensome disclosure of funding regardless of whether those funds bear any relationship to a Commission proceeding.<sup>4</sup> The EDF also pointed out that the "geographic source of an organization's general funding does not necessarily inform whether its positions reflect the interest of Louisiana residents or advance the Commission's stated goals of 'Louisiana Energy Dominance' ..."<sup>5</sup> These points, coupled with the Pelican Institute's comment regarding "Louisiana energy dominance must align with American energy dominance"<sup>6</sup> assisted in Staff's review and revisions to the Final Proposed Rules as presented herein.

When determining the constitutionality of a regulation connected to First Amendment rights, the U.S. Supreme Court has applied an exacting scrutiny standard, which requires a substantial relation between the requirement (here funding disclosures) and a sufficiently important

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<sup>4</sup> EDF comments, filed August 10, 2026, pg.3.

<sup>5</sup> *Id.*

<sup>6</sup> Pelican Institute comments, filed August 10, 2026, pg.1.

governmental interest (understanding what out-of-state policies or influences are involved in Commission proceedings and whether those influences have the same interest as Louisiana ratepayers). The regulation of utilities is one of the most important functions traditionally associated with the police power of the States. *Southern Union Co. v. Missouri Public Service Com'n*, 289 F. 3d 503 (2002) citing *Arkansas Elec. Coop. v. Arkansas Pub. Serv. Comm'n*, 461 U.S. 375, 377, 103 S.Ct. 1905, 76 L.Ed.2d 1 (1983). The Commission is allotted this function within Louisiana, and the Proposed Final Rules establish a narrowly tailored disclosure requirement that balances the functions and interest of the Commission knowing the source(s) behind any proponent or opponent while providing anonymity to any supporters of a proponent or opponent in a Commission proceeding.

As indicated in the Final Proposed Rules, the Commission's constitutional duty (police powers) in regulating common carriers and public utilities is to balance the interest of said jurisdictional entities alongside the interest of Louisiana ratepayers. Therefore, when making Commission determinations, the Commission's focus should be on the views of its citizens and entities that further those views. In EDF's comments, it cautions against conflating out-of-state funding with out-of-state viewpoints, and Staff agrees. The Final Rules do not restrict, nor prohibit any out-of-state funding or viewpoints, but simply provides transparency to influences that may be present with respect to positions or arguments of intervenors in Commission proceedings with the goal of the Commission understanding those that differ from Louisiana residents' viewpoints, or that attempt to upend the integrity of the Commission's adjudicative proceedings. Ultimately, it is the Commission who reviews all the information provided, weighs said information, and makes a public interest determination based upon said information – including information related to the underlying policies, positions, influences, and/or biases of all proponents and opponents.

As should be apparent in reviewing the Final Proposed Rules, Staff considered and used a decent portion of the Pelican Institute's proposed revisions in the current proposed Rule 11. Staff did work to streamline the proposed revisions in the Pelican Institute's comments as some, in Staff's opinion, while relevant to other funding disclosure requirements, were not applicable to funding disclosure requirements at the Commission. Staff also attempted to draft rules that were applicable to all intervenors equally, as such, the current proposed Rule 11 includes one funding disclosure certification that is applicable to any person, entity, civic or trade association, non-profit organization, or jurisdictional utility that decides to intervene in a Commission proceeding.

### **CONCLUSION**

Staff files this Notice of Final Proposed Rules for Part 2-Parties of the Commission's Rules of Practice and Procedure in response to the Commission directive at the April 15, 2026 B&E. Based upon that directive, independent research, and comments/input received from intervenors, the Proposed Final Rules focus on clarification of long-standing Commission policies, as well as furthering the Commission's goal of transparency in Commission proceedings. It is important for intervenors to provide this transparency so that the Commission can understand the various policies, interests, and/or biases of all parties providing relevant information in a proceeding – both proponents and opponents. The Final Proposed Rules simply provide the terms on which all parties may participate as intervenors in Commission proceedings; it does not purport to regulate the internal affairs, governance, or operations of any intervenor beyond what is necessary to administer intervention in Commission proceedings.

Staff requests comments and proposed redlines to the attached Proposed Rule no later than Wednesday, September 23, 2026 in order to prepare final rules for the Commission's consideration at the October 2026 B&E.

Respectfully Submitted,



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### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the aforementioned has been served upon all parties of record, by email properly addressed, on this 9th day of September, 2026.



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