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LA Public Service Commission

Harry M. Barton Assistant General Counsel Entergy Services, LLC 504-576-2984 | hbarton@entergy.com 639 Loyola Avenue, New Orleans, LA 70113

October 11, 2023

VIA UPS OVERNIGHT DELIVERY

Brandon Frey, Secretary Louisiana Public Service Commission Galvez Building, 12th Floor 602 North Fifth Street Baton Rouge, LA 70802

> Re: Application of Entergy Louisiana, LLC for Approval of Regulatory Blueprint Necessary for Company to Strengthen the Electric Grid for State of Louisiana; Alternatively Captioned: Application for an increase in rates, whether through a Formula Rate Plan extension or rate review, and proposed revisions to certain fees assessed to customers (LPSC Docket No. U-36959)

Dear Mr. Frey:

On August 30, 2023, Entergy Louisiana, LLC ("ELL" or the "Company") submitted for filing its Application for Approval of Regulatory Blueprint Necessary for Company to Strengthen the Electric Grid for State of Louisiana supported by the Direct Testimony and Exhibits of Phillip R. May, Steven N. Benyard, Laura K. Beauchamp, Ryan E. O'Malley, Alyssa Maurice-Anderson, Elizabeth C. Ingram, Adrien M. McKenzie, Todd A. Shipman, Stacey L. Whaley, Chris E. Barrilleaux, Crystal K. Elbe, Matthew S. Klucher, Kenneth F. Gallagher, and Dane A. Watson. Contemporaneously with that filing, ELL requested that the notice (attached) of the Company's Application be published in the official state journal and in the official journal of each parish within the geographical area in which ELL serves retail customers. For reasons unknown to ELL, and despite the Company's timely submission of the notice, publication of the legal notice in one such journal did not occur within twenty (20) days of the filing of the Application. Accordingly, ELL respectfully requests that the matter be republished in the next LPSC Official Bulletin with a 15-day intervention period. ELL further suggests that, to avoid confusion, the bulletin entry contain language as follows (or words to similar effect):

(this application was already published but is being republished with a new 15-day intervention period to ensure proper notice to potential interested parties)

Should you have any questions, please do not hesitate to contact me.

Sincerely Harry M. Barton

HMB/lp Enclosures cc: Official Service List U-36959 (via electronic email)

NOTICE

Notice is hereby given, pursuant to Article IV, Section 21(D)(1) of the Louisiana Constitution, that on August 30, 2023, Entergy Louisiana, LLC ("ELL" or "the Company"), an electric public utility providing retail electric service to customers in fifty-eight (58) parishes of the State of Louisiana, filed with the Louisiana Public Service Commission ("LPSC" or "Commission"), pursuant to Article IV, Section 21(D)(3) of the Louisiana Constitution and Title 45, Section 1163.1 of the Louisiana Revised Statutes, its Application for Approval of Regulatory Blueprint Necessary for Company to Strengthen the Electric Grid for State of Louisiana. This filing is herein referred to as the "Application."

The purpose of the Company's Application is to position the Company to continue the work that it has been doing to upgrade and strengthen the electric grid so that it can provide resilient, reliable, sustainable, and affordable service to customers into the future. The Application introduces a **regulatory blueprint** necessary to support the most comprehensive grid strengthening efforts in Louisiana history. In it, ELL lays out what it is doing to improve reliability, make the grid more resilient in the face of extreme weather, and add clean, affordable sources of energy.

In its Application, ELL has prepared and submitted a Cost of Service study ("COS") as required by the Commission's Order No. U-35565. The COS is based on the test year period of January 1, 2022 through December 31, 2022, and reflects a request for a specific Return on Equity, certain pro forma adjustments to reflect capital additions to rate base, updated depreciation rates and other known and measurable changes through August 31, 2024. ELL has included a class cost of service in the COS; however, this study is only being provided as information to the Commission and the Company is not recommending that the Commission implement the COSsupported rates. The Company is instead recommending that its Rate Mitigation Proposal be implemented as a more customer-centric alternative in lieu of the COS-based results. The Rate Mitigation Proposal allows ELL to continue building for the future by presenting a regulatory blueprint that is more affordable for ELL's customers and provides more accountability to stakeholders and the Commission through annual rate reviews. The Rate Mitigation Proposal is designed to achieve an outcome for customers that maintains ELL's low rates while also maintaining the Company's financial health and good credit ratings and enabling the significant grid investments needed to power Louisiana's economy into the future.

Under ELL's Rate Mitigation Proposal, ELL is requesting authorization to implement an extended Formula Rate Plan ("FRP") for re-establishing rates on an annual basis that includes limited but necessary modifications. ELL estimates that its Rate Mitigation Proposal will result in a change in revenue requirement of *less than half* of the increase supported by the COS study. In addition to amending the FRP, ELL is proposing to reduce late, connection and reconnection fees currently assessed to customers, to reduce additional facilities charge rates, and to provide eligible low-income seniors with monthly discounts on their electric bill.

The Company also seeks to combine, modify, and/or withdraw certain rate schedules, and also proposes certain new rate class combinations and cost allocations. In particular, ELL proposes a new residential rate schedule, which is a combination of the legacy residential rate schedules.

Based on the COS, ELL's revenue requirement would increase by \$430 million. This would have the following estimated effect on typical monthly customer bills: an annualized typical monthly bill for Residential Service for a Legacy ELL customer for 1,000 kWh would increase roughly \$13.92 from \$126.02 to \$139.94 while an annualized typical monthly bill for Residential Service for a Legacy EGSL customer for 1,000 kWh would increase approximately \$20.28 from \$118.77 to \$139.05. An annualized typical monthly bill for Small General Service for a Legacy ELL customer for 1,500 kWh would decrease approximately \$3.10 from \$315.97 to \$312.87 while an annualized typical bill for Small General Service for a Legacy EGSL customer for 1,500 kWh would increase roughly \$0.85 from \$232.92 to \$233.77. A typical monthly bill for Large General Service for a Legacy ELL customer for 500 kW and 225,000 kWh would increase approximately \$1,007.35 from \$20,569.99 to \$21,577.34. A typical monthly bill for General Service for a Legacy EGSL customer for 500 kW and 255,500 kWh would increase approximately \$1,489.97 from \$20,152.55 to \$21,642.52.

As previously noted, the Company is not recommending the results of the COS study be implemented. ELL estimates its Rate Mitigation Proposal, if implemented as ELL recommends, would result in less than 50% of the change in rates resulting from the COS study. The Company proposes to accept lower rates, including a lower return on equity for its owners, in order to achieve an outcome for its customers that maintains ELL's low rates. The Rate Mitigation Proposal aims to keep residential rates below the national average during grid strengthening projects. ELL also is proposing to adhere to the most stringent reliability standards of any power provider in Louisiana, with financial penalties and customer credits for failing to meet pre-determined reliability goals. By assuring a more resilient, reliable and sustainable grid while maintaining affordability, the regulatory blueprint will boost economic development, creating jobs, investment and increased tax base for the benefit of customers, communities and the entire State of Louisiana.

If accepted by the Commission, the Company's blueprint will reduce the time and expense of a traditional rate case; keep in place an efficient FRP mechanism and improve it in ways that support ELL's effort to build a stronger, more reliable grid; and provide rate mitigation for customers.

For questions regarding ELL's filing please call the LPSC toll free at (800) 256-2397. Additionally, the public version of the Company's filing, including its attachments, may be viewed in the Records Division of the LPSC at the following address:

Records Division 602 North Fifth Street, 12th Floor Baton Rouge, Louisiana 70802 Telephone: (225) 342-3157

ENTERGY LOUISIANA, LLC

CERTIFICATE OF SERVICE LPSC Docket No. U-36959

I, the undersigned counsel, hereby certify that a copy of the above and foregoing has been served on the persons listed below by facsimile, by hand delivery, by electronic mail, or by depositing a copy of same with the United States Postal Service, postage prepaid, addressed as follows:

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New Orleans, Louisiana, this 11th day of October 2023.

HarryM. Barton