

BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION

APPLICATION OF CLECO )  
POWER LLC FOR CERTIFICATE )  
OF PUBLIC CONVENIENCE AND )  
NECESSITY FOR: (I) )  
AUTHORIZATION TO ENTER )  
INTO A PROPOSED POWER )  
PURCHASE AGREEMENT )  
BETWEEN DOLET HILLS SOLAR, )  
LLC AS SELLER AND CLECO ) DOCKET NO. U-\_\_\_\_  
POWER LLC AS BUYER; (II) )  
AUTHORIZATION TO RECOVER )  
IN ITS JURISDICTIONAL RATES )  
THE CHARGES THAT CLECO )  
POWER LLC PAYS UNDER THE )  
POWER PURCHASE )  
AGREEMENT; AND (III) )  
EXPEDITED TREATMENT )  
)

DIRECT TESTIMONY

OF

J. ROBERT CLEGHORN

ON BEHALF OF

CLECO POWER LLC

AUGUST 2, 2022

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

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**EXHIBITS**

<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>
JRC-1	Regulatory Proceedings

1                                    I.        **INTRODUCTION AND BACKGROUND**

2    **Q:     PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3    A:     My name is J. Robert Cleghorn. My business address is 2030 Donahue Ferry Road,  
4           Pineville, Louisiana, 71360. I am currently employed by Cleco Power LLC ("Cleco  
5           Power" or the "Company") and serve as Vice President - Regulatory Strategy.

6    **Q:     PLEASE DESCRIBE YOUR JOB RESPONSIBILITIES.**

7    A:     I am primarily responsible for coordinating the filings in various Cleco Power  
8           proceedings before the Louisiana Public Service Commission ("LPSC" or the  
9           "Commission"), as well as ensuring Cleco Power's compliance with applicable  
10          LPSC regulatory orders.

11          More specifically, my group prepares rate case filings and supporting  
12          documentation related to revenue requirements, and develops rates and charges  
13          used to calculate bills for Cleco Power's customers. I am responsible for ensuring  
14          cost of service studies adequately allocate cost causation to the various customer  
15          classes, and ensuring rates and charges collect the appropriate level of LPSC-  
16          authorized revenues on a just, reasonable, and not unduly discriminatory basis.

17          In coordination with numerous other departments, our group ensures that Cleco  
18          Power's monthly Environmental Adjustment Clause ("EAC") and Fuel Adjustment  
19          Clause ("FAC") factors, along with many other regular and ongoing compliance  
20          filings, are prepared and filed accurately and timely.

21          I provide guidance in pricing LPSC-jurisdictional site-specific contracts which  
22          meet Rate Impact Measure ("RIM") tests, thus ensuring that Cleco Power's other  
23          customers pay no more than they would have had the customer on a site-specific

1 rate not located in or remained in Cleco Power's service area. I further provide  
2 input in pricing Cleco Power's FERC-jurisdictional contracts. I commission and  
3 review various analytical studies necessary to support Cleco Power's initiatives  
4 requiring LPSC review and authorization. My group also provides input used in  
5 Cleco Power's integrated resource planning function.

6 **Q: PLEASE DESCRIBE YOUR PROFESSIONAL AND EDUCATIONAL**  
7 **HISTORY.**

8 **A:** I received a Bachelor of Business Administration Degree from Georgia Southern  
9 College in Statesboro, Georgia in 1981. After graduation, I went to work for  
10 Savannah Electric and Power Company and was employed there from April 1981  
11 through October 1987. During that time, I held positions in General Accounting,  
12 Plant Accounting, Corporate Planning, and Rates.

13 In 1987, I accepted a position with Cleco Power as a senior rate analyst and have  
14 held several positions during my tenure. In 1993, I received a Master's Degree in  
15 Business Administration from Northwestern State University in Natchitoches,  
16 Louisiana. In 1998, I became Manager - Market Planning and Analysis and then  
17 Manager - Regulatory Planning in 1999. I became General Manager - Regulatory  
18 Strategy in 2005. In 2012, Cleco Power's analytics group began to report to me,  
19 and I began to serve as General Manager - Regulatory Strategy and Planning. In  
20 2014, I became Vice President - Regulatory Strategy and Planning. The Analytics  
21 group was transitioned to Cleco Support Group in 2018, and my title was changed  
22 to Vice President - Regulatory Strategy.

1 I represent Cleco Power on the Edison Electric Institute's Rates and Regulatory  
2 Affairs Committee. I also serve on the Association of Edison Illuminating  
3 Companies' Load Research Committee, where I have served as Chair, and have  
4 previously participated in and served as Chair of the Southeastern Electric  
5 Exchange's Rates and Regulation Committee. Our regulatory group has won  
6 several Industry Excellence Awards from the Southeastern Electric Exchange's  
7 Rates and Regulation Committee and Audit Committee for various projects.

8 **Q: HAVE YOU PREVIOUSLY PROVIDED TESTIMONY BEFORE THE**  
9 **LPSC?**

10 A: Yes. Exhibit JRC-1 lists proceedings in which I have previously participated and  
11 testified.

12 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**  
13 **PROCEEDING?**

14 A: My testimony supports Cleco Power's application in this proceeding, requesting  
15 Commission approval of a power purchase agreement for solar power (the "Solar  
16 PPA") between Cleco Power and Dolet Hills Solar, LLC ("Dolet Hills Solar").<sup>1</sup>  
17 More specifically, my testimony will discuss the proposed recovery mechanism for  
18 the costs that Cleco Power will incur under the Solar PPA, as well as the treatment  
19 of certain credits that may arise under the Solar PPA. The power that Cleco Power  
20 will purchase under the Solar PPA will be generated by a solar photovoltaic electric  
21 generation project having an expected nameplate capacity of 240 MW that Dolet

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<sup>1</sup> A copy of the Solar PPA is attached as Exhibit MB-1 to the Direct Testimony of Cleco Power witness Mark Bordelon int his docket.

1 Hills Solar will develop, design, construct, own, and operate in DeSoto Parish,  
2 Louisiana (the “Project”).

3 **II. CLECO POWER’S REQUESTED RATE RECOVERY**

4 **Q: WHAT COMPONENTS OF THE SOLAR PPA NEED TO BE ADDRESSED**  
5 **RELATIVE TO RATE RECOVERY?**

6 A: There are generally four economic components of the Solar PPA, which will impact  
7 Cleco Power’s customers in different ways, and each of which is discussed further  
8 in the following testimony.

9 The first component is the Contract Price that Cleco Power will pay Dolet Hills  
10 Solar for the energy and other products delivered to Cleco Power under the Solar  
11 PPA.

12 The second component relates to the investment in a transmission line necessary to  
13 deliver the energy from the Project to Cleco Power’s transmission grid.

14 The third component relates to any revenue that Cleco Power may receive from the  
15 Midcontinent Independent System Operator, Inc. (“MISO”) for zonal resource  
16 credits.

17 The fourth component relates to any revenues that Cleco Power may receive for  
18 renewable energy credits.

19 **Q: WHAT RECOVERY MECHANISM IS IN PLACE THROUGH WHICH**  
20 **CLECO POWER PROPOSES RECOVERING THE COSTS ASSOCIATED**  
21 **WITH THE SOLAR PPA?**

22 A: As described below, Cleco Power is proposing to recover the costs it incurs under  
23 the Solar PPA through Cleco Power’s FAC. The Commission’s General Order in

Docket No. U-21497, issued November 6, 1997 (the “FAC General Order”), governs the treatment of electric utility fuel costs. The FAC General Order provides for the recovery of purchased power as follows:

*Energy cost of other purchased power upon specific Commission review and approval preferably within a base rate proceeding, excluding demand, capacity, facilities charges, and reimbursements for fixed cost recovery by the utility through base revenues, whether explicitly identified or subsumed within an energy charge.*

*Example: Invoice cost of energy purchased under long term power purchase agreement that provides for varied energy payments related directly to the volume of energy purchased and excluding amounts representing recovery for fixed investment costs or reservation charges.*

FAC General Order, Section III.C.

**Q: WHAT ARE THE COSTS UNDER THE SOLAR PPA THAT CLECO POWER PROPOSES TO RECOVER THROUGH THE COMPANY’S FAC?**

A: Under the Solar PPA, Cleco Power shall purchase from Dolet Hills Solar, for the “Contract Price” (as defined and specified in the Solar PPA), all of the Products (as defined in the Solar PPA) produced by Dolet Hills from the Project. Cleco Power proposes to recover the Contract Price paid to Dolet Hills Solar, dollar-for-dollar, through the Company’s FAC. Cleco Power proposes to include in the Company’s monthly FAC filings the Contract Price for the energy and other Products delivered from the Project. Please refer to the Direct Testimony of Cleco Power witness Mark Bordelon for the specific details of the Contract Price.

1    **Q:    ARE THERE OTHER COSTS ASSOCIATED WITH THE PROJECT NOT**  
2           **INCLUDED IN THE CONTRACT PRICE?**

3    A:    Yes. As further described in Mr. Bordelon's Direct Testimony, Cleco Power will  
4           need to construct approximately 7 miles of a 345 kv transmission line, [REDACTED]

5           [REDACTED]

6           [REDACTED]

7           [REDACTED]

8           [REDACTED]

9           [REDACTED]

10          [REDACTED]    The transmission asset will be  
11          included as a component of Cleco Power's rate base.

12          [REDACTED]

13          [REDACTED]

14          Cleco Power shall then include this cost as part of the cost of purchased power  
15          included in its monthly Fuel Cost Adjustment filings.

16   **Q:    WILL THE TRANSMISSION LINE BE INCLUDED IN THE**  
17           **CALCULATION OF CLECO POWER'S OPEN ACCESS TRANSMISSION**  
18           **TARIFF?**

19   A:    No. Since the transmission line connects only the Project to Cleco Power's  
20          transmission system, it will not qualify to be included in Cleco Power's Open  
21          Access Transmission Tariff.



1    **Q:    DOES CLECO POWER PROPOSE THAT THE TRANSMISSION LINE BE**  
2           **FULLY DEPRECIATED AT THE EXPIRATION OF THE [REDACTED]**  
3           **SOLAR PPA?**

4    A:    Yes. Transmission investment typically depreciates over a 40-year book life. As  
5           such, absent the transmission line becoming useful to another project and/or  
6           customer before expiration of the Solar PPA and/or useful life of the Project, there  
7           will likely be a remaining book value of the transmission line of at least \$7.5 million  
8           (the actual amount may be higher depending on additional required investment  
9           subsequent to the initial in service date). However, rather than depreciating the  
10          transmission line over 40 years, Cleco Power is proposing that this transmission  
11          line be depreciated over [REDACTED], with the depreciation schedule to be coterminous  
12          with the [REDACTED] term of the Solar PPA. This would obviate the need to establish a  
13          regulatory asset for the undepreciated balance of the transmission line upon the  
14          expiration of the Solar PPA.

15   **Q:    GIVEN THE IMMEDIATELY PRECEEDING CITATION TO THE FAC**  
16          **GENERAL ORDER, SECTION III.C, WHY DOES CLECO POWER**  
17          **PROPOSE COLLECTING THE COSTS ASSOCIATED WITH THE**  
18          **TRANSMISSION LINE THROUGH CLECO POWER'S FAC?**

19   A:    One option for financing the transmission line investment would have been for  
20          Dolet Hills Solar to pay for construction of the line. Those costs would have  
21          increased the escalating Contract Price, and would have been recovered through  
22          Cleco Power's FAC.

1           There will be some amount of operations and maintenance expense, as well as  
2           periodic capital investment, associated with keeping the transmission line in  
3           service. In order to ensure those expenditures meet Cleco Power standards, Cleco  
4           Power will own, operate and maintain the transmission line.

5   **Q:   IS THERE AN ALTERNATIVE RECOVERY MECHANISM FOR THE**  
6   **TRANSMISSION LINE?**

7   **A:**   Yes. The revenue requirement could be recovered through Cleco Power's  
8           Infrastructure and Incremental Costs Recovery Rider ("Rider IICR"), under Cleco  
9           Power's Second Amended and Restated Formula Rate Plan approved in LPSC  
10          Docket No. U-35299. Should this recovery mechanism ultimately be chosen, Cleco  
11          Power will need assurance of recovery in this docket that it will be allowed to  
12          collect those costs through Rider IICR upon completion of construction.

13   **Q:   HOW DOES CLECO POWER PROPOSE TO ADDRESS ANY VALUE THE**  
14   **COMPANY MAY RECEIVE FOR ZONAL RESOURCE CREDITS IN**  
15   **CONNECTION WITH THE SOLAR PPA?**

16   **A:**   Under the Solar PPA, the Products that Cleco Power will purchase from Dolet Hills  
17          Solar include "Capacity Attributes". Capacity Attributes are defined to mean "any  
18          current or future, certificate, tag, credit, or accounting construct associated with the  
19          Available capacity [the capacity from the Project, expressed in whole MW, that is  
20          available at a particular time to generate Products] including ZRCs [zonal resource  
21          credits] or other benefits intended to value any aspect of the capacity of the Project  
22          to generate and deliver Energy to the Project Delivery Point." To the extent that  
23          Cleco Power receives any revenue from MISO for the ZRCs or otherwise for any

1           other Capacity Attribute, that revenue will be credited to the Company's customers,  
2           dollar-for-dollar, through the Company's FAC.

3   **Q:   PLEASE DISCUSS THE VALUE OF THE RENEWABLE ENERGY**  
4           **CREDITS THAT ARE INCLUDED IN THE PRODUCTS THAT CLECO**  
5           **POWER WILL PURCHASE UNDER THE SOLAR PPA.**

6   A:   Under the Solar PPA, the Products that Cleco Power will purchase from Dolet Hills  
7           Solar include "Environmental Attributes," which is defined to mean any and all  
8           credits, including renewable energy credits, benefits, emissions reductions, offsets,  
9           and allowances, attributable to the Energy generation from the Project.  
10          Commercial and Industrial customers are increasingly incorporating commitments  
11          to include renewable energy in their power requirements. Cleco Power has had  
12          requests from existing and potential customers about renewable energy in its power  
13          supply portfolio.

14          While there are no immediately pending contracts with customers, Cleco Power  
15          will be able to supply some portion of customer requests sourced from the Project.  
16          Customers may pay a premium for the portion of their power supplied by renewable  
17          energy.

18          Cleco Power proposes that any revenues associated with renewable energy credits  
19          would be credited to the monthly FAC filings on a dollar-for-dollar basis, further  
20          increasing the benefit of the Solar PPA to all of Cleco Power's customers.

21   **Q:   WHAT IS THE ESTIMATED IMPACT OF THE SOLAR PPA ON CLECO**  
22           **POWER'S CUSTOMERS?**

1 A: Given current natural gas curves as provided by NYMEX from June 30, 2022 for  
2 the initial three contract years of the Solar PPA and the Energy Information  
3 Administration AEO for the remaining twenty-two contract years of the Solar PPA,  
4 the initial net savings during the first contract year of the Solar PPA will be

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 **Q: HOW DOES THE VALUE OF THIS CAPACITY COMPARE TO**  
9 **ALTERNATIVE CAPACITY PROJECTS?**

10 A: The initial capacity value of the Project is estimated to be approximately 120 MW.  
11 The installed cost of a 200 MW F Class combustion turbine is estimated at  
12 approximately \$172 million. The proportional net present value for 120 MW  
13 suggests customer savings of approximately \$105 million. Including this  
14 substantial savings with the modest cost of the Solar PPA Contract Price and the  
15 transmission line indicates a net customer savings of \$74 million.

16 **Q: DOES THE SOLAR PPA CREATE ADDITIONAL BENEFITS FOR**  
17 **CLECO POWER'S CUSTOMERS, OTHER THAN IMMEDIATE COST**  
18 **SAVINGS?**

19 A: Yes, as discussed in Mr. Bordelon's Direct Testimony, the Solar PPA represents  
20 Cleco Power's commitment to an economically viable, emission-free resource that  
21 would add diversity to Cleco Power's generation. Furthermore, it will provide  
22 Cleco Power with a geographically well-suited resource for meeting its customers'  
23 long-term energy needs and will allow Cleco Power to continue gaining experience

1           working with renewable resources. These various factors are beneficial for the  
2           State of Louisiana, Cleco Power, and Cleco Power's customers. Adding carbon-  
3           free resources, like the Solar PPA, to Cleco Power's generation mix will be  
4           increasingly important for continuing to make the State of Louisiana an attractive  
5           location for large commercial and industrial customers, which in turn provide  
6           economic benefits to the state and its residents, including Cleco Power's customers.

7   **Q:   DOES THIS CONCLUDE YOUR TESTIMONY?**

8   **A:**   Yes, at this time.



J. ROBERT CLEGHORN  
PARTICIPATION IN REGULATORY PROCEEDINGS

1. LPSC U-35753- In Re: Cleco Power LLC and Southwestern Electric Power Company, ex parte. In re: Applicants Application of Cleco Power LLC and Southwestern Electric Power Company for (I) Authorization to Close the Oxbow Mine; (II) Authorization to Include and Defer Certain Accelerated Mine Closing Costs in Fuel and Related Ratemaking Treatments.
2. LPSC U-35807- In Re: Cleco Power LLC: Application for Recovery in Rates of Certain Storm Damage Costs Incurred as a Result of Hurricanes Laura, Delta, and Zeta.
3. LPSC U-35299- In Re: Cleco Power LLC, ex parte. In re: Application for (1) Implementation of Changes in Rates to be Effective July 1, 2020 and (2) Extension of Existing Formula Rate Plan.
4. LPSC U-35049 - In Re: June 2018 Monitoring Report - Application of Cleco Power LLC for: (i) Authorization to Implement Rate Reductions resulting from the Tax Cuts and Jobs Act of 2017; (ii) Authorization to Modify Certain Tariffs in connection with such Rate Reductions; (iii) Authorization to Implement Residential Base Revenue Decoupling; and (iv) Expedited Treatment
5. LPSC U-34966 – In re: Entergy Louisiana, LLC, Cleco Power LLC and Southwestern Electric Power Company In re: Joint Application for Approval of Toledo Bend Hydroelectric Power Sales Agreement.
6. LPSC X-34855 - In re: Audit of Federal Environmental Adjustment Clause Flings of Cleco Power LLC for the period of January 2016 through December 2017.

7. LPSC U-34794 – In re: Application for authorizations, waivers, and regulatory interpretations of certain provisions of LPSC Order No. U-33434-A and authorization for Cleco Corporate Holdings LLC to pledge ownership interest in Cleco Power LLC for the purpose of allowing a newly formed wholesale subsidiary of Cleco Corp to acquire NRG South Central Generating LLC.
8. LPSC X-34765 - In re: Audit of Fuel Adjustment Clause Flings of Cleco Power LLC for the period of January 2016 through December 2017.
9. LPSC X-34729 – In re: Audit of the Energy Efficiency Rate Rider of Cleco Power LLC for the Energy Efficiency Quick Start Program Years ending October 31, 2015 and October 31, 2016.
10. LPSC U-34687 – In re: Cleco Power LLC's June 30, 2017 Cost of Service and Formula Rate Plan (2017)
11. LPSC S-34624 - In re: Cleco Power LLC's Verified Application for Commission Authorization of New Mortgage Indenture.
12. LPSC U-34618 – In re: Cleco Power LLC's Application requesting Commission consideration of a Proposed Long-Term Derivative Hedging Program, pursuant to General Order R-32975
13. LPSC U-34617 – In re: Cleco Power LLC's Application requesting Commission consideration of a Proposed Physical Bilateral Hedge Program and a Proposed Long-Term Derivative Hedging Program, pursuant to General Order R-32975
14. LPSC U-34501 – In re: Application Regarding the Costs and Benefits of Continued Participation in the Midcontinent Independent Systems Operator, Inc. Regional Transmission Organization.

15. LPSC U-34342 - In re: Cleco Power LLC's Request for Recovery Through its Fuel Adjustment Clause Cost Associated with New Natural Gas Supply.
16. LPSC U-34289 – In re: Cleco Power LLC's June 30, 2016 Cost of Service and Formula Rate Plan (2016).
17. LPSC X-33972 – In re: Audit of Fuel Adjustment Filings for Cleco Power LLC for the period of January 2014 through December 2015.
18. LPSC X-33970 – In re: Audit of Environmental Adjustment Clause Filings for Cleco Power LLC for the period of November 2010 through December 2015.
19. LPSC U-33880 – In re: The Housing Authority of the City of Opelousas vs. Cleco Power LLC (Allegations of Violations and Discriminatory applications by Cleco Power LLC of its tariffs and Standard Terms and Conditions in its provisioning of service to the Housing Authority of the City of Opelousas and its residents).
20. LPSC U-33848 – In re: Cleco Power LLC's June 30, 2015 Cost of Service and Formula Rate Plan (2015).
21. LPSC S-33825 – In re: Directive to Establish a Service Quality Improvement Program (SQP) for Cleco Power LLC.
22. LPSC U-33593 – In re: Application for (i) a Certificate of Public Convenience and Necessity authorizing Cleco Power LLC to construct, own, and operate a 40 megawatt generating unit at Cabot Corporation's Canal Carbon Black Plant in order to provide a source of renewable power for Cleco's customers; (ii) authorization to recover the costs associated with such 40 megawatt generating unit and related waste heat purchase and sale agreement in LPSC-jurisdictional rates; and (iii) expedited treatment.



23. LPSC U-33447 – In re: Cleco Power LLC’s June 30, 2014 Cost of Service and Formula Rate Plan (2014).
24. LPSC U-33434 – In re: Potential Merger Transaction between Cleco Corporation, Macquarie Infrastructure Real Assets, and British Columbia Investment Management Corporation, together with John Hancock Financial and other infrastructure investors (2014).
25. LPSC X-33325 - In re: Audit of Cleco Power LLC’s charges flowed through its Fuel Adjustment Charge, pursuant to Commission’s General Order U-21497 dated November 6, 1997, from the period beginning January 1, 2009 though December 31, 2013 (2014).
26. LPSC S-33218 - In re: Application of Cleco Power LLC for Non-Opposition to: (i) Renewal of Cleco Power LLC’s Blanket Financing Authorization Approved by the Commission in Docket No. U-31299; and Expedited Treatment (2014).
27. LPSC U-33196 – In re: Application of Cleco Power LLC and Southwestern Electric Power Company for Certification of Messick-Layfield Transmission Project (2014).
28. LPSC U-33036 – In re: Cleco Power LLC’s June 30, 2013 Cost of Service and Formula Rate Plan (2014).
29. LPSC I-33015 - In re: 2013 Integrated Resource Planning (“IRP”) Process for Cleco Power Pursuant to General Order dated April 20, 2012 (2014).
30. LPSC U-32839 - In re: Application requesting: (i) Approvals Addressing Certain Implementation and Integration Issues Regarding Cleco Power LLC Joining the Midcontinent Independent System Operator, Inc. and (ii) Expedited Treatment (2014).

31. LPSC U-32779 - "In re: Application of Cleco Power LLC for: (i) Extension of Its Formula Rate Plan (FRP), First Authorized by LPSC Order No. U-30689, Issued October 28, 2010; and (ii) Consolidation of Docket No. U-32153 with this Docket (2014).
32. LPSC U-32766 - In re: Application for Certificate of Public Convenience and Necessity to (I) Authorization to Acquire the Coughlin Power Station from Cleco Evangeline LLC; (II) Authorization to Recover in its Jurisdictional Rates the Charges that Cleco Power LLC Incurs to Acquire, Own, and Operate the Coughlin Power Station; And (III) Expedited Treatment (2013).
33. LPSC U-32631 - In re: Application of Cleco Power LLC for: (i) public interest finding in favor of the transfer of functional control of certain transmission assets to the Midwest Independent Transmission System Operator, Inc. Regional Transmission Organization; (ii) an accounting order deferring costs related to Cleco Power LLC's transition into the MISO RTO and permitting Cleco to collect such prudently-incurred, deferred costs from Cleco's LPSC-jurisdictional customers upon Cleco's integration into the MISO RTO; and (iii) expedited treatment (2013).
34. LPSC U-32598 - In re: Cleco Power LLC June 2012 Cost of Service and Formula Rate Plan Filing (2013).
35. LPSC U-32507 – In re: Application of Cleco Power LLC for: (i) Authorization to Install Emissions Control Equipment at certain of its Generating Facilities in order to comply with the Federal National Emissions Standards for Hazardous Air Pollutants from Coal and Oil-Fired Electric Utility Steam Generating Units Rule; and (ii)

Authorization to Recover the Costs Associated with the Emissions Control Equipment in LPSC Jurisdictional Rates (2012).

36. LPSC U-32275 - In re: DEMCO Purchased Power Agreement with Cleco Power LLC (2012).
37. LPSC X-32236 - In re: Cleco Power LLC's Notice of Intent to Conduct its 2012 RFP for Long-Term Generating Power and/or Purchased Power Contract, Pursuant to the Commission's MBM Order (2012).
38. FERC ER1378-000 and ER1379-000 – Request to Revise Cleco Power's Open Access Transmission Tariff in Order to Implement Cost-Based Formula Rates for Network Integration Transmission Service, Point-to-Point Transmission Service, and Schedule 1 (Scheduling, System Control and Dispatch Service) Ancillary Services (2012).
39. LPSC U-32223 - In re: Application of Cleco Power LLC for Certificate of Public Convenience and Necessity for: (i) Authorization for Cleco Power LLC to enter into a Proposed Power Purchase Agreement with Cleco Evangeline LLC (ii) Authorization for Cleco Power LLC to Flow-Through in its Jurisdictional Rates, the Charges that it Pays under the Power Purchase Agreement; and (iii) Expedited Treatment under the LPSC's Streamlined Procedures for Limited Term Purchase Power Agreements (2012).
40. LPSC U-32155 - In re: Informational Filing Containing Draft Request for Proposals for Biomass Fuel Resources (2012).
41. LPSC U-32153 - In re: Application of Cleco Power LLC for: (i) Authorization to Install Emissions Control Equipment at certain of its Generating Facilities in Order to Comply with the Federal Cross-State Air Pollution Rule; (ii) Authorization to Recover the Costs

Associated with the Emissions Control Equipment in LPSC-Jurisdictional Rates (2011).

42. LPSC U-32150 - In re: First Annual Review of the Federal Environmental Adjustment Clause Filings of Cleco Power LLC (2011).
43. LPSC U-32149 - In re: Cleco Power LLC's June 2011 Cost of Service and Formula Rate Plan Filing (2011).
44. LPSC U-32096 - In re: Application of Cleco Power LLC for Certificate of Public Convenience and Necessity for: (i) Authorization for Cleco Power LLC to enter into Proposed Power Purchase Agreements with Cleco Evangeline LLC and NRG Power Marketing, LLC; (ii) Authorization for Cleco Power LLC to Flow-Through in its Jurisdictional Rates, the Charges that it Pays under the Power Purchase Agreements; and (iii) Expedited Treatment under the LPSC's Streamlined Procedures for Limited Term Purchase Power Agreements (2011).
45. LPSC X-32091 - In re: Cleco Power LLC, Informational Filing, Containing Request for Proposals for Contractual Resources to Meet the Cross-State Air Pollution Rule beginning in May 2012 (2011).
46. LPSC U-31792 - In re: Application of Cleco Power LLC for Certificate of Public Convenience and Necessity for: (i) Authorization to Install Certain Biomass Fuel Conversion Equipment at its Madison Unit No. 3 (Madison 3) Generating Facility; (ii) Authorization to Test Burn Biomass Fuel in Madison 3; and (iii) Authorization to Install Biomass Fuel Conversion Equipment and Test Burn Biomass Fuel (2011).
47. LPSC U-31750 - In re: Cleco Power LLC, June 30, 2010 FRP pursuant to Docket No. U-30689 (2010).

48. LPSC U-31393 - In re: Application for Certificate of Public Convenience and Necessity for: (i) Authorization to Install, Own and Operate Advanced Metering Infrastructure; (ii) Authorization to Recover in Jurisdictional Rates All Costs Reasonably and Prudently Incurred to Install, Own and Operate Advanced Metering Infrastructure; and (iii) Expedited Treatment (2010).
49. LPSC U-31352 - In re: Petition for Declaratory Order Relating to Certain Claims within the Jurisdiction and Special Expertise of the Commission Raised in Class Action Lawsuit Filed by Opelousas Ratepayers against Cleco Power LLC (2010).
50. LPSC U-31299 - In re: Application of Cleco Power, LLC for renewal of Cleco Power LLC's Blanket Financing Authorization, Approved by the Commission in Order No. U-28765-A (2010).
51. LPSC U-31157 - In re: Application for Certificate of Public Convenience and Necessity for: (i) Authorization to Acquire Power Block One and an Undivided 50% Ownership Interest in the Common Facilities of the Acadia Power Station from Acadia Power Partners LLC; (ii) Authorization to Recover in its Jurisdictional Rates the Charges that Cleco Power LLC incurs to Acquire, Own, and Operate the Acadia Facility and; and (iii) Request for Expedited Treatment (2009).
52. LPSC U-31123 - In re: Application for Certificate of Public Convenience and Necessity for: (i) Authorization to Enter into a Proposed Power Purchase Agreement between Acadia Power Partners, LLC as seller and Cleco Power LLC as Buyer; (ii) Authorization to Recover in its Jurisdictional Rates the Charges that Cleco Power LLC pays under the Power Purchase Agreement; and (iii) Request for Expedited Treatment

under the LPSC's Streamlined Certification Procedures for Limited Term Power Purchase Agreements (2009).

53. LPSC U-30975 - In re: Joint Application of Cleco Power LLC and Southwestern Electric Power Company for: (I) Authorization to Enter into a Proposed Agreement with North American Coal to Purchase the Permit, Leases, and Reserves Associated with the Oxbow Mine; (II) Authorization to Include the Permit, Leases, and Reserves in Jurisdictional Rate Base and Related Rate Making Treatments; and (III) Expedited Treatment (2009).
54. LPSC U-30958 - In re: Application of Cleco Power LLC for Certificate of Public convenience and Necessity for: (i) Authorization for Cleco Power LLC to Enter Into a Proposed Power Purchase Agreement with NRG Power Marketing LLC; (ii) Authorization for Cleco Power LLC to Recover in its Jurisdictional Rates the Charges that it Pays under the Power Purchase Agreement; and (iii) Expedited Treatment (2009).
55. LPSC U-30955 - In re: Fuel Adjustment Clause Audit for Cleco Power, LLC for Years 2003-2008 (2009).
56. LPSC U-30913 - In re: Application of Cleco Power LLC for Certificate of Public Convenience and Necessity for Authorization to Construct, Own and Operate a Blackstart Generating Unit at Existing Teche Power Station; and Expedited Treatment (2009).
57. LPSC U-30823 - In re: Investigation into the Prudence of Cleco Power, LLC's Preparation for, and Response to, Hurricanes Gustav and Ike (2008).

58. LPSC U-30689-A - In re: Application of Cleco Power, LLC for a Favorable Public Interest Determination for Transmission Upgrades in the Acadiana Load Pocket (2008).
59. LPSC U-30689 - In re: Application Of Cleco Power LLC For: (1) Implementation Of Changes in Rates and Formula Rate Plan To Be Effective Upon The Commercial Operation Date Of Rodemacher Power Station Unit No. 3 (RPS-3); (2) Favorable Public Interest Determination For Transmission Upgrades In The Acadiana Load Pocket; And (3) Renewal Of Transaction Guidelines Applicable To Certain Economy Power Purchases From Acadia Power Partners LLC (2008).
60. LPSC S-30587 - In re: Application for Approval of Interconnection Agreement for Qualifying Cogeneration Facility Between Weyerhaeuser Company, as Interconnection Customer, and Cleco Power LLC, as Interconnection Provider, dated as of March 14, 2008; and Request for Expedited Treatment (2008).
61. LPSC U-30334 - In re: Application of Cleco Power LLC for Certificate of Public Convenience and Necessity for (i) Authorization for Cleco Power LLC to Enter Proposed Power Purchase Agreements with NRG Power Marketing Inc. and Union Power Partners, L.P.; (ii) Authorization for Cleco Power LLC to Flow-through, in its Jurisdictional Rates, the Charges that it Pays under the Power Purchase Agreements; and (iii) Expedited Treatment (2007).
62. LPSC U-29797 - In re: Joint Application of Cleco Power LLC and Southwestern Electric Power Company for Amendment of Order No. U-21453, U-20925 (SC) (Subdocket G) (Approving Dolet Hills Term Sheet), issued May 31, 2001 (2006).

63. LPSC U-29784 - In re: Request for a Letter of Non-Opposition Authorizing the Agreement for Purchased Power from a Qualified Cogeneration Facility between Columbian Chemicals Company, as Seller, and Cleco Power LLC, as Purchaser (2006).
64. LPSC U-29599 - In re: Application of Cleco Power LLC for Certificate of Public Convenience and Necessity for (i) Authorization to Enter a Proposed Power Purchase Agreements with ConocoPhillips Company and NRG Power Marketing Inc.; (ii) Authorization for Cleco Power LLC to Flow-Through, in its Jurisdictional Rates, the Charges that it Pays under the Power Purchase Agreements; and (iii) Expedited Treatment (2006).
65. LPSC U-29526 - In re: Letter Application of Cleco Power LLC for Limited Exemption from the Lower of Cost or Market Pricing and Competitive Bidding Rules for Affiliate Transactions, in Connection with Purchases of Economy and Emergency Power from Acadia Power Station (2006).
66. LPSC U-29174 - In re: Prudency Inquiry of Cleco Power LLC's, Resource Planning, Resource Procurement Practices, and Incurred Fuel Costs for the Period of January 2005 through October 2005 (2005).
67. LPSC U-29157 - In re: Application of Cleco Power LLC for Recovery in Rates of Amortization of Storm Damage Costs incurred as a Result of Hurricanes Katrina and Rita effective January 1, 2006 (2005).
68. LPSC S-28529 - In re: Cleco Power LLC Request for a Letter of Non-Opposition for Cleco to Borrow an Additional \$150 Million of Long Term Debt and execute an



Unsecured, Intermediate Term Revolving Credit Agreement and to Borrow up to \$125 Million (2005).

69. LPSC U-28765 - In re: Application of Cleco Power LLC for Approval of the Construction of the Rodemacher Unit 3 (2005).
70. LPSC U-28388 - In re: Application for authorization of a proposed Agreement for Purchased Power with North Bend Cogen LLC (2004).
71. LPSC U-27980 - In re: Verified application for Certificate of Public Convenience and Necessity for (i) Authorization to enter a proposed Power Purchase Agreement with Calpine Energy Services, LP, (ii) Authorization for Cleco Power LLC to Flow-Through, in its Jurisdictional Rates, the Charges that it Pays under the Power Purchase Agreement, (iii) Expedited Treatment) (2004).
72. LPSC. U-27867 - In re: Power Purchase Agreement between Enterprise Gas Processing, LLC and Cleco Power (2004).
73. LPSC U-26994 - In re: An Investigation into the Electricity Trading, Affiliate Transactions, and Fuel Adjustment Clause Practices of Cleco Power LLC and its Affiliates Pursuant to the Commission's General Order Dated October 25, 1993 (The Fuel Audit) (2002).
74. LPSC U-25166, U-25166(A), U-25166(B), U-25166(C) - In re: Requesting the Commission to Further Amend its Order Grant Authority to Cleco Power, LLC to (a) Issue and Sell through Agents, to Agents as Principals, or to Investors, an Additional \$150 Million in Long-Term Debt, resulting in (b) no more than \$350 Million Outstanding at any One Time (2000 – 2003)

75. LPSC U-24064 – In re: Red Simpson, Inc. et. al. vs. Cleco Corporation In re: Complaint against Cleco Corporation arising out of Prohibited Subsidization of a Non-Regulated Affiliate, Cleco Services, LLC (1999).
76. LPSC U-23969 – In re: Request approval of rate change pursuant to U-21497 in Order to Realign Certain Fuel Costs from Fuel Cost Adjustment Clause Recovery to Base Rate Recovery (1998)
77. LPSC U-21496, U-21496(A), U-21496(B), U-21496(C), U-21496(D), U-21496(E), U-21496(F), U-21496(G) and U-21496(H): - In re: An Investigation of Central Louisiana Electric Company's Rates Services Rendered, and Operations (Cleco's Base Rate Case and Resulting Rate Stabilization Plan, and Subsequent Annual Reviews). (1996 - 2009)
78. LPSC U-21128(A) - In re: Joint Special Filing by Cleco and Teche requesting appropriate treatment of unrefunded amounts of patronage capital pursuant to Rule 3 of the Rules of Practice and Procedure of the LPSC (2001).
79. FERC ER90-39-002 – Request to Increase Cleco Wheeling Rates (1990)
80. FERC ER88-433-000 – Request to Increase Cleco Full Requirements Wholesale Rates (1988)
81. FERC ER88-433-000 – Request to Increase Cleco Full Requirements Wholesale Rates (1988)
82. GPSC 3584-U – Application for Change of Fuel Cost Rate of Savannah Electric and Power Company (1986)
83. GPSC 3523-U – Application for Increase of Base Rates and Charges of Savannah Electric and Power Company (1985)

84. GPSC 3479-U - Application for Change of Fuel Cost Rate of Savannah Electric and Power Company (1984)
85. GPSC 3407-U - Application for Change of Fuel Cost Rate of Savannah Electric and Power Company (1983)
86. GPSC 3381-U - Application for Change of Fuel Cost Rate of Savannah Electric and Power Company (1983)
87. GPSC 3360-U – Application for Increase of Base Rates and Charges of Savannah Electric and Power Company (1982)