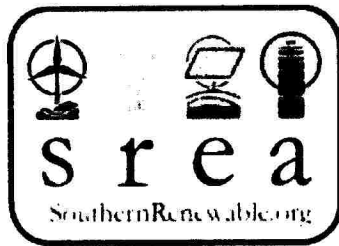


CC: MW



Southern Renewable Energy Association

P.O. Box 14858, Haltom City, TX 76117

October 23, 2019

2019 OCT 23 PM 2:55
LA PUBLIC SERVICE
COMMISSION

Ms. Terri Lemoine Bordelon
Records Section
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North Fifth Street
Baton Rouge, LA 70802

RE: LPSC Docket No. I-34715. ***Integrated Resource Planning ("IRP") Process for Southwestern Electric Power Company, Pursuant to General Order Dated April 20, 2012***

Dear Ms. Bordelon,

Please find an original and four copies of the Southern Renewable Energy Association (SREA) stakeholder written comment in LPSC Docket No. I-34715 in Re: Southwestern Electric Power Company Integrated Resource Planning process Pursuant to the General Order R-30021 (Corrected) issued April 20, 2012.

Sincerely,

Simon Mahan
SREA Executive Director

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BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

2019 OCT 23 PM 2:55
LA PUBLIC SERVICE
COMMISSION

SOUTHWESTERN ELECTRIC POWER COMPANY

DOCKET: I-34715

IN RE: 2019 INTEGRATED RESOURCE
PLANNING ("IRP") PROCESS FOR
SOUTHWESTERN ELECTRIC POWER
COMPANY ("SWEPCO") PURSUANT TO
GENERAL ORDER APRIL 20, 2012

**SOUTHERN RENEWABLE ENERGY ASSOCIATION'S COMMENTS
REGARDING THE SOUTHWESTERN ELECTRIC POWER COMPANY'S
DRAFT 2019 INTEGRATED RESOURCE PLAN**

The Southern Renewable Energy Association (SREA) is an industry-led initiative that promotes responsible use and development of wind energy, solar energy, energy storage and transmission solutions in the South. SREA has been an active stakeholder in the Southwestern Electric Power Company's (SWEPCO's) Integrated Resource Planning (IRP) and we appreciate SWEPCO's thoughtful consideration of stakeholder comments.

In September 2018, SREA filed comments regarding SWEPCO's IRP assumptions. SWEPCO addressed most of SREA's requests. As a result, SWEPCO's Draft IRP identifies a need for up to 2,000 megawatts (MW) of wind energy and up to 1,300 MW of solar energy. SWEPCO subsequently issued a 1,200 MW Request for Proposals (RFP) for wind energy in response to their IRP analysis. At the February 2019 SWEPCO stakeholder meeting, the company indicated that it would issue an RFP for utility-scale solar power later this year. SREA strongly supports SWEPCO's issuance of wind energy and solar energy RFPs and encourages the company to expeditiously seek regulatory approvals for new

wind power and solar power procurement. SREA also encourages the company to develop a framework to fairly evaluate energy storage options associated with wind energy and solar energy proposals.

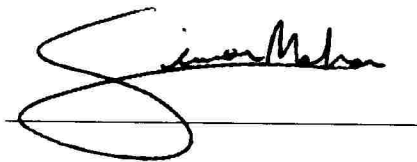
SREA would like to make an observation about the Louisiana IRP process. Overall, the process as envisioned in the IRP General Order is quite good and encourages stakeholder participation. However, based on SREA's experience, Louisiana's IRP process is the longest in the region, and perhaps in the country. Due to the length of the IRP process, significant amounts of data may be considered outdated by the time the final IRP is approved by the Commission. As such, SREA recommends to the Louisiana PSC that it develop a shorter IRP process timeframe for future IRPs. One-year processes, or less, are typical for IRPs throughout the southeast. SWEPCO's parent company, AEP, is involved in many IRP proceedings in various jurisdictions throughout the country and SREA would welcome their insights on comparative IRP proceedings.

We would like to emphasize that this round of Louisiana IRP's has been a positive experience with SWEPCO and Cleco. While both SWEPCO and Cleco have taken stakeholder engagement seriously, Entergy did not. The divergences are stark: both SWEPCO and Cleco's IRPs show significant need for renewable energy resources in the very near-term. Entergy's IRP is a "do nothing" plan for the next five years. While SWEPCO and Cleco may have not adopted all of the recommendations provided by SREA, we were impressed by the earnestness of the companies to protect their ratepayers. Entergy adopted no significant recommendations from any intervening party.

SREA appreciates SWEPCO's willingness to engage stakeholders and thoughtful consideration of our comments. We agree with much of SWEPCO's IRP and would like to make the following recommendations.

- Expedientiously review the wind energy RFP and issue a solar energy RFP in line with the findings of this IRP.
- Issue a 100 MW/400 MWh RFP for energy storage as a pilot program.
- Increase resource caps for wind energy and solar energy.
- Provide methodology and metrics associated with transmission cost assumptions and modeling.
- Reduce energy storage cost assumptions and break-out cost assumptions along with the proposed value stack.
- Provide a short review of other IRP processes across the country with recommendations on how to improve Louisiana's process.

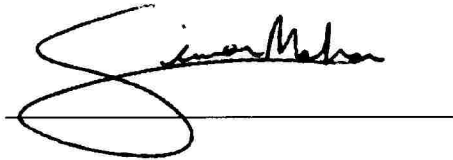
Respectfully submitted:

A handwritten signature in black ink, appearing to read "Simon Mahan", is written over a horizontal line.

Simon Mahan
Executive Director
Southern Renewable Energy Association
P.O. Box 14858
Haltom City, TX 76117
Telephone: 337-303-3723
simon@southernwind.org

CERTIFICATE OF SERVICE

I hereby certify that I have this 23rd day of October, 2019 served copies of the foregoing pleading upon all other known parties of this proceeding, by email.

A handwritten signature in black ink, appearing to read "Simon Mahan", is written over a horizontal line.

Simon Mahan