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LA Public Service Commission

BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

IN RE: EX PARTE:	)	
APPLICATION OF CLECO POWER	)	
LLC FOR: (1) IMPLEMENTATION	)	
OF CHANGES IN RATES TO BE	)	**DOCKET NO. U-_____**
EFFECTIVE JULY 1, 2024; AND (2)	)	
EXTENSION OF EXISTING	)	
FORMULA RATE PLAN	)	

DIRECT TESTIMONY

OF

FRANCESCA D. WINTER

ON BEHALF OF

CLECO POWER LLC

JUNE 30, 2023

EXHIBITS

EXHIBIT NO.	DESCRIPTION
Exhibit FDW-1	Residential Decoupling
Exhibit FDW-2	COS Rate Base and Expenses
Exhibit FDW-3	Proposed Class Billing
Exhibit FDW-4	General Service Bill Comparison
Exhibit FDW-5	Residential Billing by kWh Level
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I. INTRODUCTION AND BACKGROUND

Q: PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A: My name is Francesca D. Winter. I am employed by Cleco Power LLC ("Cleco Power" or the "Company") and serve as Director – Regulatory Strategy. My business address is 2030 Donahue Ferry Road, Pineville, Louisiana, 71360.

Q: WHAT ARE YOUR PRINCIPAL AREAS OF RESPONSIBILITY WITH CLECO POWER?

A: I am primarily responsible for assisting with the filings in various Cleco Power proceedings before the Louisiana Public Service Commission ("LPSC" or the "Commission"). Specifically, the entire Regulatory Strategy group is responsible for rate case filings and supporting documentation related to revenue requirements, and rates and charges for billing Cleco Power's customers. I am responsible for ensuring cost of service studies adequately allocate cost causation to the various customer classes, and ensuring rates and charges collect the appropriate level of LPSC-authorized revenues on a just, reasonable, and not unduly discriminatory basis.

I provide guidance in pricing LPSC-jurisdictional site-specific contracts and Cleco Power's FERC-jurisdictional contracts.

I commission and review various analytical studies necessary to support Cleco Power's initiatives requiring LPSC review and authorization.

Q: PLEASE DESCRIBE YOUR PROFESSIONAL QUALIFICATIONS, AND BUSINESS EXPERIENCE.

A: I received a Bachelor of Science degree in Electrical Engineering from Oklahoma State University in Stillwater, Oklahoma in 1999, and a Master of Business Administration degree from Oklahoma Christian University in Edmond, Oklahoma in 2004.

From 1999 through 2001, I served as a volunteer teacher with the U.S. Peace Corps in Namibia, Africa. From 2002 through 2009, I was employed at Enogex, a natural gas subsidiary of OGE Energy, where I alternated between engineering and finance-related roles, culminating in a role as a Senior Strategy Analyst. From 2011 to 2022, I was employed as a Consultant and Project Manager for Guernsey and then Burns & McDonnell / 1898 & Co., where I specialized in the development of revenue requirements, cost of service, rate design and analysis, and financial forecasts for retail electric utility systems; prepared rate filings and presented expert witness testimony in regulated environments; and developed wholesale electric rates and transmission revenue requirements, cost of service, and rates.

In 2022, I accepted a position with Cleco Power as the Director – Regulatory Strategy, and assumed the responsibilities previously stated.

Q: HAVE YOU PREVIOUSLY FILED TESTIMONY IN PROCEEDINGS BEFORE THE LOUISIANA PUBLIC SERVICE COMMISSION ("LPSC" OR THE "COMMISSION")?

A: No, I have not.

Q: HAVE YOU PREVIOUSLY FILED TESTIMONY IN PROCEEDINGS BEFORE OTHER PUBLIC SERVICE COMMISSIONS?

A: Yes, I have previously filed testimony at the Arkansas Public Service Commission in Docket TF-090-TF - Request to Revise the Transient Voltage Surge Suppression Tariff

Sheets. I have also filed testimony at the Public Utilities Commission of Texas (PUCT) in: Docket 47470 – Application of Farmers Electric Cooperative, Inc. For Interim Update of Wholesale Transmission Rates; Docket 48828 – Application of Trinity Valley Electric Cooperative, Inc. For Interim Update of Wholesale Transmission Rates; Docket 48212 – Application of Golden Spread Electric Cooperative, Inc. to Amend its Certificate of Convenience and Necessity for the Conversion of Colorado River Municipal Water District's Private 69-kV Transmission Line to Public Use in Concho County; and Docket 48500 – Application of Golden Spread Electric Cooperative, Inc. For Authority to Change Transmission Cost of Service and Wholesale Transmission Rates.

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

A: My testimony supports Cleco Power's application in this proceeding. Pursuant to Commission Order No. U-35299, issued June 16, 2021, Cleco Power is required to file a full rate case no later than March 31, 2023, to be effective July 1, 2024. The filing date was subsequently extended to June 30, 2023, at the LPSC's March 2023 Business and Executive session.

More specifically, my testimony supports Cleco Power's application and ratemaking requests in this proceeding regarding the following matters:

1. Residential revenue decoupling;
2. Cost of Service; and
3. Rate Structure and Design

II. RESIDENTIAL REVENUE DECOUPLING

Q: WHAT IS DECOUPLING?

A: In general, "decoupling" is the common name given to regulatory mechanisms that sever or weaken the link between utility revenues and volumetric sales. At times referred to as a "weather normalization adjustment," decoupling benefits customers by lowering bills when weather-related sales increase, while also benefiting utilities by creating more financial certainty when sales decline due to energy efficiency, distributed generation/net metering, conservation, and weather.

Cleco Power currently recovers substantially all its residential base revenue requirements through volumetric charges applied to customer consumption. Decoupling would effectively cap total base revenue for residential customers when weather has a higher-than-normal impact on their bills, while at the same time allowing the Company to realign its residential rate design without incurring substantial additional risk of revenue erosion.

Q: IS CLECO POWER PROPOSING DECOUPLING FOR ALL OF ITS CUSTOMERS?

A: No. Cleco Power is proposing implementing decoupling only for its residential customers.

Q: WHY IS CLECO POWER PROPOSING RESIDENTIAL RATE DECOUPLING?

A: Cleco Power has experienced notable decreases in consumption by residential customers participating in the LPSC's energy efficiency programs, as well as customers seeking to reduce their usage by purchasing more energy efficient heating, ventilating, and air conditioning systems, refrigerators, and other appliances.

The impact of rooftop solar in Cleco Power's service territory has also significantly reduced consumption for participating residential customers. The availability of more affordable systems will continue to erode consumption. Absent residential decoupling and appropriately designed rate structures, the burden of decreased revenues associated with

consumption deterioration may be borne by Cleco Power's most economically challenged customers.

Implementation of residential decoupling can also provide for greater bill stability by moderating the impact of both summer and winter weather extremes.

Q: PLEASE DEFINE THE TERM "RESIDENTIAL BASE REVENUE DECOUPLING" AS USED IN THIS PROCEEDING.

A: Currently, approximately 95% of Cleco Power's residential revenues are based on the volume of energy consumed. Residential base revenue decoupling, as proposed in this proceeding, seeks to remove the impact that sales volume has on both customer bills and utility revenues.

Q: PLEASE SUMMARIZE CLECO POWER'S REQUEST FOR RESIDENTIAL DECOUPLING.

A: As proposed, when weather and energy consumption are above normal and residential average base revenue exceeds the threshold established in this rate case, customers would realize reductions in their bills over a following twelve-month period. Conversely, when weather and energy consumption are below normal, and residential average base revenue is below the threshold established in this rate case, customers' bills would increase over a following twelve-month period.

Q: WHAT FACTORS SUPPORT CLECO POWER'S REQUEST FOR RESIDENTIAL DECOUPLING?

A: First, Cleco Power notes that a portion of its total retail revenues are decoupled today and have been for several years. Specifically, the Commission's energy efficiency pilot programs include provisions for utilities to recover the lost contribution to fixed costs

("LCFC") based on reductions of billing determinants ("deemed energy savings"), until rates are reset in a subsequent full rate case. In addition, revenues collected under the Infrastructure and Incremental Cost Recovery rider ("Rider IICR") of Cleco Power's current Second Amended and Restated Formula Rate Plan (the "Second Amended and Restated FRP") are also trued-up annually, based on sales volume and actual revenue requirements.

Weather is the single largest driver of billing determinants, customer bills, and revenue from residential customers. As mentioned earlier, the success of the LPSC's energy efficiency programs has reduced total energy consumption. Participating customers are the primary beneficiaries of these programs. In addition, lower energy requirements require dispatch of fewer higher cost generation facilities, which provides a lower fuel cost for all customers. In the long term, all customers further benefit as additional generation facilities (often with capital costs well in excess of existing generation plant in service) are delayed in the near term, and perhaps even avoided when viewed from a longer-term perspective. The impact of net metering (driven by solar installations not owned by the utility) has practically the same impacts as energy efficiency programs. Residential base revenue decoupling would also moderate the impact on customers who cannot participate in energy efficiency programs and/or customer owned generation investments. Declining energy consumption is also driven by more energy efficient home appliances such as refrigerators and air conditioning units.

Residential base revenue decoupling will also allow Cleco Power to be more aggressive in its residential rate designs. Cleco Power has traditionally moderated both the price and the volume of sales to residential customers in its highest usage tiers, due primarily to the

revenue at risk in a lower-than-normal weather year. Additionally, Cleco Power's Time of Use ("TOU") rate is designed to be revenue neutral. With the assurance that revenues from the TOU tariff are not at risk, the price differentiation between on-peak consumption and off-peak consumption can provide stronger price signals as to the cost of consumption when the energy markets are more likely to be constrained.

Q: WHY IS CLECO POWER PROPOSING DECOUPLING FOR ONLY RESIDENTIAL CUSTOMERS?

A: Weather, energy efficiency, and net metering have had more impact on residential bills and residential utility revenues than on any other class. More specifically, Cleco Power notes that actual average annual use per residential customer was 16,546 kWh in 2010 and was 14,605 kWh in 2022, a decrease of 11.7%, and will likely decrease further in subsequent years.

Currently, there is no way to collect the entirety of base revenue lost as a result of these changes in consumption. While between rate cases this loss is borne entirely by Cleco Power's investors, fewer billing determinants will ultimately result in increases in rates, which will be paid in large measure by those customers who cannot afford to make consumption-saving investments. From the perspective of revenue and bill stability, this phenomenon could also result in recouping relatively more of the residential revenue requirement from residential customers with lower usage.

While decoupling may be appropriate at some point for the entirety of Cleco Power's sales and revenue, implementing decoupling for residential customers is a relatively modest first step toward that potential goal. Given the relatively more stable bills, residential customers will likely be more satisfied over time. Finally, residential decoupling will have the largest

affordability impact, as those bills are driven by weather variability far more than any other customer class.

Q: HOW DOES RESIDENTIAL BASE REVENUE DECOUPLING IMPACT CLECO POWER'S PROPOSED THIRD AMENDED AND RESTATED FORMULA RATE PLAN ("THIRD AMENDED AND RESTATED FRP")?

A: The calculations determining whether residential customers would receive either bill credits or charges would be made before calculations which determine whether any refund is due. The adjusted residential base revenue would then be used for determining if any revenue adjustments were needed pursuant to the metrics of Cleco Power's proposed Third Amended and Restated FRP, which is asymmetrical relative to under- and over-earning (in short, there is no mechanism in the proposed Third Amended and Restated FRP for Cleco Power to collect additional revenues should Cleco Power's earnings fall short of the target return on equity, whereas Cleco Power must share over-earnings above the dead band with customers). Please refer to the Direct Testimony of Cleco Power witness Christina C. McDowell for a fuller discussion of this and other aspects of Cleco Power's proposed Third Amended and Restated FRP. As such, the likelihood of achieving earnings levels above the upper band is reduced, though not eliminated. For instance, increased residential customer growth, revenues from other customer classes, and cost control may still result in rate adjustments. Cleco Power proposes that the allocation of those rate adjustments, if any, continue to be allocated as they are today: a proportional benefit for residential customers.

Q: WHAT IS THE RESIDENTIAL DECOUPLING MECHANISM CLECO POWER IS PROPOSING?

A: Cleco Power proposes a straight-forward evaluation based upon the residential average base revenue per customer. Exhibit FDW-1 illustrates the calculation. The initial calculation of the targeted base revenue per customer, exclusive of revenues associated with energy efficiency, Rider IICR, and Excess Deferred Income Taxes ("EDIT") Giveback is shown in Line 1, Column A. The expected annual residential base revenue upon which rates were determined is shown on Line 1. This total includes the residential portion of Miscellaneous Revenue but does not include revenues from energy efficiency programs and EDIT Giveback. The total also does not include the residential portion of Rider IICR, as items collected under Rider IICR are already effectively decoupled in that the total Rider IICR collection includes an annual true-up mechanism. The Average Base Revenue on Line 6, column A is then divided by the average number of customers on Line 7 to arrive at the average annual base revenue per customer of $1,444.40 on Line 8.

Columns B, C, D, and E of Exhibit FDW-1 illustrate the calculations of any amount to be returned to or collected from customers over a four-year period, using hypothetical results that differ from Cleco Power's projected test year revenues. The calculations begin with actual base revenue collected from residential customers, Line 1. From that amount, the previous year's calculated Net Decoupling Charge or Credit would be deducted on Line 2. This removes the impact of the credit or charge attributable to the prior year.

The actual annual residential base revenue on Line 1 in Columns B-E includes Rider IICR, energy efficiency program revenue targets and EDIT Giveback for the current year, which are removed from the total in Lines 3, 4 and 5.

Line 6 is the adjusted base revenue conceptually equivalent to the Average Base Revenue anticipated in the rate case. Line 7 represents the average number of customers, which is used to determine Line 8: Average Base Revenue per Customer.

Line 9 represents the difference between the established Average Base Revenue per Residential Customer, Line 8, Column A, using the rate case revenues and the Average Base Revenue per Residential Customer for the actual rate year, Line 8, Column B. Line 10 is the product of the Line 9 value, multiplied by the average number of customers on Line 7 in thousands of dollars.

As mentioned previously, the energy efficiency program determines the deemed savings, also referred to as LCFC, accumulated until Cleco Power's next rate case, which resets the entirety of base revenue requirements and charges for Cleco Power's retail customers. The amount on Line 11 reduces the Total Credit/Charge calculated on Line 10.

Lastly, Line 12 then represents the value of the Net Decoupling Credit/Charge which would be credited to or collected from residential customers in the following year.

Q: HOW WOULD THE NET DECOUPLING CREDIT/CHARGE FLOW THROUGH TO CUSTOMERS?

A: Cleco Power proposes to include the net decoupling credit or charge utilizing the residential portion of charges assessed in the Rider IICR calculation.

III. COST OF SERVICE

Q: WHAT ARE THE MAJOR COMPONENTS OF THE COST OF SERVICE STUDY?

A: The major components of the cost of service study are rate base and expenses, and their functionalization, classification, and ultimate allocation to LPSC retail- jurisdictional customers. To that end, for over 35 years, Cleco Power has utilized guidance contained in the

National Association of Regulatory Utility Commissioners "Electric Utility Cost Allocation Manual," as well as established principles contained in the Association of Edison Illuminating Companies "Load Research Manual".

The rate base and expense elements are first functionalized as production, transmission, distribution, customer and/or administrative, and general. Each of these functions may have subcategories.

The functionalized categories are then classified as demand related, energy related, customer related, or revenue related. Finally, the classified elements are then allocated to the jurisdictional classes based upon various demand, energy, and customer components.

Q: WHAT LPSC-JURISDICTIONAL ATTRITION ADJUSTED RATE BASE AND EXPENSES DETERMINE THE BASE RATE REVENUE, NET IN THIS RATE CASE?

A: Please see Exhibit FDW-2, where the cost of service study indicates that LPSC-jurisdictional customers are responsible for a rate base of $3,258.7 million, line 18, column 2, and expenses of $493.9 million, line 30, column 2, to arrive at the Base Revenue Requirement, Net of $795.0 million as shown in J. Robert Cleghorn's Testimony, Table JRC-4, line v.

Q: WHY IS THE COST OF SERVICE STUDY A USEFUL TOOL FOR DETERMINING RETAIL REVENUE REQUIREMENTS?

A: The factors listed below support the use of a cost of service model for determining revenue requirements:

1. The entirety of the utility's cost structure is not necessary in order to serve each and every utility customer. Therefore, a given class of customers should bear

responsibility only for those portions of costs necessary for serving that customer class;

2. Most utility costs do not lend themselves to precise separation by customer, and, therefore, cost assignment must be based at least in part on a certain amount of judgement;
3. Costs responsibility by customer class is helpful in determining rate design; and
4. Consistency in determining cost of service components over time provides more stability for customers, and also provides opportunity for reassessing various methods over time.

Q: DOES THE COST OF SERVICE STUDY DETERMINE THE PROPOSED REVENUE REQUIREMENTS FOR EACH CLASS OF SERVICE?

A: The cost of service study is one of a number of factors to be considered for determining the revenues to be recovered from each customer class. However, the class revenue requirements derived from the cost of service serve as a benchmark in ultimately determining a reasonable revenue requirement for each customer class.

Various participants in the rate case normally have different perspectives on assigning cost responsibility. Ultimately, determination of revenue requirements for each customer class must consider factors other than the mathematical calculations contained in a cost of service study.

Q: WHAT ARE THE PROPOSED BASE RATE REVENUES FOR THE LPSC-JURISDICTIONAL CUSTOMER CLASSES?

A: Please see Exhibit FDW-3 Base (column J) and IICR (column K) for the proposed class billings reflecting the allocation of the Base Revenue Requirement, Net of $795.0 million.

IV. RATE STRUCTURE AND DESIGN

Q: WHAT IS MEANT BY THE TERM "RATE STRUCTURE"?

A: Rate structure is a general reference to the billing components and charges included in the tariffs for each class of service. The main components of Cleco Power's rates are customer charges, energy charges and demand charges, with some customer rate classes also utilizing reactive power charges, facilities charges, and various other charges to ensure appropriate levels of cost recovery.

Q: IS CLECO POWER PROPOSING ANY CHANGES TO THE RATE STRUCTURES FOR ANY OF THE CLASSES?

A: Yes, Cleco Power is proposing a rate structure change to its General Service rate, specifically, to the General Service Secondary Supply Voltage Non-Demand ("General Service Non-Demand") rate.

Q: WHY IS CLECO POWER PROPOSING A STRUCTURAL CHANGE TO ITS GENERAL SERVICE NON-DEMAND RATE?

A: Cleco Power is proposing a rate structure change to its General Service Non-Demand rate because of multiple customer complaints. Customers in this rate class with low load factors, but with high energy usage have experienced large bill increases when moving from the General Service Non-Demand rate to the General Service Secondary Supply Voltage Demand rate ("General Service Demand"). In an effort to be mindful of customers' bills and to send the appropriate usage and price signals, Cleco Power is proposing three changes to this rate, which are explained in the following sections.

Q: PLEASE DESCRIBE THE MAIN FEATURES OF CLECO POWER'S CURRENT GENERAL SERVICE NON-DEMAND RATE STRUCTURE.

A: Cleco Power's current General Service Non-Demand tariff has a customer charge of $15.00 per month and an energy charge, per kWh, of $0.08446.

Q: WHAT IS CLECO POWER PROPOSING FOR THE GENERAL SERVICE NON-DEMAND RATE STRUCTURE AND WHAT IS THE IMPACT OF THE CHANGE AS A RESULT OF THE PROPOSED RATE STRUCTURE?

A: Cleco Power is proposing a customer charge of $20.00 per month and to implement a second tier in the energy charge for any usage above 5,000 kWh. The first 5,000 kWh would be billed at a rate of $0.09471 per kWh and all kWh above 5,000 kWh would be billed at a rate of $0.11365 per kWh. This second tier would send a price signal to customers alerting them to the fact that their usage has increased, and should it continue to do so, they will be moved to the General Service Demand rate. Please see Exhibit FDW-4 for a comparison of the current and proposed General Service Non-Demand rate structures.

Q: IS CLECO POWER PROPOSING ANY OTHER CHANGES TO THE GENERAL SERVICE RATE?

A: Yes, Cleco Power is proposing two changes to the Application section of the tariff. The first change is where the current tariff states, "When a Customer has exceeded 5,000 kWh per month for three consecutive months, a demand meter will be installed and the Customer will be billed at the demand rate." Cleco Power is proposing a change from three consecutive months to four consecutive months and removing the language around installing a demand meter, as this is no longer necessary due to Cleco Power's implementation of an advanced metering infrastructure (AMI) system.

The second change is where the current tariff states, "Should usage for each of the twelve billing months ended December 31 not exceed 5,000 kWh, the Customer will be given the

opportunity to return to the energy only rate." Cleco Power is proposing to change this to twelve consecutive billing months.

Q: DO THESE PROPOSED GENERAL SERVICE RATE CHANGES AFFECT ANY OTHER RATE CLASSES?

A: Yes, the changes to the Application section of the tariff affect the School and Church Non-Demand Electric Service rate class.

Q: IS CLECO POWER PROPOSING ANY CHANGES TO THE RATES FOR THE RESIDENTIAL RATE CLASS?

A: Yes, Cleco Power has incorporated an adjustment to the customer charge for the Residential rate class, increasing it from $9.00 to $12.00. The cost of service study results indicate that the customer related costs for the Residential class are close to $30.00, which this requested increase will address and will start the process of moving the customer charge towards the appropriate level of recovery. In addition, Cleco Power's Residential customer charge has been at the current $9.00 for over 13 years. General rate-making principles suggest that recovering fixed costs from fixed charges (i.e., customer charges) requires less dependence on variable charges (i.e., kWh charges) to provide the appropriate levels of cost recovery and ensures that Cleco Power recovers its expenses as these expenses are incurred.

Additionally, the Residential rate class energy charges were changed to arrive at the projected revenue requirement.

Q: GIVEN THE REVENUE REQUIREMENTS AND OTHER CHARGES APPLIED TO RESIDENTIAL CUSTOMERS, WHAT ARE THE BASE REVENUE IMPACTS TO THE VARIOUS USAGE LEVELS?

A: Exhibit FDW-5 illustrates the impacts to residential customers given various kWh usage levels.

Specifically, for a typical residential customer, lines 4 and 16, using 1,000 kWh a month, the projected base portion of the bill with the first year of the phase-in bill credit would increase from $79 to $87, an $8 increase.

Q: IS CLECO POWER PROPOSING ANY CHANGES TO THE RATES FOR ANY OF THE OTHER CLASSES?

Yes, similar to the requested customer charge changes for the Residential and General Service Non-Demand rate classes, Cleco Power is requesting customer charge increases to the General Service Demand and Municipal rate classes. The General Service Demand customer charge is being changed from $25.00 to $28.00. The cost of service study indicates the customer related costs for this class are as much as $31.00. The Municipal class cost of service results indicate customer related costs are over $33.00, so Cleco Power is requesting an increase from $20.00 to $25.00. As stated previously, these customer charge increases start the process of moving the customer charge towards a more appropriate level of cost recovery and help Cleco Power recover its costs as they are incurred.

Additionally, energy and demand charges were changed proportionally in order to arrive at the projected revenue requirement for each class of customers.

Q: HAS CLECO POWER PREPARED A PROPOSAL OF HOW THESE CHARGES AND CREDITS WOULD BE BILLED?

A: Yes. Please see Exhibit FDW-6. This exhibit illustrates the various customer, energy, demand, and other billing components for each customer class at both current rates and proposed rates.

Also, please see Exhibit FDW-7 for the proposed rate schedules incorporating the proposed rates and charges and Exhibit FDW-8 for a redline of the proposed rate schedules against the rate schedules currently in place.

Q: IS CLECO POWER PROPOSING ANY CHANGES TO ITS LOW INCOME TARIFF?

A: Yes. The Cleco Alternative Rate for Electricity ("CARE") rider currently provides for a 25% discount on the fuel portion of a low-income customer's bill for the billing months of July, August, and September. Historically, this has resulted in discounts of slightly more than $73 annually for each of the 10,994 customers on this rate.

In an effort to address the significant impact electric bills can have on low-income customers, Cleco Power proposes to expand this program to provide for a 25% discount on fuel for these customers for all billing months. This would likely increase the discount to qualified applicants to approximately $218 annually. Please see Exhibit FDW-9.

Q: DOES THIS CONCLUDE YOUR TESTIMONY?

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:

FRANCESCA D. WINTER

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

1. Affiant has prepared Direct Testimony on behalf of Cleco Power LLC, dated June 30, 2023, in support of the Application of Cleco Power LLC for: (1) Implementation of Changes in Rates to be Effective July 1, 2024; and (2) Extension of Existing Formula Rate Plan.

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.

Francesca D. Winter
Cleco Power LLC
2030 Donahue Ferry Road
Pineville, LA 71360

SWORN TO AND SUBSCRIBED
BEFORE ME, NOTARY PUBLIC,
THIS 19th DAY OF JUNE, 2023.

Catina L. Ivey
NOTARY PUBLIC
BAR ROLL/NOTARY ID NO.: 51231
MY COMMISSION EXPIRES: At death

CATINA L. IVEY NOTARY PUBLIC COMMISSIONED FOR LIFE NOTARY ID NO. 51231 RAPIDES PARISH LA

CLECO POWER LLC
Examples of Potential Residential Decoupling Adjustments

LPSC Docket No. U-XXXXX
Exhibit FDW - 1

Line No.		A	B	C	D	E
			From Annually Filed Monitoring Reports			
			Year 1: Over Collection	Year 2: Under Collection	Year 3: Over Collection	Year 4: Over Collection
		Rate Case *	12ME 6/25	12ME 6/26	12ME 6/27	12ME 6/28
	($000)					
1	Res Base Rev	$366,653	$407,628	$403,748	$413,951	$419,665
2	Back out prior year Return / Collect			($3,000)	$1,000	($1,000)
3	Less EE Program Cost Revenue		$6,806	$6,806	$6,806	$6,806
4	Less IICR Revenue Allocation		$31,252	$31,377	$31,502	$31,628
5	Less EDIT Giveback		($2,784)	($2,495)	($2,366)	($2,201)
6	Adjusted Base Revenue	$366,653	$372,355	$371,061	$377,009	$384,432
7	Average Customers	253,844	254,860	255,879	256,903	257,931
8	Average Base / Customer	$1,444.40	$1,461.02	$1,450.14	$1,467.52	$1,490.45
	(Dollars)					
9	**Average (Credit) / Charge per customer**		($16.62)	($5.74)	($23.11)	($46.05)
10	**Total (Credit) / Charge**		($4,234,567)	($1,469,134)	($5,938,268)	($11,876,536)
11	Less: EE Lost Contribution to Fixed Costs		$1,234,567	$2,469,134	$4,938,268	$9,876,536
12	**Net Decoupling (Credit) / Charge**		($3,000,000)	$1,000,000	($1,000,000)	($2,000,000)

* Residential portion of Total Retail revenue requirement.
Includes Residential portion of Miscellaneous.
Does not include Energy Efficiency revenues.
Does not include Rider FRP revenues.
Does not include EDIT Giveback revenues.

CLECO POWER LLC
COS - Rate Base & Expenses
12 ME JUNE 30, 2025

LPSC Docket No. U-XXXXX
Exhibit FDW - 2

	A	B	C	D
	RATE BASE			
Line No.		Total CLECO (1)	Total LPSC (2)	Other (3)
1	Plant in Service	$5,442,559	$5,101,870	$340,688
2	less Accum. Depreciation	$1,909,553	$1,805,383	$104,169
3	Net Plant	$3,533,006	$3,296,487	$236,519
4	Const Work in Progress	$0	$0	$0
5	Plant Held for Future Use	$235	$174	$61
6	Prepayments	$7,791	$7,484	$307
7	Operating Reserves	($189,561)	($184,098)	($5,463)
8	Deferred Credits	($16,213)	($15,916)	($296)
9	Cash Working Capital	$0	$0	
10	Materials & Supplies	$102,770	$96,337	$6,433
11	Fuel Stock	$49,463	$48,750	$713
12	Deferred Fuel	$0	$0	
13	Total Deferred Debits	$504,434	$491,681	$12,752
14	Customer Deposits	($65,148)	($64,727)	($421)
15	Accum Deferred Taxes	($447,435)	($417,481)	($29,954)
16	Accum Deferred ITC	$0	$0	$0
17	Regulatory Liabilities	$0	$0	$0
18	**Rate Base**	$3,479,343	$3,258,691	$220,652

	EXPENSES			
		Total CLECO (1)	Total LPSC (2)	Other (3)
19	Production Expense	$85,455	$84,462	$993
20	Transmission Expense	$36,395	$31,412	$4,983
21	Distribution Expense	$49,894	$48,704	$1,190
22	Cust Accts, Sales, & Info	$28,029	$27,922	$106
23	Admin & General Expense	$72,879	$70,778	$2,101
24	Depreciation Expense	$181,335	$171,455	$9,880
25	General Taxes	$59,998	$56,549	$3,449
26	**Total Expenses**	$513,984	$491,282	$22,702
	Less Income Adj.			
27	Amort Debt Disc/Exp Bonds	($74)	($70)	($5)
28	Interest on Cust Deposits	($2,548)	($2,532)	($16)
29	AFUDC Income	$0	$0	$0
30	**Total**	$516,606	$493,883	$22,723

CLECO POWER LLC
Proposed Class Billing
Retail Billing for 12 Months Ending 06/2025
($000)

LPSC Docket No. U-XXXXX
Exhibit FDW - 3
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Line No.	Rate Class	@ Current Rates								@ Proposed Rates								Change	
		Base	IICR	FUEL	EE	EDIT Credit	Storm	Dolet	Total	Base	IICR	FUEL	EE	EDIT Credit	Storm	Dolet	Phase-In	Total	Total	%
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T
1	Res	$285,790	$20,038	$152,301	$9,839	($2,785)	$13,445	$13,655	$492,284	$348,512	$36,250	$124,245	$5,734	($2,755)	$13,445	$11,355	($19,952)	$516,784	$24,510	5.0%
2	GSO	$32,831	$2,274	$14,084	$813	($320)	$1,509	$1,533	$52,723	$39,994	$4,160	$11,489	$673	($320)	$1,509	$1,275	($2,291)	$56,490	$3,767	7.1%
3	GS9	$149,944	$10,395	$93,927	$5,193	($1,459)	$6,884	$6,992	$271,875	$182,651	$18,998	$76,624	$4,302	($1,459)	$6,884	$5,814	($10,452)	$283,352	$11,477	4.2%
4	GS9P	$51,020	$3,460	$43,074	$172	($499)	$2,601	$2,641	$102,490	$62,455	$6,490	$35,139	$172	($499)	$2,601	$2,197	($3,577)	$104,983	$2,493	2.4%
5	MGS	$6,655	$480	$4,045	$237	($57)	$295	$299	$12,145	$8,327	$866	$3,300	$196	($57)	$295	$249	($477)	$12,689	$544	4.5%
6	Lgt	$13,097	$771	$3,170	$185	($126)	$461	$468	$18,016	$15,776	$1,641	$2,586	$153	($126)	$461	$389	($904)	$19,977	$1,961	10.9%
7	LPS	$34,531	$1,178	$42,876	$4	($325)	$370	$376	$79,012	$40,626	$3,543	$34,979	$4	($325)	$370	$313	($2,327)	$77,183	($1,829)	-2.3%
9	Misc	$24,747							$24,747	$24,747								$24,747	$0	0.0%
8	Attrition		$2,111						$2,111											
10	Total	$598,804	$40,726	$353,479	$16,442	($5,580)	$25,565	$25,964	$1,053,403	$723,088	$71,955	$288,362	$11,234	($5,580)	$25,565	$21,591	($40,000)	$1,096,216	$40,813	3.9%

Res	Residential
GSO	General Service Non-Demand
GS9	General Service Secondary Demand
GS9P	General Service Primary Demand
MGS	Municipal General Service
Lgt	Lighting
LPS	Large Power Service

CLECO POWER LLC
Comparison of General Service Non-Demand Billing
Current Billing vs. Proposed Billing

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Adjusted Billing Determinants for TME 6/22 w/ Revenues @ Current Rates and Proposed Rates

			Current Rates				Proposed Rates	
Line No.	Description	Billing Determinants	Rate	Revenue		Billing Determinants	Rate	Revenue
A	B	C	D	E	F	G	H	I
	General Service - Non-Demand				General Service - Non-Demand			
1	Customer Charge - No. of Bills	365,233	$15.00	$5,478,495	Customer Charge - No. of Bills	365,233	$20.00	$7,304,660
2	All kWh	307,418,020	$0.08446	$25,964,526	First 5,000 kWh	292,470,686	$0.09471	$27,699,000
3					Greater than 5,000 kWh	14,947,334	$0.11365	$1,698,739
4	Total Energy Charge	307,418,020		$25,964,526		307,418,020		$29,397,740
5	Total Revenues			$31,443,021				$36,702,400

CLECO POWER LLC
Comparison of Residential Billing
Current Billing vs. Proposed Billing
At Various Usage Levels

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					CURRENT RATES							PROPOSED RATES										
A	B	C		D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V
		# of Cust >		% of Cust	Base	EE	RCR	Storm	EDIT	Fuel	Total	Base	EE	RCR	Storm	Dolet	EDIT	Phase-In	Fuel	Total	Diff	% Diff
1	Summer Bill @ 250 kWh	228,901	250	90.1%	$26	$1	$1	$2	($0)	$10	$41	$32	$0	$3	$2	$2	($0)	($1)	$8	$47	$5	13.2%
2	Summer Bill @ 500 kWh	210,857	500	83.0%	$44	$1	$3	$3	($0)	$21	$71	$52	$1	$5	$3	$3	($0)	($3)	$17	$77	$6	8.3%
3	Summer Bill @ 750 kWh	186,234	750	73.3%	$61	$2	$4	$3	($1)	$31	$101	$72	$1	$8	$3	$3	($1)	($4)	$25	$108	$6	6.2%
4	Summer Bill @ 1000 kWh	156,889	1,000	61.8%	$79	$3	$6	$4	($1)	$41	$131	$92	$2	$10	$4	$3	($1)	($6)	$34	$138	$7	5.2%
5	Summer Bill @ 1500 kWh	96,518	1,500	38.0%	$121	$4	$8	$5	($1)	$62	$199	$140	$2	$15	$5	$4	($1)	($8)	$51	$207	$9	4.4%
6	Summer Bill @ 2000 kWh	52,001	2,000	20.5%	$171	$5	$11	$6	($2)	$83	$274	$198	$3	$20	$6	$5	($2)	($11)	$67	$286	$12	4.3%
7	Summer Bill @ 2500 kWh	26,533	2,500	10.4%	$221	$7	$14	$6	($2)	$103	$350	$255	$4	$25	$6	$5	($2)	($14)	$84	$365	$15	4.3%
8	Summer Bill @ 3000 kWh	13,283	3,000	5.2%	$271	$8	$17	$7	($2)	$124	$425	$313	$5	$30	$7	$6	($2)	($17)	$101	$443	$18	4.3%
9	Summer Bill @ 3500 kWh	6,855	3,500	2.7%	$322	$10	$19	$8	($3)	$145	$501	$370	$6	$35	$8	$7	($3)	($19)	$118	$522	$21	4.2%
10	Summer Bill @ 4000 kWh	3,646	4,000	1.4%	$372	$11	$22	$9	($3)	$165	$576	$428	$6	$40	$9	$7	($3)	($22)	$135	$601	$24	4.2%
11	Summer Bill @ 4500 kWh	2,047	4,500	0.8%	$422	$12	$25	$10	($3)	$186	$652	$486	$7	$45	$10	$8	($3)	($25)	$152	$680	$28	4.2%
12	Summer Bill @ 5000 kWh	1,189	5,000	0.5%	$472	$14	$28	$11	($4)	$207	$728	$543	$8	$50	$11	$9	($4)	($28)	$169	$758	$31	4.2%
13	Winter Bill @ 250 kWh	220,177	250	86.8%	$26	$1	$1	$2	($0)	$10	$41	$32	$0	$3	$2	$2	($0)	($1)	$8	$47	$5	13.2%
14	Winter Bill @ 500 kWh	187,378	500	73.9%	$44	$1	$3	$3	($0)	$21	$71	$52	$1	$5	$3	$3	($0)	($3)	$17	$77	$6	8.3%
15	Winter Bill @ 750 kWh	148,397	750	58.5%	$61	$2	$4	$3	($1)	$31	$101	$72	$1	$8	$3	$3	($1)	($4)	$25	$108	$6	6.2%
16	Winter Bill @ 1000 kWh	112,405	1,000	44.3%	$79	$3	$6	$4	($1)	$41	$131	$92	$2	$10	$4	$3	($1)	($6)	$34	$138	$7	5.2%
17	Winter Bill @ 1500 kWh	58,495	1,500	23.1%	$114	$4	$8	$5	($1)	$62	$192	$132	$2	$15	$5	$4	($1)	($8)	$51	$199	$8	4.0%
18	Winter Bill @ 2000 kWh	28,764	2,000	11.3%	$149	$5	$11	$6	($2)	$83	$252	$172	$3	$20	$6	$5	($2)	($11)	$67	$260	$9	3.4%
19	Winter Bill @ 2500 kWh	14,153	2,500	5.6%	$183	$7	$14	$6	($2)	$103	$312	$212	$4	$25	$6	$5	($2)	($14)	$84	$321	$9	3.0%
20	Winter Bill @ 3000 kWh	7,161	3,000	2.8%	$218	$8	$17	$7	($2)	$124	$372	$252	$5	$30	$7	$6	($2)	($17)	$101	$383	$10	2.8%
21	Winter Bill @ 3500 kWh	3,791	3,500	1.5%	$253	$10	$19	$8	($3)	$145	$432	$292	$6	$35	$8	$7	($3)	($19)	$118	$444	$11	2.6%
22	Winter Bill @ 4000 kWh	2,119	4,000	0.8%	$288	$11	$22	$9	($3)	$165	$493	$332	$6	$40	$9	$7	($3)	($22)	$135	$505	$12	2.5%
23	Winter Bill @ 4500 kWh	1,250	4,500	0.5%	$323	$12	$25	$10	($3)	$186	$553	$372	$7	$45	$10	$8	($3)	($25)	$152	$566	$13	2.3%
24	Winter Bill @ 5000 kWh	762	5,000	0.3%	$358	$14	$28	$11	($4)	$207	$613	$412	$8	$50	$11	$9	($4)	($28)	$169	$627	$14	2.3%

A	B	C	D	E	F	G
Line No.	Description	Billing Determinants	Current Rate	Revenue	Proposed Rate	Revenue
	Residential					
1	Customer Charge - No. of Bills	3,046,133	$9.00	$27,415,197	$12.00	$36,553,596
2	Summer kWh ≤ 1,000	1,220,789,912	$0.06977	$85,174,512	$0.08001	$97,677,592
3	Summer kWh ≤ 1,500	371,374,864	$0.08372	$31,091,504	$0.09601	$35,655,540
4	Summer kWh > 1,500	449,518,465	$0.10047	$45,163,120	$0.11522	$51,792,781
5	Winter kWh	1,581,801,426	$0.06977	$110,362,285	$0.08001	$126,562,771
6	Total Energy Charge	3,623,484,667 OK		$271,791,421		$311,688,683
	Other Residential Revenue:					
7	Horsepower	126,037	$2.00	$252,074	$2.25	$283,583
8	Power Miser Discount			($14,048)		($14,048)
9	Facilities Charge			$58		$58
10	**Total Base Revenue**			**$299,444,702**		**$348,511,872**
11	**Total FRP Revenue - Energy Chg kWh**	3,623,484,667	$0.00553	$20,037,870	$0.01000	$36,250,135
12	**Energy Efficiency**	3,623,484,667	$0.00272	$9,839,382	$0.00158	$5,733,914
13	**Total Non-Fuel Revenue**			**$329,321,955**		**$390,495,921**

A	B	C	D	E	F	G
	General Service Non-Demand	Billing Determinants	Rate	Revenue	Rate	Revenue
14	Customer Charge - No. of Bills	370,683	$15.00	$5,560,245	$20.00	$7,413,660
15	All kWh	327,971,942	$0.08446	$27,700,510		
16	kWh ≤ 5,000 (GSO, SCO)	292,470,686			$0.09471	$27,699,000
17	kWh > 5,000 (GSO, SCO)	14,947,334			$0.11365	$1,698,739
18	Other GS Non-Demand kWh	20,553,923			$0.09471	$1,946,599
19	Irrigation - kWh (summer only)	6,879,624	$0.16000	$1,100,740	$0.17941	$1,234,285
20	Total Energy Charge	334,851,566		$28,801,250		$32,578,623
		OK				
21	Facilities Charge			$1,800		$1,800
22	**Total Base Revenue**			**$34,363,295**		**$39,994,083**
23	**Total FRP Revenue - Energy Chg kWh**	334,851,566	$0.00679	$2,273,642	$0.01242	$4,159,947
24	**Energy Efficiency**	334,851,566	$0.00243	$812,624	$0.00201	$673,241
25	**Total Non-Fuel Revenue**			**$37,449,561**		**$44,827,270**
	General Service Demand Secondary Voltage	Billing Determinants	Rate	Revenue	Rate	Revenue
26	Customer Charge	113,192	$25.00	$2,829,800	$28.00	$3,169,376
27	Energy Charge - kWh	1,953,017,686	$0.02139	$41,775,048	$0.02491	$48,654,302
28	S&C ≤ 200 hrs & 70 MWh	239,304,555	$0.03400	$8,136,355	$0.03960	$9,476,199
29	S&C > 200 hrs & 70 MWh	24,150,443	$0.02350	$567,535	$0.02737	$660,994
30	Total Energy Charge	2,216,472,684		$50,478,939		$58,791,494
		OK				
31	Demand Charge - kW	6,482,215	$14.40	$93,343,891	$16.77	$108,715,178
32	S&C Demand Chge - kW	1,161,344	$8.55	$9,929,495	$9.96	$11,564,622
33	Excess Reactive Demand	286,141	$0.70	$200,298	$0.80	$228,913
34	IDS/LED Demand Discounts			($72,403)		($84,326)
35	Total Demand Charge			$103,401,281		$120,424,386
36	Facilities Charge			$22,059		$22,059
37	EDRC			($54,508)		($54,508)
38	**Total Base Revenue**			**$156,677,570**		**$182,352,808**
39	**Total FRP Revenue - Demand Chg kW**	7,643,559	$1.36	$10,395,240	$2.49	$18,998,234
43	**Energy Efficiency**	2,139,664,101	$0.00243	$5,192,574	$0.00201	$4,301,933
44	**Total Non-Fuel Revenue**			**$172,265,385**		**$205,652,974**
	General Service Demand Primary Voltage	Billing Determinants	Rate	Revenue	Rate	Revenue
45	Customer Charge	1,269	$250	$317,250	$250	$317,250
46	Customer Charge (Customer A)	24	$100	$2,400	$100	$2,400
47	Energy Charge - kWh	952,884,789	$0.01867	$17,790,359	$0.02170	$20,681,105
48	Energy Charge - kWh (Customer A)	5,744,800	$0.00523	$30,045	$0.00523	$30,045
49	Total Energy Charge	958,629,589		$17,820,404		$20,711,150
50	Demand Charge - kW	1,985,208	$13.65	$27,098,087	$15.87	$31,501,240
51	Demand Charge - kW (Customer A)	96,000	$4.05	$388,800	$4.05	$388,800
52	Total Demand Charge	2,081,208		$27,486,887		$31,890,040
53	Excess Reactive Demand	270,114	$0.70	$189,080	$0.80	$216,091
54	Excess Reactive Demand (Customer A)	0	$0.70	$0	$0.00	$0
55	Total Excessive Reactive Demand	270,114		$189,080		$216,091
56	IDS/LED Demand Discounts			$0		$0
57	Total Demand Related Charges			$27,675,967		$32,106,131
58	Facilities Charge			$149,944		$149,944
59	EDRC			($2,193,900)		($2,193,900)
60	**Total Base Revenue**			**$43,772,065**		**$51,092,975**
61	**Total FRP Revenue - Demand Chg kW**	2,081,208	$1.42	$2,955,315	$2.59	$5,382,630
66	**Energy Efficiency**	1,146	$150	$171,900	$150	$171,900

A	B	C	D	E	F	G
67	**Total Non-Fuel Revenue**			**$46,899,280**		**$56,647,505**
	General Service Demand Primary Voltage QF Standby Service - Total	**Billing Determinants**	**Rate**	**Revenue**	**Rate**	**Revenue**
68	Administrative Charge	48	$500	$24,000	$500	$24,000
69	Subscription Charge	834,000	$2.15	$1,793,100	$2.50	$2,084,460
70	Back-up Power Demand Charge	3,753,556	$0.95	$3,565,878	$1.10	$4,145,296
71	Back-up Power Energy Charge	47,421,782	AC - varies	$2,791,052	AC - varies	$3,244,569
72	Maintenance Power Demand Charge	244,065	$0.55	$134,236	$0.64	$156,048
73	Maintenance Power Energy Charge	2,711,895	AC - varies	$157,153	AC - varies	$182,689
74	QF Customer Charge			$4,799		$4,799
75	Excess Reactive Demand	100,201	$0.70	$70,141	$0.80	$80,161
76	Facilites Charge			$783,774		$783,774
77	**Total Base Revenue**			**$9,324,133**		**$10,705,795**
	FRP Riders					
78	Subscription - kW	834,000	$0.21	$175,140	$0.44	$363,487
79	Back-up - kW	3,753,556	$0.09	$337,820	$0.19	$722,855
80	Maintenance. - kW	244,065	$0.05	$12,203	$0.11	$27,212
81	Total FRP Revenue			$525,163		$1,113,553
82	**Total Non-Fuel Revenue**			**$9,849,297**		**$11,819,348**
	Municipal	**Billing Determinants**	**Rate**	**Revenue**	**Rate**	**Revenue**
83	Customer Charge	33,330	$20.00	$666,600	$25.00	$833,250
84	Energy Charge - kWh	97,463,637	$0.06657	$6,488,154	$0.07689	$7,493,878
85	Facilities Credit			($48)		($48)
86	**Total Base Revenue**			**$7,154,706**		**$8,327,080**
87	**Total FRP Revenue - Energy Chg kWh**	97,463,637	$0.00493	$480,496	$0.00889	$866,134
94	**Energy Efficiency**	97,463,637	$0.00243	$236,526	$0.00201	$195,957
95	**Total Non-Fuel Revenue**			**$7,871,729**		**$9,389,171**
	Street Lighting	**Billing Determinants**	**Rate**	**Revenue**	**Rate**	**Revenue**
96	Unmetered Customer Charge	942	$10.00	$9,420	$15.00	$14,130
97	Fixture Charge	75,345,343	various	$13,533,456	various	$15,744,635
98	Fixture Charge - by contract	982,391	various	$31,701	various	$36,882
99	Total Fixture Charge	76,327,734		$13,565,156		$15,781,516
100	Facilities Charge			$20,795		$20,795
101	Facilities Credit			($40,734)		($40,734)
102	**Total Base Revenue**			**$13,554,637**		**$15,775,707**
103	**Total FRP Revenue - Energy Chg kWh**	76,327,734	$0.01010	$770,910	$0.02150	$1,640,896
106	**Energy Efficiency**	76,327,734	$0.00243	$185,233	$0.00201	$153,462
107	**Total Non-Fuel Revenue**			**$14,510,781**		**$17,570,065**
	Large Power Service	**Billing Determinants**	**Rate**	**Revenue**	**Rate**	**Revenue**
108	Customer Charge	60	$10,000	$600,000	$10,000	$600,000
109	Energy Charge - kWh	406,128,000	$0.00174	$706,663	$0.00240	$976,134
110	Energy Charge - kWh (Customer B)	104,686,000	varies	$3,370,109	varies	$3,370,109
111	Energy Charge - kWh (Customer C)	259,589,951	$0.00594	$1,541,964	$0.00594	$1,541,964
112	Energy Charge - kWh (Customer C)	185,410,573	$0.00594	$1,101,339	$0.00594	$1,101,339
113	Energy Charge - kWh (Customer C)	17,348,654	$0.03500	$607,203	$0.03500	$607,203
114	**Total Energy Charges**	973,163,178		$7,327,278		$7,596,749
115	Demand Charge - kW	880,404	$21.20	$18,664,565	$29.28	$25,781,922
116	Contract Demand Charge (Customer C)	360,000	$19.15	$6,894,000	$19.15	$6,894,000

A	B	C	D	E	F	G
117	SAP Demand - kW day	4,511,020	$1.05	$4,736,571	$1.05	$4,736,571
118	IDS/LED Demand Discounts			$0		$0
119	Total Demand Charge			$30,295,136		$37,412,493
120	Facilities Charge			$477,972		$477,972
121	Facilities Credit (Customer D & E)	646,404	($7.42)	($4,796,318)	($10.25)	($6,625,297)
122	**Total Base Revenue Billings**			**$33,904,068**		**$39,461,917**
123	Revenue Imputation (Refund)			$0		$0
124	**Total Base Revenue**			**$33,904,068**		**$39,461,917**
125	**Total FRP Revenue - Dmd Chg kW**	1,240,404	$0.95	$1,178,384	$2.86	$3,542,999
128	**Energy Efficiency**	24	$150	$3,600	$150	$3,600
129	**Total Non-Fuel Revenue**			**$35,086,051**		**$43,008,516**
130	**Compression & Pumping Service**					
131	Customer F	12	$1,000	$12,000	$1,000	$12,000
132	Customer G	12	$1,000	$12,000	$1,000	$12,000
133	Customer H	12	$1,000	$12,000	$1,000	$12,000
134	Customer Charge	36		$36,000		$36,000
135	Customer F	22,326,000	$0.01100	$245,586	$0.01280	$285,828
136	Customer G	49,316,000	$0.01100	$542,476	$0.01280	$631,366
137	Customer H	88,556,000	$0.01100	$974,116	$0.01280	$1,133,735
138	Energy Charge	160,198,000		$1,762,178		$2,050,929
139	Customer F	0	$0.70	$0	$0.80	$0.00
140	Customer G	15,905	$0.70	$11,134	$0.80	$12,724.00
141	Customer H	23,442	$0.70	$16,409	$0.80	$18,753.60
142	Reactive Demand	39,347		$27,543		$31,478
143	**Total Base Revenue Billings**			**$1,825,721**		**$2,118,407**

A	B	C	D	E	F	G
	ALL RETAIL CUSTOMERS					
144	Total Base Revenue (above)			$600,021		$698,341
145	FRP Riders			$38,617		$71,955
146	Energy Efficiency			$16,442		$11,234
147	Total Non-Fuel Revenue			$655,080		$781,529
148	Revenue Imputation (Refund)			$0		$0
149	Total Non-Fuel Billings			$655,080		$781,529

Third Revision

CLECO
Energizing Your Tomorrow

Rate Schedule - RS
Revision #3

Page 1.1
Effective Date: 07/01/2024
Supersedes: RS 01/01/2023
Authority: U-XXXXX

RESIDENTIAL ELECTRIC SERVICE

(1) AVAILABILITY

Service under this Schedule is available at any point on the Company's electric system where facilities of adequate capacity and suitable phase and voltage are adjacent to the premises to be served.

(2) APPLICATION

This Schedule is applicable to service furnished under the following conditions:

(a) Private residences and individual family apartments for domestic purposes therein, where service is supplied at one point of delivery and measured through one meter or one metering installation.

(b) Combination domestic and farm purposes, provided that farm use must be limited to the processing of products grown or raised on such farm, or products for ultimate consumption on such farm. Such usage of electricity for farm purposes, in conjunction with residence use, shall ordinarily be measured and billed through one meter. However, when the distance on any one such farm between the residence and the place of other use is, in the opinion of the Company, so great as to render such combination impractical, each location will be metered and billed separately.

This service may not be shared or resold.

(3) TYPE OF SERVICE

Service shall be a single-phase alternating current at any one standard voltage. Voltage shall be at the option of the Company.

(4) NET MONTHLY RATE

(a) Customer Charge: $12.00

(b) Plus **Energy Charge** per kWh, for consumption in the billing months of:

May - October:	≤1,000kWh	**$0.08001 per kWh**
	1,001-1,500 kWh	**$0.09601 per kWh**
	≥1,501 kWh	**$0.11522 per kWh**
November - April:	All kWh	**$0.08001 per kWh**

(c) Plus **Additional Facilities Charges,** if applicable. The Facilities Charge shall be agreed upon between the Company and the Customer based on the cost of the facilities and the anticipated annual charges required. Such agreement shall be in writing and made a part of the electric service agreement

(d) Plus **Fuel Cost Adjustment** as determined under Adjustment Clause FA

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(e) Plus **Environmental Cost Adjustment** as determined under Adjustment Clause EA

(f) Plus **Storm Restoration Cost Adjustment** as determined under Adjustment Clause SRCA

(g) Plus **Surcredit Adjustment** as determined under Adjustment Clause SC

(h) Plus **Lighting Cost Adjustment** as determined under Rider RSSL, if applicable

(i) Plus **Infrastructure & Incremental Costs Recovery Adjustment** as determined under Rider IICR

(j) Plus **Energy Efficiency Charge** as determined under Rider EE

(k) Plus **Cleco Alternative Rate for Electricity** fuel discounts as determined under Rider CARE, if applicable

(l) Plus 50% of the applicable **Franchise Fee** for electric service within the incorporated limits of a City which assesses a municipal franchise fee as per LPSC Order No. R-27859. Such portions of the municipal franchise fee shall be added to and separately stated on the monthly electric bill for each applicable Customer located within the incorporated limits of that City

(m) Plus the proportionate part of any **new tax or increased rate of tax,** or governmental imposition levied or assessed against the Company or upon its electric business, as the result of any new or amended laws that may become effective and operative after **December 1, 2009.**

(5) MINIMUM CHARGE

The minimum charge shall be the Customer Charge **plus** any Additional Facilities Charges **plus** Energy Charges **plus** Fuel Charges **plus** Environmental Charges **plus** applicable Storm Restoration Cost Adjustments **plus** any applicable Surcredit Adjustments **plus** any applicable Lighting Cost Adjustments **plus** Infrastructure & Incremental Costs Recovery Adjustments **plus** any applicable Energy Efficiency Charge **plus** 50% of any applicable Franchise Fee.

(6) SERVICE PERIOD

Not less than one billing month.

(7) PAYMENT

Bills for service furnished hereunder shall be rendered Net and Gross. The Net Bill is due when rendered and if not paid within 20 days the Gross Bill becomes due. The Gross Bill is the Net Bill **plus** 5% of the first $1,000 and 2% of any amount greater than $1,000.

(8) TERMS AND CONDITIONS

Service furnished under this Schedule is subject to the Company's Standard Terms and Conditions for Electric Service and to all applicable Rider Schedules and adjustment clauses.

Third Revision

CLECO
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Rate Schedule - GS
Revision #3

Page 2.1
Effective Date: 07/01/2024
Supersedes: GS 01/01/2023
Authority: U-XXXXX

GENERAL SERVICE

(1) AVAILABILITY

Service under this Schedule is available at any point of the Company's electric system where facilities of adequate capacity and suitable phase and voltage are adjacent to the premises to be served.

(2) APPLICATION

This Schedule is applicable to service furnished for **commercial and industrial** purposes. Service will be supplied at one point of delivery, measured through one meter or metering installation, and shall not be shared or resold.

At the Company's option, Customers receiving service at a **secondary** supply voltage and whose transformer capacity exceeds 300 kVA, may be required to contract for service under terms of the Company's Standard Agreement for Electric Service.

Customers receiving service at a **primary** supply voltage shall contract for service under terms of the Company's Standard Agreement for Electric Service.

When a Customer has exceeded 5,000 kWh per month for four consecutive months, the Customer will be billed at the demand rate. Should usage for the next twelve consecutive billing months not exceed 5,000 kWh, the Customer will be given the opportunity to return to the energy only rate.

(3) TYPE OF SERVICE

Single-phase or three-phase alternating current at any one standard voltage. Voltage and phase shall be at the option of the Company.

(4) NET MONTHLY RATE

		Secondary Supply Voltage		Primary Supply Voltage
		Non-Demand	Demand	Demand
(a)	**Customer Charge of**	**$20.00**	**$28.00**	**$250.00**
(b)	Plus **Billing Demand Charge per kW of**	**N/A**	**$16.77**	**$15.87**
(c)	Plus **Energy Charge per kWh of**			
	≤ 5,000 kWh	**$0.09471**		
	> 5,000 kWh	**$0.11365**		
	All kWh		**$0.02491**	**$0.02170**
(d)	Plus **Reactive Demand Charge per RkVA of**	**N/A**	**$0.80**	**$0.80**

(a) Plus **Fuel Cost Adjustment** as determined under Adjustment Clause FA

(b) Plus **Environmental Cost Adjustment** as determined under Adjustment Clause.EA

(c) Plus **Storm Restoration Cost Adjustment** as determined under Adjustment Clause SRCA

(d) Plus **Surcredit Adjustment** as determined under Adjustment Clause SC

(e) Plus **Facilities Charges,** if applicable

(f) Plus **Infrastructure & Incremental Costs Recovery Adjustment** as determined under Rider IICR

(g) Plus **Energy Efficiency Charge** as determined under Rider EE

(h) Plus 50% of the applicable **Franchise Fee** for electric service within the incorporated limits of a City which assesses a municipal franchise fee as per LPSC Order No. R-27859. Such portions of the municipal franchise fee shall be added to and separately stated on the monthly electric bill for each applicable Customer located within the incorporated limits of that City.

(i) Plus the proportionate part of any **new tax or increased rate of tax,** or governmental imposition levied or assessed against the Company or upon its electric business, as the result of any new or amended laws that may become effective and operative after **December 1, 2009.**

(5) BILLING DEMAND

For normal loads the Billing Demand shall be the highest amount determined in accordance with any of the following provisions:

(a) The highest 15 minute peak kW load, adjusted to the nearest whole kW, measured during the current month.

(b) 100% of the highest demand similarly established during the preceding eleven months, excluding the months of January, February, March, April, May, October, November and December.

(c) 50% of the Contract Power specified in the Agreement for Electric Service.

(6) FACILITIES CHARGE

The Facilities Charge shall be agreed upon between the Company and the Customer based on the cost of the facilities and the anticipated annual charges required. Such agreement shall be in writing and made a part of the electric service agreement.

(7) REACTIVE DEMAND

Reactive kilovolt ampere (RkVA) load may be measured and whenever found to exceed 48% of the measured kW load; the Reactive Demand Charge shall be $0.80 per RkVA of such excess. RkVA may be determined by multiplying the kW load by the ratio of reactive kilovolt ampere hours (RkVAh) to the kWh for the current month.

The Company may, at its option, meter kilovolt amperes (kVA) for those Customers whose RkVA demand consistently exceeds 48% of measured kW demand. For such Customers, the billing demand for part (4b) above will be 90% of the highest average 15 minute peak kVA load. No additional Reactive Demand Charges will apply to these Customers.

(8) METERING

For service delivered at primary voltage, service may be metered at Customer's utilization voltage with compensation for transformer losses. Compensation shall be based on the operating characteristics of the transformer serving the Customer.

(9) MINIMUM CHARGE

The Customer Charge **plus** an applicable Energy Charge **plus** any applicable Billing Demand Charge **plus** any applicable Facilities Charge **plus** Fuel Cost Adjustment Clause FA **plus** Environmental Cost Adjustment EA **plus** any applicable Storm Restoration Cost Adjustment plus any applicable Surcredit Adjustment **plus** Infrastructure & Incremental Costs Recovery Adjustment as determined under Rider IICR **plus** any applicable Energy Efficiency Charge as determined under Rider EE **plus** any applicable Reactive Demand Charge **plus** any applicable Franchise Fee but not less than the minimum charge specified in the Agreement for Electric Service.

(10) SERVICE PERIOD

As specified in the Agreement for Electric Service, but not less than one year.

(11) PAYMENT

Bills for service furnished hereunder shall be rendered Net and Gross. The Net Bill is due when rendered and if not paid within 20 days the Gross Bill becomes due. The Gross Bill is the Net Bill plus 5% of the first $1,000 and 2% of any amount greater than $1,000.

(12) TERMS AND CONDITIONS

Service under this Schedule is subject to the Company's Standard Terms and Conditions for Electric Service and to all applicable Rider Schedules and adjustment clauses.

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Rate Schedule - OLS
Revision #4

UNMETERED AND OUTDOOR LIGHTING SERVICE

(1) AVAILABILITY

Service under this Schedule is available at any point on the Company's electric system where facilities of adequate capacity and suitable voltage are adjacent to the area to be served.

(2) APPLICATION

This Schedule is applicable to outdoor lighting service supplied by Company approved fixtures listed herein, as well as certain unmetered applications where the maximum demand is less than 1 kW per fixture and the energy is easily determinable based on consistent usage. Availability is limited to locations on the Company's distribution system unless subsequently provided for below.

(3) TYPE OF SERVICE

Alternating current at any standard voltage designated by the Company. Unmetered service for area lighting will normally be supplied every night from dusk to dawn.

(4) SERVICE OPTIONS

(a) COMPANY OWNED, OPERATED AND MAINTAINED ON OVERHEAD SYSTEM

Where service is supplied from the Company's existing overhead distribution system in standard fixtures mounted on Company owned poles and the Company owns, operates, and maintains fixtures, luminaries, and associated equipment, including lamp renewals, the monthly charges per unit shall include the charges for energy, maintenance, and fixture for the applicable luminary plus any other applicable charges as detailed in the following NET MONTHLY RATE section. If the fixtures supplied are Dark Sky compliant, an additional monthly charge per unit to the Company Owned column will be applicable as detailed in the NET MONTHLY RATE section under Dark Skies Adder.

(b) CUSTOMER OWNED, COMPANY OPERATED AND MAINTAINED ON OVERHEAD SYSTEM

Where the Customer owns and replaces all poles, fixtures, luminaries and all wiring of the lighting system and the Company performs photo control and lamp replacements and furnishes energy for operation, the monthly charge per unit shall include the charges for energy and maintenance for the applicable luminary as detailed in the following NET MONTHLY RATE section. This service option is only available on **Customer-owned facilities.** In no instance shall Customer-owned equipment be located on Company-owned facilities or rights-of-way. **This service option is closed to all new Customers with the exception of municipalities, the Louisiana Department of Transportation and Development, and railroad companies.**

(c) CUSTOMER OWNED, OPERATED AND MAINTAINED ON OVERHEAD SYSTEM

At the Customer's option and upon approval by the Company, the Company will provide energy to Customer owned, operated and maintained equipment in accordance to the section entitled ENERGY SERVICE CHARGE. **This service option is closed to all new Customers with the exception of municipalities, the Louisiana Department of Transportation and Development, and railroad companies.**

(d) UNDERGROUND SERVICE

At the Customer's option and upon approval by the Company, underground service may be provided. Customer will pay either a lump sum Contribution in Aid of Construction or applicable facilities charges.

(5) NET MONTHLY RATES

(a) Net **Base Charge(s)**, excluding fuel per unit, are determined as follows:

LUMINAIRES:	KWH	Customer Owned	Rate Code	Company Owned	Rate Code	DS Adder	Rate Code	Fixture Code
SECURITY LIGHT FIXTURES:								
100W R LED (48W) T2	17	$9.25	520	$11.70	521	$0.35	528	SL10TT2
100W R LED (48W) T5	17	$9.25	522	$11.70	523	$0.35	526	SL10TT5
100W R LED T5+PKG (48W)	17	$9.85	524	$12.40	525	$0.35	527	SL10PT5
COBRA HEAD FIXTURES:								
100W R LED (31W)	11	$9.15	530	$12.35	531	$0.30		C10GY
150W R LED (76W)	26	$10.60	532	$14.35	533	$0.30		C15GY(BK)
200W R LED (92W)	32			$14.15	512	$0.30		C20GY
250W R LED (115W)	40	$11.40	534	$18.45	535	$0.30		C25GY(BK)
400W R LED (209W)	72	$14.15	536	$22.30	537	$0.70		C40GY
SHOE BOX-FIXTURES:								
150W R LED (88W)	30	$10.60	540	$14.15	541	N/A		SB15
250W R LED (115W)	40	$11.40	542	$18.20	543	N/A		SB25
400W R LED (208W)	71	$14.15	544	$22.30	545	N/A		SB40
FLOODLIGHTS:								
250W R LED (119W)	41	$11.40	560	$18.20	561	N/A		FL25
400W R LED (201W)	69	$14.15	562	$22.30	563	N/A		FL40
1,000W R LED (261W)	89	$25.55	564	$51.25	565	N/A		FL100
DECORATIVE:								
LED – Granville-STD (39W)	14	$12.35	570	$18.20	571	N/A		AC10
LED – Lexington-STD (55W)	19	$10.60	574	$14.85	575	N/A		LX10
LED – Lexington-DSC (40W)	14	$12.50	582	$16.75	583	N/A		LX10D
LED – Traditionaire-STD (55W)	19	$12.35	584	$18.20	585	N/A		TD10
LED – Traditionaire-DSC (55W)	19	$14.35	576	$20.25	577	N/A		TD10D
LED – Washington-DSC (47W)	16	$16.40	586	$22.35	587	N/A		AC10D
LED – Breckenridge (53W)	19	$14.90	578	$20.55	579	N/A		BRK10BK(GN)
LED – Prague-DSC (53W)	19	$19.35	580	$25.00	581	N/A		PRG10BZ(BK)
EEPE INSTALLED LIGHTS:								
SIA 60	21	$5.20						
SLB160	55	$5.20						
SLB320	109	$5.20						
EZ LED VERSA PT-65	23	$5.20						

FIXTURES CLOSED TO NEW APPLICATIONS								
LUMINAIRES:	**KWH**	**Customer Owned**	**Rate Code**	**Company Owned**	**Rate Code**	**DS Adder**	**Rate Code**	**Fixture Code**
NEMA HEAD FIXTURES:								
175 Watt Mercury Vapor	68			$10.90	400	N/A		NEMA
COBRA HEAD FIXTURES:								
175 Watt Mercury Vapor	68			$7.00	410	N/A		COBRA
250 Watt Mercury Vapor	98	$11.40	416	$9.30	415	N/A		COBRA
250 Watt Metal Halide	98			$24.00	466	N/A		COBRA
400 Watt Mercury Vapor	156	$8.40	421	$12.75	420	N/A		COBRA
1,000 Watt Mercury Vapor	421			$38.45	428	N/A		COBRA
1,000 Watt High Pressure Sodium	368			$53.45	445	N/A		COBRA
100 Watt High Pressure Sodium	50	$8.85	431	$12.05	430	$0.30	438	COBRA
150 Watt High Pressure Sodium	72	$10.60	433	$14.15	432	$0.30	439	COBRA
250 Watt High Pressure Sodium	104	$11.40	436	$18.20	435	$0.30	437	COBRA
400 Watt High Pressure Sodium	162	$14.15	441	$22.30	440	$0.70	442	COBRA
SECURITY LIGHT FIXTURES:								
100W HPS - Night watchman (DS)	50	$8.90	402	$11.40	401	$0.35	403	NEMA
SHOE BOX FIXTURES:								
150 Watt High Pressure Sodium	72	$10.60	471	$14.15	470	N/A		SHOEBOX
250 Watt High Pressure Sodium	104	$11.40	473	$18.20	472	N/A		SHOEBOX
400 Watt High Pressure Sodium	162			$22.30	474	N/A		SHOEBOX
FLOODLIGHTS:								
250 Watt High Pressure Sodium	104	$11.40	451	$18.20	450	N/A		FLOOD
400 Watt High Pressure Sodium	162	$14.15	453	$22.30	452	N/A		FLOOD
1,000 Watt High Pressure Sodium	368	$25.55	455	$51.20	454	N/A		FLOOD
250 Watt Metal Halide	98	$11.40	461	$18.20	460	N/A		FLOOD
400 Watt Metal Halide	162	$14.15	463	$22.30	462	N/A		FLOOD
1,000 Watt Metal Halide	368	$25.55	465	$51.20	464	N/A		FLOOD
DECORATIVE:								
100W HPS - Acorn (Acadian)	50	$12.35	481	$18.20	480	$4.20	482	ACORN
100W HPS - Lexington (Dayform)	50			$14.85	485	$1.90	489	LEX-DAY
100W HPS - Traditionaire (Dayform)	50			$18.20	488	$2.05	490	TRADTN-DAY

(b) Plus **Facilities Charges,** if applicable, agreed upon between the Customer and the Company based on the difference between the cost of the facilities and the anticipated annual charges required. Such agreement shall be in writing and made a part of the electric service agreement.

(c) Plus **Fuel Cost Adjustment,** as calculated, based upon the total kWh included in the monthly bill times the adjustment per kWh for the current month computed in accordance with Rate Schedule FA.

(d) Plus **Environmental Cost Adjustment,** as calculated, based upon the total kWh included in the monthly bill times the adjustment per kWh for the current month computed in accordance with Rate Schedule EA.

(e) Plus **Storm Restoration Cost Adjustment,** as calculated, based upon the total kWh included in the monthly bill times the adjustment per kWh for the current month computed in accordance with Rate Schedule SRCA.

(f) Plus **Surcredit Adjustment,** as calculated, based upon the total kWH included in the monthly bill times the adjustment per kWh for the current month computed in accordance with the Rate Schedule SC.

(g) Plus **Infrastructure & Incremental Costs Recovery Adjustment** as determined under Rider IICR.

(h) Plus **Energy Efficiency Charges** as determined under Rider EE.

(i) Plus 50% of the applicable **Franchise Fee** for electric service within the incorporated limits of a City which assesses a municipal franchise fee as per LPSC Order No. R-27859. Such portions of the municipal franchise fee shall be added to and separately stated on the monthly electric bill for each applicable Customer located within the incorporated limits of that City.

(j) Plus the proportionate part of any **new tax or increased rate of tax,** or governmental imposition levied or assessed against the Company or upon its electric business, as the result of any new or amended laws that may become effective and operative after **December 1, 2009.**

(6) MINIMUM CHARGE

The **Unit Charge(s)** plus **Facilities Charges,** if applicable.

(7) CUSTOMER CONTRIBUTIONS IN AID OF CONSTRUCTION

When the investment by the Company in the installed luminaries and associated equipment exceeds three (3) times annual base revenue, the Customer will be required to pay all such excess as a Contribution in Aid of Construction prior to installation, except upon mutual agreement between the Customer and the Company for facilities charges.

(8) ENERGY SERVICE CHARGE

The Company will, at the option of the Customer, provide **energy only** to Customer-owned and maintained lamps not included in the preceding Fixture Charge table, subject to Company inspection and approval of such installations as follows: