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November 25, 2025

VIA UPS OVERNIGHT DELIVERY

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

RECEIVED

DEC 01 2025

LA Public Service Commission

Re: Application of Entergy Louisiana, LLC For Approval to Construct Votaw and Segno Solar Facilities, and For Cost Recovery (LPSC Docket No. U-_____)

Dear Mr. Frey:

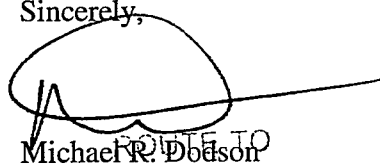
I have enclosed, on behalf of Entergy Louisiana, LLC (“ELL” or the “Company”), the original and three copies of the Company’s Application for Approval to Construct Votaw and Segno Solar Facilities, and for Cost Recovery. The Application is supported by the Direct Testimony and Exhibits of Michael J. Plaisance, Robert J. Fluth, Elizabeth C. Ingram, and Phong D. Nguyen. Please retain the original and two copies for your files and return a date-stamped copy to me in the enclosed, self-addressed envelope.

I have also enclosed five copies of the Confidential Version of the referenced filing, which is being provided under seal pursuant to the provisions of the LPSC General Order dated August 31, 1992, and Rules 12.1 and 26 of the Commission’s Rules of Practice and Procedure. The confidential materials included in the filing consist of competitively sensitive market information or sensitive infrastructure information, the disclosure of which may create an artificial target for suppliers/vendors or create physical security risks. For this reason, this material is confidential and commercially sensitive. The disclosure of the information contained herein would subject not only the Company, but also its customers, to a substantial risk of harm. Accordingly, it is critical that this information remain confidential.

Please retain the appropriately marked Confidential Version for your files and return a date-stamped copy to me in the enclosed, self-addressed envelope. Additional copies of the Confidential Version of this filing will be provided to appropriate representatives of the LPSC Staff and made available to other interested parties once a suitable Confidentiality Agreement has been executed.

If you have any questions, please do not hesitate to call me. Thank you for your courtesy and assistance with this matter.

Sincerely,



Michael R. Dodson

ROUTE FROM

MRD/jlc
 Enclosures
 cc: LPSC Commissioners (*public version only via electronic mail*)

DEPT. Bull DATE 12/1/25 DEPT. _____
 DEPT. _____ DATE _____ DEPT. _____
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BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

RECEIVED

DEC 01 2025

LA Public Service Commission

**IN RE: APPLICATION OF ENTERGY)
LOUISIANA, LLC FOR APPROVAL TO)
CONSTRUCT VOTAW AND SEGNO SOLAR)
FACILITIES, AND FOR COST RECOVERY)**

DOCKET NO. U-_____

**APPLICATION OF ENTERGY LOUISIANA, LLC FOR APPROVAL TO CONSTRUCT
VOTAW AND SEGNO SOLAR FACILITIES, AND FOR COST RECOVERY**

Pursuant to the Rules of Practice and Procedure of the Louisiana Public Service Commission (the “LPSC” or the “Commission”), Entergy Louisiana, LLC (“ELL” or “the Company”) respectfully submits this Application seeking, among other things, approval to construct the Votaw and Segno Solar Facilities (collectively, the “Proposed Solar Facilities”), and associated cost recovery, as set forth herein. The Company also requests that the Louisiana Public Service Commission (“LPSC” or “Commission”) approve, subject to ongoing discussions with Laidley, LLC (“Laidley”) described further below and in the accompanying testimony, allocation of the Proposed Solar Facilities to Laidley’s Group 3 subscription to ELL’s Rider Geaux Zero (“Rider GZ”), which is referred to as the Initial Renewable Subscription Amount in Laidley’s Corporate Sustainability Rider (“CSR”). In support of this Application, ELL submits the following:

PROPOSED SOLAR FACILITIES

I.

ELL is a limited liability company duly authorized and qualified to do and doing business in the State of Louisiana, created and organized for the purposes, among others, of generating, transmitting, distributing, and selling electricity for power, lighting, heating, and other such uses; and ELL is engaged in the business thereof in fifty-eight (58) of the sixty-four (64) parishes of the State of Louisiana.

II.

Through this Application, ELL seeks approval to construct the Proposed Solar Facilities, which consist of, for Votaw, a 141-megawatt (“MW”) alternating current (“AC”) solar photovoltaic (“PV”) electric generation facility to be constructed in Hardin County, Texas, and, for Segno, a 170-MW AC solar PV electric generation facility to be constructed in Polk County, Texas. As explained by Company witness Robert J. Fluth, the Proposed Solar Facilities are “greenfield” projects that were selected from two Requests for Proposals (“RFPs”)—the 2021 Request for Proposals for Photovoltaic Resources for Entergy Texas, Inc. (“2021 Solar RFP”) and the 2022 Request for Proposals for Renewable Resources for Entergy Texas, Inc. (“2022 Renewables RFP”)—conducted by Entergy Services, LLC (“ESL”)¹ for Entergy Texas, Inc. (“ETI”).

III.

As explained by both Company witnesses Michael J. Plaisance and Phong D. Nguyen, ETI submitted an application to the Public Utility Commission of Texas to amend its certificate of convenience and necessity to allow for construction of the Proposed Solar Facilities but, in a recent filing asking to withdraw the application, explained that it no longer intended or sought approval to construct, own, or operate the Proposed Solar Facilities due to ETI’s need to optimize other capital investments for the benefit of its customers. As explained by Mr. Plaisance, ELL recognized an opportunity to acquire the Proposed Solar Facilities to help with its own capacity needs and to respond to customer demand for renewable energy resources, including, in particular, by potentially assisting with fulfilling, in part, the Initial Renewable Subscription Amount in the CSR. ELL and ETI accordingly arranged for the Proposed Solar Facilities to be transferred from ETI to ELL, as set forth in Mr. Fluth’s testimony.

¹ ESL is an affiliate of the Entergy Operating Companies (“EOCs”) that provides engineering, planning, accounting, legal, technical, regulatory, and other administrative support services to each of the EOCs. The EOCs are ELL; Entergy Arkansas, LLC; Entergy Mississippi, LLC; Entergy New Orleans, LLC; and Entergy Texas, Inc.

IV.

As explained in the Direct Testimony of both Mr. Plaisance and Company witness Elizabeth C. Ingram, ELL is offering the Proposed Solar Facilities to Laidley to potentially assist with fulfilling, in part, the Initial Renewable Subscription Amount in the CSR. ELL and Laidley are continuing its discussions with respect to whether the Proposed Solar Facilities will be added to the Initial Renewable Subscription Amount.

V.

In the event Laidley does not agree to inclusion of the Proposed Solar Facilities in the Initial Renewable Subscription Amount, ELL will evaluate all available options. As Company witness Phong D. Nguyen explains, however, the costs for the Proposed Solar Facilities are below the Breakeven Parameters established by the Commission in its June 14, 2024 Order Number U-36697 (Corrected) in Docket No. U-36697² (the “3GW Order”). Thus, as Ms. Ingram explains, had the Proposed Solar Facilities been located in Louisiana and procured through the streamlined procurement process provided in the 3GW Order, the Proposed Solar Facilities would have been eligible for the expedited certification process approved in that Order. As a result, even if Laidley does not agree to subscribe to the Proposed Solar Facilities, ELL will seek certification of the Proposed Solar Facilities as system resources that are in the public interest.

² See LPSC Docket No. U-36697, *In re: Application for approval of an alternative market-based mechanism process seeking to secure up to 3,000 MW of solar resources, including certification of those resources, expansion of the Geaux Green Option Rider, and approval of a new renewable tariff.*

VI.

As Mr. Plaisance explains in his Direct Testimony, the Proposed Solar Facilities will help with the Company's continuing need for additional capacity while advancing the Company's resource-planning objectives of affordability, reliability, and environmental stewardship. Mr. Plaisance provides information concerning the Company's projected load and capacity and explains that the Company has a need for capacity from resources like the Proposed Solar Facilities. Mr. Plaisance further explains that the Proposed Solar Facilities will advance the Company's resource-planning goals by providing capacity from zero-carbon resources that fall below the Commission's Breakeven Parameters.

VII.

As Ms. Ingram opines in her Direct Testimony, certification and construction of the Proposed Solar Facilities would be in the public interest. As set forth above, ELL is offering the Proposed Solar Facilities to Laidley to potentially assist with fulfilling, in part, the Initial Renewable Subscription Amount in the CSR. If Laidley agrees to including the resources in the Initial Renewable Subscription Amount (and the Commission approves of the allocation),³ certification of the Proposed Solar Facilities will advance economic development in the state by further advancing the development of Laidley's large and economically transformational data center project in North Louisiana. Even more, the public interest would be served by adding the Proposed Solar Facilities to ELL's supply plan because, as set forth above and in Mr. Nguyen's Direct Testimony, the costs for the Proposed Solar Facilities fall below the 3GW Order's Breakeven Parameters and, thus, if they were located in Louisiana and had been procured through the 3GW Order's procurement process, would be eligible for expedited certification under the

³ As Ms. Ingram explains in her Direct Testimony, the Company believes it does not require approval of the proposed allocation to the Initial Renewable Subscription Amount, but is requesting such approval out of an abundance of caution under the circumstances of this case.

3GW Order. As Ms. Ingram explains, the Proposed Solar Facilities are emission-free resources that add diversity to ELL's generation mix and that, because of their carbon-free attributes further advance Louisiana as an attractive location for large commercial and industrial customers who seek to limit their carbon footprint while doing business in our state. For these and other reasons, the Proposed Solar Facilities should be certified as being in the public interest.

VIII.

As Ms. Ingram also explains, the market-testing through the RFPs, when analyzed in combination with results from Procurement Windows 1 and 2 of the 3GW Order procurement process, supports a finding that ELL has employed an acceptable, alternative market-based mechanism for the Proposed Solar Facilities. Because the Proposed Solar Facilities were originally being pursued by ETI, various requirements of the Commission's Market-Based Mechanisms Order ("MBM Order")⁴ were not satisfied. As explained in the accompanying testimony, however, the Proposed Solar Facilities were selected as cost-effective resources from the 2021 Solar RFP (as to Votaw) and the 2022 Renewables RFP (as to Segno), and the resources remain cost-competitive, as demonstrated by results from the first and second Procurement Windows conducted in connection with the 3GW Order. ELL should be found to have satisfied the requirements of the MBM Order by supporting its Application with an acceptable market-based mechanism. To the extent the Commission disagrees, ELL asks that the Commission exempt ELL from any requirements of the MBM Order that the Commission finds the Company has not satisfied.

⁴ See General Order (February 16, 2004), *In re: Development of Market-Based Mechanisms to Evaluate Proposals to Construct or Acquire Generating Capacity to Meeting Native Load, Supplements the September 20, 1983 General Order*, Docket No. R-26172 Subdocket A, as amended by General Order, Docket No. R-26172 Subdocket B, dated November 3, 2006 and further amended by the April 26, 2007 General Order and the amendments approved by the Commission at its October 15, 2008 Business and Executive Meeting; the October 29, 2008 General Order No. R-26172, Subdocket C; and the October 14, 2024 General Order No. R-34247.

COMPANY WITNESS TESTIMONY

VI.

In support of this Application, the Company presents testimony supporting a finding that construction of the Proposed Solar Facilities is in the public interest and in compliance with the requirements of the Commission's Orders. The testimony accompanying the Application describes the Company's resource planning process and needs, the 2021 Solar RFP and 2022 Renewables RFP, the estimated costs to construct the Proposed Solar Facilities, and the terms and conditions of the contracts to which ELL is a party to procure the materials for, and construct, the resources.

VII.

The Direct Testimony and associated exhibits for the following witnesses supporting the requested relief are attached hereto and filed herewith as part of this Application. It is anticipated that these witnesses, as well as any necessary rebuttal witnesses, will be called to testify at the hearing of this matter on the subjects indicated below:

- Michael J. Plaisance, who is employed as Senior Manager, Resource Planning for ELL, provides an overview of the Company's Application and a brief description of Laidley's CSR and the potential that the Proposed Solar Facilities could be allocated to Laidley's Initial Renewable Subscription Amount under the CSR. Mr. Plaisance also explains the Company's resource-planning objectives and process before explaining the manner in which the Proposed Solar Facilities satisfy the Company's resource-planning objectives. Mr. Plaisance concludes by explaining the reasons for which the Proposed Solar Facilities contribute to satisfying the Company's customers' needs for sustainable generation options.
- Robert J. Fluth, who is employed by ESL as Director, Power Development, provides details of the Proposed Solar Facilities as well as the Company's current cost estimates for the Proposed Solar Facilities and details concerning the Engineering, Procurement, and Construction ("EPC") contracts for constructing the Proposed Solar Facilities.
- Elizabeth C. Ingram, who is employed by ESL as Director, Regulatory Strategy, testifies concerning the CSR; the Initial Renewable Subscription Amount, which is Laidley's Group 3 subscription to Rider GZ; and the proposed allocation of the Proposed Solar Facilities to the Initial Renewable Subscription Amount. Ms. Ingram further explains the Company's requested ratemaking treatment (which is the same as the ratemaking treatment for resources allocated to subscriptions under Rider GZ), the reasons for which certification of the Proposed Solar Facilities serves the public interest (including the fact that, as

demonstrated by the analysis presented by Company witness Phong D. Nguyen, the Proposed Solar Facilities fall below the Breakeven Parameters established as part of the 3GW Order), and the reasons for which selection of the Proposed Solar Facilities from the two RFPs conducted by ESL on behalf of ETI should be viewed as an acceptable alternative market-based mechanism under the Commission's MBM Order.

- Phong D. Nguyen, who is employed by ESL as Director, Advanced Economic Planning for the System Planning & Operations organization, testifies concerning the analysis performed by ESL for the Proposed Solar Facilities that demonstrates the resources fall below the Breakeven Parameters established as part of the Commission's 3GW Order. In addition, Mr. Nguyen describes the 2021 Solar RFP from which Votaw was selected and the 2022 Renewables RFP from which Segno was selected, including the manner in which each RFP was conducted and the analyses that led to the selection of the Proposed Solar Facilities from those RFPs.

REQUEST FOR TIMELY TREATMENT

VIII.

As explained in the Direct Testimony of Company witness Michael J. Plaisance, the Company is seeking timely approval of its Application in order to issue a Final Notice to Proceed ("FNTP") for both of the Proposed Solar Facilities by September 1, 2026 and, in doing so, ensure the resources are safe-harbored with respect to certain tax credits. As explained by both Mr. Plaisance and Mr. Fluth, the Company is seeking to safe-harbor the Proposed Solar Facilities with respect to tax credits made available under the Inflation Reduction Act of 2022 that are important for the cost-effectiveness of the resources but which are at risk, absent safe-harboring, pursuant to the One, Big, Beautiful, Bill Act of 2025. As Mr. Fluth explains, the Company has satisfied certain physical work requirements to safe-harbor the resources; the Company must also satisfy a separate continuity requirement by completing construction in 2029. In order to satisfy the continuity requirement, the Company seeks to issue an FNTP for its EPC contractor by September 1, 2026. The Company thus asks for a procedural schedule that allows for consideration by the Commission of the Company's Application no later than the Commission's August 2026 Business and Executive Session, in order that the Company can issue FNTP by September 1, 2026.

IX.

In addition, and as further support for the Company's request that the Commission consider the Company's Application no later than the Commission's August 2026 Business and Executive Session, the Company notes that, except for the locational requirement and the fact that the resources were not procured through the streamlined procurement process in the 3GW Order, the Proposed Solar Facilities would have qualified for expedited certification under that Order. Ms. Ingram explains the requirements of the 3GW Order—and the Proposed Solar Facilities' compliance with that Order, except for the locational and procurement requirements—in greater detail in her Direct Testimony.

SERVICE OF NOTICE AND PLEADINGS

X.

The Company requests that notices, correspondence, and other communications concerning this Application be directed to the following persons:

Lawrence J. Hand, Jr.
Patrick Sullivan
4809 Jefferson Highway
Mail Unit L-JEF-357
Jefferson, Louisiana 70121
Telephone: (504) 840-2528
Facsimile: (504) 840-2681
lhand@entergy.com
psulli2@entergy.com

Matthew T. Brown
Michael R. Dodson
639 Loyola Avenue
Mail Unit L-ENT-26E
New Orleans, Louisiana 70113
Telephone: (504) 576-4122
Facsimile: (504) 576-5579
mbrow12@entergy.com
mdodso1@entergy.com

ELL requests that the foregoing persons be placed on the Official Service List for this proceeding, and respectfully requests that the Commission permit the designation of more than one person to be placed on the Official Service List for service in this proceeding.

REQUEST FOR CONFIDENTIAL TREATMENT

XI.

Certain materials and/or information that may be produced in connection with this matter could contain information considered by the Company and/or third parties to be proprietary and confidential. Disclosure of certain information may present an unreasonable risk of harm to ELL its customers, and third parties. Therefore, in light of the sensitive nature of such information, the Company intends to submit two versions of any such confidential and proprietary materials and/or information, one marked “Non-Confidential Redacted Version” and the other marked “Confidential Version.” The Confidential Versions will bear the designation “Highly Sensitive Protected Materials” or words of similar import. Although confidential information and documents that may be produced in discovery in this matter may be viewed by appropriate representatives of the LPSC Staff and intervenors pursuant to the terms and conditions of a suitable confidentiality agreement once such an agreement has been executed in this Docket, this confidential information also is being provided pursuant to, and shall be exempt from public disclosure pursuant to, the Commission’s General Order dated August 31, 1992 and Rule 12.1 of the Rules of Practice and Procedure of the Commission.

PRAYER FOR RELIEF

XII.

WHEREFORE, for the foregoing reasons and those in the accompanying testimony, Entergy Louisiana, LLC respectfully requests that, subject to the fullest extent of its jurisdiction and after due and lawful proceedings are held, the Commission grant relief and give its approval as follows:

1. Find that the Votaw Solar Facility and Segno Solar Facility serve the public convenience and necessity and are in the public interest, and are therefore prudent, in accordance with the Commission's 1983 General Order;
2. Find that the selection of the Votaw Solar Facility and Segno Solar Facility through the 2021 Solar RFP and the 2022 Renewables RFP, respectively, constitutes an acceptable alternative market-based mechanism pursuant to the Commission's MBM Order, particularly in light of the continued cost-effectiveness of the Proposed Solar Facilities compared with other resources submitted as part of Procurement Windows 1 and 2 pursuant to the 3GW Order, and/or, in the alternative, granting any exemption to the MBM Order deemed necessary by the Commission;
3. Find that, with respect to the Proposed Solar Facilities, the Company has complied with, or is not in conflict with, the provisions of all applicable LPSC Orders, to the extent applicable;
4. Find that the Proposed Solar Facilities are eligible to be system resources and further are eligible for inclusion as a Designated Renewable Resource in Laidley's Group 3 subscription to Rider GZ (*i.e.*, the Initial Renewable Subscription Amount of the CSR);
5. Find that all MISO energy revenues for the Proposed Solar Facilities and the Renewable Energy Credits, as defined in the CSR (and which correspond to the product of GZ Energy multiplied by the MISO Market Settlement Rate in Rider GZ), are deemed eligible for inclusion in and recovery through the Company's FAC;
6. Find that (1) the estimated first-year revenue requirements of the Proposed Solar Facilities and the subscription fees generated from inclusion of the Proposed Solar Facilities in the Initial Renewable Subscription Amount are deemed eligible for recovery in accordance with the terms of the Company's FRP that is in place at the time the Proposed Solar

Facilities are placed into service (or, in the alternative, if ELL does not have an FRP in place at the time the Proposed Solar Facilities are placed in service, grant the Company permission to defer the first-year revenue requirements of the Proposed Solar Facilities and establish regulatory assets, including carrying costs at the then-effective weighted average cost of capital, until those costs can be reflected in rates); and (2) ratemaking treatment of the charges and credits associated with the Proposed Solar Facilities and the allocation and pricing of those resources pursuant to Option C of Rider GZ will be consistent with and adhere to the applicable provisions of prior Commission Orders, including in particular the provisions concerning cost recovery for Rider GZ subscriptions set forth in the Commission's Order in U-36697 and the finding in Order Number U-37425⁵ that the Initial Renewable Subscription Amount in Laidley's CSR is a Group 3 Subscription under Rider GZ;

7. Find that a thirty-year depreciation period is appropriate for the Proposed Solar Facilities;
8. Find that the confidential testimony, exhibits, and other materials referenced in this Application shall be exempt from public disclosure pursuant to the Commission's General Order dated August 31, 1992, and Rule 12.1 of the Rules of Practice and Procedure of the Louisiana Public Service Commission;
9. Direct the procedural steps necessary to facilitate a Commission decision on the Company's Application consistent with the 120-day requirement in the Commission's 1983 General Order, and in any event no later than is needed to allow for Commission

⁵ See Order Number U-37425 (Aug. 29, 2025), LPSC Docket No. U-37425, *In re: Application for approval of generation and transmission resources in connection with a single customer for a project in North Louisiana*.

consideration of the Company's Application at or before the Commission's August 2026 Business & Executive Session;

10. Establish a fifteen-day period for interventions in this proceeding;
11. Direct that notice of all matters in these proceedings be sent to Lawrence J. Hand, Jr., and Patrick Sullivan, as well as Matthew T. Brown and Michael R. Dodson, as representatives of Entergy Louisiana, LLC; and
12. Grant such other relief to which the Company shows itself to be entitled.

Respectfully submitted,

By:  _____

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**ATTORNEYS FOR
ENTERGY LOUISIANA, LLC**