

**BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION**

***IN RE:* APPLICATION OF ENTERGY )  
LOUISIANA, LLC FOR RECOVERY )  
IN RATES OF COSTS RELATED TO )  
HURRICANE IDA AND FOR )  
RELATED RELIEF )**

**DOCKET NO. U-** 36350

**DIRECT TESTIMONY**

**OF**

**PHILLIP R. MAY**

**ON BEHALF OF**

**ENTERGY LOUISIANA, LLC**

**APRIL 2022**

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## EXHIBIT LIST

Exhibit PRM-1	List of Prior Testimony
Exhibit PRM-2	Executive Summary of Storm Recovery Application
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1 I. INTRODUCTION

2 Q1. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.

3 A. My name is Phillip R. May. I am President and Chief Executive Officer (“CEO”) of  
4 Entergy Louisiana, LLC (“ELL” or the “Company”).<sup>1</sup> My business addresses are 4809  
5 Jefferson Highway, Jefferson, Louisiana 70121 and 446 North Boulevard, Baton Rouge,  
6 Louisiana 70802.

7  
8 Q2. ON WHOSE BEHALF ARE YOU SUBMITTING THIS DIRECT TESTIMONY?

9 A. I am testifying on behalf of ELL in support of its application (the “Application”) before  
10 the Commission seeking certification of and approval for securitization of the costs  
11 incurred to rebuild ELL’s electric infrastructure and to restore power to customers in  
12 connection with Hurricane Ida.

13  
14 Q3. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL  
15 BACKGROUND.

16 A. I have a Bachelor of Science degree in Electrical Engineering from the University of  
17 Southwestern Louisiana, now called the University of Louisiana at Lafayette, and a Master  
18 of Business Administration from the University of New Orleans. I also completed the  
19 Wharton School’s Mergers and Acquisitions program.

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<sup>1</sup> On October 1, 2015, pursuant to Louisiana Public Service Commission (“LPSC” or “Commission”) Order No. U-33244-A, Energy Gulf States Louisiana, L.L.C. (“Legacy EGSL”) and Entergy Louisiana, LLC (“Legacy ELL”) combined substantially all of their respective assets and liabilities into a single operating company, Entergy Louisiana Power, LLC, which subsequently changed its name to Entergy Louisiana, LLC (“ELL”) (“Business Combination”). Upon consummation of the Business Combination, ELL became the public utility that is subject to LPSC regulation and now stands in the shoes of Legacy EGSL and Legacy ELL.

1 I have worked for subsidiaries of Entergy Corporation for nearly 36 years. I joined  
2 Louisiana Power & Light Company (now known as ELL) in 1986 as an Engineer in the  
3 Rates and Regulatory Affairs Department. I was responsible for developing cost of service  
4 studies to support Legacy ELL's retail and wholesale rates. I also planned and directed  
5 numerous engineering studies and special projects. In 1993, I joined the Entergy/Gulf  
6 States Utilities Merger Team as a Senior Engineer. Following that assignment, I joined  
7 Entergy Services, Inc.'s<sup>2</sup> Financial Planning Department and was responsible for financial  
8 planning for Entergy Gulf States, Inc. (a predecessor-in-interest to Entergy Texas, Inc., and  
9 Legacy EGSL) as well as for Legacy ELL. In 1994, I was promoted to Senior Lead Analyst  
10 in Wholesale Transactions. In that role, I worked directly with large customers to meet  
11 their wholesale power requirements. In 1995, I was promoted to Manager of Strategic  
12 Planning. The members of my group served as internal consultants to various business  
13 units. I was later promoted to the Director of Utility Transition and Development. I was  
14 responsible for analytical and strategic analysis of the regulated utilities' transition to  
15 competition efforts. In 2000, I assumed the role of Vice President, Regulatory Services.  
16 In that position, I was responsible for providing technical and analytical support to all of  
17 the EOCs to enable them to satisfy their regulatory obligations. My department consisted  
18 of: System Regulatory Planning & Support, Regulatory Strategy, Regulatory Projects, and  
19 Integrated Energy Management. In February 2013, I became the President and CEO of  
20 Legacy ELL and Legacy EGSL. Legacy ELL and Legacy EGSL consummated their

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<sup>2</sup> Entergy Services, LLC ("ESL"), formerly Entergy Services, Inc., is a service company to the five Entergy Operating Companies ("EOCs"), which are Entergy Arkansas, LLC; ELL; Entergy Mississippi, LLC; Entergy New Orleans, LLC; and Entergy Texas, Inc.

1 Business Combination in October 2015, and I continue to serve as President and CEO of  
2 the combined entity, ELL.

3 As my background and current duties indicate, in addition to my other areas of  
4 formal education and experience, I have particular experience with analyzing how industry  
5 trends, strategic initiatives, policy choices, and financial planning affect the Company's  
6 ability to provide safe, efficient, and reliable service at reasonable rates.

7  
8 Q4. HAVE YOU PREVIOUSLY TESTIFIED IN ANY REGULATORY PROCEEDING?

9 A. Yes. A listing of the cases in which I have previously testified is attached hereto as Exhibit  
10 PRM-1.

11  
12 Q5. WHAT ARE YOUR CURRENT DUTIES?

13 A. As President and CEO of ELL, I have executive responsibility for the Company, including  
14 financial responsibility for the business and assets that are used to serve customers, which  
15 include generation, transmission, and distribution assets. In addition, my responsibilities  
16 include oversight of the field management of the Company's gas distribution system,  
17 customer service, economic development, regulatory affairs, public affairs, and the  
18 financial performance of ELL. During an emergency event (such as a storm), I work  
19 closely with and receive direct reports from the State Incident Commander for Louisiana,  
20 Company witness John W. Hawkins, Jr.

1 Q6. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

2 A. My testimony provides an overview of the relief sought by ELL as a result of the large-  
3 scale damage to its electric system (including, in particular, its distribution system in  
4 southeast Louisiana) caused by Hurricane Ida. To put that discussion in context, my  
5 testimony begins with a description of the Company's historical investment in its  
6 transmission and distribution systems and describes the Company's current and future  
7 plans to continue to modernize its infrastructure for the benefit of its customers, including  
8 the Company's ongoing discussions with local, state, and federal entities, together with the  
9 Commission, to seek out funding opportunities for such investments such as those available  
10 to electric cooperatives through the Stafford Act (42 U.S.C. 5172, *et seq.*).<sup>3</sup> It is through  
11 such collaborative, creative solutions that the important goal of fostering and enhancing  
12 the resilience of the electric grid in the face of increasingly powerful and frequent weather  
13 events can be achieved without the Company's customers having to bear an overwhelming  
14 cost burden.

15 My testimony then summarizes the Company's Application, including providing  
16 details about the challenges encountered by ELL in restoring service to customers  
17 following the storm while utilizing the largest restoration workforce ever mobilized in  
18 Louisiana. I also describe Hurricane Ida and its impact on the Company's transmission,  
19 distribution, and generation facilities, and I provide an overview of the Company's storm  
20 response. Next, I describe the Company's interaction with its customers, including the

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<sup>3</sup> See LPSC Resolution No. 01-2021, *In re: Resolution directed to Louisiana's Congressional Delegation to take any necessary action to ensure federal disaster relief be made available to all Louisiana electric utilities affected by the 2020 and 2021 storms, and ultimately the ratepayers and citizens of Louisiana.*

1 measures the Company took to support and communicate with customers throughout the  
2 restoration process. My testimony also discusses the financial impact of the storm on the  
3 Company, as well as the Company's general plan to arrange for permanent financing of  
4 storm costs. Finally, I also introduce the other witnesses who support the Company's  
5 Application.

6 As ELL's Application and supporting testimony demonstrate, the storm costs  
7 incurred by ELL were both reasonable and necessary to repair, in the safest and most  
8 expeditious manner possible, the unprecedented amount of damage sustained by ELL's  
9 system and to restore service to ELL's customers following Hurricane Ida.

10  
11 **II. ELL'S INVESTMENT IN ITS SYSTEM**

12 Q7. DID THE COMPANY'S EXPERIENCE WITH HURRICANE IDA PROVIDE ANY  
13 INSIGHT INTO THE COMPANY'S HISTORICAL, AND FUTURE PLANS FOR,  
14 INVESTMENT IN ITS SYSTEM?

15 A. Yes. ELL has been working to make its system more resilient since the significant storms  
16 that impacted Louisiana in the early 2000s, and the experience with Hurricane Ida, as well  
17 as the challenges of the record-setting 2020 Atlantic hurricane season, demonstrate the  
18 necessity of those improvements. In the intervening years, ELL, like the overall electric  
19 utility industry in the United States, has invested considerable capital to replace and  
20 upgrade aging infrastructure. In particular, ELL has modernized its power plants, adding  
21 both cleaner and more efficient energy sources in order to provide our customers with  
22 reliable, safe, and low-cost energy. ELL has also invested significantly in its transmission  
23 grid to expand for growth and to comply with federal reliability requirements. And, for its

1 distribution system, ELL has implemented grid modernization and system-hardening  
2 improvements.

3 The Company takes seriously its responsibility to provide customers with safe and  
4 reliable service at the lowest reasonable cost. As I and the other witnesses whose testimony  
5 supports the Company's Application explain, Hurricane Ida has reinforced the need for the  
6 sort of distribution hardening that the Company has been undertaking for years now (and  
7 which is discussed by Mr. Hawkins). The storm also demonstrated that previous  
8 transmission hardening has made an enormous difference in our ability to restore  
9 transmission in the wake of a major hurricane, as well as the value of ongoing transmission  
10 hardening investment (as addressed by Company witness Michelle P. Bourg).

11 The Company also recognizes that it must continue to invest, and evaluate ways to  
12 accelerate that investment where appropriate, to address the increased frequency and  
13 intensity of storms affecting Louisiana and the Gulf Coast region, but that investment must  
14 be balanced with the need to maintain affordable customer bills. Any such investment also  
15 must recognize that serving our customers reliably requires ongoing investment in many  
16 areas of our business (e.g., generation, distribution, transmission, and  
17 innovation/technology). Resilience to withstand and recover quickly from major storms  
18 requires transmission, generation, and distribution facilities that are robust and working in  
19 tandem to get power into the homes and businesses in our communities.

20  
21 Q8. WHAT DO YOU MEAN WHEN YOU REFER TO SYSTEM RESILIENCE?

22 A. Resilience is the ability to prepare for, adapt to, and recover from non-normal events, such  
23 as major storm events or some other major system disruption. Our society depends on



1 electricity to power homes and businesses and to support critical services such as  
2 governmental, military, police, fire, health care, water/sewerage/drainage, food, and  
3 communications systems and services, as well as commercial and industrial customers.  
4 And due to a variety of trends, our customers' dependence upon the electricity that we  
5 provide is increasing. As an electricity generator and provider, the Company plays a key  
6 role in the communities that it serves because the electric system contributes substantially  
7 to withstanding and recovering from disruptive events.

8  
9 Q9. PLEASE DESCRIBE THE COMPANY'S RECENT INVESTMENT IN AND  
10 IMPROVEMENT OF ITS TRANSMISSION SYSTEM TO SUPPORT SYSTEM  
11 RESILIENCE.

12 A. As discussed in more detail by Ms. Bourg, transmission capital investment can be divided  
13 into a few primary categories: (1) projects that ensure the transmission system meets North  
14 American Electric Reliability Corporation ("NERC") standards for bulk electric system  
15 reliability through new lines, substations, and equipment upgrades; (2) projects that  
16 improve reliability through replacement of aging equipment; and (3) projects that build  
17 new facilities to reduce congestion on the system to ensure customers have access to the  
18 lowest cost power. For the period 2013-2021, the Company invested approximately \$3  
19 billion in its transmission system (not including costs associated with Hurricanes Laura,  
20 Delta, and Zeta, Winter Storm Uri, and Hurricane Ida). The need for this level of  
21 investment was driven by many factors, including reliability planning, load growth,  
22 infrastructure maintenance and reliability needs, economic transmission investments (*i.e.*,

1 investments that produce cost savings to customers), and generation interconnection  
2 projects.

3 By way of example, more recently installed transmission facilities that were  
4 designed and constructed under current standards largely remained intact through  
5 Hurricane Ida and required repairs as opposed to full scale replacement. For example, the  
6 Bayou Vista – Terrebonne 230 kV line, which runs right through the heart of the Bayou  
7 region that took a direct hit from Ida's winds, sustained minimal damage. This new line  
8 was built on structures designed to withstand winds of up to 150 mph. Another example  
9 is the Valentine – Clovelly 115 kV transmission line, which was also in the direct path of  
10 Hurricane Ida and took a direct hit from the storm near the coast, yet sustained no damage.

11 Following Hurricane Ida, the Company completed a transmission system upgrade  
12 in Lafourche Parish in south Louisiana that was designed to improve the resilience and  
13 reliability of the local power grid for customers in the Bayou region. Ms. Bourg provides  
14 additional examples of transmission projects recently completed by the Company that will  
15 likewise improve the power grid going forward.

16  
17 Q10. WHAT IS THE STATUS OF ELL'S INVESTMENT IN ITS DISTRIBUTION SYSTEM?

18 A. As discussed by Mr. Hawkins, ELL has ramped up the pace and level of its distribution  
19 investment in recent years and plans to continue making significant investments to  
20 modernize and improve the reliability and resilience of the distribution grid. On average,  
21 the Company invested approximately \$267 million annually in capital spending (non-  
22 storm) for its distribution system for the five-year period of 2017 through 2021, with

1 distribution line plant closing increasing from \$177 million in 2017 to \$377 million in  
2 2021.

3 Like many of its utility peers, ELL has an aging distribution system that is now in  
4 a period of significant modernization as it evolves to address changes in customer  
5 expectations and grid technologies, opportunities to maximize the benefits of the  
6 Company's investment in Advanced Metering Systems, and the increasing frequency and  
7 severity of named storms and other extreme weather events, as evident in the past two  
8 Atlantic Hurricane Seasons and in the recent tornadoes that have impacted southeast  
9 Louisiana as I describe in my testimony below. Grid modernization is being enabled by  
10 new technology and developed in response to increasing customer expectations for  
11 reliability enhancements that require a more modern, responsive, and resilient grid to  
12 minimize the frequency and duration of outages. Mr. Hawkins provides more details in his  
13 testimony about ELL's distribution plan, which combines system hardening and grid  
14 modernization efforts with traditional reliability and infrastructure programs with an  
15 objective to improve the overall service quality provided to customers.

16  
17 Q11. IS THE COMPANY TAKING STEPS TO ADDRESS THE COST IMPACT TO  
18 CUSTOMERS OF COMPLETING THE TRANSITION TO A MORE RESILIENT AND  
19 MODERN GRID, PARTICULARLY IN THE FACE OF MAJOR STORM EVENTS  
20 LIKE HURRICANE IDA?

21 A. Yes. The Company remains mindful of the cost to customers of grid improvements and,  
22 indeed, has been collaborating with the Commission for several years on modernization  
23 efforts across its generation, transmission, and distribution systems. In addition to that

1 ongoing collaboration, the Company continues to assess the impact  
2 of the growing frequency and intensity of hurricanes and has raised with state and federal  
3 agencies the need for increased resilience investment grants that will enable additional  
4 hardening investment without resulting in crippling customer bills.

5 For example, the Company, in coordination with The Governor's Office of  
6 Homeland Security and Emergency Preparedness and together with Entergy New Orleans,  
7 LLC ("ENO"), recently has submitted eight grant applications to the Federal Emergency  
8 Management Agency ("FEMA") requesting funding for projects to enhance the resilience  
9 of the electric grid through FEMA's Building Resilient Infrastructure and Communities  
10 ("BRIC") Program. The projects included in the grant applications will provide flood  
11 protection to several substations in Calcasieu and St. Charles Parishes; reconfigure and  
12 harden transmission facilities serving Houma, Louisiana, and the surrounding areas; and  
13 upgrade distribution facilities in lower Plaquemines Parish to withstand wind speeds up to  
14 150 miles per hour. The total costs of the projects submitted is approximately \$450 million.  
15 We anticipate that FEMA will announce preliminary awards by Summer 2022.

16  
17 Q12. IS THERE ANYTHING ELSE YOU WISH TO HIGHLIGHT ABOUT THE  
18 COMPANY'S EFFORTS TO IMPROVE THE DELIVERY OF SERVICE TO ITS  
19 CUSTOMERS?

20 A. Yes. Not only is grid resilience a substantial focus of the Company's efforts, but ELL also  
21 is acutely aware of its customers' growing clean electricity needs and is working closely  
22 with its customers to meet those needs. To that end, the Company is working to deliver  
23 energy solutions that are affordable, reliable, and also clean to help its customers achieve

1        their important environmental and sustainability objectives. By way of an example, the  
2        Company recently entered into a memorandum of understanding with Sempra  
3        Infrastructure to develop options designed to accelerate the deployment of renewable  
4        energy to power Sempra Infrastructure's facilities in Louisiana. In particular, a proposed  
5        expansion of Cameron LNG, a liquefied natural gas export facility in which Sempra  
6        Infrastructure owns a majority interest, would require roughly 300 MW of demand from  
7        ELL, equivalent to about 900 MW of renewable energy capacity.

8                As per a recent study by S&P Global Marketplace Intelligence, the EOCs provide  
9        electricity at some of the lowest rates in the county to their retail customers, including  
10       customers in Louisiana. In addition, Entergy announced in 2021 that it plans to triple its  
11       renewable energy portfolio over a 3-year period, as well as achieve 11 gigawatts of  
12       renewable energy by 2030. This combination of low rates and increasingly clean power  
13       is helping our customers grow their businesses and meet their sustainability goals. It also  
14       helps Louisiana's efforts to attract new businesses and economic development.

15              The Company also is seeking to facilitate the use of green tariffs for customers  
16       looking to meet energy and sustainability goals, with 475 MW of new green tariff capacity  
17       having been proposed in Louisiana.<sup>4</sup>

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<sup>4</sup>        ELL's proposal is currently under consideration in LPSC Docket No. U-36190, *In re: Application for Certification and Approval of the 2021 Solar Portfolio, Rider Geaux Green Option, Cost Recovery and Related Relief*.

1                   **III.       SUMMARY OF THE COMPANY'S APPLICATION**

2   Q13.   PLEASE DESCRIBE THE RELIEF THAT THE COMPANY IS SEEKING IN THIS  
3           PROCEEDING.

4   A.     Through its Application, the Company seeks the Commission's review and determination  
5           of the prudently-incurred costs to rebuild and repair its electric infrastructure and restore  
6           power to customers in the wake of Hurricane Ida, which determination will establish the  
7           amount that is eligible for recovery from customers. In a subsequent application, ELL will  
8           propose a permanent financing method (or methods) to the Commission that ELL believes  
9           will be both beneficial to customers and at a lower cost than would be obtained if ELL  
10          financed storm recovery using traditional utility capital.

11  
12   Q14.   DOES ELL'S APPLICATION INCLUDE ANY REQUESTS ASSOCIATED WITH  
13           ADDITIONAL COSTS INCURRED IN CONNECTION WITH HURRICANES  
14           LAURA, DELTA, AND ZETA IN 2020 AND WINTER STORM URI IN 2021?

15   A.     Yes. As discussed by Company witness Sarah M. H Marcus, the Company is seeking to  
16           recover \$31.9 million in storm costs associated with Hurricanes Laura, Delta, and Zeta and  
17           Winter Storm Uri. Subsequent to the Company's filing to get approval to recover costs  
18           associated with Hurricanes Laura, Delta, and Zeta and Winter Storm Uri, additional  
19           restoration work was completed and invoices for costs previously incurred were received.  
20           The amount being requested in this application are the total net costs in excess of the  
21           estimated costs included in Docket No. U-35991. The \$31.9 million does include some  
22           credits or reductions for amounts that were estimated in Docket No. U-35991, but that came  
23           in less than estimated. Crediting the amounts in this way ensures that the unspent amounts

1 authorized in Order No. U-35991 are credited to customers dollar for dollar and in the same  
2 proportion as the charges will be imposed on customers under the Financed Storm Cost IV  
3 Rider approved by the Commission. The Company has included these amounts with this  
4 filing to capitalize on the significant savings for the Company's customers that can be  
5 realized through the anticipated securitization.

6  
7 Q15. WHAT IS THE CURRENT STATUS OF THE COMPANY'S BUSINESS AS IT  
8 RELATES TO ELL'S APPLICATION?

9 A. ELL and its customers are recovering from the most destructive hurricane in the  
10 Company's history. The Company is fully mindful of the hardships that our customers  
11 have been facing with courage and resilience, and I discuss in this testimony some of ELL's  
12 efforts to assist our customers. Although this filing comes at a challenging time,  
13 Louisiana's back-to-back years of devastating storms require that ELL remain a  
14 financially-healthy utility that can facilitate economic growth and complete the transition  
15 to the modern electric grid. Indeed, ELL's financial health is what allowed it to withstand  
16 lost revenue due to the devastating 2020 Atlantic hurricane season, and Hurricane Ida in  
17 2021, while undertaking multiple extraordinary efforts (collectively totaling more than \$4  
18 billion in 2020 and 2021) to quickly repair storm damage and restore power. The relief  
19 requested in ELL's Application is necessary to meet the fundamental, vital objective of  
20 maintaining ELL's financial health so that it, in turn, can provide safe, reliable, and cost-  
21 effective service to our customers.

1 Q16. HOW WOULD YOU DESCRIBE THE RISK THAT SEVERE WEATHER POSES TO  
2 ELL AND ITS CUSTOMERS?

3 A. The challenge of maintaining reliable service in an area that has seen more than its fair  
4 share of devastation from severe weather is one of the most significant characteristics of  
5 ELL's risk profile. Louisiana has a history of vulnerability to hurricanes and other storms  
6 along its coast that has resulted in significant unplanned cash expenditures (capital and  
7 operations and maintenance/other). And Louisiana's recent experience is that tropical  
8 storms are becoming more frequent and intense. The following table reflects costs that the  
9 Company (through its predecessor entities) incurred and the Commission deemed prudent  
10 and properly recoverable following Hurricanes Katrina, Rita, Gustav, Ike, Isaac, Laura,  
11 Delta, and Zeta.



**Table 1**

<b>Event</b>	<b>Year(s) of storm</b>	<b>Amount Approved for Recovery (\$M)</b>
Hurricanes Katrina and Rita	2005	Legacy ELL: 545 Legacy EGSL: 187 <b>Total: 732<sup>5</sup></b>
Hurricanes Gustav and Ike	2008	Legacy ELL: 394 Legacy EGSL: 234 <b>Total: 628<sup>6</sup></b>
Hurricane Isaac	2012	Legacy ELL: 224.3 Legacy EGSL: 66.5 <b>Total: 290.8<sup>7</sup></b>
Hurricanes Laura, Delta, and Zeta	2020	<b>Total: 2,007.3<sup>8</sup></b>

Q17. PLEASE SUMMARIZE THE COMPANY'S EXPERIENCE WITH HURRICANE IDA.

A. On August 29, 2021, Hurricane Ida made landfall near Port Fourchon, Louisiana, as a strong Category 4 hurricane with sustained winds of 150 miles per hour. An instantaneous peak wind gust of 172 miles per hour was clocked by instruments on a ship in Port Fourchon as the eyewall of the storm pummeled the Louisiana coast. As depicted in Figure 1, Hurricane Ida retained hurricane strength to the northern edge of ELL's service territory, knocking out power and crippling mobile and 911 communications in its wake. The storm

<sup>5</sup> *In re: Joint Application of Entergy Gulf States, Inc. and Entergy Louisiana, Inc. for Interim and Permanent Recovery in Rates of Costs Related to Hurricanes Katrina and Rita*, Commission Order No. U-29203-B (March 3, 2006) at 16.

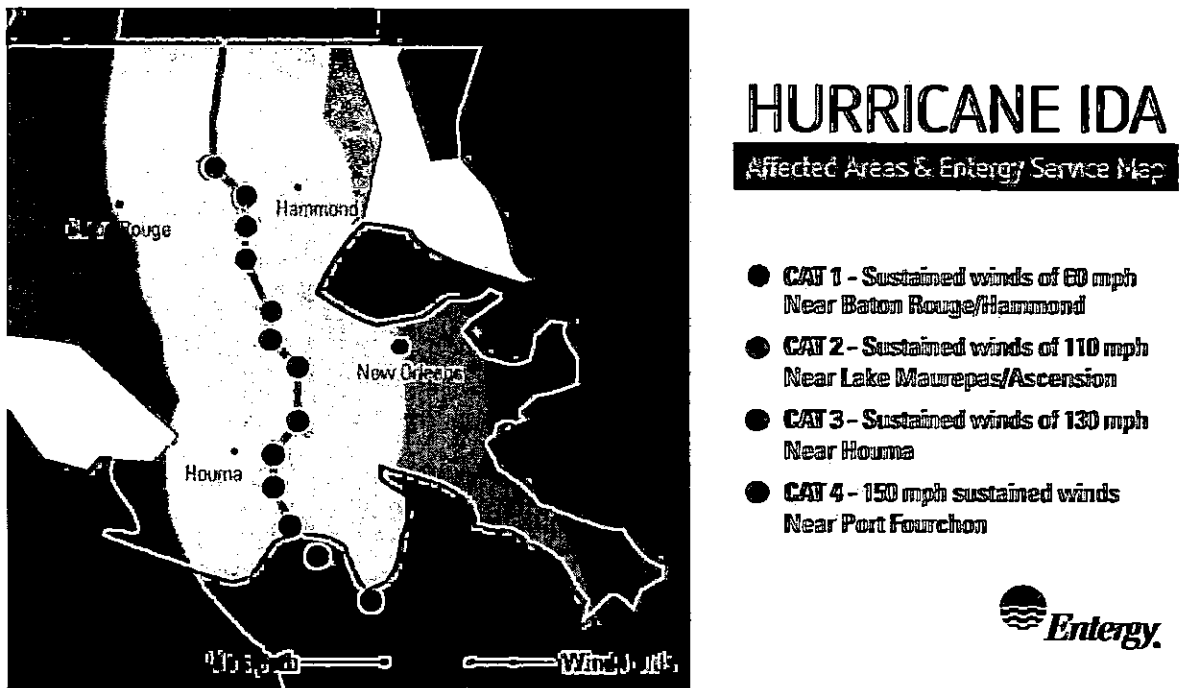
<sup>6</sup> *In re: Joint Application of Entergy Gulf States Louisiana, L.L.C. and Entergy Louisiana, LLC for Recovery in Rates of Costs Related to Hurricanes Gustav and Ike*, Commission Order No. U-30981 (April 30, 2010) at 7.

<sup>7</sup> *In re: Joint Application for Recovery in Rates of Costs Related to Hurricane Isaac, Determination of Appropriate Storm Reserve Escrow Amounts and Related Relief*, Commission Order No. U-32764 (June 18, 2014) at 57; *In re: Joint Application for Recovery in Rates of Costs Related to Hurricane Isaac, Determination of Appropriate Storm Reserve Escrow Amounts and Related Relief*, Commission Order No. U-32764-A (June 18, 2014) at 57.

<sup>8</sup> *In re: Application of Entergy Louisiana, LLC for Recovery in Rates of Costs Related to Hurricanes Laura, Delta, Zeta and Winter Storm Uri and for Related Relief*, Commission Order No. U-35991-A (March 3, 2022) at 28. This amount does not include \$49.6 million in costs that the Commission authorized ELL to recover associated with ELL's response to Winter Storm Uri in 2021.

1 then exited the state and continued its 1,500-mile journey, impacting 22 different states and  
2 Washington, D.C., along the way.

**Figure 1: Path and Strength of Hurricane Ida**



3 Despite its tying Hurricane Laura in terms of strength, Hurricane Ida's unorthodox  
4 behavior resulted in unprecedented damage to ELL's utility system in southeast Louisiana  
5 that far surpassed the damage that Hurricane Laura inflicted in southwest Louisiana in  
6 2020, as I discuss below. The magnitude of the damage caused by Hurricane Ida,  
7 particularly to the Company's distribution infrastructure in the coastal communities in  
8 southeast Louisiana, presented several challenges that the Company had to overcome in  
9 restoring service to its customers. Furthermore, the path that Ida took was directly over  
10 critical transmission corridors in the region, bisecting two major population centers of the  
11 state (the New Orleans and Baton Rouge metropolitan areas), ultimately resulting in the

1       disconnection of the greater New Orleans region from the Eastern Interconnection<sup>9</sup> with  
2       all eight transmission ties into that region rendered out of service. Due to the designed  
3       redundancy of the system and its performance in the face of such a devastating storm,  
4       however, we were able to restore first light to the area in less than 48 hours after landfall.

5             As the storm passed between Baton Rouge and Hammond, gusts over 60 mph were  
6       reported in Baton Rouge, with higher gusts measured to the east of the storm's path. In  
7       restoring power to customers in the Baton Rouge area, the Company overcame challenges  
8       associated with, among other things, vegetation entanglement and rear lot access, and we  
9       successfully restored power to all customers in Baton Rouge who could safely accept it by  
10      September 6, 2021.

11            I attach as Exhibit PRM-2 to my testimony an Executive Summary of ELL's  
12      Application that highlights, among other things, the Company's storm recovery efforts  
13      undertaken in response to Hurricane Ida.

14  
15   Q18.   CAN YOU ELABORATE ON THE CHALLENGES FACED BY THE COMPANY IN  
16       RESPONDING TO HURRICANE IDA?

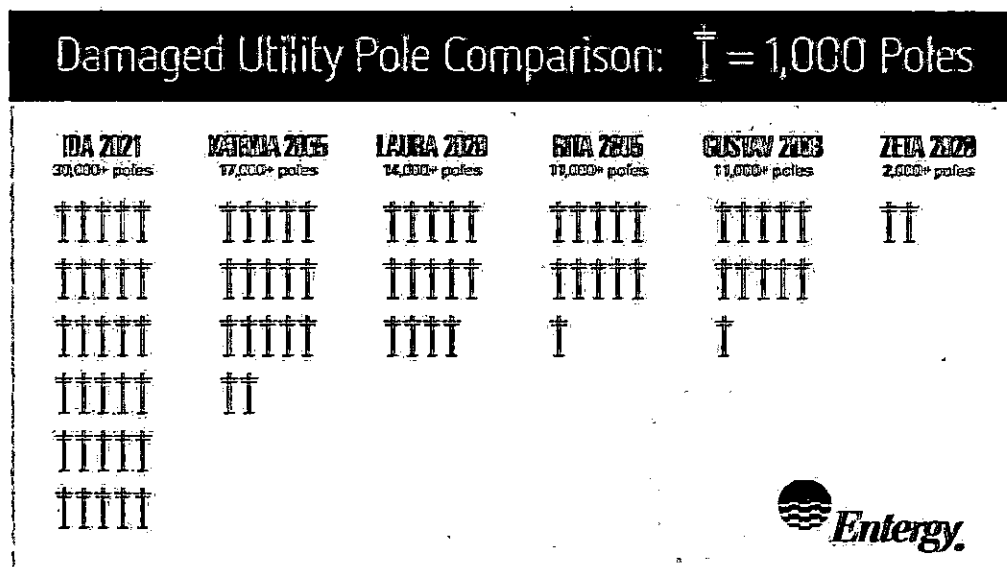
17   A.     Certainly. Although ELL has learned through experience that a restoration effort after any  
18       major storm is challenging and involves its own unique set of circumstances, I will say that  
19       I have been in this business for 36 years, and the amount of damage dealt with as a result  
20       of Hurricane Ida was unprecedented. No past storm has even come close to what Ida

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<sup>9</sup>       The power system in the contiguous United States is made up of three main interconnections, which operate largely independently from each other with limited transfers of power between them. The Eastern Interconnection encompasses the area east of the Rocky Mountains and a portion of northern Texas.

wrought in terms of the devastation it placed on ELL's system. As shown in Figure 2, Hurricane Ida damaged or destroyed more than double the number of distribution poles as Hurricane Laura destroyed in 2020 and more than Hurricanes Katrina, Ike, Delta, and Zeta combined.

Figure 2



\* Values in Figure 2 reflect distribution pole damage sustained by all affected EOCs.

Due in large part to the magnitude of the damage to the distribution system in southeast Louisiana, where accessibility to our infrastructure was compromised, special equipment was required to access damaged lines in wetlands and coastal areas. As Mr. Hawkins explains, the Company deployed K-MAX helicopters to quickly move mangled structures out of the way and new ones into place. The Company also utilized tracked marsh buggies, barge-mounted cranes, and air boats, as well as advanced technology such as infrared cameras, drones, and satellite imagery, to access some of the hard-to-reach areas.

1           Furthermore, when Hurricane Ida struck, Louisiana was battling its fourth COVID-  
2           19 surge, and hospitalizations were as high as at any point during the pandemic. Thus,  
3           COVID-19 heightened the urgency of restoring power to hospitals and care facilities, and  
4           it also brought challenges throughout the restoration.

5           To assist in repairing (and in some locations, rebuilding) ELL's system, the  
6           Company brought in substation, relay, line, and vegetation personnel from mutual-  
7           assistance utilities and third-party contractors. This workforce worked significant overtime  
8           shifts to restore service as quickly as safely possible. Supplying food and lodging to the  
9           approximately 27,000 workers assisting in the restoration effort in Louisiana was another  
10          challenge given the widespread damage.

11          Additional challenges included heat, humidity, and stubbornly persistent severe  
12          weather impacting our service area that was experienced during the restoration process  
13          (including Hurricane Nicholas, a Category 1 hurricane that made landfall in Texas and  
14          drifted slowly over Louisiana, drenching the Gulf Coast in mid-September 2021). For  
15          example, whenever lightning strikes within 10 miles of our crews, they have to shelter in  
16          their vehicles for 20 to 30 minutes to make sure conditions are safe before they return to  
17          work. And during the post-Ida restoration process, we experienced heat indices up to 105  
18          degrees, with restoration workers wearing fire-retardant clothing and rubber gloves. To  
19          keep those workers safe in such conditions, there are mandated rest periods for cooldowns.  
20          In sum, the restoration process proceeded as quickly as possible, all while the Company  
21          adhered to its own procedures and mandates, together with Occupational Safety and Health  
22          Administration ("OSHA") guidelines, to ensure the safety of the restoration workforce.

1 Q19. DID THE COMPANY EXPERIENCE ANY CHALLENGES IN ACQUIRING  
2 SUFFICIENT MATERIAL AND EQUIPMENT DURING THE HURRICANE IDA  
3 RESTORATION?

4 A. Yes. Not only did the storm's catastrophic damages affect the availability of items for  
5 everyone in Hurricane Ida's path (including fuel, lodging, and even bare essentials such as  
6 food and water in the hardest hit areas), but the storm also created a historic demand for  
7 certain restoration materials and placed an additional burden on an already fragile supply  
8 chain considering the widespread constraints on supplies that have risen both nationally  
9 and globally since the onset of COVID-19. To overcome these challenges, the Company  
10 worked hand in hand with both manufacturers and other mutual aid utilities to meet the  
11 demand for materials by accelerating supply chain timelines and reconfiguring and  
12 repurposing available assets to restore service to impacted customers where necessary.  
13 Through these efforts, the Company received needed materials on a daily basis and was  
14 able to deploy them to restore customers in a safe and timely manner. Collaborating across  
15 the energy industry in this way to acquire surplus materials from other companies and  
16 engagement with key suppliers on innovative methodologies to mitigate material supply  
17 challenges allowed us to minimize potential effects on restoration times. The Company  
18 also deployed onsite expediting resources to our wood pole mill source to assist with  
19 coordination of supplier priorities and reporting needs.

20 I, along with Mr. Hawkins and Ms. Bourg, discuss in our testimonies these and  
21 other challenges, including the primary cost drivers that affected the storm costs for which  
22 ELL seeks recovery in this proceeding.

1 Q20. CAN YOU EXPLAIN HOW THE COMPANY WAS INVOLVED IN RESTORING  
2 FIRST LIGHT TO THE GREATER NEW ORLEANS AREA?

3 A. Yes. While ENO is the utility that provides service to customers in Orleans Parish, ELL  
4 has a large customer base in the parishes surrounding New Orleans, and the great majority  
5 of the transmission lines used to import power into the greater New Orleans area are owned  
6 by ELL. As I noted above and as explained in more detail by Ms. Bourg, Hurricane Ida  
7 resulted in the greater New Orleans area's complete isolation from the bulk electric system,  
8 with all eight transmission lines into that region rendered out of service as a result of  
9 Hurricane Ida's devastating impact.

10 As Ms. Bourg describes, the eight lines went out of service between the hours of  
11 3:00 pm and 6:00 pm on August 29, 2021. Our team of engineers quickly began working  
12 on two parallel paths for transmission restoration to the region. The preferred path was to  
13 re-establish connection to the grid, but we also were exploring the possibility of "islanding"  
14 the area (*i.e.*, supplying load with generation located within an area disconnected from the  
15 bulk electric system).

16 While preparations were being made to operate the New Orleans Power Station  
17 ("NOPS"), owned by ENO, in an electrical island,<sup>10</sup> our team was able to reconnect the  
18 first transmission tie line into the Jefferson/Orleans area from the east (Slidell) less than 48  
19 hours after the storm made landfall. After careful analysis by our engineering teams, it was  
20 determined that the best path forward was to reconnect NOPS and the greater New Orleans

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<sup>10</sup> NOPS has full black start capability and was capable of starting and operating in an island configuration.

1 area with the broader electric system to improve overall stability and provide a quicker  
2 path to restoring customers.

3 With that first transmission line in place, NOPS and Ninemile 6 (a highly-efficient  
4 combined cycle gas turbine located on the West Bank of Jefferson Parish) were utilized in  
5 tandem, building load and restoring power to the entire region. Both NOPS and Ninemile  
6 6 performed exactly as they were designed to do, and in my opinion, it is a remarkable  
7 accomplishment that first light was restored to the greater New Orleans area less than 48  
8 hours after a very intense category 4 storm left the state.

9  
10 Q21. WERE THE STORM COSTS FOR WHICH ELL SEEKS RECOVERY IN THIS  
11 PROCEEDING REASONABLE AND NECESSARY TO RESTORE SERVICE?

12 A. Yes. I have reviewed the storm costs presented in ELL's Application, and I believe that  
13 they were reasonable and necessary under the circumstances. I summarize those costs  
14 below, and other ELL witnesses provide more detail on the costs, including why they were  
15 reasonable and necessary, and why they should be certified by the Commission as eligible  
16 for recovery from customers.

17  
18 Q22. WHAT ARE THE AMOUNTS OF ELL'S STORM COSTS INCURRED FOR  
19 HURRICANE IDA FOR WHICH RECOVERY IS SOUGHT?

20 A. ELL's actual storm costs incurred through March 31, 2022, including estimates of  
21 restoration work not yet completed as of March 31, 2022, but excluding carrying costs,  
22 related to Hurricane Ida are summarized in Table 2, below.



**Table 2**

<b>Costs Incurred Through March 31, 2022</b>	<b>Estimated Costs to be Incurred After March 31, 2022</b>	<b>Total Gross Storm Costs</b>
\$2,392,468,292	\$150,783,675	\$2,543,251,967

After adding carrying costs in the amount of \$58.7 million through December 2022, ELL is requesting approval from this Commission to recover a total of \$2.602 billion incurred as a result of Hurricane Ida. ELL's gross storm costs, estimated costs to be incurred after March 31, 2022, and carrying costs for each storm are discussed in greater detail in Ms. Marcus's Direct Testimony and in Exhibit SMH-1 and SMH-4 to her testimony.<sup>11</sup>

**Q23. WHY HAS ELL INCLUDED ESTIMATED COSTS IN ITS TOTAL AMOUNT OF STORM COSTS?**

**A.** At this time, ELL does not have a total amount of final storm costs because certain storm-related projects remain to be completed (or were not completed as of March 31, 2022) and some vendors have yet to submit invoices, but these types of costs represent a small percentage of all storm costs. Consistent with prior storms, ELL is including in its request estimated costs for these items so that the Company may move forward with the regulatory approval process and potentially finance or securitize while rates remain attractive relative to ELL's weighted average cost of capital. If the Company waited until 100% of costs were final to initiate the regulatory approval process, this could increase costs to customers

<sup>11</sup> Ms. Marcus also addresses the amount of carrying costs associated with storm costs incurred in response to Hurricanes Laura, Delta, Zeta, and Winter Storm Uri.

1 if interest rates were to rise in the interim, as well as increasing carrying costs until  
2 permanent financing is in place. Ms. Marcus describes the items for which estimates were  
3 used, and Ms. Bourg and Mr. Hawkins, and Company witness Jason E. Willis provide  
4 details on the specific transmission, distribution, and generation projects underlying those  
5 estimates. ELL will provide the actual cost information for these projects as they are  
6 completed.

7  
8 Q24. HAS ELL RECEIVED ANY EXTERNAL SOURCES OF FUNDING, SUCH AS  
9 INSURANCE PROCEEDS OR GOVERNMENT GRANTS, FOR ITS STORM COSTS  
10 TO DATE?

11 A. No. ELL has not received any insurance proceeds to date in connection with damage  
12 sustained to its system as a result of Hurricane Ida. As discussed in prior storm cost  
13 proceedings, insurance has not been reasonably available for damages to transmission and  
14 distribution lines, which represent the vast majority of damages from Hurricane Ida. With  
15 respect to insurance coverage for other property for which coverage was reasonably  
16 available, the claims process for damages to generation facilities and company buildings is  
17 ongoing at this time, and it is uncertain whether the Company will ultimately receive  
18 insurance proceeds and in what amount. Additionally, ELL has not received any relief  
19 grants or funds from any federal or state governmental bodies to date. (By contrast, when  
20 an electric cooperative's service territory is included in a Presidentially-declared disaster  
21 area, FEMA reimburses a co-op at least 75 percent of the allowed costs of replacing  
22 damaged and destroyed co-op facilities.) ELL, as well as the Commission, has proactively  
23 elevated the need for federal assistance to elements of both the current and previous

1 administrations, focusing on the catastrophic damage to ELL's electric infrastructure and  
2 the fact that, short of federal support, ELL's customers will bear responsibility for the costs  
3 to repair this infrastructure that supports the energy independence of the entire nation. If  
4 ELL's efforts to secure Federal assistance ultimately are successful, ELL proposes a flow-  
5 back mechanism to handle any future amounts received, consistent with prior storm  
6 recovery orders.

7  
8 Q25. PLEASE SUMMARIZE HOW THE COMPANY DEMONSTRATES THAT THE  
9 STORM COSTS IDENTIFIED IN THIS FILING ARE REASONABLE AND  
10 THEREFORE ELIGIBLE FOR RECOVERY FROM CUSTOMERS.

11 A. The Company demonstrates that these costs are composed of expenditures that were  
12 reasonable and necessary for the restoration of service to ELL's customers after Hurricane  
13 Ida. To establish that these costs were reasonable and necessary, I, along with four other  
14 witnesses, present both high-level as well as cost-specific evidence supporting the costs  
15 divided among three functions: Transmission, Distribution, and Generation. Whether the  
16 costs presented are reasonable and necessary must be determined based on the  
17 circumstances that existed at the time and based on the resources and information  
18 reasonably available to the Company at the time.

19 The high-level evidence presented in my testimony and that of Ms. Marcus and the  
20 three functional witnesses includes (1) the identification and discussion of the major cost  
21 drivers that directly affected the amount of storm costs incurred; and (2) a discussion of  
22 the Company's storm preparedness, which facilitated an efficient and cost-effective  
23 response.

1           With regard to cost-specific evidence, the functionalized cost classes are further  
2           broken down into five major “cost categories”: Contract Work, Employee Expense, Labor,  
3           Materials, and “Other.” In addition, affiliate costs are assigned one of two major cost  
4           categories – ESL Billings and Loaned Resources. The remaining cost category is  
5           Uninvoiced Mutual Assistance, which includes mutual assistance costs incurred but for  
6           which invoices had not been received as of March 31, 2022. The functional witnesses  
7           explain in detail how the expenditures reflected in these cost categories are reasonable and  
8           necessary. For example, each functional witness describes why it was necessary for ELL  
9           to engage and obtain the services and materials that were required to restore and support  
10          the restoration of the facilities in that class; why the costs paid to vendors providing certain  
11          services and materials were reasonable; and how the Company contracted for those  
12          services and materials.

13           In addition to my testimony and that of the functional witnesses who directly  
14          support the cost classes, the Company presents testimony that provides additional support  
15          for (1) the effectiveness and reliability of the Company’s processes to monitor and approve  
16          invoices associated with the restoration efforts following each storm, to ensure that the  
17          costs charged to the Company were for services actually performed and were consistent  
18          with the approved pricing for those services; and (2) verification of the process by which  
19          the Company captured and accounted for all storm costs.

1 Q26. IS ELL REQUESTING ANY OTHER RELIEF FROM THE COMMISSION IN ITS  
2 APPLICATION?

3 A. Not in this Application. As explained below, ELL will file subsequent applications  
4 requesting relief from the Commission relating to the permanent financing of the storm  
5 costs and rate recovery for storm-related costs.  
6

7 Q27. PLEASE ELABORATE ON THE PROCEDURAL PROCESS BY WHICH THE  
8 COMPANY SEEKS TO ADDRESS THE COSTS OF RESTORING SERVICE AFTER  
9 HURRICANE IDA.

10 A. The Company asks the Commission to review the prudence of its storm costs and approve  
11 the costs as eligible for recovery in rates and to determine the manner in which the costs  
12 may be recovered, with all such relief to be ordered simultaneously. However, in this initial  
13 filing, ELL presents the costs for which it seeks recovery, and asks that the Commission  
14 review these costs and approve them as eligible for recovery.

15 ELL intends to supplement this filing with a request for permanent financing and  
16 to implement recovery of these costs. However, at this time, the Company is still  
17 developing and considering options for a proposed financing method. As I discuss below,  
18 the Company will make a supplemental filing requesting permanent financing shortly.

1                                   **IV.        HURRICANE IDA**

2                                   **A.        Damage Caused by the Storm**

3    Q28.   PLEASE DESCRIBE HURRICANE IDA.

4    A.     Hurricane Ida tied Hurricane Laura as the strongest storm to make landfall in Louisiana  
5           since 1856, and those three storms are tied for the fifth strongest to make landfall in the  
6           continental United States. Hurricane Ida came ashore near Port Fourchon, Louisiana, at  
7           11:55 a.m. CDT on August 29, 2021, as a strong Category 4 hurricane with sustained winds  
8           speeds of 150 mph. Before it even made landfall, however, Hurricane Ida had already set  
9           a record for its rapid intensification in the hours before landfall, surprising planners and  
10          forecasters, who just days before had been predicting that Ida would primarily be a rain  
11          event from a Category 1 hurricane. Taking advantage of very warm water in the Gulf of  
12          Mexico, Ida rapidly intensified from Category 1 to Category 4 status in the 24-hour period  
13          from August 28, 2021 to the morning of August 29, 2021, tying the record set in 2007 by  
14          Hurricane Humberto for most rapid intensification in the day before landfall.

15                After making landfall, Hurricane Ida's winds battered the Louisiana coast and  
16                refused to let up even as the storm moved inland. Even in a state that has seen some of the  
17                most powerful storms to ever strike the U.S., the nature and magnitude of the damage  
18                Hurricane Ida inflicted in southeast Louisiana were very different than ever before  
19                experienced. Most hurricanes rapidly weaken following landfall, limiting the most  
20                extensive damages to at or near the coastline. Hurricane Ida did not follow this pattern.  
21                Instead, Hurricane Ida maintained its catastrophic Category 4 strength for six hours after  
22                landfall, inflicting extensive damage well inland. To make matters worse, Hurricane Ida's  
23                forward movement slowed after landfall, exposing the communities in its path to rain and

1 damage winds for longer duration. The devastation and damage stretched from the Gulf  
2 of Mexico all the way through the Louisiana-Mississippi border. Governor John Bel  
3 Edwards requested, and was granted, a Major Disaster Declaration for 25 parishes in  
4 Louisiana impacted by Hurricane Ida, including Ascension, Assumption, East Baton  
5 Rouge, East Feliciana, Iberia, Iberville, Jefferson, Lafourche, Livingston, Orleans,  
6 Plaquemines, Pointe Coupee, St. Bernard, St. Charles, St. Helena, St. James, St. John the  
7 Baptist, St. Martin, St. Mary, St. Tammany, Tangipahoa, Terrebonne, Washington, West  
8 Baton Rouge, and West Feliciana Parishes.

9  
10 Q29. DID THE EXTENSIVE DAMAGE FROM HURRICANE IDA STEM ONLY FROM  
11 THE STORM'S POWERFUL WINDS?

12 A. No. Hurricane Ida produced a devastating storm surge that impacted communities well  
13 inland of the Louisiana gulf coastline, including on both the east and west banks of the  
14 Mississippi River and bordering portions of Lake Pontchartrain. As Company witness Dr.  
15 Barry D. Keim describes, storm surge levels were high enough in some locations to overtop  
16 local levee systems. Serious storm surge flooding from Hurricane Ida inundated towns like  
17 Galliano, Lafitte, and Barataria. And several feet of storm surge from Lake Pontchartrain,  
18 together with torrential rain, also prompted rare flash flood emergencies for St. John the  
19 Baptist and St. Charles Parishes, with significant flooding occurring on the west side of  
20 Lake Pontchartrain. In addition to storm surge, Hurricane Ida produced widespread rainfall  
21 and toppled trees along and near its track.

1 Q30. PLEASE PROVIDE A SUMMARY OVERVIEW OF THE DAMAGE CAUSED BY  
2 HURRICANE IDA TO ELL'S GENERATION, TRANSMISSION, AND  
3 DISTRIBUTION SYSTEMS.

4 A. The storm's slow movement, combined with its sustained power as it moved through  
5 Louisiana, damaged utility infrastructure on a scale not experienced with prior hurricanes.  
6 Hurricane Laura was previously the most devastating weather event to ever strike ELL's  
7 utility system. Just one year later, Hurricane Ida impacted multiple population centers and  
8 vastly surpassed the damage caused by Hurricane Laura.

9 Hurricane Ida's damage to the Company's transmission and distribution systems  
10 included destroyed and damaged structures and associated facilities, downed trees on lines,  
11 and vegetation and other debris that blocked the roads and rights-of-way. In addition, ELL  
12 sustained wind and/or water damage at the J. Wayne Leonard Power Station, Little Gypsy,  
13 Ninemile Point Units 4 and 5, Ninemile Unit 6, and Waterford Units 1, 2, 3, and 4. The  
14 following summary of damage to ELL's infrastructure highlights Hurricane Ida's historic  
15 intensity:

- 16 • 29,595 distribution poles damaged and/or destroyed;
- 17 • 5,617 transformers damaged and/or destroyed;
- 18 • 34,932 spans of distribution wire damaged and/or destroyed;
- 19 • 21,270 cross-arms damaged and/or destroyed;
- 20 • 530 transmission structures damaged and/or destroyed;
- 21 • 91 substations damaged and/or impacted; and
- 22 • 190 transmission lines out of service.



1 Q31. CAN YOU PROVIDE MORE DETAILS ABOUT THE DAMAGE CAUSED BY  
2 HURRICANE IDA TO ELL'S TRANSMISSION SYSTEM?

3 A. Yes. To put the above damage numbers in context, it is important to consider that the  
4 southeast Louisiana region impacted by hurricane-force winds includes 19 parishes  
5 representing over 2,300 miles of transmission lines and approximately 17,000 individual  
6 transmission structures (the poles and towers that hold the lines in the air). Of  
7 these roughly 17,000 structures, 250 were destroyed and 280 others were damaged. What  
8 this shows is that, despite Hurricane Ida's intensity, and contrary to various erroneous  
9 media reports in the immediate aftermath of the storm relating to one ELL-owned  
10 transmission structure on the Mississippi River west of New Orleans that was  
11 destroyed, the Company's transmission system withstood the storm well and was rapidly  
12 restored to service.

13 Indeed, the damage to the transmission system was well below any previous storm  
14 of similar magnitude, which reflects the success of past and continuing investment in the  
15 Company's transmission system. Directly because of our investments in hardening (that  
16 are described by Ms. Bourg), the Company was able to complete fast repairs to the  
17 transmission system following Hurricane Ida rather than lengthy and costly rebuilds.  
18

19 Q32. CAN YOU PROVIDE MORE DETAILS ABOUT THE DAMAGE CAUSED BY  
20 HURRICANE IDA TO ELL'S DISTRIBUTION SYSTEM?

21 A. Yes. Hurricane Ida devastated ELL's distribution system in its path, destroying and/or  
22 damaging nearly 30,000 distribution poles. To put this number in context, Florida Power  
23 & Light replaced around 25,600 poles in 2004 and 2005 after its service area was impacted

by seven hurricanes. As shown in Table 3, there is a direct correlation between the location of the vast majority of those broken or damaged poles and the areas of the state that were most heavily impacted by Hurricane Ida.

**Table 3: Location of Damaged and/or Destroyed  
Distribution Poles (By ELL Region and Local Network)**

Region	Local Network	Number of Poles
ELL Southeast	Lockport	9,229
	Luling	4,108
	Terrebonne	3,498
	Labadieville	1,218
	Gretna	673
	Chalmette	285
	St. Rosalie/Buras	166
ELL South	Hammond	3,389
	Reserve	3,513
	Metairie/Kenner	1,964
EGS East	Amite/Bogalusa	730
	B.R. Metro	285
	Denham Springs	264
	Gonzalez	238
	Zachary	28
	Port Allen	7
<b>Total</b>		<b>29,575</b>

As a result of Hurricane Ida's more extensive damage, large portions of the underlying distribution system in the storm's path required nearly a complete rebuild. This was the case in the Southeast region, namely, in Lafourche and Terrebonne Parishes and in Grand Isle in lower Jefferson Parish, where many of the Company's customers sustained devastating damage where homes or businesses were destroyed.

1 Q33. WHAT IMPACT DID HURRICANE IDA HAVE ON ELL'S GENERATING PLANT  
2 SITES?

3 A. As I noted above, ELL sustained wind and/or water damage at the J. Wayne Leonard Power  
4 Station, Little Gypsy, Ninemile Point Units 4 and 5, Ninemile Unit 6, and Waterford Units  
5 1, 2, 3, and 4. Mr. Willis describes the damage that these units sustained in his testimony,  
6 as well as the tasks that were required to restore or repair the damage.  
7

8 **B. Overview of ELL's Response to Hurricane Ida**

9 Q34. WHAT IS YOUR ROLE IN ELL'S RESPONSE TO STORMS SUCH AS HURRICANE  
10 IDA?

11 A. As President and CEO of ELL, I have oversight responsibility for the coordination of  
12 restoration efforts in Louisiana, including ensuring communications to customers along  
13 with key governmental, regulatory, and emergency management contacts. Willie Wilson  
14 filled the role of the Entergy System Storm Incident Commander, responsible for overall  
15 planning and response to storms. As I noted above, Mr. Hawkins is the State Incident  
16 Commander for Louisiana.  
17

18 Q35. HOW DID THE COMPANY RESPOND TO HURRICANE IDA?

19 A. After the storm made landfall, ELL performed damage assessments and began the process  
20 of repairing and restoring service to customers. As I discuss below, the Company also  
21 communicated with government officials, customers, emergency personnel, and local  
22 media regarding the restoration efforts, safety concerns during the aftermath of the storm,  
23 and ELL's actions to restore service as quickly and safely as possible.

1 More specifically, the EOCs deployed the largest restoration effort ever mobilized  
2 in company history, with approximately 27,000 workers from 41 states. These workers  
3 included scouts, field workers, vegetation workers, and support staff. Most of the men  
4 and women who composed the Hurricane Ida restoration workforce worked in Louisiana  
5 to restore service to our communities. The size and dedication of this workforce allowed  
6 for aggressive distribution restoration efforts that rivaled those of Hurricane Laura. Mr.  
7 Hawkins and Ms. Bourg describe the efforts undertaken by the Company to restore its  
8 distribution and transmission systems, respectively, in the face of the damage sustained  
9 during Hurricane Ida.

10  
11 Q36. DID THE COVID-19 PANDEMIC COMPLICATE ELL'S EFFORTS IN RESTORING  
12 SERVICE FOLLOWING HURRICANE IDA?

13 A. Yes. Due to the ongoing pandemic, the Company was required to implement its COVID-  
14 19 safety protocols for safety, travel, logistics, and lodging, which, in turn, resulted in  
15 increased costs associated with those safety measures, including alternative lodging,  
16 extended travel, and personal protection equipment, as discussed by Mr. Hawkins. And as  
17 I described above, the Hurricane Ida restoration was further complicated by the impact that  
18 the COVID-19 pandemic has had on the global supply chain.

19  
20 Q37. HOW MANY ELL CUSTOMER OUTAGES RESULTED FROM HURRICANE IDA?

21 A. The storm resulted in a total of 696,776 outages for ELL customers at its peak.

1 Q38. WHEN WAS SERVICE RESTORED TO CUSTOMERS FOLLOWING HURRICANE  
2 IDA?

3 A. ELL was able to restore service to 90% of Louisiana customers affected by Hurricane Ida  
4 by September 14, 2021 (after 15 days of restoration work). Power to nearly all ELL  
5 customers who were able to safely accept service (*i.e.*, customers who did not require  
6 reconstruction of their personal property) was restored by September 27, 2021 (29 days  
7 after Hurricane Ida made landfall). As Mr. Hawkins explains, work continued after that  
8 date to restore power along some water routes and in the hardest hit areas of Port Fourchon  
9 and Grand Isle.

10  
11 Q39. WHY DOES ELL PLACE SO MUCH EMPHASIS ON RESTORING POWER AS  
12 QUICKLY AS POSSIBLE?

13 A. There is a high personal and societal burden when people are without electric service,  
14 particularly in the aftermath of devastating storms such as Hurricane Ida. Urgent  
15 restoration is needed to protect the health and welfare of citizens in the areas served by the  
16 Company. Therefore, a paramount concern is the health and safety of the community,  
17 which requires restoring service to hospitals, water facilities, and other critical facilities, as  
18 well as social infrastructure such as grocery stores, gas stations, and pharmacies.

19 Urgent restoration also is necessary because ELL serves a large number of  
20 industries that are essential to the national and regional economies. Hurricane Ida's path  
21 between the New Orleans and Baton Rouge metropolitan areas impacted one of the most  
22 critical areas of industrial infrastructure in the U.S. For example, the refineries, petroleum  
23 import and storage facilities, and natural gas gathering and processing facilities served by

1 ELL are essential to the national energy supply, and if service to these customers is  
2 interrupted for an extended time, it will affect energy supply and prices nationally, as  
3 occurred in the aftermath of Hurricanes Katrina, Rita, and Laura. The industrial corridor  
4 also has three of the largest ports in the U.S., including the world's largest bulk cargo port.  
5 ELL is pursuing federal infrastructure assistance precisely because a large portion of our  
6 nation's energy supply and agricultural products come through Louisiana's ports,  
7 pipelines, and roads.

8 ELL recognized from the outset that it was imperative to restore service as quickly  
9 and safely as possible, and ELL coordinated its restoration efforts with government  
10 officials, including the LPSC and its Staff, the Governor of Louisiana and officials from  
11 the Department of Energy, and its industrial customers to ensure every effort was taken to  
12 get service restored to all vital services. Ms. Bourg explains those efforts in detail in her  
13 testimony.

14  
15 Q40. ARE THE ENTERGY OPERATING COMPANIES KNOWN FOR THEIR  
16 EXCELLENCE IN STORM RESPONSE?

17 A. Yes. The Entergy System is the only utility group to have received awards from the Edison  
18 Electric Institute for restoration excellence every year since the institute established the  
19 honor. Mr. Hawkins lists the awards in his Direct Testimony.

1 Q41. HAS THE COMPANY TAKEN STEPS BEYOND REPAIRING AND REBUILDING  
2 ITS SYSTEM TO HELP CUSTOMERS AND COMMUNITIES AFFECTED BY  
3 HURRICANE IDA?

4 A. Yes. ELL and Entergy Corporation have provided financial support to assist our  
5 communities that were devastated by Hurricane Ida. Entergy Corporation committed \$1.25  
6 million in shareholder contributions to help nonprofit partners provide disaster relief and  
7 assistance with rebuilding and recovery from Hurricane Ida. This commitment included  
8 \$250,000 in pre-disaster funding that enabled the American Red Cross to provide  
9 immediate help with emergency food, water, and shelter for our most vulnerable customers.  
10 Entergy Corporation also awarded \$500,000 in shareholder-funded grants to organizations  
11 helping minority small business owners recover from the devastating storm. And the  
12 Company also suspended service disconnections and waived late fees for non-payment for  
13 customers affected by Hurricane Ida and offered flexible customer payment arrangements  
14 for those customers.

15 In addition, because critical infrastructure is important to a community's recovery,  
16 the Company partnered with local officials on a generator distribution project following  
17 Hurricane Ida. The Company was able to secure portable commercial generating units to  
18 provide temporary power to essential services located in the impacted areas that were  
19 facing prolonged restoration times following the storm. These units were deployed to  
20 restore power to essential services such as water, sewerage, and police and fire  
21 departments, as well as critical customers, pharmacies, grocery stores, and hotels. In total,  
22 around 150 generators were acquired and deployed to assist ELL's customers.

1           For example, in the aftermath of the storm, there was a critical need for medical  
2 facilities in southeast Louisiana. Lady of the Sea's Medical Clinic and Rehab Centers are  
3 the only medical facilities within 46 miles of Cut Off and Larose, Louisiana. After the  
4 storm, their permanent backup generator was only able to support a part of the facility. By  
5 September 2, 2021, three backup generators were installed at Lady of the Sea's facilities,  
6 totaling 440 kW of power generation. Ms. Bourg provides additional examples of the  
7 critical customers who were served with backup generators because of the national  
8 economic impact of their facilities. And Mr. Hawkins describes how the Company was  
9 able to restore first light back to Grand Isle on September 15, 2021, by providing temporary  
10 generators capable of powering critical facilities like grocery stores, lodging, and  
11 emergency and government operations.

12  
13                           **V.       INTERACTION WITH CUSTOMERS**

14 Q42. PLEASE DESCRIBE THE COMPANY'S COMMUNICATION WITH ITS  
15 CUSTOMERS IN ADVANCE OF HURRICANE IDA.

16 A.   The Company communicated with customers through traditional news outlets and social  
17 media platforms several days prior to the storm's landfall, placing hurricane preparedness  
18 advertisements on local radio and in print publications well in advance of the storm in an  
19 effort to inform customers and the general public on safety and preparedness issues. In  
20 addition, several ELL spokespersons conducted live interviews on television and radio  
21 stations throughout each area threatened by Hurricane Ida to discuss our storm  
22 preparations. The Company also sent proactive messages to customers via text or email to  
23 alert customers of storm activities.



1 Q43. PLEASE DESCRIBE THE COMPANY'S INTERACTION WITH ITS CUSTOMERS  
2 DURING AND FOLLOWING HURRICANE IDA.

3 A. The Company used various media platforms to provide timely updates to customers around  
4 the catastrophic damage caused by Hurricane Ida and the impacts to the Company's system  
5 in order to help manage expectations throughout the restoration. Entergy's website, Storm  
6 Center, and social media platforms are where most of the Company's interaction with  
7 customers took place. The Company also initiated over 2.5 million outbound calls and 7.6  
8 million text messages to customers with updated information, generated over 142,000  
9 business e-mails, and 67 social media posts. The Company also issued 13 news releases  
10 and 36 Entergy Storm Center posts. The Company's online platform also included a  
11 Hurricane Ida hub that compiled information and helpful links about available local, state,  
12 and federal disaster-recovery resources.<sup>12</sup>

13 Shortly following Ida's landfall, I personally participated in daily press conferences  
14 with ENO leadership, public officials, and the media to provide regular updates on our  
15 restoration efforts. During a severe storm event, including Hurricane Ida, the Entergy  
16 Corporate Communications department utilizes a communications process known as "One  
17 Voice," which allows Entergy to coordinate the dissemination of the most recent available  
18 information pre-storm, during the event, and post-storm from a single point of contact.  
19 Information is disseminated at set times each day to coincide with local news cycles so that  
20 residents in affected areas have the latest information in terms of expected storm impact,

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<sup>12</sup> In conjunction with the Company's Storm Center website, the Hurricane Ida website also displayed the latest news about Hurricane Ida restoration efforts and public safety information, as well as updated estimated restoration times. The website when live on August 31, 2021, and remained up until January 11, 2022.

1 progress of the storm, and restoration activities. We also established a daily call that was  
2 coordinated by the American Public Power Association to provide detailed information  
3 and estimated restoration times to the cooperatives and municipal utilities in the area.

4 Officials on behalf of the Company also communicated and interacted with  
5 customers on a daily basis. Customers could call the 1-800-ENTERGY and 1-800-  
6 9OUTAGE telephone numbers 24 hours per day to talk to agents in the system network.  
7 ELL customers were encouraged to sign up for an app to report outages or receive valuable  
8 information and alerts. Customers also had the option to receive text alerts and report  
9 outages via text. Senior management appeared frequently on local television newscasts  
10 and radio talk shows, and the Company provided regular press releases and information  
11 updates to the media.

12 In addition, the Company deployed mobile customer information centers ("CICs")  
13 in hard-hit areas, including multiple CICs in St. John the Baptist Parish, St. James Parish,  
14 St. Charles Parish, Tangipahoa Parish, Lafourche Parish, Plaquemines Parish, and  
15 Jefferson Parish. These were resource centers where customers were able to ask Company  
16 representatives about restoration information, discuss outage issues in person, get general  
17 bill help, and receive emergency supplies and information about available resources.  
18 Nearly 6,000 customers visited the Company's CICs after their post-storm deployment.  
19 Some of the CICs were facilitated by equipment and resources we obtained through  
20 mutual-assistance partners.