



Louisiana Public Service Commission

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February 13, 2026

VIA HAND DELIVERY

Louisiana Public Service Commission
Records and Recordings
602 N. Fifth Street
Galvez Building, 12th Fl.
Baton Rouge, LA 70802

Re: Docket U-37677, Entergy Louisiana, LLC, ex parte. In re: Application for approval to complete uprate project at the Waterford 3 Nuclear Station, including cost recovery.

To whom it may concern:

Please accept this letter as a submission of two direct testimonies in connection with the above-referenced matter. Enclosed are Direct Testimony of John A. Chapman and R. Lane Sisung on Behalf of the Staff of the Louisiana Public Service Commission. A confidential version of Mr. Sisung's testimony and its exhibits are being provided under seal. Please file the enclosed into the record of the above-captioned docket and provide a copy to the Administrative Hearings Division. If you have any questions regarding this filing, please do not hesitate to contact me.

Sincerely,

Lauren Evans (Bar Roll 35576)
Deputy General Counsel
Louisiana Public Service Commission
Phone: (225) 342-9888
Email: lauren.evans@la.gov

cc: Service List (via email)

Staff

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

DOCKET NUMBER U-37677

ENTERGY LOUISIANA, LLC

*In re: Application of Entergy Louisiana, LLC for Approval to Complete Uprate Project at the
Waterford 3 Nuclear Station, for Cost Recovery, and Other Associated Relief*

**DIRECT TESTIMONY
OF
JOHN A. CHAPMAN
ON BEHALF OF THE
STAFF OF THE
LOUISIANA PUBLIC SERVICE COMMISSION**

FEBRUARY 13, 2026

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I. INTRODUCTION

Q1. PLEASE STATE YOUR NAME, PLACE OF EMPLOYMENT, TITLE, AND BUSINESS ADDRESS.

A. My name is John “Jake” A. Chapman. I am Vice President of Special Projects for United Professionals Company, LLC (“UPC”). UPC’s address is 3850 North Causeway Boulevard, Suite 1930, Metairie, Louisiana 70002.

Q2. PLEASE DISCUSS YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND.

A. I hold a Bachelor of Accountancy, cum laude, and a Master of Business Administration, concentration in Finance, both from Loyola University New Orleans. I have further completed continuing professional education courses sponsored by the Center for Public Utilities at New Mexico State University and the Regulatory Training Initiative of the National Association of Regulatory Utility Commissioners (“NARUC”). I am a Certified Depreciation Professional (“CDP”) by the Society of Depreciation Professionals. I am a fully licensed Investment Banking Representative (Series 79), Registered Investment Adviser (Series 65), and I have passed my Securities Industries Essentials (“SIE”) exam, all of which are conferred or administered by the Financial Industry Regulatory Authority (“FINRA”). I maintain an active license in Building Construction with the Louisiana State Licensing Board for Contractors. Since 2012, I have been employed by UPC or one of its affiliates in roles of increasing responsibility in the areas of investment banking and corporate finance, asset management and investment advisory services, venture capital, business development, healthcare finance consulting, program management and development, and accounting, operations, and compliance. Currently, my primary

endeavor is working with UPC and its team of consultants in providing utility regulatory consulting and expert witness services.

Q3. ON WHOSE BEHALF ARE YOU APPEARING IN THIS DOCKET?

A. I am appearing on behalf of the Louisiana Public Service Commission (“LPSC” or “Commission”) Staff.

Q4. WHY ARE YOU SUBMITTING THIS DIRECT TESTIMONY?

A. UPC was retained by the Commission to review an application (the “Application”) filed by Entergy Louisiana, LLC (“ELL” or the “Company”) in accordance with the Commission’s General Order dated September 20, 1983 (the “1983 General Order”)¹ seeking certification of, and approval for, ELL’s proposal to conduct an uprate (the “Uprate” or “Uprate Project”) at the Company’s Waterford 3 Steam Electric Station (“Waterford 3” or the “Plant”) located in Killona, Louisiana. Additionally, ELL is requesting that the Commission determine that the costs associated with the Uprate Project are deemed eligible for recovery through the Additional Capacity Mechanism (“ACM”) as part of ELL’s Formula Rate Plan (“FRP”), with the Commission expressly making such authorization despite the Uprate Projects’ projected first-year non-fuel, retail revenue requirement being below \$10 million.

Q5. SPECIFICALLY, WHAT IS ELL REQUESTING IN THE APPLICATION?

A. ELL’s Application includes several substantive prayers for relief, which I summarize as follows:

¹ LPSC General Order dated September 20, 1983 (*In re: in the Matter of the Expansion of Utility Power Plant; Proposed Certification of New Plant by the LPSC*), as amended by General Order (Corrected) in Docket No. R-30517 (*In re: Possible modifications to the September 20, 1983 General Order to allow (1) for more expeditious certifications of limited-term resource procurements and (2) an exemption for annual and seasonal liquidated damages to block energy purchases*) dated May 27, 2009.

- Find that the Uprate Project serves the public convenience and necessity, is in the public interest, and is therefore prudent, in accordance with the Commission's 1983 General Order. **(Prayer for Relief 1)**
- Find that, with respect to the Uprate Project, the Company has complied with, or is not in conflict with, the provisions of all applicable LPSC General Orders. **(Prayer for Relief 2)**
- Find that the costs of the Uprate Project are eligible for recovery through the ACM in ELL's FRP and, further, that ELL is authorized to include the costs in its Additional Capacity Revenue Requirement even if the project's incremental annual revenue requirement is less than \$10 million. **(Prayer for Relief 3)**

Q6. WHAT ISSUES ARE YOU ADDRESSING IN YOUR TESTIMONY?

A. My Direct Testimony addresses the LPSC Orders applicable to ELL's requests in this proceeding, as well as Staff's proposed monitoring plan related to the Uprate Project. My colleague at UPC, Mr. Sisung, in his Direct Testimony discusses Waterford 3 and the proposed Uprate Project, analyzes ELL's stated need for the capacity to be provided by the Uprate Project, evaluates the economic justification of ELL's proposed Uprate Project, and discusses the recovery method proposed by ELL to recover the costs of the Uprate Project.

Q7. WHAT DID YOU RELY ON IN PREPARING YOUR TESTIMONY?

A. I reviewed and relied on ELL's filed Application and supporting exhibits, including the direct testimony and exhibits of the Company's four witnesses. I also reviewed and analyzed the information provided by ELL in response to numerous data requests propounded by Staff.

II. APPLICABLE LPSC ORDERS

Q8. WHAT LPSC ORDERS DOES ELL CONTEND ARE APPLICABLE TO ITS PRAYERS FOR RELIEF IN THIS PROCEEDING?

1 A. Primarily, the 1983 General Order. Although, ELL states that the Market-Based
2 Mechanisms General Order (“MBM Order”)² may be relevant.³

3 **Q9. HOW IS THE 1983 GENERAL ORDER APPLICABLE TO ELL’S PRAYERS FOR**
4 **RELIEF IN THIS PROCEEDING?**

5 A. The 1983 General Order requires that:

6 No electric public utility subject to the jurisdiction of the Commission shall
7 commence any on site construction activity or enter into any contract for
8 construction or conversion of electric generating facilities or contract for
9 the purchase of capacity or electric power, other than emergency or
10 economy powered purchases, as well as the exemption listed in Paragraph
11 7(a), without first having applied to the Commission for a certification that
12 the public convenience and necessity would be served through completion
13 of such project or confection of such contract.⁴
14

15 **Q10. DOES THE SCOPE OF THE UPRATE PROJECT AS PROPOSED BY ELL IN**
16 **THIS DOCKET NECESSITATE COMPLIANCE WITH THE 1983 GENERAL**
17 **ORDER?**

18 A. Yes.

19 **Q11. WHAT INFORMATION IS ELL REQUIRED TO SUBMIT WITH ANY**
20 **APPLICATION TO THE COMMISSION PURSUANT TO THE 1983 GENERAL**
21 **ORDER?**

² LPSC General Order, Docket No. R-26172, Subdocket A (Feb. 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*), as amended by General Order No. R-26172, Subdocket B (Nov. 3, 2006), further amended by the April 26, 2007 General Order, and further amended by General Order No. R-26172, Subdocket C (Oct. 29, 2008), and further amended and superseded by General Order 10-14-2024, Docket No. R-34247 (Oct. 14, 2024).

³ Direct Testimony of Patrick A. Sullivan at 4.

⁴ 1983 General Order at 3.

1 A. Per the terms of the 1983 General Order and of relevance to the proposed Uprate Project:
2 specific data utilized by the utility in justification of the generation project, an itemized
3 projection of total costs, and the scheduled completion date with appropriate time schedules
4 for the percentage of the total project to be completed by specific target dates.⁵

5 **Q12. HAS ELL COMPLIED WITH THESE FILING REQUIREMENTS OF THE 1803**
6 **GENERAL ORDER WITH ITS INSTANT APPLICATION?**

7 A. Yes. In his Direct Testimony, ELL witness Mr. Willis provides the estimated costs to
8 complete the Uprate Project classified by specific cost components.⁶ Regarding the
9 scheduled completion date with appropriate time schedules, Mr. Willis represents that the
10 turbine cooling water heat exchangers replacement, stator cooling water skid replacement,
11 pressure increase for generator cooling system, current transformer replacement, and
12 feedwater heater level control valve replacement are currently planned to be completed in
13 the scheduled fall 2026 refueling outage.⁷ The final component of the Uprate Project, the
14 high-pressure turbine inner casing replacement is scheduled to be completed during a 2029
15 outage to coincide with existing high-pressure turbine inspection work already scheduled.⁸
16 ELL's justification for the Uprate Project is included throughout its Application and
17 supporting testimony, and is particularly supported by the resource planning needs asserted

⁵ 1983 General Order at 4.

⁶ Direct Testimony of Jason E. Willis at 14.

⁷ *Id.* at 10.

⁸ *Id.* at 13.

1 by Company witness Ms. Beauchamp⁹ and the economic analysis and assumptions offered
2 by Company witness Mr. Boratko.¹⁰

3 **Q13. DO YOU BELIEVE THAT ELL'S APPLICATION IN THIS PROCEEDING**
4 **MEETS THE FILING REQUIREMENTS SET FORTH IN THE 1983 GENERAL**
5 **ORDER?**

6 A. I do.

7 **Q14. DOES THE 1983 GENERAL ORDER OUTLINE ANY ADDITIONAL**
8 **REQUIREMENTS INCUMBENT UPON ELL RELATED TO ITS APPLICATION**
9 **IN THIS PROCEEDING?**

10 A. Yes. Should the Commission approve ELL's Application to initiate the Uprate Project,
11 ELL "shall notify the Commission immediately when it is determined that project or
12 contract costs will exceed that stated in the application or the completion date for
13 commercial operation is extended."¹¹ I recommend that such requirement as stated in the
14 1983 General Order be adopted as part of the monitoring plan that I am proposing for ELL
15 in this proceeding related to the Uprate Project as discussed later in Section III of my
16 testimony.

17 **Q15. TURNING NOW TO OTHER COMMISSION ORDERS POTENTIALLY**
18 **RELEVANT TO ELL'S APPLICATION IN THIS PROCEEDING, WHAT IS THE**
19 **MBM ORDER?**

⁹ Direct Testimony of Laura K. Beauchamp, generally.

¹⁰ Direct Testimony of Daniel C. Boratko, generally.

¹¹ 1983 General Order at 4.

1 A. The Commission's MBM Order requires electric utilities subject to the Commission's
2 jurisdiction to "employ a market-based mechanism [(e.g., a Request for Proposals or
3 "RFP")] to support the addition of generating capacity intended to serve LPSC-
4 jurisdictional retail customers, whether through the construction of that capacity, the
5 acquisition of that capacity, or the contracting for that capacity through a Purchase Power
6 Agreement ("PPA").¹²

7 **Q16. DOES THE MBM ORDER PROVIDE FOR ANY EXEMPTIONS?**

8 A. Yes. Per the terms of the MBM Order:

9 2. The following generating capacity investments or contracts do not
10 require the formal use of a market-based mechanism:

11 ...

12
13
14 (b) modifications to an existing unit which expand the unit's capacity
15 either by less than 10 percent or by less than 50 MW ...¹³
16

17 **Q17. DO YOU BELIEVE THAT THE SCOPE OF THE UPRATE PROJECT AS**
18 **REPRESENTED BY ELL IN ITS APPLICATION IN THIS PROCEEDING**
19 **QUALIFIES FOR EXEMPTION FROM THE MBM ORDER?**

20 A. I do. The scope of the Uprate Project as represented by ELL in its Application in this
21 proceeding would qualify for exemption from the MBM Order pursuant to Paragraph 2(b)
22 of the MBM Order as stated in the previous question. The Uprate Project as proposed
23 would provide an additional 45 MWe of unit capacity (less than 50 MW) and with an
24 existing capacity of 1,150 MWe, the proposed modifications to the existing Waterford 3

¹² Attachment (Rules) to the MBM Order at 3.

¹³ *Id.*

unit resulting from the Uprate Project proposed by ELL would be less than 10% (115 MWe) of the unit's existing capacity.

Q18. DOES THE MBM ORDER ADDRESS A CONTINUING OBLIGATION OF PRUDENCE ASSOCIATED WITH AN EXEMPT CAPACITY PROCUREMENT?

A. Yes. Paragraph 6 states that:

Any capacity investment exempt from the market-based mechanism must be supported with the appropriate justification at the time the utility seeks Commission approval or rate recovery for that investment. For any such exempt capacity addition or PPA, **the utility retains the obligation to prudently implement, construct and/or manage the resource consistent with the objective to provide reliable service at the lowest reasonable cost.**¹⁴

Accordingly, if the Uprate Project is certified, ELL retains the obligation to prudently implement, construct, and manage the resource consistent with the objective to provide reliable service at the lowest reasonable cost.

III. MONITORING PLAN

Q19. IS ELL PROPOSING ANY MONITORING PLAN ASSOCIATED WITH THE UPRATE PROJECT?

A. No. ELL does not propose or offer for Commission consideration any construction, cost, or prudence monitoring plan in either its Application or Direct Testimony in this proceeding.

Q20. DO YOU RECOMMEND THAT THE COMMISSION IMPOSE UPON ELL A MONITORING AND REPORTING REQUIREMENT FOR THE UPRATE PROJECT?

¹⁴ Attachment (Rules) to the MBM Order at 4 (emphasis added).

1 A. Yes. I recommend that the Commission impose upon ELL a formal monitoring and
2 reporting requirement as a condition of any approval granted in this proceeding.

3 **Q21. WHAT IS THE BASIS FOR RECOMMENDING A MONITORING PLAN?**

4 A. My recommendation is grounded in three factors.

5 First, all cost estimates provided by ELL for the Uprate Project are Class 5
6 estimates, which by definition carry a wide range of potential cost variance.

7 Second, the 1983 General Order requires utilities to notify the Commission when
8 project costs are expected to exceed those presented in an application or when completion
9 schedules materially change.

10 Third, the Commission has previously required periodic reporting and ongoing
11 oversight in certification proceedings involving projects with material cost and execution
12 risk, consistent with prior Staff testimony regarding construction reporting requirements in
13 other recent ELL dockets.

14 **Q22. WHAT SPECIFIC REPORTING REQUIREMENTS DO YOU RECOMMEND?**

15 A. I recommend that ELL be required to file quarterly monitoring reports with the
16 Commission for the duration of the Uprate Project. At a minimum, those reports should
17 include:

- 18 1. Updated project cost estimates by major component;
- 19 2. Identification of the current estimate classification (e.g., Class 5, Class 4, Class 3);
- 20 3. A comparison of updated projected costs to the original estimates presented in this
21 proceeding;
- 22 4. An updated project schedule, including milestone completion status;
- 23 5. Identification of any material scope changes or newly identified risks; and,

1 6. Whether the scope, design, or operating assumptions of the Uprate Projects have
2 changed from what was originally estimated by ELL in its Application in a manner that
3 affects Waterford 3's licensed thermal power or other NRC-regulated parameters such
4 that ELL would be required to seek additional NRC review or approval to complete the
5 Uprate Project.

6 These reports should be informational and shall not be construed as a finding of prudence
7 or approval of incurred costs. Nothing in such reports shall limit the Commission's
8 authority to disallow costs determined to be imprudent.

9 **Q23. DO YOU RECOMMEND ANY SPECIFIC COST OVERRUN TRIGGERS?**

10 A. Yes. Because ELL has provided only Class 5 estimates in this proceeding, I recommend in
11 each quarterly report that if the projected total costs of the Uprate Project exceed the Class
12 5 estimates presented by ELL in its Application in this proceeding by more than 30%
13 (consistent with a Class 3 estimate accuracy range of -20% / +30%), ELL be required, as
14 part of its next quarterly report, to file a written justification explaining whether
15 continuation of the Uprate Project remains reasonable and/or whether the Uprate should be
16 modified, deferred, or cancelled before incurring significant additional costs.

17 **Q24. WHY IS A CLASS 3-BASED TRIGGER APPROPRIATE?**

18 A. A Class 3 estimate represents a materially higher level of engineering definition and cost
19 certainty than a Class 5 estimate. Using a Class 3-based threshold ensures that the
20 Commission's review is informed by more reliable information while still providing an
21 opportunity to reassess the Uprate Project before costs escalate beyond reasonable bounds.

22 **Q25. DO YOU ALSO RECOMMEND A FINAL PRUDENCE REVIEW?**

1 A. Yes. I recommend that the Commission conduct a prudence review of the Uprate Project
2 upon completion. Such a review should evaluate whether the Uprate was implemented in
3 a reasonable and prudent manner, consistent with the representations made by ELL in this
4 proceeding, the requirements of the 1983 General Order, and the Commission's general
5 ratemaking standards. ELL should make a filing to support the prudence of its planning,
6 construction, and implementation of the Uprate Project within 6 months of the completion
7 of the Uprate.

8 **IV. CONCLUSIONS AND RECOMMENDATIONS**

9 A. Based on my review of the record in this proceeding, I make the following
10 recommendations:

- 11 1. The Commission find that ELL, with respect to the proposed Uprate Project as
12 represented in its Application in this proceeding, has complied with, or is not in
13 conflict with, the provisions of the 1983 General Order or the MBM Order.
- 14 2. The Commission should require ELL to comply with a formal monitoring and
15 reporting plan for the Uprate Project, including quarterly reports and cost-overrun
16 justification triggers, as discussed in Section III above.
- 17 3. The Commission should expressly require a prudence review of the Uprate Project
18 upon completion, as discussed in Section III above.

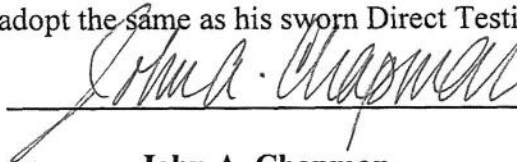
BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION
ENTERGY LOUISIANA, LLC

*In re: Application of Entergy Louisiana,
LLC for Approval to Complete Uprate
Project at the Waterford 3 Nuclear Station,
for Cost Recovery, and Other Associated
Relief*

DOCKET NO. U-37677

AFFIDAVIT

John A. Chapman, being first duly sworn, deposes and says: that he is the same John A. Chapman whose Direct Testimony accompanies this affidavit; that Direct Testimony was prepared by him or under his direct supervision and control; that he is familiar with the contents thereof; that the facts and opinions set forth therein are true and correct to the best of his knowledge, information and belief; and that he does adopt the same as his sworn Direct Testimony in this proceeding.


John A. Chapman

Subscribed and sworn before me on this 12th day of February, 2026.


Robert Lane Sisung
Jefferson Parish, LA
Notary Public ID NO. 51044
BAR NO. 23420
Notary Public

My Commission Expires: At next

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

DOCKET NUMBER U-37677

ENTERGY LOUISIANA, LLC

***In re: Application of Entergy Louisiana, LLC for Approval to Complete Uprate Project at the
Waterford 3 Nuclear Station, for Cost Recovery, and Other Associated Relief***

DIRECT TESTIMONY

OF

R. LANE SISUNG

**ON BEHALF OF THE
STAFF OF THE
LOUISIANA PUBLIC SERVICE COMMISSION**

PUBLIC VERSION

FEBRUARY 13, 2026

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I. INTRODUCTION

Q1. PLEASE STATE YOUR NAME, PLACE OF EMPLOYMENT, TITLE, AND BUSINESS ADDRESS.

A. My name is R. Lane Sisung. I am President of United Professionals Company, LLC (“UPC”). My business address is 3850 North Causeway Boulevard, Suite 1930, Metairie, Louisiana 70002.

Q2. PLEASE DISCUSS YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND.

A. I hold a Bachelor of Science degree in Accounting from Louisiana State University in Baton Rouge, Louisiana, and I sat for and passed the Certified Public Accounting Examination. I attended Loyola School of Law, where I was a member of the Law Review and received my Juris Doctor degree. I then furthered my legal and accounting education at the University of Florida where I received an L.L.M. in Tax Law. I am a fully licensed General Securities Representative (Series 7), General Securities Principal (Series 24), Options Principal (Series 4), Financial and Operations Principal (Series 27), and Registered Investment Adviser (Series 65). I am a member of the Society of Utility Regulatory Financial Analysts, by which I have been qualified as a Certified Rate of Return Analyst (“CRRA”). I have over thirty years of experience in working on financial, regulatory, real estate, and investment transactions. My current primary endeavor is managing and providing regulatory consulting and expert witness services for UPC.

Q3. PLEASE BRIEFLY DESCRIBE YOUR PRIOR REGULATORY EXPERIENCE.

A. I have provided consulting and expert witness services in numerous regulatory matters for state regulators and at proceedings at the Federal Energy Regulatory Commission

1 (“FERC”), including rate determinations, mergers and acquisitions, prudence
2 determinations, generator certifications, transmission certifications, tax matters, sale-
3 leaseback transactions, forensic investigations, revenue requirements, storm damage cost
4 recovery, and other general rulemaking matters. Attached as Exhibit RLS-001 is an
5 illustrative list of the utility regulatory dockets in which I have provided services. In
6 addition to working on specific dockets, I am also currently advising the Louisiana Public
7 Service Commission (“Commission” or “LPSC”) in matters related to the participation by
8 its regulated electric utilities in the Midcontinent Independent System Operator, Inc.
9 (“MISO”) and Southwest Power Pool, Inc. (“SPP”) Regional Transmission Organizations
10 (“RTOs”).

11 **Q4. ON WHOSE BEHALF ARE YOU APPEARING IN THIS DOCKET?**

12 A. I am appearing on behalf of the Commission Staff (“Staff”).

13 **Q5. WHY ARE YOU SUBMITTING THIS DIRECT TESTIMONY?**

14 UPC was retained by the Commission to review an application (the “Application”) filed
15 by Entergy Louisiana, LLC (“ELL” or the “Company”) in accordance with the
16 Commission’s General Order dated September 20, 1983 (the “1983 General Order”)¹
17 seeking certification of, and approval for, ELL’s proposal to conduct an uprate (the
18 “Uprate” or “Uprate Project”) at the Company’s Waterford 3 Steam Electric Station
19 (“Waterford 3” or the “Plant”) located in Killona, Louisiana. Additionally, ELL is
20 requesting that the Commission determine that the costs associated with the Uprate Project

¹ LPSC General Order dated September 20, 1983 (*In re: in the Matter of the Expansion of Utility Power Plant; Proposed Certification of New Plant by the LPSC*), as amended by General Order (Corrected) in Docket No. R-30517 (*In re: Possible modifications to the September 20, 1983 General Order to allow (1) for more expeditious certifications of limited-term resource procurements and (2) an exemption for annual and seasonal liquidated damages to block energy purchases*) dated May 27, 2009.

1 are deemed eligible for recovery through the Additional Capacity Mechanism (“ACM”) as
2 part of ELL’s Formula Rate Plan (“FRP”), with the Commission expressly making such
3 authorization despite the Uprate Projects’ projected first-year non-fuel, retail revenue
4 requirement being below the required \$10 million floor.

5 **Q6. SPECIFICALLY, WHAT IS ELL REQUESTING IN THE APPLICATION?**

6 A. ELL’s Application includes several substantive prayers for relief, which I summarize as
7 follows:

- 8 ○ Find that the Uprate Project serves the public convenience and necessity, is
9 in the public interest, and is therefore prudent, in accordance with the
10 Commission’s 1983 General Order. **(Prayer for Relief 1)**
11
- 12 ○ Find that, with respect to the Uprate Project, the Company has complied
13 with, or is not in conflict with, the provisions of all applicable LPSC General
14 Orders. **(Prayer for Relief 2)**
15
- 16 ○ Find that the costs of the Uprate Project are eligible for recovery through
17 the ACM in ELL’s FRP and, further, that ELL is authorized to include the
18 costs in its Additional Capacity Revenue Requirement even if the project’s
19 incremental annual revenue requirement is less than \$10 million. **(Prayer**
20 **for Relief 3)**
21

22 **Q7. HOW IS STAFF’S TESTIMONY STRUCTURED?**

23 A. Section II of my Direct Testimony discusses Waterford 3 and the proposed Uprate Project.
24 Section III analyzes ELL’s stated need for the capacity to be provided by the Uprate
25 Project. Section IV evaluates the economic justification of ELL’s proposed Uprate Project.
26 Section V discusses the recovery method proposed by ELL to recover the costs of the
27 Uprate Project. Finally, Section VI of my Direct Testimony summarizes my conclusions
28 and recommendations.

1 My colleague at UPC, Mr. Chapman, addresses in his Direct Testimony the LPSC Orders
2 applicable to ELL's requests in this proceeding, as well as Staff's proposed monitoring
3 plan related to the Uprate Project.

4 **Q8. WHAT DID YOU RELY ON IN PREPARING YOUR TESTIMONY?**

5 A. I reviewed and relied on ELL's filed Application and supporting exhibits, including the
6 direct testimony and exhibits of the Company's four witnesses. I also reviewed and
7 analyzed the information provided by ELL in response to numerous data requests
8 propounded by Staff.

9 **II. WATERFORD 3 AND THE PROPOSED UPRATE PROJECT**

10 **Q9. WHAT IS WATERFORD 3?**

11 A. Located on the Mississippi River in Killona, Louisiana (St. Charles Parish), Waterford 3 is
12 a single unit, pressurized water reactor design ("PWR") nuclear power plant that
13 commenced commercial operations in September 1985. The Plant is owned by ELL and
14 operated by an affiliate, Entergy Operations, Inc. ("EOI"). Waterford 3 currently has a
15 maximum capacity of approximately 1,150 MW. The Plant's nuclear reactors were
16 manufactured by Combustion Engineering (now Siemens Energy) and contains turbine
17 generators manufactured by Westinghouse. Approximately 745 people are employed at
18 Waterford 3.²

² Entergy, "Waterford 3 Steam Electric Station," available at <https://www.entergy.com/nuclear/waterford-3> (last visited Feb. 10, 2026).

1 **Q10. IS WATERFORD 3 SUBJECT TO ANY FEDERAL REGULATORY**
2 **OVERSIGHT?**

3 A. Yes, extensively. The Energy Reorganization Act of 1974 created the Nuclear Regulatory
4 Commission (“NRC”), the independent federal agency with exclusive authority to license,
5 regulate, and oversee the safety of commercial nuclear power plants in the United States.
6 Prior to the NRC, the Atomic Energy Act of 1946 (and later the Atomic Energy Act of
7 1954) vested this authority in the Atomic Energy Commission (“AEC”).³

8 **Q11. IS WATERFORD 3 CURRENTLY LICENSED BY THE NRC?**

9 A. Yes. Waterford 3 was first issued an operating license by the NRC on March 16, 1985.
10 This original operating license was a 40-year license and was set to expire on December
11 18, 2024. However, the NRC issued (at ELL and EOI’s request) a renewed license to
12 Waterford 3 on December 27, 2018 that extended the Plant’s licensure for an additional 20
13 years. Waterford 3’s NRC operating license is currently set to expire December 18, 2044.⁴

14 **Q12. IS THERE A CHANCE THAT WATERFORD 3 WILL OPERATE PAST**
15 **DECEMBER 18, 2044?**

16 A. Yes. ELL is currently considering a second license renewal (or “subsequent license
17 renewal”) for Waterford 3 that would be expected to extend the Plant’s NRC operating

³ U.S. Nuclear Regulatory Commission, “History,” <https://www.nrc.gov/about-nrc/history> (last reviewed/updated Feb. 20, 2025; last accessed Feb. 10, 2026).

⁴ U.S. Nuclear Regulatory Commission, “Waterford Steam Electric Station, Unit 3,” <https://www.nrc.gov/info-finder/reactors/wat3> (last reviewed May 6, 2022; last accessed Feb. 10, 2026)

1 license for an additional twenty years to 2064.⁵ However, ELL has not yet commenced
2 any work on an application for subsequent license renewal for Waterford 3.⁶

3 **Q13. IS THERE A LIMIT AS TO HOW MANY SUBSEQUENT LICENSE RENEWALS**
4 **THE NRC MAY GRANT A NUCLEAR FACILITY?**

5 A. It is my understanding that neither the Atomic Energy Act nor the NRC's regulations
6 impose a limit on the number of operating renewals that may be granted for a nuclear power
7 plant.⁷

8 **Q14. ARE THE OWNERS AND OPERATORS OF NUCLEAR POWER PLANTS**
9 **REQUIRED TO MEET CERTAIN CRITERIA IN ORDER TO MAINTAIN**
10 **LICENSURE BY THE NRC?**

11 A. Yes, continuously. Like any other nuclear power plant in the United States, ELL and EOI
12 as owner and operator of Waterford 3 must ensure that the Plant remains in constant
13 compliance with the facility's operating license and technical specifications, as well as
14 NRC regulations. The NRC maintains a rigorous inspection and oversight regime that
15 includes on-site resident inspectors, routine inspections, special inspections, and
16 performance-based reviews. Owners and operators of the facility must also maintain robust
17 plant safety systems, education and training programs, reporting procedures, and
18 emergency preparedness plans.

⁵ Direct Testimony of Jason E. Willis at 5.

⁶ ELL Response to Discovery Request Staff 1-22 (attached as Exhibit RLS-002).

⁷ Direct Testimony of Jason E. Willis at 5 (referencing the Atomic Energy Act of 1954).

1 **Q15. WHAT IS AN UPRATE?**

2 A. In this instance, an “uprate” generally refers to a set of upgrades or other modifications to
3 an electric generator’s plant equipment that are undertaken to increase the facility’s
4 electrical output. The NRC provides that there are three categories of uprates, and as
5 explained later these uprates require a license amendment.

6 First, are *Measurement uncertainty recapture power uprates* that increase output
7 less than 2 percent and are achieved by implementing enhanced techniques for calculating
8 reactor power. This involves the use of state-of-the-art feedwater flow measurement
9 devices to more precisely measure feedwater flow, which is used to calculate reactor
10 power. More precise measurements reduce the degree of uncertainty in the power level,
11 which is used by analysts to predict the ability of the reactor to be safely shutdown under
12 postulated accident conditions.

13 Second, are *Stretch power uprates* that typically increase output up to 7 percent
14 and are within the design capacity of the plant. The actual value of percentage increase in
15 power a plant can achieve and stay within the stretch power uprate category is plant-
16 specific and depends on the operating margins included in the design of a particular plant.
17 Stretch power uprates usually involve changes to instrumentation setpoints but do not
18 involve major plant modifications.

19 Third, are *Extended power uprates* that are greater than stretch power uprates and
20 have been approved for increases in output as high as 20 percent. These uprates require

1 significant modifications to major balance-of-plant equipment such as the high-pressure
2 turbines, condensate pumps and motors, main generators, and/or transformers.⁸

3 **Q16. DESCRIBE ELL'S PROPOSED WATERFORD 3 UPRATE.**

4 A. As contemplated by ELL, the Uprate Project proposed for Waterford 3 would increase the
5 electrical output of the facility by 45 MWe without increasing the MWt output (an
6 "efficiency uprate").⁹ With a current net electrical output of approximately 1,150 MWe,
7 ELL's proposed Uprate Project would increase the electrical output of Waterford 3 to
8 nearly 1,200 MWe.¹⁰

9 **Q17. WILL ELL BE REQUIRED TO SEEK NRC APPROVAL OR A LICENSE**
10 **AMENDMENT TO IMPLEMENT THE WATERFORD 3 UPRATE PROJECT?**

11 A. According to ELL, as an efficiency uprate, the Uprate Project is not expected to require an
12 amendment to Waterford 3's NRC operating license. ELL explains that when the NRC
13 licenses a commercial nuclear power plant, it establishes limits on the maximum thermal
14 power output of the reactor core, expressed in megawatts thermal ("MWt").¹¹ Any project
15 that would increase the licensed thermal power level above the NRC-approved limit would
16 require the plant owner to seek and obtain an NRC license amendment.

⁸ U.S. Nuclear Regulatory Commission, "Types of Power Uprates," <https://www.nrc.gov/reactors/operating/licensing/power-uprates/type-power> (last reviewed/updated Mar. 10, 2020; last accessed Feb. 10, 2026) (describing measurement uncertainty recapture, stretch, and extended power uprates).

⁹ Application at 4. Further, MWe represents the net electrical power exported from a generating unit to the transmission system, measured at the generator terminals, or point of interconnection, and excludes power consumed by the plant's auxiliary equipment.

¹⁰ Application at 4.

¹¹ MWt represents the thermal power generated in the reactor core, measured as heat output prior to conversion to electricity, and excludes any consideration of electrical generation or plant efficiency.

ELL represents that the Uprate Project is an efficiency uprate because electrical output would be achieved through improvements to secondary-side equipment. These improvements include more efficient turbine components and associated balance-of-plant upgrades that do not increase the licensed thermal power output of the reactor core. Based on that representation, ELL states that the Uprate Project is not expected to trigger the need for NRC approval or a license amendment because it does not increase licensed thermal power.¹²

Q18. HAS STAFF IDENTIFIED INFORMATION THAT SUPPORTS ELL'S DESCRIPTION OF THE NRC LICENSING FRAMEWORK?

A. Yes. When the NRC licenses a commercial nuclear power plant, it sets a limit on the maximum heat output, or power level, of the reactor core.¹³ For Waterford 3, this limit is 3,716 MWt.¹⁴ Any "uprate" that would cause Waterford 3 to exceed the limit of its NRC-licensed maximum power level (i.e., 3,716 MWt) would require ELL to apply for and receive an operating license amendment from the NRC. For example, the NRC would require ELL to seek approval before completing one of three types of typical power uprates designed to increase the maximum licensed thermal output of Waterford 3's nuclear reactor. These types of power uprates include measurement uncertainty recapture uprates (increases output less than 2%), stretch power uprates (increases output between 2% and

¹² Direct Testimony of Jason E. Willis at 11-12. Also, see ELL Response to Discovery Request Staff 1-23 (attached as Exhibit RLS-003).

¹³ U.S. Nuclear Regulatory Commission, "Backgrounder on Power Uprates for Nuclear Plants" (Fact Sheet), <https://www.nrc.gov/reading-rm/doc-collections/fact-sheets/power-uprates> (last reviewed/updated Jan. 12, 2022; last accessed Feb. 10, 2026) (providing overview of NRC power uprates, including types, review process, and history of approved uprates).

¹⁴ U.S. Nuclear Regulatory Commission, "Waterford Steam Electric Station, Unit 3," <https://www.nrc.gov/info-finder/reactors/wat3> (last reviewed May 6, 2022; last accessed Feb. 10, 2026)

1 7%), and extended power uprates (increases output up to 20%).¹⁵ As planned by ELL, the
2 Uprate Project would constitute an “efficiency” uprate¹⁶ and according to ELL would not
3 result in an increase to Waterford 3’s reactor power.¹⁷ Rather, ELL intends to achieve an
4 incremental 45 MWe of electrical output at Waterford 3 through the operation of more
5 efficient low-pressure turbine rotors previously installed during the spring 2025 refueling
6 outage as well as additional modifications to be undertaken during future refueling outages
7 in the fall of 2026 and later in 2029 to support the new, more efficient low-pressure turbine
8 rotors.¹⁸ ELL contends that the increased output resulting from the Uprate Project will be
9 within the design limits of Waterford 3 following the refueling outage scheduled for the
10 fall of this year when the Uprate Project is placed in service.¹⁹

11 Despite identifying corroborating information, Staff has not independently
12 evaluated whether implementation of the Uprate Project will require changes to NRC-
13 licensed thermal limits or other license conditions and relies on ELL’s representations for
14 purposes of this proceeding. Should the scope, design, or operating assumptions of the
15 Uprate Project be different than represented or change in a manner that affects licensed
16 thermal power or other NRC-regulated parameters, additional NRC review or approval
17 could be required.

¹⁵ U.S. Nuclear Regulatory Commission, “Backgrounder on Power Uprates for Nuclear Plants” (Fact Sheet), <https://www.nrc.gov/reading-rm/doc-collections/fact-sheets/power-uprates> (last reviewed/updated Jan. 12, 2022; last accessed Feb. 10, 2026) (providing overview of NRC power uprates, including types, review process, and history of approved uprates).

¹⁶ ELL Response to Discovery Request Staff 1-23 (attached as Exhibit RLS-003).

¹⁷ Direct Testimony of Jason E. Willis at 9.

¹⁸ *Id.* at 11-13.

¹⁹ ELL Response to Discovery Request Staff 1-23 (attached as Exhibit RLS-003).

1 **Q19. CAN YOU GENERALLY DISCUSS THE SCOPE OF WORK ASSOCIATED**
2 **WITH THE PROPOSED UPRATE PROJECT?**

3 A. To be clear, the replacement of the three low-pressure turbine rotors that ELL completed
4 at Waterford 3 during the refueling outage in spring of 2025 is not part of the scope of the
5 proposed Uprate Project. Per ELL, these rotors had reached the end of their useful lives,
6 and ELL would have replaced these three low-pressure turbine rotors at Waterford 3 even
7 if it were not contemplating the Uprate Project.²⁰ That said, the scope of the Uprate Project
8 includes modifications to certain other equipment that ELL contends, along with the three
9 newly-replaced low-pressure turbine rotors, will allow ELL to achieve an additional 45
10 MWe of electrical output at Waterford 3. These modifications are scheduled to occur
11 during two upcoming refueling outages. During refueling outage scheduled in the fall of
12 this year, ELL intends to replace the turbine cooling water heat exchangers, stator cooling
13 water skid, current transformer, and feedwater heater level control valve. Additionally,
14 ELL will also work to increase the pressure for the generator cooling system and begin the
15 MISO Definitive Planning Phase (“DPP”) Study necessary to increase ELL’s right to inject
16 additional energy from Waterford 3 onto the transmission grid. This scope of work is
17 scheduled to be undertaken during the fall 2026 refueling outage should result in 40 MWe
18 of the total 45 MWe electrical output being realized from the Uprate Project (the “Phase 1
19 Upgrades”).²¹

²⁰ ELL Response to Discovery Request Staff 1-9 (attached as Exhibit RLS-004).

²¹ Direct Testimony of Jason E. Willis at 11.

1 **Q20. HOW AND WHEN DOES ELL INTEND TO REALIZE THE REMAINING 5 MWE**
2 **ELECTRICAL OUTPUT RESULTING FROM THE UPRATE PROJECT?**

3 A. During the refueling outage scheduled during 2029, ELL intends to replace Waterford 3's
4 high-pressure turbine inner casing to realize the remaining 5 MWe electrical output
5 resulting from the Uprate Project (the "Phase 2 Upgrades"). The Company states that this
6 scope of work is planned for the 2029 refueling outage to coincide with existing high-
7 pressure turbine inspection work already scheduled during that refueling outage that will
8 require opening up the high-pressure turbine.²²

9 **Q21. HAS ELL PROVIDED COST ESTIMATES ASSOCIATED WITH THE UPRATE**
10 **PROJECT?**

11 A. Yes, twice. ELL witness Jason Willis provided an itemized budget for the Uprate Project
12 by component as HSPM Table 1 within his Direct Testimony. ELL then provided an
13 itemized budget in response to a discovery request by Staff. The table below (Table RLS-
14 001 (HSPM)) incorporates both budgets provided by ELL:

²² *Id.* at 13.

Source	Direct Testimony of Jason Willis at 14 (HSPM Table 1)	ELL Response to Data Request Staff 1-8²³
“As Of” Date	June 2025	November 17, 2025
Project Component	Cost (\$MM)	Cost (\$MM)
Turbine Cooling Water Heat Exchanger Replacement	████	████
Stator Cooling Water Skid Replacement	████	████
Increase Hydrogen Pressure	████	████
Current Transformer Replacement	████	████
Feedwater Heater Level Control Valve Replacement	████	████
HP Turbine Inner Casing Replacement	████	████
MISO DPP Application Fee	████	████
Total	████	████
Transmission Upgrades (Staff 1-12)²⁴		
MISO ERS Upgrades	Not Yet Identified	████
MISO NRIS Upgrades	Not Yet Identified	████

Q22. DO THE ABOVE ITEMIZED BUDGETS PRESENTED IN TABLE RLS-001 HSPM AND OFFERED BY ELL REPRESENT A CERTAIN COST ESTIMATE?

A. Yes. All of these costs are Class 5 estimates (-50% to +100%).²⁵

Q23. WHAT TYPES OF COSTS ARE INCLUDED WITHIN EACH OF THESE PROJECT COMPONENTS?

A. [REDACTED]

[REDACTED]

²³ ELL Response to Discovery Request Staff 1-8 and Attachments (attached as Exhibit RLS-005).

²⁴ ELL Response to Discovery Request Staff 1-12 (attached as Exhibit RLS-006).

²⁵ ELL Response to Discovery Request Staff 1-8 and Attachments (attached as Exhibit RLS-005).

1

2

²⁶

3

**Q24. DO ANY OF THE ESTIMATED COSTS INCLUDED IN THE ITEMIZED
BUDGETS CONTAIN A CONTINGENCY?**

4

5

A. ELL has stated that the only contingency included is an approximate [REDACTED] related to
the Current Transformer Replacement project component.²⁷

6

7

**Q25. HAS ELL INDICATED WHETHER THE UPRATE PROJECT WILL BE
PERFORMED BY COMPANY PERSONNEL OR OUTSIDE CONTRACTORS?**

8

9

A. ELL has indicated that most of the work will be performed by outside contractors, with
some tasks being performed by Waterford 3 employees. ELL further states that all work
will be overseen by Company personnel.²⁸

10

11

²⁶ *Id.*

²⁷ *Id.*

²⁸ Direct Testimony of Jason E. Willis at 15.

1 **Q26. YOUR TABLE RLS-001 (HSPM) ABOVE INDICATES THAT THE ESTIMATED**
2 **COSTS RELATED TO TRANSMISSION UPGRADES WERE NOT YET**
3 **IDENTIFIED AS OF JUNE 25, 2025 BUT ESTIMATES ARE INCLUDED AS OF**
4 **NOVEMBER 17, 2025. CAN YOU PLEASE ELABORATE?**

5 A. Mr. Willis stated in his Direct Testimony that his cost estimates “do not account for any
6 transmission upgrades that may be required for the uprate, but any such upgrades are
7 believed at this time to be relatively minor.”²⁹ At the time of his Direct Testimony (July
8 2025), Mr. Willis further stated the necessary transmission studies to be conducted by
9 MISO to determine whether the uprated capacity at Waterford 3 would require a change to
10 the facility’s MISO interconnection were to begin in late August 2025 and he expected
11 them to be completed by the end of the year.³⁰ Since the filing of Mr. Willis’s Direct
12 Testimony, Staff issued a data request to ELL requesting “all updates on the status of the
13 MISO Interconnection study related to the Uprate Project... [and] any known and
14 necessary changes to the scope and estimated costs of the Uprate Project as a result of the
15 MISO study.”³¹ At that time (November 2025), ELL then responded that MISO had
16 provided draft Phase I study results that estimated approximately [REDACTED] for ERIS
17 upgrades and [REDACTED] for NRIS upgrades resulting from the Uprate Project. However,
18 these costs could ultimately increase or decrease as the Phase I study released by MISO at
19 the time was a draft and the process was not yet complete.³²

²⁹ *Id.* at 14.

³⁰ *Id.* at 16.

³¹ ELL Response to Discovery Request Staff 1-12 (attached as Exhibit RLS-006).

³² *Id.*

1 **Q27. BASED ON THE WIDE RANGE OF COST UNCERTAINTY ASSOCIATED WITH**
2 **A CLASS 5 LEVEL ESTIMATE, WHAT DO YOU RECOMMEND REGARDING**
3 **THE COSTING OF THE PROPOSED UPRATE PROJECT?**

4 A. In his testimony, Mr. Chapman recommends that ELL be required to submit to a
5 monitoring plan for the Uprate Project. Such plan should include ELL providing
6 continuing updates of the costs as they are known by ELL, and if projected costs were to
7 materially increase above the proposed estimate, ELL should provide a justification for the
8 continuation of the project or the cancellation of the project. Further, to the extent
9 additional costing information is available at the time ELL submits its Rebuttal Testimony
10 in this proceeding, such information should be provided.

11 **III. ELL'S STATED NEED**

12 **Q28. WHAT IS ELL'S PRIMARY JUSTIFICATION FOR PROPOSING THE UPRATE**
13 **PROJECT?**

14 A. As described in the Direct Testimony of ELL witness Ms. Beauchamp, ELL's projected
15 load (plus a planning reserve margin) exceeds the capacity of the Company's existing and
16 LPSC-approved resources. This is exacerbated by the Company's need to serve several
17 new high-profile loads that have been announced by the Company over the last year, as
18 well as the Company's planned deactivation of certain generating units and the upcoming
19 expiration dates of existing PPAs currently utilized by the Company.³³ Using ELL's
20 Spring Seasonal Accredited Capacity ("SAC") by MISO, [REDACTED]
21 [REDACTED]

³³ Direct Testimony of Laura K. Beauchamp Direct at 15.

1 [REDACTED]³⁴ Further, and specific to the environmental
2 attributes offered by nuclear generation, Ms. Beauchamp states that “ELL’s customers,
3 especially in the large commercial and industrial sector, increasingly are seeking carbon-
4 free generation options to meet their planning objectives, as well as the desires of their own
5 investors, customers, and the communities in the vicinity of their operations. Having this
6 access to kind [sic] of clean energy will allow these customers to meet their own
7 decarbonization and sustainability goals and encourage continued investment within the
8 state of Louisiana.”³⁵ Ms. Beauchamp finally asserts that, “Satisfying this demand is
9 essential for fostering continued economic growth in Louisiana. Many businesses that are
10 considering Louisiana as a possible location have sustainability goals. As a result, a
11 prerequisite for such businesses locating in Louisiana is access to emission-free energy.”³⁶

12 **Q29. WHAT IS THE SCOPE OF “NEED” THAT YOU ARE EVALUATING IN THIS**
13 **PROCEEDING?**

14 A. In this proceeding, my evaluation of need is limited to whether ELL has demonstrated a
15 need for approximately 45 MW of additional generating capacity, corresponding to the
16 incremental output associated with the proposed Waterford 3 Uprate Project. I am not
17 making a finding regarding ELL’s broader long-term resource requirements beyond this
18 incremental amount.

³⁴ *Id.* at 16

³⁵ *Id.* at 20.

³⁶ *Id.*

1 **Q30. DO YOU AGREE THAT ELL HAS IDENTIFIED A NEED FOR THIS**
2 **INCREMENTAL 45 MW OF ADDITIONAL CAPACITY?**

3 A. Yes. Based on my review of ELL's testimony in this docket and my familiarity with ELL's
4 recent certification proceedings, I find that ELL has identified a credible need for an
5 incremental 45 MW of additional generating capacity to maintain system adequacy in light
6 of projected load growth, announced large customer additions, planned generation
7 retirements, and expiring contractual resources.

8 **Q31. IS YOUR FINDING OF NEED FOR 45 MW DEPENDENT ON ANY SINGLE**
9 **LOAD FORECAST OR CUSTOMER ANNOUNCEMENT?**

10 A. No. My conclusion that ELL has demonstrated a need for approximately 45 MW of
11 additional capacity does not depend on any single forecast, customer commitment, or
12 planning assumption. Rather, I find that the combined effect of multiple factors supports
13 the existence of a reasonable need for this incremental amount of capacity.

14 **Q32. DO YOU VIEW THE NEED FOR 45 MW AS A SHORT-TERM OR LONG-TERM**
15 **NEED?**

16 A. I view the need for an incremental 45 MW of capacity as a durable capacity need, rather
17 than a temporary or short-term imbalance. The factors cited by ELL that contribute to this
18 need extend beyond a single planning year and reflect ongoing capacity adequacy
19 considerations.

20 **Q33. DOES YOUR FINDING OF NEED FOR 45 MW RELY ON ASSUMPTIONS**
21 **ABOUT FUTURE CAPACITY MARKET PURCHASES?**

22 A. No. My determination that ELL has demonstrated a need for approximately 45 MW of
23 additional capacity does not rely on the assumption that ELL will procure capacity through

1 future capacity market purchases. I evaluate need based on the requirement for physical
2 generating capacity sufficient to reliably serve load, independent of short-term market
3 transactions.

4 **Q34. DID YOU CONSIDER THE TECHNOLOGY OR FUEL TYPE OF THE**
5 **RESOURCE WHEN DETERMINING WHETHER THERE IS A NEED FOR 45**
6 **MW?**

7 A. No. For purposes of determining need in this docket, my focus is limited to whether ELL
8 requires an additional 45 MW of generating capacity, regardless of technology, ownership
9 structure, or fuel type. Consideration of the appropriateness or desirability of a particular
10 resource is addressed separately from the threshold question of need.

11 **Q35. WHAT IS YOUR OVERALL CONCLUSION REGARDING NEED IN THIS**
12 **DOCKET?**

13 A. I conclude that ELL has demonstrated a credible need for approximately 45 MW of
14 additional generating capacity. This conclusion is limited to the existence of need for that
15 incremental amount and does not prejudge whether the proposed Waterford 3 Uprate
16 Project is the most appropriate, economical, or prudent means of meeting that need.

17 **IV. EVALUATION OF THE ECONOMIC JUSTIFICATION OF THE PROPOSED**
18 **UPRATE PROJECT**

19 **Q36. CAN YOU DESCRIBE THE PURPOSE OF THE ECONOMIC TESTIMONY**
20 **OFFERED BY ELL IN SUPPORT OF THE WATERFORD 3 UPRATE PROJECT?**

21 A. Yes. ELL witness Daniel Boratko explains that his testimony is intended to support ELL's
22 Application by presenting the results of an economic analysis of the proposed Waterford 3
23 Uprate Project. That analysis evaluates both the costs required to achieve an incremental

1 45 MWe increase in output at Waterford 3 and the economic benefits that ELL contends
2 its customers are projected to realize from that increase.³⁷

3 **Q37. HOW DOES ELL FRAME THE ECONOMIC QUESTION ASSOCIATED WITH**
4 **THE UPRATE PROJECT?**

5 A. ELL frames the economic question as whether the incremental capacity and energy
6 associated with a 45 MWe uprate at Waterford 3 produces net economic benefits for
7 customers when compared to the costs required to implement the project. As explained by
8 Mr. Boratko, ELL's analysis assesses whether implementing the Uprate is economically
9 preferable to pursuing alternative sources of capacity that would otherwise be needed
10 absent the Uprate Project.³⁸

11 **Q38. WHAT COSTS DOES ELL INCLUDE IN ITS ECONOMIC EVALUATION OF**
12 **THE UPRATE PROJECT?**

13 A. According to Mr. Boratko, ELL's economic analysis includes the projected capital costs
14 associated with the projects required to implement the 45 MWe Uprate, as well as the return
15 of and on those capital expenditures. Mr. Boratko states that these costs were provided by
16 ELL's Nuclear organization and are summarized in Exhibit DCB-1 accompanying his
17 testimony.³⁹

³⁷ Direct Testimony of Daniel C. Boratko at 3.

³⁸ *Id.* at 4, 6.

³⁹ *Id.* at 4 and Exhibit DCB-1(HSPM).

1 **Q39. HOW DOES ELL CALCULATE THE ECONOMIC BENEFITS OF THE UPRATE**
2 **PROJECT?**

3 A. Mr. Boratko explains that ELL's economic analysis includes two primary benefit
4 components: incremental energy value and incremental capacity value associated with the
5 45 MWe increase. Incremental energy value is estimated using projected locational
6 marginal prices developed through production cost modeling, while incremental capacity
7 value is calculated based on ELL's long-term avoided cost of capacity.⁴⁰

8 **Q40. HOW DOES ELL DEFINE THE CAPACITY VALUE ASSOCIATED WITH THE**
9 **UPRATE PROJECT?**

10 A. ELL defines the capacity value of the Uprate Project based on the avoided long-term cost
11 of developing new capacity. Specifically, Mr. Boratko states that the capacity value of the
12 Uprate Project is calculated using ELL's then-current estimate of the levelized cost of a
13 new gas-fired combustion turbine, which ELL considers a commonly used proxy for the
14 lowest-cost source of accredited capacity.⁴¹

15 **Q41. WHY DOES ELL CONSIDER IT REASONABLE TO USE AVOIDED CAPACITY**
16 **COSTS IN ITS ECONOMIC ANALYSIS?**

17 A. Mr. Boratko explains that, absent the additional capacity provided by the Uprate Project,
18 ELL would need to pursue an alternative source of capacity to meet its long-term needs.
19 For that reason, ELL contends it is reasonable to value the capacity provided by the Uprate

⁴⁰ *Id.* at 4-5.

⁴¹ *Id.* at 5.

1 Project at ELL's long-term avoided cost of capacity, rather than treating the incremental
2 output as surplus or discretionary.⁴²

3 **Q42. WHAT CONCLUSIONS DOES ELL DRAW FROM ITS ECONOMIC ANALYSIS?**

4 A. Mr. Boratko testifies that, subject to certain identified uncertainties, ELL's analysis shows
5 that implementation of the 45 MWe Uprate at Waterford 3 is projected to result in net
6 economic benefits to customers. Mr. Boratko further states that the analysis estimates a
7 positive net present value over the assumed implementation schedule for the Uprate
8 Project.⁴³

9 **Q43. DID YOU ATTEMPT TO REPLICATE OR REPLACE ELL'S DETAILED**
10 **ECONOMIC MODEL?**

11 A. No. I did not attempt to replicate or replace ELL's production cost or financial modeling.
12 Instead, I evaluated the reasonableness and robustness of ELL's economic justification
13 using the cost and benefit magnitudes disclosed in the record, consistent with the present-
14 value framework employed by ELL's own witness.

15 **Q44. HOW DOES ELL'S PRESENT-VALUE ANALYSIS FRAMEWORK INFORM**
16 **YOUR EVALUATION OF THE ROBUSTNESS OF ELL'S ECONOMIC**
17 **JUSTIFICATION?**

18 A. My evaluation relies on the present-value framework used by ELL's economic witness. In
19 his testimony, Mr. Boratko reports a net present value benefit of approximately \$205
20 million and a present value of project costs of approximately \$68.7 million. Because net
21 present value is calculated as the present value of gross benefits minus the present value of

⁴² *Id.* at 6.

⁴³ *Id.* at 3, 7.

1 costs, and because those costs include return of and on capital, those figures imply total
2 present-value gross benefits on the order of \$270 million, using the same present-value
3 framework described by Mr. Boratko.

4 Within that framework, the Uprate Project would cease to be economically
5 beneficial only if the present value of gross benefits were reduced by roughly \$205 million,
6 if present-value costs increased by a comparable amount, or if some combination of
7 reduced benefits and increased costs eliminated that net benefit. I therefore evaluated
8 whether reasonably foreseeable adverse outcomes, such as reduced capacity value, delayed
9 or unavailable tax credits, higher interconnection costs, schedule slippage, or higher project
10 costs, were sufficient, individually or in combination, to erode benefits by that magnitude.
11 Based on the magnitudes disclosed in the record, I concluded that while several of these
12 factors materially weaken the economics, they do not, under current planning assumptions,
13 eliminate the entire net benefit reflected in ELL's analysis.

14 **Q45. HAVE YOU REVIEWED ELL'S ECONOMIC JUSTIFICATION FOR THE**
15 **WATERFORD 3 UPRATE PROJECT?**

16 A. Yes. I reviewed the direct testimony of ELL witness Daniel Boratko and the supporting
17 economic analysis prepared by Entergy Services. That testimony presents ELL's
18 evaluation of the costs and projected benefits associated with increasing Waterford 3's
19 output by 45 MWe and also explains the basis on which ELL claims the Uprate Project
20 produces net economic benefits when compared to alternative means of meeting capacity
21 needs.

1 **Q46. HOW DOES ELL QUANTIFY THE CAPACITY VALUE ASSOCIATED WITH**
2 **THE UPRATE PROJECT?**

3 A. ELL characterizes the capacity value of the Uprate Project based on its long-term avoided
4 cost of capacity. In particular, ELL values the incremental 45 MWe using the estimated
5 levelized cost of a new gas-fired combustion turbine, which ELL treats as a proxy for the
6 lowest-cost source of new accredited capacity that would otherwise need to be developed
7 absent the Uprate.

8 **Q47. DO YOU FIND ELL'S USE OF AVOIDED NEW-BUILD CAPACITY COSTS TO**
9 **BE A REASONABLE FRAME OF REFERENCE?**

10 A. Yes, in general. I find it reasonable for ELL to evaluate the capacity value of the Uprate
11 Project by reference to the avoided cost of new physical capacity, rather than treating the
12 incremental output as surplus or discretionary. If ELL requires additional capacity over
13 the planning horizon, then comparing the Uprate to the cost of alternative capacity
14 resources provides a relevant economic benchmark.

15 **Q48. DOES YOUR ECONOMIC ASSESSMENT RELY ON FUTURE CAPACITY**
16 **MARKET PURCHASES OR PLANNING RESOURCE AUCTION CLEARING**
17 **PRICES?**

18 A. No. My assessment of the Uprate Project's economic reasonableness does not rely on
19 assumptions regarding future capacity market purchases or Planning Resource Auction
20 ("PRA") clearing prices. As I have previously stated, capacity market transactions are
21 short-term and financial in nature and do not ensure the availability of physical capacity
22 when needed to reliably serve load.

**Q49. HOW DO YOU TREAT THE ENERGY VALUE COMPONENT OF ELL'S
ECONOMIC ANALYSIS?**

A. I recognize that ELL includes incremental energy value in its economic analysis based on projected market prices. While energy value contributes to the overall economics, I do not view incremental energy value, standing alone, as the primary driver of the project's justification. In my assessment, the more durable economic value of the Uprate Project is associated with the provision of incremental, physically available capacity from a highly reliable generating unit.

**Q50. HOW DO YOU ACCOUNT FOR UNCERTAINTIES IDENTIFIED IN ELL'S
ECONOMIC ANALYSIS?**

A. I recognize that ELL's economic analysis identifies several uncertainties, including the treatment of federal tax credits and the outcome of interconnection-related processes. My evaluation does not assume that all favorable outcomes occur exactly as projected. Instead, I considered whether the Uprate Project remains economically reasonable under a range of plausible conditions, recognizing that cost, timing, and regulatory outcomes may vary. Those uncertainties were evaluated in light of the present-value thresholds discussed above.

**Q51. DO YOU CONSIDER COST UNCERTAINTY IN REACHING YOUR
CONCLUSION?**

A. Yes. I recognize that certain components of the Uprate Project remain subject to cost uncertainty, including work scheduled for future refueling outages and estimates that are preliminary in nature. My conclusion regarding economic reasonableness does not assume

1 perfect cost certainty and contemplates the need for continued oversight as the project
2 progresses.

3 **Q52. WHAT IS YOUR OVERALL CONCLUSION REGARDING THE ECONOMIC**
4 **JUSTIFICATION FOR THE UPRATE PROJECT?**

5 A. Based on my review of ELL's economic analysis and my independent evaluation, I
6 conclude that the Waterford 3 Uprate Project is economically reasonable under current
7 planning assumptions. This conclusion is grounded primarily in the value of incremental,
8 long-lived, physically deliverable capacity provided by an existing nuclear facility, rather
9 than reliance on short-term market mechanisms or speculative future transactions. Further,
10 my conclusion is based on the information currently available and does not preclude
11 additional review should project costs, scope, or underlying assumptions materially
12 change.

13 **V. PROPOSED COST RECOVERY**

14 **Q53. HOW IS ELL PROPOSING TO RECOVER THE COSTS ASSOCIATED WITH**
15 **THE UPRATE PROJECT?**

16 A. According to ELL witness Mr. Sullivan, the Company requests that the retail portion of the
17 costs associated with the Phase 1 Upgrades of the Uprate Project be recovered through the
18 ACM in ELL's FRP.⁴⁴ ELL does not intend to seek recovery of the Phase 2 Upgrades
19 through the ACM and anticipates that those costs would be recovered through whatever
20 base recovery mechanism is in place when the Uprate Project is fully completed.⁴⁵

⁴⁴ Direct Testimony of Patrick A. Sullivan at 6.

⁴⁵ *Id.* at 8.

Q54. WHAT IS THE ACM IN ELL'S FRP?

A. The ACM is a limited feature of ELL's Commission-approved FRP that allows the Company to recover the Additional Capacity Revenue Requirement ("ACRR") associated with certain LPSC-approved (or exempted from LPSC approval) supply-side capacity resources outside of the FRP bandwidth mechanism during the first year of operation. After that initial period, the revenue requirement is trued-up and realigned into Base Rider FRP Revenue, where it becomes subject to the FRP earnings test.⁴⁶

Q55. IS THE ACM A GENERAL-PURPOSE MECHANISM FOR RECOVERING ALL GENERATION-RELATED COSTS?

A. No. The ACM is not a general-purpose recovery mechanism. It applies only to narrowly defined categories of capacity additions and only under the conditions set forth in Section 3.D of the FRP. The ACM was designed as a limited exception to the FRP bandwidth, not as a mechanism to ensure immediate recovery for all generation investments that produce customer benefits.

Q56. WHAT LIMITATIONS DOES THE FRP PLACE ON ACM RECOVERY FOR ELL-OWNED CAPACITY RESOURCES?

A. For ELL-owned capacity resources, Section 3.D.1 of the FRP limits ACM recovery to the first-year non-fuel, retail revenue requirement associated with:

- a. The modification or replacement of an existing generating facility having an incremental annual revenue requirement exceeding \$10 million;
- b. The acquisition of new generating facilities; and/or,

⁴⁶ See ELL FRP at page 163.8, Section 3.D (available here: https://www.entergyloouisiana.com/wp-content/uploads/ell_frp.pdf).

- 1 c. The construction of a new generating facility, having an annual revenue
2 requirement exceeding \$10 million (except as otherwise provided for in
3 Section 3.D.3 of the FRP), and/or unless otherwise authorized by the
4 Commission.⁴⁷
5

6 **Q57. DOES THE UPRATE PROJECT MEET THE \$10 MILLION THRESHOLD**
7 **APPLICABLE TO MODIFICATIONS OF EXISTING GENERATING**
8 **FACILITIES?**

- 9 A. No. ELL witness Mr. Sullivan estimates the total annual revenue requirement associated
10 with the entire Uprate Project to be approximately \$6.9 million. The revenue requirement
11 associated with the Phase 1 Upgrades that ELL seeks to recover through the ACM is even
12 lower—approximately \$4.4 million after accounting for wholesale revenues recovered
13 through ELL’s FERC-regulated MSS-4 Replacement Tariff.⁴⁸

14 **Q58. WHAT IS ELL’S TEXTUAL ARGUMENT THAT THE UPRATE PROJECT CAN**
15 **STILL RECEIVE ACM TREATMENT UNDER THE FRP?**

- 16 A. ELL argues that the phrase “unless otherwise authorized by the Commission” allows the
17 Commission to authorize ACM recovery for the Uprate Project even though the project
18 does not meet the \$10 million threshold. In effect, ELL seeks to extend discretionary
19 language expressly tied to the construction of new generating facilities to other categories
20 of owned capacity resources.⁴⁹

⁴⁷ See ELL FRP at page 163.8, Section 3.D.1 (available here: https://www.energylouisiana.com/wp-content/uploads/ell_frp.pdf).

⁴⁸ Direct Testimony of Patrick A. Sullivan at 8.

⁴⁹ *Id.* at 7.

1 **Q59. DO YOU AGREE WITH ELL’S INTERPRETATION OF THE FRP?**

2 A. I do not. The FRP’s “unless otherwise authorized by the Commission” language appears
3 in subsection (c) describing the construction of a new generating facility, and it does not
4 appear in subsection (a), which expressly limits ACM treatment for modification or
5 replacement of an existing generating facility to projects exceeding \$10 million.

6 **Q60. WHAT IS YOUR INTERPRETATION OF THE FRP BASED ON THAT TEXTUAL**
7 **STRUCTURE?**

8 A. My interpretation is that the FRP includes an explicit \$10 million threshold for
9 modifications/replacements of existing generation and does not provide a parallel “unless
10 otherwise authorized” carve-out for that category. The Commission’s reserved
11 authorization language is tied to new construction in subsection (c), not to modifications
12 in subsection (a)

13 **Q61. EVEN IF THE COMMISSION, IN THE EXERCISE OF ITS BROAD**
14 **AUTHORITY, WERE TO CONSIDER DEVIATING FROM THE TERMS OF THE**
15 **FRP AND GRANTING ACM RECOVERY FOR THIS PROJECT, DO YOU**
16 **RECOMMEND THAT IT DO SO?**

17 A. No. Even if the Commission does have discretion under the FRP to authorize ACM
18 recovery for the Uprate Project, after reviewing ELL’s proposed justification for such
19 treatment, I do not recommend that such discretion be exercised in this case.

20 **Q62. WHAT JUSTIFICATION DOES ELL OFFER FOR WHY IT SHOULD RECEIVE**
21 **ACM RECOVERY DESPITE NOT MEETING THE \$10 MILLION THRESHOLD?**

22 A. ELL primarily argues that ACM recovery is warranted in order to “match” the costs of the
23 Uprate Project with the customer benefits it contends the project will produce. Mr. Sullivan

1 asserts that the increased electrical output from the Uprate Project is expected to be
2 achieved with no increase in fuel costs and no material change in operating expenses. He
3 further references ELL witness Mr. Boratko's analysis estimating an \$11.2 million
4 reduction in fuel expenses flowing through the Fuel Adjustment Clause in the first year of
5 Phase 1 operations, as well as approximately \$13.1 million in nuclear production tax credits
6 that would flow through to customers pursuant to the Global Settlement Stipulation
7 Agreement approved in Docket No. U-36959.⁵⁰

8 **Q63. DO YOU FIND THIS "BENEFITS-MATCHING" RATIONALE A VALID BASIS**
9 **FOR ACM RECOVERY UNDER THE FRP?**

10 A. No. The fact that a generation investment produces customer benefits is not, by itself, a
11 basis for recovery outside the FRP bandwidth. All prudent generation investments are
12 expected to produce customer benefits; that expectation is embedded in the FRP's design.
13 If the production of customer benefits alone were sufficient to justify ACM recovery, the
14 \$10 million threshold, and other limitations in Section 3.D of the FRP would serve no
15 purpose. The FRP does not provide that costs should be removed from the earnings test
16 whenever a project produces favorable fuel, energy, or tax outcomes.

17 Allowing ACM recovery on the basis that a project produces benefits would
18 effectively convert the ACM into a general "benefits-based" recovery mechanism, which
19 is inconsistent with the text and structure of the FRP and would fundamentally alter the
20 allocation of risks and rewards that was negotiated and approved.

⁵⁰ *Id.* at 6-7.

1 **Q64. HOW DOES THE FRP CONTEMPLATE CUSTOMER BENEFITS FROM**
2 **GENERATION INVESTMENTS BEING REFLECTED IN RATES?**

3 A. Under the FRP, customer benefits from generation investments, such as reduced fuel costs,
4 increased market revenues, or tax credit flows, are generally reflected through existing
5 mechanisms, including the Fuel Adjustment Clause, formula-based earnings calculations,
6 and tax adjustment mechanisms. These benefits accrue to customers without requiring
7 costs to be removed from the FRP bandwidth. That structure allows customers to realize
8 the full benefit of favorable outcomes while preserving the incentive and risk framework
9 of the FRP. Nothing in the FRP suggests that these benefit-flow-through mechanisms were
10 intended to trigger or justify removal of costs that are specifically determined to be
11 included in the earnings bandwidth.

12 **Q65. WHAT WOULD BE THE EFFECT OF GRANTING ACM RECOVERY ON THE**
13 **BASIS PROPOSED BY ELL?**

14 A. Granting ACM recovery on the basis that a project produces significant customer benefits
15 would shift a portion of those benefits back to the Company by insulating the associated
16 costs from the FRP earnings test. That outcome would erode the bargained-for exchange
17 embodied in the FRP, under which ELL received formula-based recovery and reduced rate-
18 case exposure in exchange for accepting earnings risk on investments that fall below the
19 ACM materiality threshold.

20 **Q66. WHAT ROLE DOES THE \$10 MILLION THRESHOLD PLAY IN THAT**
21 **BARGAINED-FOR FRAMEWORK?**

22 A. The \$10 million annual revenue requirement threshold functions as a materiality screen. It
23 ensures that only large, discrete capacity investments that could meaningfully distort

1 earnings if immediately subject to the FRP bandwidth are eligible for temporary recovery
2 outside the bandwidth. Smaller projects were intended to be absorbed within the normal
3 operation of the FRP.

4 Importantly, that threshold has remained fixed in nominal terms for more than a
5 decade and has not been adjusted for inflation or changes in construction and financing
6 costs. As a result, its real economic significance has declined over time. In that context,
7 the existing threshold already reflects a more permissive standard than originally
8 contemplated when the FRP framework was negotiated and approved.

9 **Q67. WHAT IS YOUR OVERALL RECOMMENDATION REGARDING ELL'S**
10 **REQUEST TO RECOVER UPRATE COSTS THROUGH THE ACM?**

11 A. I recommend that the Commission deny ELL's request to recover the revenue requirement
12 associated with the Uprate Project through the ACM. While the Uprate Project may be
13 economically reasonable and provide customer benefits, that does not entitle it to recovery
14 outside the FRP bandwidth. Denying ACM recovery preserves the bargained-for exchange
15 reflected in the FRP, ensures that customers retain the full benefit of favorable project
16 outcomes, and avoids expanding the ACM beyond the limits expressly negotiated and
17 approved by the Commission. Further, to be clear, a denial of ACM coverage is not a
18 denial of recovery, it just means that the costs of the Uprate Project will be recovered within
19 the normal operation of ELL's FRP.

VI. CONCLUSIONS AND RECOMMENDATIONS

Q68. PLEASE SUMMARIZE YOUR RECOMMENDATIONS IN THIS PROCEEDING.

A. Based on my review of the record in this proceeding, I make the following recommendations:

1. The Commission should find that ELL has demonstrated a need for approximately 45 MW of additional generating capacity.
2. The Commission should find that the Uprate Project is economically reasonable under current planning assumptions.
3. The Commission should deny ELL's request to recover Uprate Project costs through the Additional Capacity Mechanism of the FRP.
4. The Commission should require ELL to comply with a formal monitoring and reporting plan for the Uprate Project, including quarterly reports and cost-overrun justification triggers, as discussed further in Mr. Chapman's Direct Testimony.
5. The Commission should expressly reserve the right to conduct a prudence review of the Uprate Project upon completion, as discussed further in Mr. Chapman's Direct Testimony.

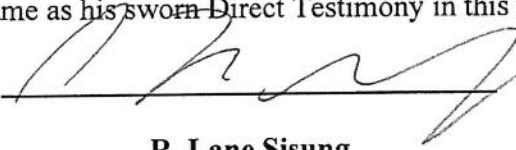
BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION
ENTERGY LOUISIANA, LLC

*In re: Application of Entergy Louisiana,
LLC for Approval to Complete Upstate
Project at the Waterford 3 Nuclear Station,
for Cost Recovery, and Other Associated
Relief*

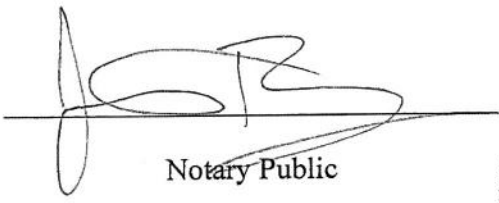
DOCKET NO. U-37677

AFFIDAVIT

R. Lane Sisung, being first duly sworn, deposes and says: that he is the same R. Lane Sisung whose Direct Testimony accompanies this affidavit; that Direct Testimony was prepared by him or under his direct supervision and control; that he is familiar with the contents thereof; that the facts and opinions set forth therein are true and correct to the best of his knowledge, information and belief; and that he does adopt the same as his sworn Direct Testimony in this proceeding.


R. Lane Sisung

Subscribed and sworn before me on this 12TH day of February, 2026.


Notary Public

My Commission Expires: At Death



**Service List for U-37677
as of 2/13/2026**

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Mike Francis

Davante Lewis

Foster L. Campbell

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Exhibit RLS-001
Robert Lane Sisung
Illustrative Experience

Client	Docket Identifier/Number	Matter Description	UPC Deliverable
Georgia Public Service Commission	43453	Generic Proceeding to Implement House Bill 244	Filed Staff Report
Louisiana Public Service Commission	U-32538	Joint Application of Entergy Louisiana, LLC, Entergy Gulf States Louisiana, L.L.C., et. al. for Approval of Change of Ownership of Electric Transmission Business, for Certain Recovery Adjustments, and for related Relief	R. Lane Sisung Testimony John Mayeaux Testimony Dr. J. Thomas McGuckin Testimony Mr. Stephen Hill Testimony Mr. Lawrence J. Sisung, III Testimony
Louisiana Public Service Commission	U-32707	Application of Entergy Gulf States, Louisiana, L.L.C. for authority to Change Rates, Approval of Formula Rate Plan and for Related Relief	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-32708	Application of Entergy Louisiana, LLC for authority to Change Rates, Approval of Formula Rate Plan and for Related Relief	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-33244	Potential Business Combination of Entergy Louisiana, LLC and Entergy Gulf States Louisiana L.L.C.	R. Lane Sisung Testimony John Mayeaux Testimony Dr. J. Thomas McGuckin Testimony Mr. Paul Chastant Testimony
Louisiana Public Service Commission	U-33434	Joint Application of Cleco Power, LLC and Cleco Partners L.P. for : (i) Authorization of the Change of Ownership and Control of Cleco Power LLC and (ii) Expedited Treatment	R. Lane Sisung Testimony John Mayeaux Testimony Dr. J. Thomas McGuckin Testimony Paul Chastant Testimony
Louisiana Public Service Commission	U-33510	Application for Entergy Gulf States Louisiana, L.L.C. For Approval To Purchase Power Blocks Three and Four of the Union Power Station and Request for Timely Treatment and Cost Recovery	R. Lane Sisung Testimony Dr. J. Thomas McGuckin Testimony
Louisiana Public Service Commission	U-33605	Joint Application of Entergy Gulf States Louisiana L.L.C. and Entergy Louisiana LLC for Certification of the Louisiana Economic Transmission Project in Accordance with Louisiana Public Service Commission General Order Dated October 10, 2013	Filed Staff Report
Louisiana Public Service Commission	U-33645	Application of Entergy Gulf States Louisiana L.L.C. for Certification of the Lake Charles Transmission Project in Accordance with Louisiana Public Service Commission General Order Dated October 10, 2013	Filed Staff Report
Louisiana Public Service Commission	U-33782	Entergy Louisiana, LLC and Entergy Gulf States Louisiana L.L.C. In Re: Test Year 2014 Formula Rate Plan Filing	Filed Staff Report
Louisiana Public Service Commission	U-33848	Cleco Power LLC Formula Rate Plan June 2015 Monitoring Report	Filed Staff Report
Louisiana Public Service Commission	U-33925	In re: Atmos Entergy Trans Louisiana Rate Stabilization Clause ("RSC") Cost of Service Schedules and Workpapers Test Year Ending September 30, 2015	Filed Staff Report
Louisiana Public Service Commission	U-33950	Compliance Submission Regarding Deactivation of Little Gypsy 1, Ninemile 3, and Willow Glen 2 and 4, as required by Order No. U-33510	Filed Staff Statement of Position

Client	Docket Identifier/Number	Matter Description	UPC Deliverable
Louisiana Public Service Commission	U-33974	Entergy Gulf States Louisiana, L.L.C. Test Year 2015 Rate Stabilization Plan Filing	Filed Staff Report
Louisiana Public Service Commission	U-33983	In Re: Motion for Extension of Entergy Louisiana, LLC's Gas Rate Stabilization Plan	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-34028	Atmos Energy Corporation 2015 Rate Stabilization Clause filing for Louisiana Gas Service Rate Division	Filed Staff Report
Louisiana Public Service Commission	U-34081	Entergy Louisiana, LLC Test Year 2015 Formula Rate Plan Filing	Filed Staff Report
Louisiana Public Service Commission	U-34289	Cleco Power LLC Formula Rate Plan – June 2016 Monitoring Report and pursuant to U-32507 Prudence Review of Cleco's Installation of MATS Emissions Control Equipment at Dolet Hills Power Station, Rodenucher Power Station Unit No. 2, and Madison Unit No. 3	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-34332	Commission Directive to Review Entergy's Load Shedding Agreement with Vinton Power Public Authority	Filed Staff Report
Louisiana Public Service Commission	U-34343	In re: Atmos Entergy Trans Louisiana Rate Stabilization Clause ("RSC") Cost of Service Schedules and Workpapers Test Year Ending September 30, 2016	Filed Staff Report
Louisiana Public Service Commission	U-34354	Southwestern Electric Power Company's Request for Certification of Long Term Natural Gas Contract	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-34376	Entergy Louisiana, LLC ex parte IN Re: 2016 Rate Stabilization Plan Filing	Filed Staff Report
Louisiana Public Service Commission	U-34424	Atmos Energy Corporation 2015 Rate Stabilization Clause filing for Louisiana Gas Service Rate Division	Filed Staff Report
Louisiana Public Service Commission	U-34445	Entergy Louisiana, LLC's Application for Authorization to Recover Gas Storm Deferred Operations and Maintenance Expense Resulting from the August 2016 Flood	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-34475	Entergy Louisiana, LLC Test Year 2015 Formula Rate Plan Filing	Filed Staff Report
Louisiana Public Service Commission	U-34617	Application of Cleco Power LLC requesting Commission consideration of a Proposed Physical Bilateral Hedge Program, pursuant to General Order R-32975	NA-Application Abandoned

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Client	Docket Identifier/Number	Matter Description	UPC Deliverable
Louisiana Public Service Commission	U-34619	In re: Application of Southwestern Electric Power Company (SWEPCO) for Expedited Certification and Approval of the Acquisition of Certain Renewable Resources and the Construction of a Generation Tie Pursuant to the 1983 and/or 1994 General Orders	R. Lane Sisung Testimony Paul Chastant Testimony
Louisiana Public Service Commission	U-34687	Cleco Power LLC Formula Rate Plan- June 2017 Monitoring Report	Filed Staff Report
Louisiana Public Service Commission	U-34735	In Re: Application of Entergy Louisiana, LLC For Approval of Natural Gas Cost Stabilization Pilot Program, Transaction Parameters, and Other Relief.	Paul Chastant Testimony
Louisiana Public Service Commission	U-34742	Community Utilities of Louisiana Inc. and Utilities, Inc. of Louisiana - Request for Statewide Consolidation of Assets, Request for Uniform Rate Structure, Request for the Establishment of Formula Rate Plan, and Application for Adjustment in Retail Rates Pursuant to the Global Settlement Agreement Contained in LPSC Order Nos. U-34206 and U-34287, as well as Reservation of Rights to Request Interim Rates	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-34744	In re: Annual Evaluation Report for Entergy Louisiana, LLC for the test year ended September 30, 2017.	Filed Staff Report
Louisiana Public Service Commission	U-34794	In Re: Application of Cleco Corporate Holdings LLC and Cleco Power LLC for (i) Authorizations, Waivers, and Regulatory Interpretations of Certain Provisions of LPSC Order No. U-33434-A; (i) Authorization for Cleco Corporate Holdings, LLC to Pledge its Ownership Interest in Cleco Power LLC; and (iii) Expedited Treatment.	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-34951	Entergy Louisiana, LLC's Formula Rate Plan Annual Evaluation Reports for Test Years Ending December 31, 2017	Filed Staff Report
Louisiana Public Service Commission	U-35049	Cleco Power LLC, LPSC Docket U-35049, In Re: June 2018 Monitoring Report - Application of Cleco Power LLC for: (i) Authorization to Implement Rate Reductions resulting from the Tax Cuts and Jobs Act of 2017; (ii) Authorization to Modify Certain Tariffs in connection with such Rate Reductions; (iii) Authorization to Implement Residential Base Revenue Decoupling; and (iv) Expedited Treatment	Filed Staff Report
Louisiana Public Service Commission	U-35078	Application of Entergy Louisiana, LLC for Certification of the Waterford to Churchill Transmission Project in Accordance with Louisiana Public Service Commission General Order Dated October 10, 2013	Filed Staff Report Application Dismissed
Louisiana Public Service Commission	U-35106	Atmos Energy Services 2018 Rate Stabilization Clause Annual Filing for Trans Louisiana Gas Division	Filed Staff Report
Louisiana Public Service Commission	U-35118	Entergy Louisiana, LLC 2018 Test Year Gas Rate Stabilization Filing	Filed Staff Report
Louisiana Public Service Commission	U-35130	Entergy Louisiana, LLC Request to Terminate, or in the Alternative Modify, the Fuel Tracking Mechanism-A Request Initially Included in an April 2, 2018 Compliance Filing in Docket No. U-33244 Pursuant to Order U-33244-A (LPSC Docket No. U-35130)	R. Lane Sisung Testimony Paul Chastant Testimony
Louisiana Public Service Commission	U-35153	Atmos Energy Service 2018 Rate Stabilization Clause Filing for Louisiana Gas Service Rate Division	Filed Staff Report

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Client	Docket Identifier/Number	Matter Description	UPC Deliverable
Louisiana Public Service Commission	U-35200	Utilities Inc. of Louisiana 2018 Formula Rate Plan Annual Filing	Filed Staff Report
Louisiana Public Service Commission	U-35205	Entergy Louisiana, LLC's Formula Rate Plan Annual Evaluation Reports for Test Years Ending December 31, 2018	Filed Staff Report
Louisiana Public Service Commission	U-35299	Application of Cleco Power LLC for (1) Implementation of Changes in Rates to be Effective July 1, 2020; and (2) Extension of Existing Formula Rate Plan	R. Lane Sisung Testimony (Settlement)
Louisiana Public Service Commission	U-35324	Application of Southwestern Electric Power Company (SWEPCO) for Certification and Approval of the Acquisition of Certain Renewable Resources in Accordance with the MBM Order and the 1983 and 194 General Orders.	R. Lane Sisung Testimony Paul Chastant Testimony
Louisiana Public Service Commission	U-35350	Application of Entergy Louisiana, LLC for Approval of a Change in Funding for Decommissioning Trusts for River Bend and Waterford 3 Nuclear Facilities	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-35370	Motion for Extension of Entergy Louisiana, LLC's Gas Rate Stabilization Plan	R. Lane Sisung Testimony (Settlement)
Louisiana Public Service Commission	U-35407	Cleco Power LLC Formula Rate Plan- June 2019 Monitoring Report	Filed Staff Report
Louisiana Public Service Commission	U-35488	Entergy Louisiana, LLC 2019 Test Year Gas Rate Stabilization Filing	Filed Staff Report
Louisiana Public Service Commission	U-35558	Utilities Inc. of Louisiana 2019 Formula Rate Plan Annual Filing	Filed Staff Report
Louisiana Public Service Commission	U-35565	Application of Entergy Louisiana, LLC for Extension and Modification of Formula Rate Plan	R. Lane Sisung Testimony (Settlement)
Louisiana Public Service Commission	U-35581	Entergy Louisiana, LLC's Formula Rate Plan Annual Evaluation Reports for Test Years Ending December 31, 2019	Filed Staff Report
Louisiana Public Service Commission	U-35753	Joint Application of Cleco Power LLC and SWEPCO for : (i) authorization to close the Oxbow Mine; (ii) authorization to include and defer certain accelerated mine closing costs in fuel and related rate making treatments; and (iii) expedited treatment	R. Lane Sisung Testimony J. Bourg Testimony
Louisiana Public Service Commission	U-35762	Application of Entergy Louisiana, LLC for Approval of Ratemaking Adjustment for Interim Hurricane Laura Financing	NA

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Client	Docket Identifier/Number	Matter Description	UPC Deliverable
Louisiana Public Service Commission	U-35806	Request for recovery of lost revenues related to LPSC Special Order nos. 22-2020, 28-2020, and 43-2020 and request for accounting order	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-35807	Application of Cleco Power LLC for (I) Recovery in Rates of Certain Storm Damage Costs Incurred as a Result of Hurricanes Laura Delta and Zeta	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-35835	Application of Entergy Louisiana LC for Authorization to Implement an Experimental Interruptible Option Rider, Rider EIO, and Related Relief	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-35862	Entergy Louisiana, LLC 2020 Test Year Gas Rate Stabilization Filing	Filed Staff Report
Louisiana Public Service Commission	U-35936	Application of Southwestern Electric Power Company for the Certification of the Trinity Solar Project	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-36002	Utilities Inc. of Louisiana 2020 Formula Rate Plan Annual Filing	Filed Staff Report
Louisiana Public Service Commission	U-36003	Utilities Inc. of Louisiana Request for Extension of Formula Rate Plan with Modifications Thereto	R. Lane Sisung Testimony Paul Chastant Testimony
Louisiana Public Service Commission	U-36092	Entergy Louisiana, LLC's Formula Rate Plan Annual Evaluation Reports for Test Years Ending December 31, 2020	Filed Staff Report
Louisiana Public Service Commission	U-36103	Entergy Louisiana, LLC's Application for change in Decommissioning Rates for River Bend and Waterford 3	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-36105	Entergy Louisiana, LLC Application for "Power Through" Program for customer sited generation.	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-36133	Dixie Electric Membership Corporation, NextEra Energy Marketing, LLC and Amite Solar, LLC's Joint Application for Approval of Power Supply	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-36135	Jefferson Davis Electric Cooperative and NextEra Marketing, LLC Joint Application for Approval of Power Supply Agreement	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-36165	SWEPCO Request for Certification of Kingston Reliability Transmission Project	Filed Staff Report

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Client	Docket Identifier/Number	Matter Description	UPC Deliverable
Louisiana Public Service Commission	U-36174	Southwestern Power Company (SWEPCO) Application for recovery of Storm Costs.	R. Lane Sisung Testimony Jonathan Bourg Testimony
Louisiana Public Service Commission	U-36259	SWEPCO certification of Rocking R Solar	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-36265	Entergy Louisiana, LLC's Gas Rate Stabilization Plan Annual Evaluation Reports for Test Years Ending December 31, 2021	Filed Staff Report
Louisiana Public Service Commission	U-36301	Atmos Application for Infrastructure Expansion Program	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-36338	Entergy Louisiana, LLC's Application of Gas Rate Stabilization Plan and Infrastructure Rider	R. Lane Sisung Testimony Paul Chastant Testimony
Louisiana Public Service Commission	U-36381	Entergy Louisiana, LLC's Formula Rate Plan Annual Evaluation Reports for Test Years Ending December 31, 2021	Filed Staff Report
Louisiana Public Service Commission	U-36383	National Water Infrastructure, LLC Rate Case	R. Lane Sisung Testimony Paul Chastant Testimony
Louisiana Public Service Commission	U-36385	Southwestern Power Company (SWEPCO) Application for Certification of selected Renewable Facilities and approval of natural gas capacity purchase agreements	Jonathan Bourg Testimony
Louisiana Public Service Commission	U-36502	Cleco Power LLC Application for Certification of Unsolicited Offer for Solar Facility at Dolet Hills.	Jonathan Bourg Testimony
Louisiana Public Service Commission	U-36514	Concordia Electric Application for Certification of Power Supply	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-36515	Point Coupee Application for Certification of Power Supply	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-36516	SLEMCO Application for Certification of Power Supply	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-36582	Cleco Power, LLC June 30, 2022 Formula Rate Plan Annual Filing	Filed Staff Report

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Client	Docket Identifier/Number	Matter Description	UPC Deliverable
Louisiana Public Service Commission	U-36625	Entergy Louisiana, LLC's Application for Approval of the Entergy Future Ready Resilience Plan	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-36658	Atmos Renewal of Louisiana Rate Stabilization Plans (Cost of Capital Only)	Paul Chastant Testimony
Louisiana Public Service Commission	U-36682	Entergy Louisiana, LLC's Gas Rate Stabilization Plan Annual Evaluation Reports for Test Years Ending December 31, 2022	Filed Staff Report
Louisiana Public Service Commission	U-36697	ELL Application for Approval of Alternative Process to Secure up to 3,000MW of Solar Resources, Certification of the Resources, Expansion of the Geaux Green Option, Approval of a New Renewable Tariff, and Related Relief	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-36923	Application of Cleco Power LLC for (1) Implementation of Changes in Rates to be Effective July 1, 2024; and (2) Extension of Existing Formula Rate Plan	R. Lane Sisung testimony John Mayeaux Testimony Jonathan Bourg Testimony - (Settlement)
Louisiana Public Service Commission	U-36959	Application of Entergy Louisiana, LLC for Approval of Rate Case or Extension of Formula Rate Plan to be effective September 1, 2024	Settlement Affidavit in support of Negotiated Stipulated Settlement Agreement
Louisiana Public Service Commission	U-37062	Cleco Power 2023 Formula Rate Plan Annual Filing	Filed Staff Report
Louisiana Public Service Commission	U-37067	Evaluation of Southwestern Electric Power Company's decision to retire the Pirkey Power Plant pursuant to Commission Order No. U-36385-A	R. Lane Sisung testimony Jonathan Bourg Testimony
Louisiana Public Service Commission	U-37112	Entergy Louisiana, LLC 2023 Gas Rate Stabilization Plan Annual Filing	Filed Staff Report
Louisiana Public Service Commission	U-37122	1803 Electric Cooperative, Inc. - 2022 and 2023 Formula Rate Plan Annual Filings	Active-Nothing Filed to Date
Louisiana Public Service Commission	U-37131	Application of Entergy Louisiana, LLC for Approval to Construct Bayou Power Station, and for Cost Recovery	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-37143	Application of Entergy Louisiana, LLC for Exemption and/or Certification of the West Bank 230kV Transmission Project	R. Lane Sisung Settlement Testimony Filed
Louisiana Public Service Commission	U-37155	Southwestern Electric Power Company's 2023 and 2024 Formula Rate Plan Annual Filings	Active-Nothing Filed to Date

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Louisiana Public Service Commission	U-37193	Application of Entergy Louisiana, LLC for approval of the Magnolia Capacity Credit Purchase Agreement, Cost Recovery, and Related Relief	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-37213	Cleco Power Securitization Financing of Dolet Hills Power and Associated Mines	Active R. Lane Sisung Testimony
Louisiana Public Service Commission	U-37225	Application of Entergy Louisiana, LLC for Approval of Natural Gas Cost Stabilization Program	Active R. Lane Sisung Testimony
Louisiana Public Service Commission	U-37371	Entergy Louisiana, LLC Test Year 2023 Formula Rate Plan Evaluation Report	Active-Staff Reports Filed
Louisiana Public Service Commission	U-37407	Application of Southwestern Electric Power Company For Approval of a Natural Gas Capacity Purchased Agreement	Jonathan Bourg Testimony
Louisiana Public Service Commission	U-37421	Cleco Power, LLC Formula Rate Plan - Twelve Month Ending ("TMS") June 30 2024 Monitoring Report	Active-Staff Reports Filed
Louisiana Public Service Commission	U-37425	Entergy Louisiana, LLC Application for approval of generation and transmission resources in connection with service to a single customer for a project in North Louisiana	Active R. Lane Sisung Testimony Jake Chapman Testimony
Louisiana Public Service Commission	U-37441	Petition for Qualification of 1803 Electric Cooperative Facilities as Transmission Facilities, Approval of Transfer of Functional Control of Transmission Facilities to MISO, and for Expedited Consideration	Active R. Lane Sisung Testimony
Louisiana Public Service Commission	U-37463	Application of Southwestern Electric Power Company for Certification and Approval to Construct the Hallsville Natural Gas Plant and to Convert the Welsh Power Plant Units 1 and 3 to Natural Gas, in Accordance with the MBM Order and 1983 General Order	Active Jonathan Bourg Testimony
Louisiana Public Service Commission	U-37467	Application of Entergy Louisiana, LLC for Certification of the West Bank 500kV Transmission Project in Accordance with Louisiana Public Service Commission General Order Dated September 10, 2024	Active R. Lane Sisung Testimony Jake Chapman Testimony
Louisiana Public Service Commission	U-37479	Cleco Power, LLC Application for Authorization of Phase I of the Comprehensive Hardening Plan; (II) Related Rate Recovery; and (III) Expedited Treatment.	Active R. Lane Sisung Testimony
Louisiana Public Service Commission	U-37494	1803 Electric Cooperative, Inc. - 2024 Formula Rate Plan Annual Report	Active-Nothing Filed to Date
Louisiana Public Service Commission	U-37496	Entergy Louisiana, L.L.C. Test Year 2024 Gas Rate Stabilization Plan Filing.	Staff Reports Filed

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Louisiana Public Service Commission	U-37502	Application for Southwestern Electric Power Company for Extension of Formula Rate Plan and Service Quality Improvement Plan	Active R. Lane Sisung Testimony Jonathan Bourg Testimony
Louisiana Public Service Commission	U-37527	Application of Entergy Louisiana, LLC for Certification of the East Bank Geismar 230kV Project in Accordance with Louisiana Public Service Commission General Order Dated September 10, 2024	Active R. Lane Sisung Testimony Jake Chapman Testimony
Louisiana Public Service Commission	U-37537	Joint Application for: 1) qualification of certain Concordia assets as transmission facilities; 2) approval of the transfer of Concordia's designated transmission facilities to GridLiance; and 3) Commission determination of GridLiance as an Independent Transmission Company subject to the Commission's jurisdiction.	Active R. Lane Sisung Testimony
Louisiana Public Service Commission	U-37538	Joint Application for: 1) qualification of certain SLEMCO assets as transmission facilities; 2) approval of the transfer of SLEMCO's designated transmission facilities to GridLiance; and 3) Commission determination of GridLiance as an Independent Transmission Company subject to the Commission's jurisdiction.	Active R. Lane Sisung Testimony
Louisiana Public Service Commission	U-37563	Certification of Adams Creek - Robert 230kV Project	Active R. Lane Sisung Testimony Jake Chapman Testimony
Louisiana Public Service Commission	U-37594	Entergy Louisiana, LLC Annual Evaluation Report for Test Year 2024	Filed Staff Report
Louisiana Public Service Commission	U-37595	Entergy Louisiana, LLC Request for Approval of Demand Response Programs	Active-Nothing Filed to Date
Louisiana Public Service Commission	U-37677	Entergy Louisiana, LLC Application for uprate Project at Waterford 3 Nuclear Station	Active-Nothing Filed to Date
Louisiana Public Service Commission	U-37706	SWEPCO Request for Approval of Short Term Capacity Agreements	Active-Nothing Filed to Date
Louisiana Public Service Commission	U-32631	Application of Cleco Power LLC for: (i) public interest finding in favor of the transfer of functional control of certain transmission assets to the Midwest Independent Transmission System Operator, Inc.	Post Integration Monitoring
Louisiana Public Service Commission	U-32675	Entergy Louisiana, LLC and Entergy Gulf States Louisiana, LLC., ex parte. Joint implementation filing and request for associated approvals addressing certain implementation, integration, and other issues regarding EGSL and ELL joining MISO	Post Integration Monitoring
Louisiana Public Service Commission	U-34317	Entergy Louisiana, LLC, ex parte Application for Authorization to Extend the Midcontinent Independent System Operator Cost Recovery Mechanism	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-34447	Application of Entergy Louisiana, LLC Regarding Continued Participation in the Midcontinent Independent System Operator, Inc. Regional Transmission Organization	R. Lane Sisung Testimony Dr. J. Thomas McGuckin Testimony

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Louisiana Public Service Commission	U-34501	Cleco Power LLC, ex parte. Application Regarding the Costs and Benefits of Continued Participation in the Midcontinent Independent Systems Operator, Inc. Regional Transmission Organization.	R. Lane Sisung Testimony
Louisiana Public Service Commission	U-34345	Investigation of the Meter Reading, Billing, Collection and Customer-Service practices of the Greater Ouachita Water Company and through its operating contractor Severn Trent Environmental Services, for the year 2016	Staff Report Filed
Louisiana Public Service Commission	U-34324	Audit of Purchased Gas Adjustment Filings for Trans Louisiana Gas Company and Louisiana Gas Service Company (Regulatory Divisions of Atmos Energy Corporation) for the period of April 2014 through March 2016	Staff Report Filed
Louisiana Public Service Commission	X-34341	Audit of Fuel Adjustment Clause Filing for Entergy Louisiana LLC for the Period of January 2014 through December 2015	Staff Report Filed
Louisiana Public Service Commission	X-35085	Southwestern Electric Power Company Request for Proposals for up to 1,200 MW of Wind Energy Resources	Staff Report Filed
Louisiana Public Service Commission	X-35071	In re: Investigation of Entergy Services, LLC	Nothing Filed
Louisiana Public Service Commission	X-35119	SWEPSCO Notice of Intent to Conduct Request For Proposals for Solar Resources – In Accordance with General Order R-26172, Subdocket C, The Market Based Mechanism ("MBM") Order	Application Withdrawn
Louisiana Public Service Commission	X-35500	Notice of Intent of Jefferson Davis Electric Cooperative Inc. and Dixie Electric Membership Cooperative to Conduct 2020 Request for Proposals for Long Term Power Purchase Contracts and/or Generating Capacity Pursuant to the LPSC's Market Based Mechanism General Order	Nothing Filed in this Docket Certification Filings Followed
Louisiana Public Service Commission	U-35508	Audit of Federal Environmental Adjustment Clause filings of SWEPSCO for the Period of January 2018 through December 2019	Staff Report Filed
Louisiana Public Service Commission	U-35511	Audit of Federal Environmental Adjustment Clause filings of Cleco Power, LLC for the Period of January 2018 through December 2019	Still Active
Louisiana Public Service Commission	X-35741	MBM Notice of Intent of Concordia Electric Cooperative, Point Coupee Electric Membership Corporation and Southwest Louisiana Electric Membership Corporation	Nothing Filed in this Docket Certification Filings Followed
Louisiana Public Service Commission	X-35981	Investigatory Audit of Total Environmental Solutions, Inc.'s compliance and management of all drinking water and wastewater systems, including compliance with a Modified Consent Decree	Staff Report Pending
Louisiana Public Service Commission	X-35983	SWEPSCO RFP - In accordance with General Order R-26172, Subdocket C, the market Based Mechanism ("MBM") Order	Nothing Filed in this Docket Certification Filings Followed

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Louisiana Public Service Commission	U-35987	Audit of Fuel Costs of Entergy Louisiana, LLC, for Provision of Electricity, Associated with February 2021 Winter Storm Event.	Staff Report Filed
Louisiana Public Service Commission	X-36125	SWEPCO Fuel Adjustment Clause Audit (Jan 2019-Dec 2020)	Staff Report Submitted
Louisiana Public Service Commission	X-36645	SWEPCO Fuel Adjustment Clause Audit (Jan 2021-Dec 2022)	Staff Report Submitted
Louisiana Public Service Commission	X-36646	Entergy Louisiana, LLC Purchase Gas Adjustment Audit (Jan 2021-Dec 2022)	Staff Report Submitted
Louisiana Public Service Commission	X-36647(48)	CenterPoint Purchase Gas Adjustment Audit (Jan 2021-Dec 2022)	Staff Report Submitted
Louisiana Public Service Commission	X-36498	SWEPCO Market Based Mechanism for Renewable Generation.	NA
Louisiana Public Service Commission	X-36718	Cleco Environmental Adjustment Clause Audit (Jan 2020-Dec 2022)	Staff Report Filed
Louisiana Public Service Commission	X-36720	SWEPCO Environmental Adjustment Clause Audit (Jan 2021-Dec 2022)	Still Active
Louisiana Public Service Commission	X-37003	SWEPCO Requests for Proposal for the purchase of diverse generation and capacity resources in accordance with the Market Based Mechanism (MBM) Order.	NA
Louisiana Public Service Commission	X-37323	Investigative Audit into SWEPCO Service Quality	Staff Report Filed
Louisiana Public Service Commission	X-37450	Entergy Louisiana, LLC Request for Proposals for long-term developmental combined-cycle combustion turbine resources	Still Active
Louisiana Public Service Commission	X-37469	Cleco Power, LLC Request for Proposals for renewable energy resources.	Still Active
Louisiana Public Service Commission	X-37566	Commission Minimum Capacity Obligation Repository	Still Active

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Louisiana Public Service Commission	X-37588	After Action Review of SPP-SWEPCO's April 2 and 26, 2025 Outages	Staff Report Filed
Louisiana Public Service Commission	X-37608	After Action Review of MISO-ELL-Cleco Power, LLC May 25, 2025 Outages	Still Active
Louisiana Public Service Commission	X-37665	1803 Electric Cooperative Request for Proposals for long term power purchase contracts, generating capacity, and/or generating resources.	Still Active
Louisiana Public Service Commission	R-32975	Examination of Long-Term Natural Gas Hedging Proposals.	Staff Report Filed with Rule
Louisiana Public Service Commission	R-34026	Investigation of Double Leveraging Issues for all LPSC-Jurisdictional Utilities	Still Active
Louisiana Public Service Commission	R-34029	Investigation of Tax Structure Issues for all LPSC-Jurisdictional Utilities	Still Active
Louisiana Public Service Commission	R-34407	Rulemaking Docket to Consider Whether or Not the Commission Should Exercise Authority Over Future Utility Generation Deactivation and Retirement Decisions and the Rules and Procedures that Could Apply to Any Such Exercise of Authority	Staff Report Filed With Rule
Louisiana Public Service Commission	R-34738	Proceeding to Establish Rules Regarding Electric Utility Tariff Filings and Related Review, Including Site Specific Rate Filings	Staff Report Filed With Rule
Louisiana Public Service Commission	R-34754	Consideration of appropriate manner to flow through to ratepayers the benefits of the reduction in corporate income taxes as a result of the Tax Cuts and Jobs Act, treatment of the regulatory liability ordered by the Commission to be recorded by utilities pursuant to the Commission's Special Order No. 13-2018,	Staff Report Filed With Rule
Louisiana Public Service Commission	R-34758	Louisiana Public Service Commission, ex parte Timely Disclosure of Facts and Notices, Regarding Such Matters as MaxGen Alerts, to Commission and Commissioners, and Related Matters.	Staff Report Filed With Rule
Louisiana Public Service Commission	R-34860	Rules Applicable to Electric Service Provider's Provision of Service to Load Outside its Historical Footprint that may be Offered for Industrial Load	Staff Report Filed With Rule
Louisiana Public Service Commission	R-34948	Rulemaking to Study the Implications of Participation of Aggregators of Retail Customers to Determine Whether, and Under What Conditions, Such Activity Should be Allowed in the Louisiana Public Service Commission's Jurisdiction	Staff Report Filed With Rule
Louisiana Public Service Commission	R-35135	Rulemaking Pursuant to the General Order Dated March 7, 2019 in Docket to Develop Rules Under Which Third-Party Aggregators of Retail Customers Seeking Authority to Operated will be Allowed to do Business Within the LPSC's Jurisdiction.	Staff Report Filed With Proposed Rule

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Louisiana Public Service Commission	R-35136	Rulemaking to Determine Need for Rate Schedules and Programs Offering Demand Response Products, Development of Such Rate Schedules and Programs, Determination of Customer Participation in such programs, Allocation and Recovery of Program Costs and Whether Such Programs Shall be Mandatory or Voluntary for Utilities as set Fort in Sec. 3 of the Rule Adopted in General Order Dated March 7, 2019 in Docket No. R-34948	Staff Report Filed With Rule
Louisiana Public Service Commission	R-35462	Rulemaking to Research and Evaluate Customer Centered Options for all Electric Customer Classes as well as Other Regulatory Environments.	Staff Report Filed With Rule
Louisiana Public Service Commission	R-36263	Rulemaking on Minimum Capacity Obligations for Regulated Electric Utilities	Staff Report Filed With Rule
Louisiana Public Service Commission	R-37639	Possible Amendments to General Order dated April 30, 1998 regarding electric reliability standards, including the Commission's current penalty levels and enforcement mechanisms.	Active-Nothing Filed to Date
Louisiana Public Service Commission	S-33825	Directive to Establish a Service Quality Program (SQP) for Cleco Power, LLC	Staff Report Filed
Louisiana Public Service Commission	S-34082	Entergy Louisiana, LLC Request to Close LMPS Rate Schedule to New Business	Joint Report of Staff and ELL Issued
Louisiana Public Service Commission	S-34426	Status of Electric Rates in Louisiana: Where Are We and Where Are We Going?	Staff Report Filed
Louisiana Public Service Commission	S-37113	Entergy Louisiana, LLC's Notice of Exemption Regarding the Audubon Substation and Related Transmission Facilities Consistent with Louisiana Public Service Commission General Order Dated October 10, 2013	Staff Report Filed
Louisiana Public Service Commission	T-34959	Pecten Midstream LLC Request to (i) Increase Rates for Transportation Service of Petroleum on its Delta Pipeline System, (ii) Revise Tariff No. 2.2.0, (iii) Reserve Right for Interim Rate Relief, and (iv) Expedited Consideration	Paul Chastant Testimony
Louisiana Public Service Commission	S-37113	Entergy Louisiana, LLC's Notice of Exemption Regarding the Audubon Substation and Related Transmission Facilities Consistent with the LPSC General Order	Still Active
Louisiana Public Service Commission	I-33013	Integrated Resource Planning ("IRP") process for Southwestern Electric Power Company (SWEPCO), pursuant to General Order dated April 20, 2012	Staff Report Filed
Louisiana Public Service Commission	I-34693	Cleco Power, LLC, ex parte. In re: Request to Initiate 2017 Integrated Resource Planning ("IRP") Process Pursuant to General Order No. R-30021 (Corrected) dated April 20, 2012	Staff Report Filed
Louisiana Public Service Commission	I-34694	Entergy Louisiana, LLC, ex parte. In re: Request to Initiate 2017 Integrated Resource Planning ("IRP") Process Pursuant to General Order No. R-30021 (Corrected) dated April 20, 2012	Staff Report Filed

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Louisiana Public Service Commission	I-34715	Integrated Resource Planning ("IRP") process for Southwestern Electric Power Company (SWEPCO), pursuant to General Order dated April 20, 2012	Staff Report Filed
Louisiana Public Service Commission	FERC ER17-2219	System Energy Resources, Inc. submits tariff filing (Depreciation and Decommissioning).	Nothing Filed. Depreciation Rates and Decommissioning Rates Negotiated
Louisiana Public Service Commission	FERC ER22-736	System Energy Resources, Inc. submits tariff filing (Change in Depreciation).	Nothing Filed. Depreciation Rates and Decommissioning Rates Negotiated
Louisiana Public Service Commission	FERC EL-18-142	Re: Arkansas Public Service Commission and Mississippi Public Service Commission v. System Energy Resources, Inc., Docket No. EL17-41-001 and Louisiana Public Service Commission v. System Energy Resources, Inc., et al., Docket No. EL18-142 -000 (Consolidated) (ROE Complaints)	R. Lane Sisung Complaint Affidavit and Testimony
Louisiana Public Service Commission	FERC EL18-204	In the Matter of Louisiana Public Service Commission v. System Energy Resources, Inc. (Capital Structure Complaint)	R. Lane Sisung Complaint Affidavit and Testimony
Louisiana Public Service Commission	FERC EL18-152	In the Matter of Louisiana Public Service Commission v. System Energy Resources, Inc. and Entergy Services, Inc. (Sale Leaseback and FIN48 ADIT Complaint)	R. Lane Sisung Complaint Affidavit and Testimony
Louisiana Public Service Commission	FERC ER18-1182	System Energy Resources, Inc. submits tariff filing per 35.13(a)(2)(iii): UPSA Amendment to Reflect Tax Cuts and Jobs Act of 2017 to be effective 6/1/2018	R. Lane Sisung Testimony
Louisiana Public Service Commission	FERC ER21-24; ER21-46; ER21-117; ER21-129; ER21-748	SERI Filings related to IRS Settlement and contested impacts on EL18-152 (SERI Sale/Leaseback and FIN48 ADIT) and ER18-1182 (SERI TCJA)	NA
Louisiana Public Service Commission	FERC EL20-72	LPSC, MPSC, APSC, CNO V. SERI for numerous alleged Tariff Formula violations	R. Lane Sisung Complaint Affidavit and Testimony
Louisiana Public Service Commission	FERC ER23-625	SERI Proposed change to AFUDC due to partial Settlement in EL20-72	Nothing Filed
Louisiana Public Service Commission	FERC EL21-56; EL24-5	LPSC, APSC, CNO V. SERI for Alleged Imprudent Operations and Imprudent 2012 Uprate	R. Lane Sisung Complaint Affidavit and Testimony
Louisiana Public Service Commission	FERC ER21-45; ER22-958; ER23-1022; ER24-1203;	SERI Formula Rate Protocols Annual Filings with challenges brought for 2020, 2021, and 2022; and a review of 2023	Annual Reviews of FERC Formular Rate Plan Protocols and Associated complaints
Louisiana Public Service Commission	FERC ER22-24	System Energy Resources, Inc. submits tariff filing (Inclusion of Prepaid Pension)	R. Lane Sisung Testimony

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Louisiana Public Service Commission	FERC ER18-1247	Entergy Louisiana, LLC submits tariff filing per 35.13(a)(2)(iii): TCJA and MSS-4 Replacement Tariff	Nothing Filed in this Docket ER21-915 and EL22-6 Addressed Issues
Louisiana Public Service Commission	FERC ER 21-915	Entergy filing to Include NOL ADIT into MSS-4 Replacement Tariff Effective Prospectively	R. Lane Sisung Testimony
Louisiana Public Service Commission	FERC EL 22-6	LPSC Complaint for Refund based on exclusion of NOL ADIT from MSS-4 Replacement Tariffs	R. Lane Sisung Complaint Affidavit and Testimony
Louisiana Public Service Commission	FERC ER21-1720	Entergy MSS-4 Replacement Tariff Storm Cost Related Filing	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER21-1997	Entergy MSS-4 Replacement Tariff Waterford 3 Decommissioning Filing	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER22-2332	Entergy MSS-4 Replacement Tariff Annual Protocols and 2022 and 2023 Annual Filings	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER16-227, ER17-1777	MISO Entergy Attachment O-Depreciation Rates	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER18-1260	Midcontinent Independent System Operator, Inc. submits tariff filing per 35.13(a)(2)(iii): 2018-03-30 Entergy Att O Revisions Re Tax Rate Change to be effective 6/1/2018	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER18-1721	MISO-Entergy Attachment O - TCJA	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER 19-1503	MISO-Entergy Attachment O - CIAC and ADIT issues	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER20-1449	MISO-Entergy Attachment O - to implement a change in the functionalization of certain NOL ADIT Accounts from Plant related to Multi-functional related	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER15-1436; ER15-1453; ER16-1528	Entergy Post Retirement Benefits Other than Pensions to be included in Operating Companies; annual formula rate updates	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER18-1513	Entergy 2017 Post Retirement Benefits Other than Pensions	Monitored for Retail Impacts

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Louisiana Public Service Commission	FERC ER20-1472; ER20-1726	MISO-Energy Attachment O Inclusion of Prepaid and Accrued pension costs in Rate Base	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER21-309	MISO-Energy Attachment O Change in Depreciation Rates	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC PL19-4	Return on Equity Notice of Inquiry	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC RM07-19	FERC Rulemaking on Wholesale Competition in Regions with Organized Electric Markets (Order 719)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC RM16-23	Ferc Rulemaking on Electric Storage Participation in Markets Operated by RTOs and ISO (Order 841)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC RM18-1	FERC Rulemaking on Grid "Resiliency"	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC RM18-9	FERC Rulemaking of Distributed Energy Resource Aggregations in Markets Operated by RTOs and ISO (Order 2222)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC RM19-5	FERC Rulemaking on ADIT treatment due to Tax Cuts and Jobs Act	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC RM20-10	Electric Transmission Incentives Policy Under Section 219 of the Federal Power Act	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC RM21-14	FERC Rulemaking on Participation of Aggregators of Retail Demand Response Customers in Markets Operated by RTOs and ISOs	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC RM21-17	Building for the Future Through Electric Regional Transmission Planning Allocation and Generator Interconnection	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC RM 22-5	Industry Association Dues	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC RM 22-7	Applications of Permits to Site Interstate Electric Transmission Rates	Monitored for Retail Impacts

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Louisiana Public Service Commission	FERC RM 22-10	Extreme Weather Conditions	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC RM 22-14	Interconnection Reforms	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC AD21-10	Modernizing Electricity Market	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC AD21-11	Reliability Technical Conference	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC AD21-12	Electrification and the Grid of the Future	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC AD21-13	Climate Change, Extreme Weather and Electric System Reliability	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC AD 21-15	Joint Federal State Task Force on Electric Transmission	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC AD 22-5	Dynamic Line Ratings	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC AD 22-8	Transmission Planning and Oversight	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC AD 23-3	Establishing Interregional Transfer Capability and Cost Allocation Requirements	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC AD23-5	Environmental Justice and Equity in Jurisdictional Infrastructure Permitting Processes	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC AD24-6	NOPR Blanket Authorizations for Investment Companies	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER14-1174; EL11-34L EL14-21; EL14-30	MISO dispute with SPP and Joint Parties on Available System Capacity	Monitored for Retail Impacts

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Louisiana Public Service Commission	FERC EL16-112; ER17-892	MISO calculation of the Sub-Regional Export Constraint from MISO South to MISO Midwest	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL13-88	NIPSCO Seam Protocols for Economic Projects	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER17-387	MISO Interregional Cost Allocation Proposal	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL15-72; EL15-70	Challenge to MISO PRA results	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL14-12	MISO ROE Challenge (Opinion 569)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER14-1242	MISO Tariff Provisions related to System Support Resources (SSR)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC. EL15-77	Application of Attachment FF-6 changes	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER15-1776	Modification of Emergency pricing	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER17-2097	MISO introduction of Dynamic Narrow Constrained Areas (Dynamic NCA) for Market Monitor mitigation	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER18-1260; ER18-783	MISO filing for Tax Cut and Jobs Act (TCJA)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER18-462	MISO Resource Adequacy Filing. Locational Historic Unit Considerations (HUC) utilized to allocate excess revenue from PRA.	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER18-136	MISO-PJM Overlapping Congestion Charges	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER18-1899	MISO-PJM Joint Operating Agreement Provisions with Pacado-Ties	Monitored for Retail Impacts

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Louisiana Public Service Commission	FERC ER18-2773	MISO waiver request for VLR Testing to include Fancy Point	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER19-1124; ER19-1125	MISO Regional Cost Allocation	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER19-1156	MISO Interregional Cost Allocation Filing	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER19-34	MISO filing to address Pseudo-Tie issues	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER19-465	MISO filing to address Order 841 Compliance regarding Electric Storage Resources.	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL19-60	Overlapping Congestion Charges for pseudo tied load and generation between MISO and SPP	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER19-79	MISO-LS Power Complaint	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER20-1846	MISO Filing to Enhance Accreditation of Load Modifying Resources Participating in MISO Markets.	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER20-2322	MISO Filing which resulted in an Order to allow transmission owners and affected system operators to unilaterally elect to provide initial funding for network upgrades, if they so choose	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER21-2801	Tariff Provisions pricing during emergency conditions: applicability of VOLL during distinct emergency event types	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER21-2793	Market Wide Operating Demand Reserve Curve (ORDC) when cleared reserve less than Operating Reserve Requirement.	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER21-530	North/South Cost Allocation of MISO-SPP Settlement Charges for Regional Directional Transfer Limit	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER21-2677	MISO and SPP Compliance Filing on Pseudo Ties	Monitored for Retail Impacts

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Louisiana Public Service Commission	FERC ER22-74(75)	MISO Short Term Reserve Filing	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER22-15	MISO Short Term Reserve Filing	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER22-1640	MISO Order 2222 Compliance Filing	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER22-495	MISO SAC Proposal for Seasonal Resource Accreditation for Planning Resource Auction	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER22-496	MISO Minimum Capacity Obligation for Planning Resource Auction	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL22-78	MISO Industrial Customers Complaint Challenging ROFRs	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL22-60	Complaint of Coalition of MISO Transmission Customers	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-413	MISO Generation stability Limits	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-523	Schedule 2 MISO TO submission (MISO Reactive Power)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER22-2763	St Charles Reactive Power Filing	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-630	MISO Attachment Y filing	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-865	Harrisburg Sabine Cancellation	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-904	Seasonal Construct-LRZ Prices in Shortage Conditions	Monitored for Retail Impacts

Client	Docket Identifier/Number	Matter Description	UPC Deliverable
Louisiana Public Service Commission	FERC EL23-28	Complaint against MISO's ban on Renewables providing Ancillary services.	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-1140	Entergy Waiver for SAC Values	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-1195	Dispatchable Intermittent Ramp	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-1223	MISO changing UCAP/SAC ratio.	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL23-46	FERC Rule to Show Cause due to MISO violating its tariff by not adjusting UCAP/ISAC Ratio after adjusting to correct for incorrect outage information	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-1465	MISO Request for waiver to delay PRA	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-1949	Cancelling of Teche 3 SSR Schedule	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-2311	MISO Cost Recovery for MVPs	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-2847	MISO ICAP Deferral Clean Up Filing	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-2977	MISO Reliability Based Demand Curve (RBDC)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER24-37	MISO Annual Calculation of CONE for each LRZ	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER24-1191	MISO Forced Off Asset Reforms	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER24-1634	MISO Entergy Attachment O Clean Up	Monitored for Retail Impacts

Exhibit RLS-001
Robert Lane Sisung
Illustrative Experience

Client	Docket Identifier/Number	Matter Description	UPC Deliverable
Louisiana Public Service Commission	FERC ER24-1638	MISO Resource Adequacy Reform- Direct loss of load (DLOL)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER24-2046	MISO Compliance with Order 2023 and 2023-A Gen Interconnection improvements	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL24-80	MISO Rule to Show Cause on Transmission Owner initial funding	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL24-61	Montana Dakota Utilities V MISO and SPP (Charlie Creek M2M Congestion)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER18-2243	Southwest Power Pool, Inc. submits tariff filing per 35.13(a)(2)(iii) Morgan Transformer Project Cost Allocation (Part 1) to be effective 10/16/2018	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER14-1736	Cost Recovery related to SPP tariff	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER18-194	AEP Attachment O (Dolet Costs in Transmission Rates)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER21-1676	SPP Filing for By-Way Allocation Waiver for "Wind Rich Zones" (Rejected)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL19-60	City of Prescott v SPP and MISO on Pancaked Rates and Overlapping Congestion related to Pseudo-Tied load	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL17-89	AEP V SPP and MISO on Pancaked Rates and Overlapping Congestion related to Pseudo-Tied load	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL21-90	Basin Electric V SPP: Winter Weather issue related to Multi-Day Reliability Assessment (MDRA) Commitments	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL 21-77	Tenaska Clear Creek V SPP: Generator Connection Cost Allocation Issues associated with re-studies	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER22-331	Modifications to RCAR	Monitored for Retail Impacts

Client	Docket Identifier/Number	Matter Description	UPC Deliverable
Louisiana Public Service Commission	FERC ER 22-914	SPP Revision to Add Uncertainty Reserve Product	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER22-1846	SPP Revisions to add the waiver of Base Plan Allocation Methodology	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER22-2814	SPP Revisions to Bylaws to clarify Membership on Regional State Committee	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-636	SPP submits revisions to Tariff to add process by which LRE may qualify for exemption of Deficiency Payment	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL23-40	Complaint against SPP Increase of PRM to 15%	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-1216	SPP Deficiency Payment Recipient Limitations	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-1218	SPP Deficiency Payment Changes	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-2650	SPP Aggregator of Retail Customers (ARC) Definitions and Requirements	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER23-2927	SPP Multi Day Reliability Assessment Design	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER24-1221	SPP Revisions to Att AA LOLE use in PRM	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER24-1317	SPP Revisions to ELCC and PBA Methodology	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER24-1583	SPP Sunflower Revisions to Byway	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER24-1658	SPP Markets +	Monitored for Retail Impacts

Client	Docket Identifier/Number	Matter Description	LPC Deliverable
Louisiana Public Service Commission	FERC EL24-96	SPP Sierra/Sustainable FERC/Etc. Complaint on ELCC/PBA Accreditation	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER24-1775	SPP Congestion Hedging Improvements	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER24-2026	SPP Compliance Filing for Order 2023 and 2023-A for Generator Interconnection Improvements	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL24-82	SPP Rule to show cause TO Initial Funding	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EC12-145; EL12-107, ER12-2681	FERC Approval of OATT Entergy-ITC Transaction	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER12-2682	Module B-1 to MISO OATT for Entergy-ITC Transaction	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER12-2683	Entergy Replacement Tariff-ITC Transaction	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER12-2693	Cancellation of Entergy MSS-2 Agreement related to ITC Transaction	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER 13-252	ESI Transmission-Industrial Load Related to ITC Transaction	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER13-288	Entergy Transmission Monitoring Services related to ITC Transaction	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER13-782	Entergy-ITC Transaction: Related ratemaking treatment for pension and OPEB	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER13-948	Entergy-ITC Transaction: Related MISO OATT	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ES13-5	Entergy-ITC Transaction: Related Debt Authorizations	Monitored for Retail Impacts

Exhibit RLS-001
Robert Lane Sisung
Illustrative Experience

Client	Docket Identifier/Number	Matter Description	UPC Deliverable
Louisiana Public Service Commission	FERC ES13-6	Entergy-ITC Transaction: Related Debt Authorizations	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EC 15-98	Entergy Acquisition of Union Plants	Monitored for Retail Impacts

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Robert Lane Sisung
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Client	Docket Identifier/Number	Matter Description	UPC Deliverable
Louisiana Public Service Commission	FERC EC15-47	Entergy Business Combination FERC Dockets	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER15-1922	Entergy Change of Responsibility Ratio-Entergy Business Comb (Entergy Louisiana Transfer of Algiers to Entergy New Orleans)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER18-445	Revisions to Rate Schedule 435-A (ESI Service Agreement) to reflect current terminology and add a new Gross Utility Plant Assets allocation. (Entergy Asset Management Program)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER17-2030	Transmission Control Center Reimbursement Agreement Filing; Related FERC Dockets ER17-2029, ER17-2031, ER17-2033, ER17-2034)	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EL 18-201	Transmission Control Center Depreciation	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EC19-18	Entergy Transmission Control Centers	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER19-211	Entergy Transmission Control Centers	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC EC18-63	Cleco: Joint Application for Order Authorizing Disposition of Jurisdictional Facilities Under Section 203 of the Federal Power Act of the Cleco and NRG Applicants	Monitored for Retail Impacts
Louisiana Public Service Commission	FERC ER17-1368	Cleco Power, LLC System Support Resource ("SSR") Payment for Toche Power Station Unit 3	Monitored for Retail Impacts

Exhibit RLS-001
Robert Lane Sisung
Illustrative Experience

Client	Docket Identifier/Number	Matter Description	UPC Deliverable
Mississippi Public Utilities Staff	2022-UN-137	2022 - 2024 Entergy Mississippi Formula Rate Plan	(i) Proposed Stipulation to the Commission (ii) Draft Memorandum/Report to the Commission on behalf of Staff (iii) Internal Memorandum/Report to Staff
Mississippi Public Utilities Staff	2018-UN-205	2022 - 2024 Entergy Mississippi Vegetation Management Rider	Memorandum/Report to Staff
Mississippi Public Utilities Staff	2019-UN-219	2022 - 2024 Mississippi Power Company Performance Evaluation Plan	Memorandum/Report to Staff
Mississippi Public Utilities Staff	1992-UN-059	2022 - 2024 Mississippi Power Company Environmental Compliance Rider	Memorandum/Report to Staff
Mississippi Public Utilities Staff	2005-UN-503	2022 and 2023 Atmos Stable Rate Adjustment Plan	(i) Proposed Stipulation to the Commission (ii) Draft Memorandum/Report to the Commission on behalf of Staff (iii) Internal Memorandum/Report to Staff
Mississippi Public Utilities Staff	2015-UN-049	2023 and 2024 Atmos System Integrity Rate Plan	Memorandum/Report to Staff
Mississippi Public Utilities Staff	2025-UN-529	2025 Atmos Rate Case	Still Active R. Lane Sisung Testimony Jonathan Bourg Testimony J. Thomas McGuckin Testimony
Mississippi Public Utilities Staff	2012-UN-139	2022 and 2023 CenterPoint Rate Regulation Adjustment	(i) Proposed Stipulation to the Commission (ii) Draft Memorandum/Report to the Commission on behalf of Staff (iii) Internal Memorandum/Report to Staff
Mississippi Public Utilities Staff	2015-UN109	2022 and 2023 SPIRE Rate Stabilization Adjustment	(i) Proposed Stipulation to the Commission (ii) Draft Memorandum/Report to the Commission on behalf of Staff (iii) Internal Memorandum/Report to Staff
Mississippi Public Utilities Staff	2017-UA-079	Transmission Certification Application for Southern Spirit	Submitted a Staff Report
Mississippi Public Utilities Staff	2020-UA-143 et. al.	Great Rivers Water and Sewer Rate Case and Annual FRP Filings	Submit Annual Reports to Staff
Mississippi Public Service Commission	2022-UN-086 & 087	Great River Rate Case	Report to the Commission

Exhibit RLS-001
Robert Lane Sisung
Illustrative Experience

Client	Docket Identifier/Number	Matter Description	UPC Deliverable
Louisiana Pilotage Fee Commission	P-20-001	Louisiana Pilotage Fee Commission Rate Case for Crescent River Ports Pilots Association	Filed Staff Report and R. Lane Sisung Testified in Court
Louisiana Pilotage Fee Commission	P-22-003	Louisiana Pilotage Fee Commission Rate Case for Bar Pilots Association	Filed Staff Report
Louisiana Pilotage Fee Commission	P-22-005	Louisiana Pilotage Fee Commission Bond Calculation for New Orleans Baton Rouge Steamship Pilots Association	N/A
Louisiana Pilotage Fee Commission	P-07-001	Louisiana Pilotage Fee Commission Review of True-Up Calculation for Crescent River Ports Pilots Association	N/A

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37677

Response of: Entergy Louisiana, LLC
to the First Set of Data Requests
of Requesting Party: Louisiana Public Service
Commission Staff

Question No.: STAFF 1-22

Part No.:

Addendum:

Question:

See the Application at 4, footnote 10. Please discuss any actions taken to date by the Company in furtherance of the “subsequent license renewal” being considered for Waterford 3. In your response, please discuss to what extent, if any, the pursual of the subsequent license renewal depends on the completion of the Project Update. Further, please detail any costs incurred to date, if any, related to the subsequent license renewal, and whether those costs have been recovered and through what mechanism.

Response:

The Company has not yet commenced work on an application for subsequent license renewal for Waterford 3. No costs for Waterford 3 subsequent license renewal have been incurred at this time.

Pursual of a subsequent license renewal is not contingent upon completion of the plant uprate discussed in Mr. Willis’ testimony.

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37677

Response of: Entergy Louisiana, LLC
to the First Set of Data Requests
of Requesting Party: Louisiana Public Service
Commission Staff

Question No.: STAFF 1-23

Part No.:

Addendum:

Question:

Please confirm whether (1) the Uprate Project constitutes an “efficiency” uprate, and (2) that the results of the Uprate Project will result in increasing electricity output from Waterford 3 within the existing design margins of the facility.

Objection:

The Company objects to this request in that it constitutes a Request for Admission, in contravention of the Commission’s Rules of Practice and Procedure. Subject to and without waiving this objection, the Company responds as follows.

Response:

1. Yes. As noted on page 15, line 18 of Company witness Jason Willis’s testimony, “The additional electrical output from the uprate is an efficiency gain and should not affect the plant’s fuel costs.”
2. The increased output associated with the Uprate Project will be within the design margins of Waterford 3 as of completion of the Fall 2026 refueling outage, when the Uprate Project is placed in service.

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37677

Response of: Entergy Louisiana, LLC
to the First Set of Data Requests
of Requesting Party: Louisiana Public Service
Commission Staff

Question No.: STAFF 1-9

Part No.:

Addendum:

Question:

Please provide the total cost of the previously completed project to replace the low pressure turbines at Waterford 3. Further, please discuss whether the Company would have replaced these three low-pressure turbine rotors (at all or at a similar scope) were it not contemplating the Uprate Project.

Response:

Accounting for the Low Pressure Turbine Replacement Project has not yet been closed out. The total cost accumulated as of November 17 is \$189,217,439. Some further charges are still anticipated for the cost of disposal of removed components, and some additional contractor invoices may still be outstanding. Remaining costs are not believed to be significant compared to accumulated project costs.

As described in Company witness Willis's testimony at page 10 line 8, "The plant replaced the three low-pressure turbine rotors during refueling outage 26 in spring of 2025, as the original rotors had reached the end of their useful lives." Yes, Waterford 3 would have replaced the three low pressure turbine rotors even if it were not contemplating the uprate project. It was the rotor replacement that gave rise to the uprate opportunity. The costs of the uprate project at issue in the Company's Application are incremental to the costs of the rotor replacements, which costs are not at issue in this proceeding.

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37677

Response of: Entergy Louisiana, LLC
to the First Set of Data Requests
of Requesting Party: Louisiana Public Service
Commission Staff

Question No.: STAFF 1-8

Part No.:

Addendum:

Question:

In HSPM Table 1 of his Direct Testimony, Mr. Willis provides the total estimated project cost of each component of the Uprate Project.

- a. Provide the class of estimate for each of the project cost amounts listed in the table, including the range of accuracy associated with that class estimate (e.g., +/- 50%).
 - b. Provide the breakdown of these cost estimates in as much detail as currently developed by the Company.
 - c. Provide the amount of contingency included within the total estimated project cost.
 - d. Provide the amount of internal costs included with the total estimated project cost.
 - e. Has the Company estimated the total cost of the HP Turbine Inner Casing Replacement (including installation costs adjusted for inflation) in 2029\$? If so, please provide such estimate.
-

Response:

Information responsive to this request has been designated as Highly Sensitive Protected Material ("HSPM") and will be produced only to the appropriate Reviewing Representatives in accordance with the Confidentiality Agreement in effect and executed in this docket. HSPM files will be served upon appropriate reviewing representatives through an OpenText™ Core Share link. Any downloads of such files shall be treated in accordance with the applicable provisions of the Confidentiality Agreement regarding duplication of HSPM files.

- a. The estimates of the project cost in HSPM Table 1 as of June 2025 were Class 5.

- b. The provided HSPM file entitled “WF3 Uprate Estimates with AFUDC” provides the latest project cost estimate as of November 17, 2025. Separate tabs show the estimates for the types of costs that are involved in each sub-project. All of the sub-projects except for the HP turbine casing are being considered as “Phase 1” of the uprate project, with the HP turbine casing sub-project being considered as “Phase 2” of the uprate project. These estimates are designated as Class 5.
- c. At this time, the only contingency included is an approximate \$ [REDACTED] value included on the Generator Current Transformer sub-project, as shown on that sub-project’s tab in the provided HSPM filed entitled “WF3 Uprate Estimates with AFUDC.”
- d. Please see the provided HSPM file entitled “WF3 Uprate Estimates with AFUDC.” Tabs for the sub-projects show the line items for “Internal Labor.”
- e. Please see the provided HSPM file entitled “WF3 Uprate Estimates with AFUDC.” The tab for the sub-project “HP Turbine Inner Casing” provides the estimate for that sub-project as of November 17, 2025.

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37677

Response of: Entergy Louisiana, LLC
to the First Set of Data Requests
of Requesting Party: Louisiana Public Service
Commission Staff

Question No.: STAFF 1-12

Part No.:

Addendum:

Question:

Provide all updates on the status of the MISO Interconnection study related to the Uprate Project, including any outputs received from MISO by ELL related to that process. Additionally, to the extent applicable, please describe any known and necessary changes to the scope and estimated costs of the Uprate Project as a result of the MISO study.

Response:

Information responsive to this request has been designated as Highly Sensitive Protected Material ("HSPM") and will be produced only to the appropriate Reviewing Representatives in accordance with the Confidentiality Agreement in effect and executed in this docket. HSPM files will be served upon appropriate reviewing representatives through an OpenText™ Core Share link. Any downloads of such files shall be treated in accordance with the applicable provisions of the Confidentiality Agreement regarding duplication of HSPM files.

MISO has provided draft Phase I study results on its extranet site, visible to the Transmission Owners and Interconnection Customers. See the highly sensitive results attached for the Waterford 3 uprate queue request (J3815). Phase I is expected to be completed on 12/17/2025. The draft results currently estimate approximately \$[REDACTED] for ERIS upgrades and \$[REDACTED] for NRIS upgrades associated with the uprate request. It should be noted that the MISO Phase I study is a draft and this process is not yet complete. As such, the costs of any required transmission investments may increase or decrease relative to MISO's current draft Phase I study.

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37677

Response of: Entergy Louisiana, LLC
to the First Set of Data Requests
of Requesting Party: Louisiana Public Service
Commission Staff

Question No.: STAFF 1-12

Part No.:

Addendum:

Question:

Provide all updates on the status of the MISO Interconnection study related to the Uprate Project, including any outputs received from MISO by ELL related to that process. Additionally, to the extent applicable, please describe any known and necessary changes to the scope and estimated costs of the Uprate Project as a result of the MISO study.

Response:

Information responsive to this request has been designated as Highly Sensitive Protected Material ("HSPM") and will be produced only to the appropriate Reviewing Representatives in accordance with the Confidentiality Agreement in effect and executed in this docket. HSPM files will be served upon appropriate reviewing representatives through an OpenText™ Core Share link. Any downloads of such files shall be treated in accordance with the applicable provisions of the Confidentiality Agreement regarding duplication of HSPM files.

MISO has provided draft Phase I study results on its extranet site, visible to the Transmission Owners and Interconnection Customers. See the highly sensitive results attached for the Waterford 3 uprate queue request (J3815). Phase I is expected to be completed on 12/17/2025. The draft results currently estimate approximately \$[REDACTED] for ERIIS upgrades and \$[REDACTED] for NRIS upgrades associated with the uprate request. It should be noted that the MISO Phase I study is a draft and this process is not yet complete. As such, the costs of any required transmission investments may increase or decrease relative to MISO's current draft Phase I study.