

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

DOCKET NO. I-37765

CLECO POWER, LLC, EX PARTE

In re: 2025 Request to initiate Integrated Resource Planning process pursuant to the General Order (Corrected) dated August 28, 2024 (R-36262).

**COMMENTS OF COMMISSION STAFF REGARDING IRP MODELING
ASSUMPTIONS**

Commission Staff (“Staff”) appreciates the information Cleco Power, LLC (“Cleco”) has provided to date within the IRP process. The information provided in Cleco’s filing and stakeholder meeting has been helpful in understanding the overall modeling framework. Cleco initially filed an interim IRP pursuant to LPSC Order No. U-36923 upon which Staff propounded discovery. Subsequently, Cleco requested and was allowed to merge that Interim IRP with this current cyclical IRP. It was Staff’s understanding that upon that merger, Cleco would continue to answer its previously issued discovery. To date, Staff has received no responses. The purpose of Staff’s discovery is to help identify potential items that should be addressed prior to the engagement of developing the actual IRP. Accordingly, Staff encourages Cleco to work with Staff in answering the discovery responses to avoid potential issues where Staff objects to issues in its proposed IRP that could have been resolved through a collaborative discovery process.

Based on the information Staff has received, as Cleco proceeds toward development of its Draft IRP and associated resource planning decisions, Staff offers the following comments regarding areas where additional clarity would support a more complete understanding of how modeling assumptions translate into near-term planning outcomes.

1. Timing of Resource Additions

Staff appreciates that Cleco’s three load futures are intended to capture three potential outcomes: (1) Future 1 in which load continues without the addition of a large load; (2) Future 2 in which load increases significantly in the near term due to a large load addition and then continues along the general upward trajectory of Future 1; and (3) Future 3 that recognizes the near term large-load addition and then continue to accelerate load growth at a significant rate.

Staff expects that the IRP will clearly describe how, within each of these scenarios – and with the uncertainty as to timing and reality of each – the IRP modeling informs the timing of resource additions within the 5-year action plan, particularly in relation to the expected ramp of large load additions.

2. Generation Cost and Performance

Cleco informed stakeholders that the costs it has included for some of its generation options include a 40% contingency factor due to uncertainties in the market. Staff anticipates that the IRP will utilize the best information available to Cleco regarding the cost of generation, avoiding general contingency figures to the greatest extent possible. When its final assumptions are outlined in the IRP report, Cleco should provide stakeholders with the data upon which those cost assumptions are based.

3. Transmission Assumptions and Deliverability

Staff expects that the IRP will clearly identify the extent to which the analysis assumes the availability of external capacity resources to meet reserve margin requirements, and how such assumptions influence the need for in-zone resource additions, including whether Cleco's plan is intended to rely primarily on internally available resources or assumes access to capacity from resources located outside of Cleco's service area.

Conclusion

Staff believes that the areas identified above are important to ensuring transparency and clarity in how modeling assumptions translate into near-term planning decisions. Staff remains available and would welcome the opportunity to meet with Cleco to discuss these issues further prior to the initiation of any resource procurement processes, including any related requests for proposals.

Respectfully submitted,



Justin Bello (Bar Roll No. 35039)

Staff Attorney

Louisiana Public Service Commission

Post Office Box 91154

Baton Rouge, Louisiana 70821-9154

602 North Fifth Street, Galvez Bldg., 12th Fl.

Baton Rouge, Louisiana 70802-5312

Telephone: (225) 342-9888

E-mail : justin.bello@la.gov

CERTIFICATE OF SERVICE

I hereby certify that I have this 4th day of June, 2026, served copies of the foregoing pleading upon all known parties of this proceedings by electronic mail.



Justin Bello

**Service List for I-37765
as of 6/4/2026**

Commissioner(s)

Eric Skrmetta

Jean-Paul P. Coussan

Mike Francis

Foster L. Campbell

LPSC Staff Counsel

Justin Bello, LPSC Staff Attorney

LPSC Staff

Donnie Marks, LPSC Utilities Division

Robin Pendergrass, LPSC Auditing Division

LPSC Consultant

R. Lane Sisung

United Professionals Company

3850 North Causeway Blvd., Suite 1930

Metairie, LA 70002

Email: lane@sisung.com

Fax: (504)544-7701; Phone: (504)544-7724

Julie Viviano

United Professionals Company

3850 North Causeway Blvd., Suite 1930

Metairie, LA 70002

Email: julie@sisung.com

Fax: (504)544-7701; Phone: (504)544-7711

Jake Chapman

United Professionals Company

3850 North Causeway Blvd., Suite 1930

Metairie, LA 70002

Email: jake@sisung.com

Fax: (504)544-7730; Phone: (504)544-7701

Jonathan Bourg

United Professionals Company

3850 North Causeway Blvd., Suite 1930

Metairie, LA 70002

Email: jbourg@sisung.com

Fax: (504)544-7702; Phone: (504)544-7728

Company :

Cleco Power LLC

Daniel T. Pancamo
Phelps Dunbar, LLP
365 Canal Street, Suite 2000
New Orleans, LA 70130-6534
Email: dan.pancamo@phelps.com
Fax: (504)568-9130; Phone: (504)566-1311

Mark D. Kleehammer
Cleco Power, LLC.
2030 Donahue Ferry Road
Pineville, LA 71360
Email: mark.kleehammer@cleco.com
Fax: (318)484-7685; Phone: (318)484-7716

Nathan G. Huntwork
Phelps Dunbar, LLP
365 Canal Street, Suite 2000
New Orleans, LA 70130-6534
Email: nathan.huntwork@phelps.com
Fax: (504)568-9130; Phone: (504)566-1311

Collin Buisson
Phelps Dunbar, LLP
365 Canal Street, Suite 2000
New Orleans, LA 70130-6534
Email: Collin.Buisson@phelps.com
Fax: (504)568-9130; Phone: (504)566-1311

Intervenor : Southern Renewable Energy Association

Simon Mahan

Southern Renewable Energy Association (SREA)

11610 Pleasant Ridge Road, Suite 103 #176

Little Rock, AR 72223

Email: simon@southernwind.org

Fax: ; Phone: (337)303-3723

Whit Cox

Southern Renewable Energy Association (SREA)

11610 Pleasant Ridge Road, Suite 103 #176

Little Rock, AR 72223

Email: whit@southernrenewable.org

Fax: ; Phone: (501)701-0874

Intervenor : Alliance for Affordable Energy

Alaina DiLaura
Alliance for Affordable Energy
4505 S. Claiborne Ave.
New Orleans, LA 70125
Email: alaina@all4energy.org
Fax: ; Phone: (504)208-9761

Logan Atkinson Burke
Alliance for Affordable Energy
4505 S. Claiborne Avenue
New Orleans, LA 70125
Email: Logan@all4energy.org
Fax: (504)313-3478; Phone: (504)208-9761

Sophie Zaken
Alliance for Affordable Energy
4505 S. Claiborne Avenue
New Orleans, LA 70125
Email: regulatory@all4energy.org
Fax: (504)313-3478; Phone: (504)208-9761

Intervenor : International Paper Company

Carrie R. Tournillon
Kean Miller, LLP
909 Poydras Street, Suite 3600
New Orleans, LA 70112
Email: carrie.tournillon@keanmiller.com
Fax: (504)585-3051; Phone: (504)585-3056

Intervenor : Packaging Corporation of America

Carrie R. Tournillon

Kean Miller, LLP

909 Poydras Street, Suite 3600

New Orleans, LA 70112

Email: carrie.tournillon@keanmiller.com

Fax: (504)585-3051; Phone: (504)585-3056

Intervenor : Sierra Club

Joshua Smith

Sierra Club Environmental Law Program

2101 Webster Street, Suite 1300

Oakland, CA 94612-3011

Email: joshua.smith@sierraclub.org

Fax: (510)208-3140; Phone: (415)977-5560

Intervenor : Union of Concerned Scientists

Paul Arbaje
Union of Concerned Scientists
200 East Randolph Street
Suite 5151
Chicago, IL 60601
Email: parbaje@ucs.org
Fax: ; Phone: (617)716-6314

Sam Gomberg
Union of Concerned Scientists
1825 K St. NW
Suite 800
Washington, DC 20006
Email: sgomberg@ucs.org
Fax: ; Phone: (202)331-6953

Jeff Deyette
Union of Concerned Scientists
2 Brattle Square
Cambridge, MA 02138
Email: jdeyette@ucs.org
Fax: ; Phone: (617)301-8012

Interested Party : Conservative Energy Network

Brent Bailey
Vice President, EPL Advisors
228 Avalon Circle
Brandon, MS 39047
Email: brent.bailey@efficientpl.com
Fax: ; Phone: (601)360-8720