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## Southern Renewable Energy Association

11610 Pleasant Ridge Rd., Suite 103 #176, Little Rock, AR 72223

October 13, 2023

Ms. Terri Lemoine Bordelon  
Louisiana Public Service Commission  
Records Section  
Galvez Building, 12<sup>th</sup> Floor  
602 North Fifth Street  
Baton Rouge, LA 70821-9154

LA PUBLIC SERVICE COMM  
OCT 12 2023 PM12:37

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

Dear Ms. Bordelon,

Please find an original and three copies of testimony provided by the Clean Energy Buyers Association on behalf of the Southern Renewable Energy Association in LPSC Docket No. U-36697 regarding Entergy Louisiana's proposed renewable procurement plan.

Sincerely,

A handwritten signature in black ink that reads 'Simon Mahan'. The signature is written in a cursive style with a large, looping initial 'S'.

Simon Mahan  
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Mail

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Southern Renewable Energy Association's Petition for Intervention and Inclusion on Service List has been served by electronic mail to all parties on the Official Service List on this day, October 13, 2023.

A handwritten signature in black ink that reads "Simon Mahan". The signature is written in a cursive style and is positioned above a solid horizontal line that extends to the right.

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**BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION**

Entergy Louisiana, LLC, ex parte  
Application for approval of an alternative  
market-based mechanism process seeking to  
secure up to 3,000 MW of solar resources,  
including certification of those resources,  
expansion of the Geaux Green Option Rider,  
and approval of a new renewable tariff.

Docket No. U-36697

**DIRECT TESTIMONY OF PRIYA BARUA**  
**ON BEHALF OF SOUTHERN RENEWABLE ENERGY ASSOCIATION**

**October 13, 2023**

1       **I.       Introduction and Summary of Recommendations.**

2       **Q:       Please state your name.**

3       A:       My name is Priya Barua.

4       **Q:       By whom are you employed and in what position?**

5       A:       I am Director of Market and Policy Innovation at Clean Energy Buyers Association  
6               (CEBA).

7       **Q:       Please describe your current role and your relevant professional experience.**

8       A:       I have been with CEBA since 2019 and have been the Director of Market and Policy  
9               Innovation since 2021. In my current role I oversee CEBA's Market Access Initiative,  
10              which is focused on increasing customer access to cost-effective, reliable clean energy,  
11              particularly in the West and Southeast regions, where customers do not have access to  
12              organized wholesale markets and are therefore more restricted in the ways in which they  
13              can procure clean energy. Previously, I worked at the World Resources Institute (WRI) for  
14              almost 8 years, where I worked with energy customers to develop the Renewable Energy  
15              Buyers' Principles<sup>1</sup> in 2014, which outlined six principles that customers are looking for  
16              from utilities and other suppliers when buying clean energy from the grid. This was signed  
17              by 75 corporate signatories. I then helped establish WRI's work on green tariffs. This work  
18              included tracking and analyzing utility green tariff programs that emerged across the  
19              country, starting with the first publication of *Emerging Green Tariffs in U.S. Regulated*  
20              *Electricity Markets* in 2014, and supporting subsequent iterations of that publication and

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<sup>1</sup> <https://cebusers.org/programs/education-engagement/buyers-principles/>

1 associated maps, including the transfer of these resources to CEBA when I joined CEBA  
2 in 2019. I also fostered collaborations between utilities and large energy buyers in  
3 traditional, regulated markets, to develop customer clean energy programs that support an  
4 efficient and economic transition to clean energy resources, through customer-utility  
5 leadership forums between 2014-2018. This work included establishing and leading the  
6 Special Clean Power Council (CPC) for Utilities and Buyers,<sup>2</sup> a two-year initiative with  
7 six large IOUs and eight large commercial and industrial customers. I have presented on  
8 green tariffs to utilities through forums led by Edison Electric Institute (EEI), American  
9 Public Power Association (APPA), and to regulatory staff through the National Association  
10 of Regulatory Utility Commissioners (NARUC), and on an individual basis. I also authored  
11 the publication: *Implementation Guide for Utilities: Designing Renewable Energy*  
12 *Products to Meet Large Energy Customer Needs*<sup>3</sup> in 2017. I have a Master in Public Policy  
13 degree from the Harvard Kennedy School and a Bachelor of Arts degree from Brandeis  
14 University.

15 **Q: Have you previously provided testimony before the Louisiana Public Service**  
16 **Commission?**

17 **A:** No, I have not.

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<sup>2</sup> <https://www.wri.org/initiatives/special-clean-power-council-customers-utilities-cpc>

<sup>3</sup> <https://www.wri.org/research/implementation-guide-utilities-designing-renewable-energy-products-meet-large-energy>

1 **Q: Have you previously provided testimony in any proceedings before other regulatory**  
2 **commissions?**

3 A: No, I have not.

4 **Q: Please describe CEBA.**

5 A: CEBA is a 501c6 membership association for energy customers seeking to procure clean  
6 energy across the U.S. CEBA's aspiration is to achieve a 90% carbon-free U.S. electricity  
7 system by 2030. Today, CEBA has over 400 members, including one-fifth of the Fortune  
8 500, corporate and industrial energy customers, project developers, and service providers  
9 that represent more than \$7 trillion in revenues and 18 million employees. Since 2014,  
10 commercial and industrial energy customers have voluntarily procured 71 gigawatts (GW)  
11 of clean energy, equivalent to 42% of all wind and solar capacity added to the U.S. grid  
12 during that time.<sup>4</sup>

13 CEBA, and previously WRI, has been tracking and reporting details of utility green  
14 tariff programs across the country since 2014, and I have been engaged in the tracking and  
15 reporting efforts since the very first report. The most recent version of CEBA's report,  
16 "U.S. Utility Green Tariff Report, January 2023 Update," was published in January of this  
17 year.<sup>5</sup> To my knowledge, CEBA is the only organization that puts together this type of  
18 public resource on green tariffs, and it is referenced by government entities such as the  
19 U.S. Environmental Protection Agency<sup>6</sup> on educational websites and relied upon by a

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<sup>4</sup> Clean Energy Buyers Association, "CEBA Deal Tracker" available at <https://cebbuyers.org/deal-tracker/>

<sup>5</sup> Available at: [https://cebbuyers.org/wp-content/uploads/2023/04/Final-CEBA\\_Green-Tariff-Report.pdf](https://cebbuyers.org/wp-content/uploads/2023/04/Final-CEBA_Green-Tariff-Report.pdf)

<sup>6</sup> Utility Green Tariffs | US EPA (<https://www.epa.gov/green-power-markets/utility-green-tariffs>)

1 variety of organizations such as energy customers, project developers, regulators, the  
2 White House Council on Environmental Quality, the National Renewable Energy  
3 Laboratory (NREL), EEI and the Retail Industry Leaders Association (RILA).

4 **Q: Please describe the SREA.**

5 A: SREA is an industry-led initiative that promotes responsible use and development of wind  
6 energy, solar energy, energy storage, and transmission solutions in the South. SREA's  
7 vision is for renewable energy to become a leading source of energy in the South and  
8 SREA's mission is to promote responsible use and development of renewable energy in  
9 the South. SREA's geographic region covers seven Southeastern states: Alabama,  
10 Arkansas, Georgia, Kentucky, Louisiana, Mississippi, and Tennessee.

11 **Q: Please explain why CEBA and SREA are working together on this docket.**

12 A: CEBA and SREA have a common interest in promoting the growth of clean energy in the  
13 Southeast. SREA asked CEBA to provide expert testimony on ELL's proposed new  
14 renewable tariff, Geaux ZERO, and expansion of the Geaux Green Option rider given  
15 CEBA's expertise on utility green tariff programs and the needs of voluntary clean energy  
16 customers to ensure that these programs work well for the commercial and industrial  
17 energy customers that CEBA represents.

18 **Q: What is the purpose of your Direct Testimony?**

19 A: The purpose of my Direct Testimony is to offer recommendations regarding Entergy  
20 Louisiana LLC's (ELL) various proposals in this proceeding. I offer several

1 recommendations for how to improve ELL's proposed new renewable tariff program to  
2 ensure that it meets the needs of voluntary energy customers and promotes participation.

3 **Q: Please summarize your recommendations to the Commission.**

4 A: I recommend that the Commission approve ELL's proposed Geaux ZERO program,  
5 including ELL's proposed procurement of up to 3,000 MW of new solar resources, with  
6 the following modifications:

- 7 ● Request that ELL lower the minimum requested subscription level from 100  
8 MW to 50 MW to allow more customers to participate in Geaux ZERO and  
9 ensure that all industrial customers have the opportunity to meet their energy  
10 needs with clean energy;
- 11 ● Request that ELL allow eligible customers that subscribe to Geaux ZERO  
12 during the Group 1 Subscription phase to choose either pricing Option A or  
13 Option B;
- 14 ● Request that ELL reserve 50% of Group 2 subscriptions for existing industrial  
15 customers, regardless of whether they are expanding or not, and 50% of Group  
16 2 subscriptions for new industrial customers;
- 17 ● Request that ELL allocate sufficient solar capacity to Rider GGO to meet  
18 expressed demand from existing customers that do not qualify for Geaux ZERO  
19 after ELL completes its Group 1 subscription phase and completes its first  
20 "open season" Group 2 tranche, up to the amount of capacity on the Rider GGO  
21 waitlist at that time.

1       **II.     Minimum required subscription level for Geaux ZERO**

2       **Q:     What will you address in this section of your testimony?**

3       A:     In this section of my testimony, I will address ELL’s proposed minimum capacity  
4           subscription for the Geaux ZERO tariff.

5       **Q:     What minimum subscription level has ELL proposed?**

6       A:     ELL proposes to require customers to subscribe to at least 100 MW of capacity through  
7           Geaux ZERO in order to participate in the program.<sup>7</sup>

8       **Q:     Do you have any concerns with ELL’s proposal to require customers to subscribe to  
9           at least 100 MW of capacity to participate in Geaux Zero?**

10      A:     Yes. ELL’s existing green tariff program, Rider Go Green Option (Rider GGO), has a  
11           capacity subscription cap of 50 MW per parent company.<sup>8</sup> Under ELL’s proposal, there  
12           would not be any green tariff options available for customers requiring subscription levels  
13           between 50 MW and 100 MW.

14      **Q:     Are there reasons to think that there is customer demand for a green tariff option like  
15           Geaux ZERO and Rider GGO at subscription levels between 50 MW and 100 MW?**

16      A:     Yes. As shown in ELL’s GGO Reservation List (Exhibit ECI-3), four customers  
17           (Customer 5, 6, 7, and 12) out of 21 stated to Entergy that they would be interested in  
18           subscribing to more than 50 MW but less than 100 MW of capacity under Rider GGO.<sup>9</sup>  
19           Further, ELL witness Ms. Ingram stated in her testimony: “Customers have also expressed

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<sup>7</sup> Ingram Direct at 8.

<sup>8</sup> Ingram Direct at 7.

<sup>9</sup> Exhibit ECI-3.

1 interest in a product that does not include a 50 MW cap (per parent company), which some  
2 larger customers have indicated is too restrictive in meeting their companies' sustainability  
3 goals."<sup>10</sup> I recognize that Geaux ZERO is intended to meet the needs of these larger  
4 customers, but there is no reason to think that these larger customers will *only* be interested  
5 in Geaux ZERO if the minimum subscription level is 100 MW rather than 50 MW.

6 **Q: What is the implication of ELL's proposal to require a minimum subscription of 100**  
7 **MW for Geaux ZERO?**

8 A: Under ELL's proposal, both new and existing industrial customers with loads requiring a  
9 subscription level between 50 MW and 100 MW will have no option to meet 100 percent  
10 of their electricity needs with clean energy. Similarly, industrial customers with loads that  
11 can currently be supplied with a subscription of 50 MW or less on Rider GGO but that are  
12 considering expanding their operations would not be able to supply their expanded loads  
13 with clean energy if their subscription need remained below 100 MW. This inability would  
14 likely be a factor for consideration for customers evaluating whether or not to expand their  
15 operations in Louisiana. Likewise, new industrial customers with subscription needs less  
16 than 100 MW would not have an option to supply their loads with clean energy because  
17 they would not qualify for Geaux ZERO as proposed.

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19  

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<sup>10</sup> Ingram Direct at 6.

1 **Q: Is it common for utility green tariff programs like Geaux ZERO to have minimum**  
2 **capacity subscription requirements?**

3 A: According to CEBA’s “U.S. Utility Green Tariff Report, January 2023 Update,”<sup>11</sup> some  
4 utilities establish a minimum capacity subscription level but typically the required  
5 minimum is measured in kilowatts or a single megawatt. As an alternative to minimum  
6 capacity subscription requirements, many green tariff programs require customers to meet  
7 a minimum peak demand requirement to participate. The highest minimum requirement  
8 identified in CEBA’s report is a 25 MW peak demand minimum for customers participating  
9 in Georgia Power’s “Carbon Free Energy Around the Clock” option; but notably, Georgia  
10 Power offers another option for commercial and industrial customers with a minimum peak  
11 demand of only 3 MW.<sup>12</sup> If approved, ELL’s proposed minimum subscription level of 100  
12 MW for Geaux ZERO would be an outlier, both for its high level and for its effect of  
13 preventing customers with loads requiring subscription levels between 50 MW and 100  
14 MW from being able to meet all of their electricity needs with clean energy.

15 **Q: Would establishing a minimum capacity subscription level of 50 MW instead of 100**  
16 **MW for Geaux ZERO have any negative implications?**

17 A: No. The main effect of establishing a minimum capacity subscription level of 50 MW  
18 instead of 100 MW is likely to be that more customers will want to participate in Geaux  
19 ZERO. I recognize that ELL has proposed to supply Geaux ZERO with up to 3,000 MW

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<sup>11</sup> Available at: [https://cebbuyers.org/wp-content/uploads/2023/04/Final-CEBA\\_Green-Tariff-Report.pdf](https://cebbuyers.org/wp-content/uploads/2023/04/Final-CEBA_Green-Tariff-Report.pdf)

<sup>12</sup> Clean Energy Buyers Association, “U.S. Utility Green Tariff - January 2023 Update” at 19.

1 of solar and that increasing demand from customers will result in less supply available to  
2 meet all customer needs. However, if limited supply of clean energy is a concern, ELL  
3 should focus on expanding supply in the near future by requesting approval to acquire more  
4 than the 3,000 MW of solar resources it has proposed to procure in this proceeding. ELL's  
5 proposal effectively reserves this new solar capacity for very large industrial customers to  
6 the detriment of other industrial customers with smaller (but still substantial) subscription  
7 needs in the 50-100 MW range and other industrial customers with subscription needs of  
8 50 MW or less that cannot access Rider GGO because it is currently full.

9 **Q: What do you recommend with respect to this issue?**

10 A: There is no reason to exclude customers with loads that require capacity subscriptions  
11 between 50 MW and 100 MW from Geaux ZERO, especially given the 50 MW  
12 subscription cap for Rider GGO. I recommend that the Commission request ELL to lower  
13 the minimum requested subscription level from 100 MW to 50 MW to allow more  
14 customers to participate in Geaux ZERO and ensure that all industrial customers have the  
15 opportunity to meet their energy needs with clean energy.

16 **III. Geaux ZERO pricing options and capacity allocations.**

17 **Q: What will you address in this section of your testimony?**

18 A: In this section of my testimony, I will address ELL's proposal to offer only one pricing  
19 option for Group 1 subscriptions and ELL's proposed capacity allocations for Group 2  
20 subscriptions.

21

1 **Q: What pricing options has ELL proposed for Geaux ZERO?**

2 A: ELL has proposed to offer two pricing options for Geaux ZERO: Option A, which ELL  
3 describes as the Renewable Energy Credit (REC) option, and Option B, which ELL  
4 describes as the Volumetric Price Option.<sup>13</sup> Under Option A, ELL establishes a fixed price  
5 for RECs upfront that customers will pay over the term of the contract and results in an  
6 additional charge on subscribing customers' bills.<sup>14</sup> Under Option B, customers receive bill  
7 credits based on the market value of the solar resource to which they subscribe.<sup>15</sup> For  
8 Option B, it is possible for the value of a customer's bill credits to exceed the customer's  
9 subscription fee, resulting in net bill savings.<sup>16</sup>

10 **Q: Please explain your understanding of ELL's proposals with respect to Group 1 and**  
11 **Group 2 subscriptions.**

12 A: ELL has proposed to offer up to 1,000 MW of subscriptions to qualifying industrial  
13 customers that sign up for Geaux ZERO on a first-come, first-served basis by the end of  
14 2023.<sup>17</sup> However, ELL has proposed that these "Group 1 Subscriptions" will only be  
15 available to customers that sign up for Option A, the REC option that results in an  
16 additional charge on subscribing customers' bills.<sup>18</sup> After the end of 2023, ELL proposes  
17 an "open season" process for "Group 2 Subscriptions," through which customers would be

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<sup>13</sup> Ingram Direct at 7.

<sup>14</sup> Ingram Direct at 11-12.

<sup>15</sup> Ingram Direct at 12-13.

<sup>16</sup> Ingram Direct at 13.

<sup>17</sup> Ingram Direct at 8-9.

<sup>18</sup> Ingram Direct at 8-9.

1 able to select either Option A or Option B to subscribe to the remaining 2,000 MW of  
2 capacity plus any capacity that was not subscribed in the Group 1 process.<sup>19</sup> Finally, ELL  
3 has proposed to allocate the capacity available to Group 2 subscriptions as follows: 25%  
4 to existing industrial customers, 25% to expanding customers, and 50% to new  
5 customers.<sup>20</sup> Assuming the entire 1,000 MW proposed for Group 1 subscriptions is fully  
6 subscribed, ELL's proposed allocation of the remaining 2,000 MW would result in 500  
7 MW being available to existing industrial customers, 500 MW being available to  
8 expanding customers, and 1,000 MW being available to new customers. ELL proposes that  
9 this proposed allocation apply to each "open season" tranche.<sup>21</sup>

10 **Q: Do you generally support ELL's pricing proposals?**

11 A: Yes, generally. In particular, I appreciate ELL's efforts to create two pricing options to  
12 meet the needs and preferences of different customers. I expect some customers will  
13 appreciate the ability to secure a fixed REC price over a long-term contract through Option  
14 A while other customers will appreciate the ability to receive the market value of the solar  
15 energy and capacity they purchase through Option B. I also appreciate ELL's efforts to  
16 make Geaux ZERO Group 1 subscriptions available on an expedited basis by the end of  
17 2023 (though I expect this proposed timing will no longer be possible given that the hearing  
18 in this matter is scheduled for March of 2024).

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<sup>19</sup> Ingram Direct at 8-9.

<sup>20</sup> Ingram Direct at 9.

<sup>21</sup> Ingram Direct at 9.

1 **Q: Do you have any concerns with ELL's proposals?**

2 A: Yes, I have two concerns. First, I am concerned that ELL's proposal to restrict Group 1  
3 subscriptions only to Option A will needlessly limit customer choice. While some  
4 customers will appreciate the price certainty of Option A, I expect the type of sophisticated  
5 industrial customers that will be interested in Geaux ZERO are likely to prefer Option B  
6 because they will receive the market value of the solar energy and capacity they purchase  
7 and therefore have the opportunity to reduce their bills. This expectation is supported by  
8 the fact that in Rider GGO, which offers two analogous options also called Option A and  
9 Option B, only four out of 30 customers selected Option A, representing only 15 percent  
10 of total subscription capacity (including both participating and waitlisted customers and  
11 capacity).<sup>22</sup> Even if there is not a general preference among customers for Option B, Geaux  
12 ZERO will be more likely to achieve ELL's goals for the program if it offers both pricing  
13 options to those customers that are most eager to purchase clean energy (*i.e.*, the customers  
14 that are sufficiently motivated to sign up for Group 1 subscriptions).

15 **Q: Did ELL provide any reason for its proposal to restrict Group 1 Subscriptions to**  
16 **Option A?**

17 A: No, ELL did not explain why it proposed to restrict Group 1 subscriptions to Option A. As  
18 ELL witness Ms. Ingram points out in her testimony, ELL's proposed Option B is very  
19 similar to the volumetric price option ELL offers through Rider GGO (which ELL also

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<sup>22</sup>Annual Report of Energy Louisiana, LLC, Docket Nos. R-28271, U-35916, and U-36190 at 20, Table 9 (available at: <https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=IncY8BlcD68%3d>)

1 refers to as Option B in that program).<sup>23</sup> Accordingly, it is reasonable to expect that ELL  
2 is capable of offering both Option A and Option B through the Group 1 subscriptions that  
3 would be available on a more expedited basis than the Group 2 “open season” tranches. I  
4 recommend that the Commission request that ELL allow eligible customers that subscribe  
5 to Geaux ZERO during the Group 1 subscription phase to choose either Option A or Option  
6 B.

7 **Q: What is your second concern?**

8 A: My second concern is ELL’s proposed allocation of solar capacity among new, expanding,  
9 and existing industrial customers in the proposed Geaux ZERO tariff. While I understand  
10 that one of ELL’s goals in offering Geaux ZERO is to support economic development in  
11 its service territory, ELL’s allocation proposal unfairly preferences new customers (50%  
12 capacity allocation) and expanding customers (25% capacity allocation) to the detriment  
13 of ELL’s existing customers (25% capacity allocation). This disparity is especially unfair  
14 given that ELL is aware of significant demand for clean energy from its existing customers.  
15 Specifically, the GGO Reservation List (Exhibit ECI-3) provides the amount of capacity  
16 requested by existing commercial and industrial customers on the Rider GGO waitlist and  
17 the amount of capacity ELL’s existing customers have stated they would be interested in  
18 subscribing if Rider GGO did not include a 50 MW per parent company subscription cap.<sup>24</sup>  
19 Adding these amounts together yields a total of nearly 1,600 MW of demand for clean

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<sup>23</sup> Ingram Direct at 15.

<sup>24</sup> Exhibit ECI-3

1 energy from existing customers that ELL is currently unable to meet.<sup>25</sup> While existing  
2 industrial customers will be able to sign up for up to 1,000 MW of capacity in Group 1,  
3 under ELL's proposal these Group 1 subscribers would only be able to choose pricing  
4 Option A, which may not be the preferred option for many existing customers. Also, since  
5 Group 1 subscriptions will be available on a first-come, first-served basis, it is possible that  
6 much or even most of the Group 1 capacity will go to new customers and not to existing  
7 customers.

8 **Q: What do you recommend to address this concern?**

9 A: I recommend that the Commission request that ELL reserve 50% of Group 2 subscriptions  
10 for existing customers, regardless of whether they are expanding or not, and 50% of Group  
11 2 subscriptions for new customers. This allocation puts all existing customers that want to  
12 meet their electricity needs with clean energy on an equal footing with new customers. This  
13 allocation will also help ensure that existing industrial customers that have already  
14 expressed interest in purchasing more clean energy than they are able to purchase through  
15 Rider GGO will be able to meet their clean energy needs through Geaux ZERO.

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<sup>25</sup> The sum of the "GGO Waitlist" column and the "Additional GGO Interest, if Uncapped" column is 1,596.5 MW. I note that it is my understanding that the additional capacity in which existing customers expressed interest would be to serve existing loads, but it is possible that some of this requested capacity would cover planned load expansions. The distinction would not change my recommendation.

1 **Q: Please summarize your recommendations with respect to ELL’s pricing and**  
2 **subscription allocation proposals.**

3 A: For the reasons discussed, I recommend that the Commission:

- 4 • Recommend that ELL allow eligible customers that subscribe to Geaux ZERO  
5 during the Group 1 subscription phase to choose either Option A or B;
- 6 • Recommend that ELL reserve 50% of Group 2 subscriptions for existing customers,  
7 regardless of whether they are expanding or not, and 50% of Group 2 subscriptions  
8 for new customers.

9 **IV. Allocation of new solar capacity between Geaux ZERO and Rider GGO.**

10 **Q: What will you address in this section of your testimony?**

11 A: In this section of my testimony, I will address ELL’s proposed allocation of new solar  
12 capacity to Geaux ZERO and Rider GGO.

13 **Q: What has ELL proposed with respect to the allocation of the 3,000 MW of new solar**  
14 **capacity it proposes to acquire in this proceeding?**

15 A: ELL proposes to allocate the full 3,000 MW of new solar capacity to Geaux ZERO but  
16 seeks Commission approval to allocate any capacity that is not subscribed by December  
17 31, 2025 to an expansion of Rider GGO.<sup>26</sup> ELL witness Ms. Ingram characterizes the  
18 possibility that Geaux ZERO is not fully subscribed by this date as an “unlikely event.”<sup>27</sup>

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<sup>26</sup> Ingram Direct at 19.

<sup>27</sup> Ingram Direct at 20.

1 **Q: Do you have any concerns with this proposal?**

2 A: I am not opposed to ELL's proposal to allocate any capacity that is not subscribed through  
3 Geaux ZERO to Rider GGO, but I am disappointed that ELL has not proposed to allocate  
4 any of the 3,000 MW it proposes to acquire in this proceeding to Rider GGO unless there  
5 is unsubscribed capacity remaining at the end of 2025. I recognize that the Commission is  
6 currently evaluating ELL's proposal to expand Rider GGO by an additional 224 MW in  
7 Docket No. U-36685.<sup>28</sup> However, the GGO Reservation List (Exhibit ECI-3) attached to  
8 Ms. Ingram's testimony in this docket shows that there is a waitlist for Rider GGO of an  
9 additional 335.5 MW of capacity. Exhibit ECI-3 also indicates that there are a number of  
10 customers on the Rider GGO waitlist (either entirely or for a portion of their needs) that  
11 would not qualify for Geaux ZERO under ELL's proposed minimum 100 MW capacity  
12 requirement. The unmet need from these customers, not counting unmet need on the Rider  
13 GGO waitlist, is at least 86 MW.<sup>29</sup>

14 Accordingly, it is my understanding that ELL's proposal to expand Rider GGO in  
15 Docket No. U-36685 by only 224 MW will be insufficient to meet ELL's current demand  
16 from existing customers.

17 **Q: What do you recommend?**

18 A: I recommend that the Commission request ELL allocate a portion of the 3,000 MW of solar  
19 it proposes to acquire in this docket to Rider GGO prior to the end of 2025. Specifically,

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<sup>28</sup> See Direct Testimony of Elizabeth C. Ingram, Docket No. U-36685, at 7.

<sup>29</sup> Customers 5, 6, 7, and 12 have expressed that, if Rider GGO did not include a 50 MW per parent company cap, they would subscribe to an additional 12 MW, 10 MW, 44 MW, and 20 MW, respectively.

1 after ELL completes its Group 1 subscription phase and after ELL completes its first “open  
2 season” Group 2 tranche for Geaux ZERO, ELL should allocate sufficient capacity to Rider  
3 GGO to meet expressed demand from existing customers that do not qualify for Geaux  
4 ZERO, up to the amount of capacity on the Rider GGO waitlist at that time. This  
5 recommendation provides time for any customers currently on Rider GGO that want to  
6 switch to Geaux ZERO to do so (if they qualify for Geaux ZERO), which will ensure that  
7 ELL does not overallocate capacity to Rider GGO.

8 If the Commission approves another expansion of Rider GGO in a separate docket,  
9 ELL may not need to allocate any additional capacity from the 3,000 MW to Rider GGO  
10 to meet customer demand. Either way, it is crucial that the Commission ensure that ELL is  
11 meeting demand for clean energy from customers of all sizes, including its existing  
12 customers, and does not unduly preference the very large industrial customers that qualify  
13 for Geaux ZERO over other customers that only qualify for Rider GGO.

14 **V. Conclusion and Recommendations.**

15 **Q: Please summarize your recommendations to the Commission.**

16 **A:** I recommend that the Commission:

- 17 • Request that ELL lower the minimum requested subscription level from 100  
18 MW to 50 MW to allow more customers to participate in Geaux ZERO and  
19 ensure that all industrial customers have the opportunity to meet their energy  
20 needs with clean energy;

- 1           ● Request that ELL allow eligible customers that subscribe to Geaux ZERO  
2           during the Group 1 Subscription phase to choose either pricing Option A or  
3           Option B;
- 4           ● Request that ELL reserve 50% of Group 2 subscriptions for existing industrial  
5           customers, regardless of whether they are expanding or not, and 50% of Group  
6           2 subscriptions for new industrial customers;
- 7           ● Request that ELL allocate sufficient solar capacity to Rider GGO to meet  
8           expressed demand from existing customers that do not qualify for Geaux ZERO  
9           after ELL completes its Group 1 subscription phase and completes its first  
10          “open season” Group 2 tranche, up to the amount of capacity on the Rider GGO  
11          waitlist at that time.

12   **Q:    Does this conclude your testimony at this time?**

13   A:    Yes.

**BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION**

Entergy Louisiana, LLC, ex parte Application for approval of an alternative market-based mechanism process seeking to secure up to 3,000 MW of solar resources, including certification of those resources, expansion of the Geaux Green Option Rider, and approval of a new renewable tariff.

Docket No. U-36697

**AFFIDAVIT OF PRIYA BARUA**

My name is Priya Barua. I am Director of Market and Policy Innovation at Clean Energy Buyers Association (CEBA). My business address is 1425 K Street, Suite 1110, Washington, D.C. 20005. I caused the Direct Testimony of Priya Barua to be filed in this proceeding. My Direct Testimony was prepared by me or under my supervision. If asked the questions that are contained in my Direct Testimony again today, I would provide the same responses.

I hereby declare that the above statement is true to the best of my knowledge and belief, and I understand that it is subject to penalty for perjury.

PBarua

Priya Barua

Dated: October 6, 2023

County/City of Falls Church  
Commonwealth/State of Virginia  
The foregoing instrument was acknowledged  
before me this 6 day of October  
2023, by  
Priya Barua  
(name of person seeking acknowledgement)  
\_\_\_\_\_  
Notary Public  
My Commission Expires: 6/30/2026

