Exhibit G - Public

TESTIMONY

OF

PATRICK JEHRING

ON BEHALF OF

GRIDLIANCE LOUISIANA, LLC

PUBLIC VERSION

March 7, 2025

EXHIBIT __

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. Patrick Jehring and my business address is 700 Universe Boulevard Juno Beach FL, 33408.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by NextEra Energy Transmission ("NEET"), LLC as a Director of Systems Planning.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL EXPERIENCE.

A. I earned a Bachelor of Science degree and a Master of Science degree in Electrical Engineering with an emphasis on Power Systems from the University of Wisconsin – Madison in 2007 and 2009 respectively. I have also earned a Master of Business Administration from the Indiana University Kelley School of Business in 2022. I have over fifteen years of experience in the electric utility industry with roles in reliability and economic transmission planning as well as wholesale energy market analysis. I started my career at Siemens Power Technologies International ("PTI") in their consulting group where I performed various transmission planning studies for generator interconnection, long-term transmission service, and system reliability. Following my time at PTI, I worked for 10 years at the Midcontinent Independent System Operator ("MISO") in its modeling, transmission expansion planning, and market analytics groups. During my time in the transmission expansion planning group my focus was the MISO South region as well as being a subject matter expert for North American Electric Reliability Corporation ("NERC") compliance. I joined NEET in 2022 where my duties include long range transmission planning for our GridLiance Heartland transmission assets and supporting our

work with cooperatives and municipal utilities across the country. I am also currently the acting chair of MISO's Planning Subcommittee group.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

A. I am testifying on behalf of GridLiance Louisiana, LLC ("GLL"). GLL is an indirect subsidiary of NEET.

Q. HAS THIS TESTIMONY BEEN PREPARED BY YOU OR UNDER YOUR SUPERVISION?

A. Yes.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE LOUISIANA PUBLIC SERVICE COMMISSION ("LPSC")?

A. No.

II. PURPOSE AND SUMMARY OF DIRECT TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS PROCEEDING?

A. The purpose of my testimony is to: (1) provide an overview of the application of the Federal Energy Regulatory Commission's ("FERC") seven factor test to the of the proposed transfer of certain transmission assets ("Transmission Assets") between GLL and Southwest Louisiana Electric Membership Corporation ("SLEMCO"), as set forth in Table 1 of the Application, and (2) address the following public interest factors set forth in the LPSC 1994 General Order: 1 and 4.

Q. PLEASE DESCRIBE THE TRANSMISSION ASSETS.

A. The Transmission Assets set forth in the Asset Purchase Agreement between SLEMCO and GLL are a set of substations that SLEMCO is acquiring from Big Pelican LLC and Pelican South Central LLC ("Pelican") (formerly Cleco Cajun, LLC) on April 1, 2025. The

Transmission Assets proposed to be transferred to GLL are set forth in Table 1 of the Application, which is also set forth below.

Table 1	
Transmission Assets to be transferred from SLEMCO to GLL	
Substation	**kilovolt ("kV")**
Crowley	138
East Opelousas	138
Hebert	138
Judice	138
Krotz Springs	138
LeBlanc Bulk	138
Scanlan	138
Semere Road	138
Vatican	138

GLL is only proposing to acquire assets that qualify for inclusion in MISO.

Q. ARE YOU SPONSORING ANY EXHIBITS WITH YOUR TESTIMONY?

A. Yes. I am sponsoring the following exhibits:

- Exhibit 1 - Seven-Factor Test Analysis.
- Exhibit 2 - Benefit Analysis.

III. SEVEN FACTOR TEST

Q. PLEASE PROVIDE A GENERAL OVERVIEW OF FERC'S SEVEN FACTOR TEST.

A. In FERC Order No. 888 (75 FERC ¶ 61,080, pp. 435-440), FERC established a seven-factor test for determining whether a line segment or substation, as applicable, is to be classified as transmission or distribution. The seven-factor test was designed to be applied by FERC, an Independent System Operator ("ISO"), or a state commission. The following are the seven-factors:

Factor #1: Local distribution facilities are normally in close proximity to retail customers.

Factor #2: Local distribution facilities are primarily radial in character.

Factor #3: Power flows into local distribution systems; it rarely, if ever, flows out.

Factor #4: When power enters a local distribution system, it is not reconsigned or transported on to some other market.

Factor #5: Power entering a local distribution system is consumed in a comparatively restricted geographical area.

Factor #6: Meters are based at the transmission/local distribution interface to measure flows into the local distribution system.

Factor #7: Local distribution systems will be of reduced voltage.

If an asset is appropriately classified as transmission using the seven-factor test, the asset is also appropriate for inclusion in an ISO, such as MISO, and the associated costs recovered under the MISO tariff.

Q. HOW IS THE SEVEN FACTOR TEST APPLIED?

A. Each factor of the seven-factor test is applied to each Transmission Asset, which in this case are substations. The application of the factor results in a pass or fail determination. For some assets, the application of all factors will indicate a uniform pass or fail grade. An overall passing grade indicates that the asset is appropriately classified as distribution. Conversely, if the overall grade is failing, then the asset is appropriately classified as transmission. If the asset fails some factors and passes others, then a comprehensive consideration is employed to determine whether the substation is appropriately classified as either distribution or transmission. FERC has elaborated on the use of the seven-factor test as follows:[1]

> When the characteristics of facilities are consistent with a factor, the facilities are more likely to be classified as distribution. Conversely, when the characteristics of facilities are inconsistent with a factor, the facilities are more likely to be classified as transmission. The Commission has also stated that the seven-factor test is 'not subject to formulaic application or categorical standards' but instead requires 'comprehensive consideration of how the totality of the circumstances bears on each of the seven factors.'

For example, MISO performed a transmission determination for 69 kV assets in Arkansas where MISO concluded the assets under evaluation failed certain factors, and, yet, were still considered transmission.[2]

[1] *Midcontinent Independent System Operator, Inc.*, 181 FERC ¶ 61,056, 61374 (Opinion 580) (2022), quoting *S. Cal. Edison Co.*, 153 FERC P 61,384, at P 19 (2015) (Southern California Edison) (citing Order No. 888, FERC Stats. & Regs. P 31,036, app. G at 31,980-81; *Cal. Pac. Elec. Co., LLC*, 133 FERC P 61,018, at PP 45-48 (2010)); see also *Commonwealth Edison Co.*, 167 FERC P 61,173, at P 26 (2019).

[2] https://cdn.misoenergy.org/20221115%20PSC%20Item%2005a%20Transmission%20Determination%20-%20City%20Water%20and%20Light%20(CWL)%20-%20Jonesboro626965.pdf

Q. WHAT SUBSTATIONS DID YOU APPLY THE SEVEN FACTOR TEST TO?

A. As shown in Exhibit 1, the seven-factor test was applied to the substation Transmission Assets set forth in Table 1.

Q. PLEASE EXPLAIN THE APPLICATION OF FACTOR #1 TO THE TRANSMISSION ASSETS.

A. As explained in Exhibit 1, I reviewed factor #1 in the context of the electrical system and the geographical proximity to the location of retail customers. From an electrical system perspective, the 138 kV substation Transmission Assets all require to be stepped down to lower voltages to serve the retail customers. Therefore, from an electrical perspective, the Transmission Assets are not in close proximity to the retail customers; instead, the assets are remote compared to distribution facilities serving retail customers. Additionally, from a geographic perspective the Transmission Assets are not close to retail customers when compared to the distribution facilities serving these customers. I provide illustrations and maps in Exhibit 1 to show the remoteness of the Transmission Assets to retail customers. Thus, based on my application of the methodology explained above, all Transmission Assets fail factor #1.

Q. PLEASE EXPLAIN THE APPLICATION OF FACTOR #2 TO THE TRANSMISSION ASSETS.

A. As explained in Exhibit 1, the methodology applied under factor #2 involved whether the Transmission Assets are radial in nature, meaning their electrical configuration emanates from a single point and does not have any other electrical connections to the overall transmission system. Conversely, if transmission assets are not radial and are rather

networked, they will have two or more electrical connections to the transmission system. Figure 1 shows examples of radial and network transmission assets.

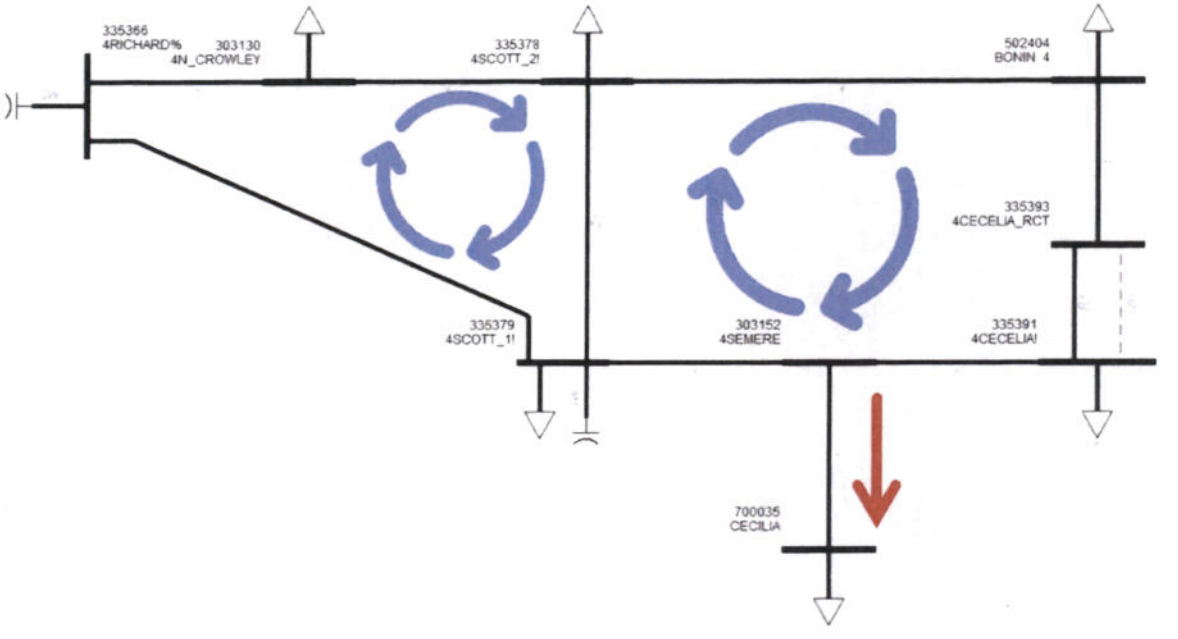

Figure 1: Example of Network and Radial Transmission

Figure 1 shows two examples of networked transmission as noted with the blue circles and one example of radial transmission as noted with the red arrow. Networked transmission has multiple connections whereas radial transmission has a single connection. Figure 1 shows that Entergy Louisiana, LLC ("Entergy")'s Richard, Scott, and Cecelia, Lafayette Utilities System ("LUS")'s Bonin, and SLEMCO's Crowley and Semere Road create a network allowing power to flow between all six stations. In contrast the single, radial, connection from SLEMCO's Semere Road to Cecilia only allows power to flow between those two stations.

A review of the Transmission Assets, during normal operating conditions, shows that they all have two connections to the transmission system and are networked, therefore, failing factor #2. To reach this conclusion, I reviewed one-line diagrams of the Transmission Assets and their electrical connection to the boarder transmission network. Additionally, for the two 138 kV lines connected to each substation I reviewed their connections to the transmission system and found the lines had additional connections and are not radial. Finally, all of the 138 kV lines connected to the stations under review are listed in Entergy's Attachment O Appendix H list of transmission lines which means they have been transferred to MISO's functional control. A transmission line transferred to MISO's functional control means the Transmission Owner is allowing the line to be used by MISO to facilitate energy market flows and is subject to MISO's Open Access Transmission Tariff. This also means the Transmission Owner includes those lines in their Annual Transmission Revenue Requirement ("ATRR"). This provides clear evidence that the Transmission Assets are networked with other assets that are already considered transmission by the neighboring Transmission Owner and existing System Operator.

Q. PLEASE EXPLAIN THE APPLICATION OF FACTOR #3 TO THE TRANSMISSION ASSETS.

A. The methodology applied under factor #3 involved examining the Transmission Assets using powerflow analysis to quantify the flow and direction of real power flowing through the Transmission Assets. A powerflow analysis was used rather than historical flow data as GridLiance and SLEMCO only have access to historical meter data measuring the flows from the Transmission Assets to SLEMCO's distribution step-down transformers and SLEMCO's radially operated 138 kV lines. This type of historical data does not provide

the amount of power flowing through the station, but, rather, the amount of power being withdrawn from the transmission system.

To quantify the amount of power flowing through each of the stations, I used the latest available MISO Transmission Expansion Plan ("MTEP") powerflow cases developed for the current 2024 planning cycle, and, specifically, the 2025 Spring Light Load, Spring Peak, Summer Shoulder, Summer Peak, Fall Peak, and 2025-2026 Winter Peak load scenarios. I used this set of cases to get a broad set of load conditions and as a result understand the typical flows on the system. Additionally, I simulated over 6,000 contingencies on each of the powerflow cases to identify any situations where the powerflow flow significantly changed from the system intact condition. The complete findings of the powerflow analysis are provided in Exhibit 1 and examples for Scanlan and Vatican substations are shown in Table 2 and Table 3 respectively.

Table 2

Season	Scanlan		
	N-0 Through Flow	Max N-1 Through Flow	Events w/ through flow
25SLL	40.3	57.8	6293
25SPR	56.7	89.6	6293
25SHHW	83.4	126.2	6334
25SUM	71.3	107.8	6334
25FAL	41.4	73.4	6351
26WIN	75.0	121.9	6401

Table 3			
Season	Vatican		
	N-0 Through Flow	Max N-1 Through Flow	Events w/ through flow
25SLL	0.0	31.8	45
25SPR	0.0	46.9	43
25SHHW	0.0	39.5	39
25SUM	0.0	56.1	78
25FAL	0.0	23.7	21
26WIN	0.0	21.0	12

The powerflow analysis results for Scanlan, shown in Table 3, show under nearly all system conditions power is flowing through the station to support the larger transmission and not just power flowing into the distribution step-down transformers. For Vatican, the powerflow analysis results, displayed in Table 4 hereinbelow, show through-flow only occurs under contingencies and does not occur system intact. Although through-flows only occur under contingency events, through-flows occurs for numerous different events and across all the loading scenarios which leads to the conclusion that through-flows occurring at Vatican is not rare. For the real-world operation of the transmission system, often multiple transmission elements are out of service either for planned maintenance or

unexpectedly forced out of service (for example a tree falling onto a transmission line). Additionally, for forward- looking planning of the transmission system, various contingency conditions are evaluated, and future upgrades were developed to meet NERC Reliability Standards as well as the local planning criteria set by the NERC-registered Transmission Owners. Both in real-time operations and planning of the transmission system, a set of contingencies were examined to ensure the system is dispatched in such a manner to avoid any of the transmission facilities from exceeding their applicable rating. As such, it is prudent to examine all feasible single element initiating contingencies to identify what the flows would be through the stations. Based on the results of the above explained powerflow analysis as set forth in Exhibit 1, I concluded that power often is flowing through these stations, and, therefore, the Transmission Assets fail factor #3.

Q. PLEASE EXPLAIN THE APPLICATION OF FACTOR #4 TO THE TRANSMISSION ASSETS.

A. The methodology applied under factor #4 involved examining the real power flowing through the Transmission Assets and identifying where the power is flowing from and to. If power is only flowing into a transmission asset, such an asset's power is only flowing through the Transmission Asset to serve SLEMCO's retail customers. Conversely, if power is flowing in and out of a Transmission Asset, this shows that power is flowing through the Transmission Asset not only to serve SLEMCO's retail customers, but, also, to other Louisiana customers. In the latter case, the power flows into the MISO market flows. Therefore, if MISO market flows are occurring on the Transmission Assets, the asset would fail factor #4. The application of the methodology showed the Transmission Assets fail factor #4, because the assets all have power flowing in and out. This conclusion is based on

the same powerflow analysis performed for Factor #3 wherein numerous system conditions were simulated and showed that power often flowed in and out of the Transmission Assets. The power flowing through the Transmission Assets in excess of that needed to serve SLEMCO's retail customers demonstrates the assets inject power into the MISO market, which ultimately serves Entergy, Cleco, and LUS customers.

Q. PLEASE EXPLAIN THE APPLICATION OF FACTOR #5 TO THE TRANSMISSION ASSETS.

A. The methodology applied under factor #5 involved examining the real power flowing through the Transmission Assets and identifying the typical direction of flow and how often flows occur in the opposite direction. Additionally, the overall configuration and connections of the Transmission Assets to the transmission system are considered to identify if the power goes beyond the SLEMCO's service territory.

The application of the methodology showed the Transmission Assets fail factor #5 because there are numerous loading and contingency conditions where power flows through the Transmission Assets that goes on to serve customers beyond SLEMCO. For example, the typical flow through the Vatican substation is from north to south which means power is coming from Entergy's Bloomfield and Cleco's Plaisance transmission in the north and flowing south towards Entergy's Scott and LUS's Bonin transmission. As shown in Table 4, this typical north to south flow occurs under multiple loading scenarios and contingency conditions. Further there are several contingency conditions where the typical north to south flow reverses and a south to north flow is observed. Based on these facts, the analysis of Vatican substation demonstrates that power is consumed in a broad geographical area

spanning multiple service territories. The remaining Transmission Assets are similarly situated as explained in Exhibit 1, and, therefore, also fail factor# 5.

Table 4		
Season	Vatican	
	Events w/ North to South Flow	Events w/ South to North Flow
25SLL	32	13
25SPR	42	1
25SHHW	26	13
25SUM	78	0
25FAL	20	1
26WIN	3	9

Q. PLEASE EXPLAIN THE APPLICATION OF FACTOR #6 TO THE TRANSMISSION ASSETS.

A. The methodology applied under factor #6 involved examining the one-line diagrams of the transmission facilities and identifying the locations of the meters. The locations of these meters provide a strong indication of where the historical boundary of transmission system was drawn.

The application of the methodology showed that the location of meters for Transmission Assets fell into two categories: (1) GridLiance ownership extends up to and includes the meter and (2) GridLiance ownership extends beyond the meter location up to the high-side of SLEMCO's 138/25 kV stepdown transformers. For both categories, the Transmission Assets fail factor #6 because GridLiance's ownership only extends to equipment that would have network flows from the transmission system. In five (5) of the Transmission Assets (Judice, LeBlanc, Scanlan, Semere Road, and Vatican) GridLiance ownership extends up to and includes the single meter in the station. Beyond the meters in these substations are either a SLEMCO 138/25 kV step-down transformer(s) to their distribution system or radially operated 138 kV line(s) which feed other SLEMCO stations, which are eventually step-downed to the SLEMCO distribution system to provide service to SLEMCO retail customers. For example, examining the Judice substation, GridLiance's ownership would extend up to and include the meter as shown in Figure 2, beyond the meter are two radially operated 138 kV lines. The meter provides a good boundary to differentiate the power flowing through the station to serve Entergy, Cleco, and LUS customers versus power flowing only to serve SLEMCO's retail customers.

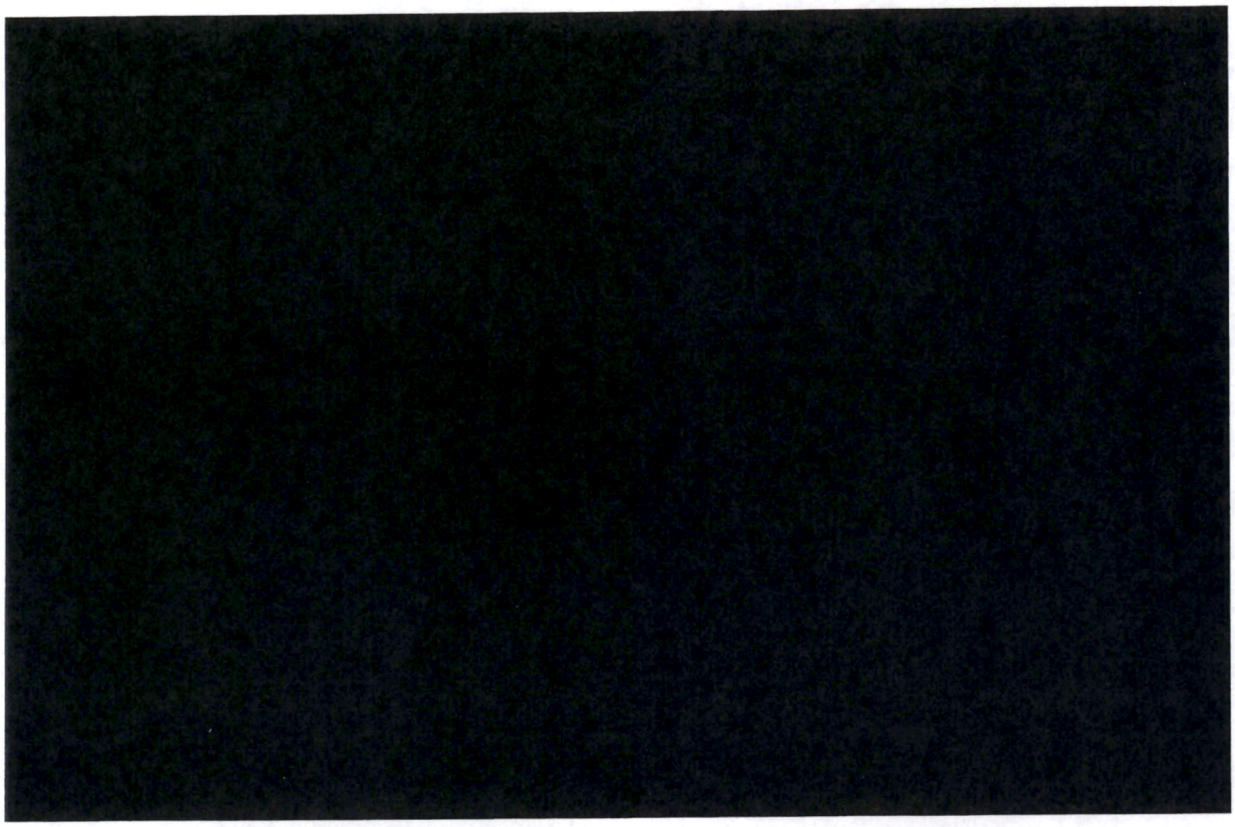

Figure 2: One-line diagram of Judice Substation

In the second category of Transmission Assets where GridLiance ownership extends beyond the meter, the key difference is that these substations have two parallel meters which allow for an alternate path for power to flow under outage conditions within the station. Hence, the normal operation power would flow from the transmission system and through one or more of the meters to SLEMCO's retail customers; however, when portions of the station are in outage, power will flow down one meter with a portion going to SLEMCO's retail customers and another portion going through the other meter and back out to the transmission system. For example, in Krotz Springs, GridLiance's ownership will include three switches beyond the two meters as shown in Figure 3. The meter connected to

the normally open switch J0181 serves as a backup to the meter connected to J0182 and in order for GridLiance to switch between using either meter requires that GridLiance own and control the other 3 switches (J0181, J0182, and J0184). [redacted]. As such even though those three switches are beyond the meters they should be considered as part of the Transmission system because of the functionality they provide. The three other stations (Crowley, East Opelousas, and Hebert) have a similar configuration and fail factor #6.

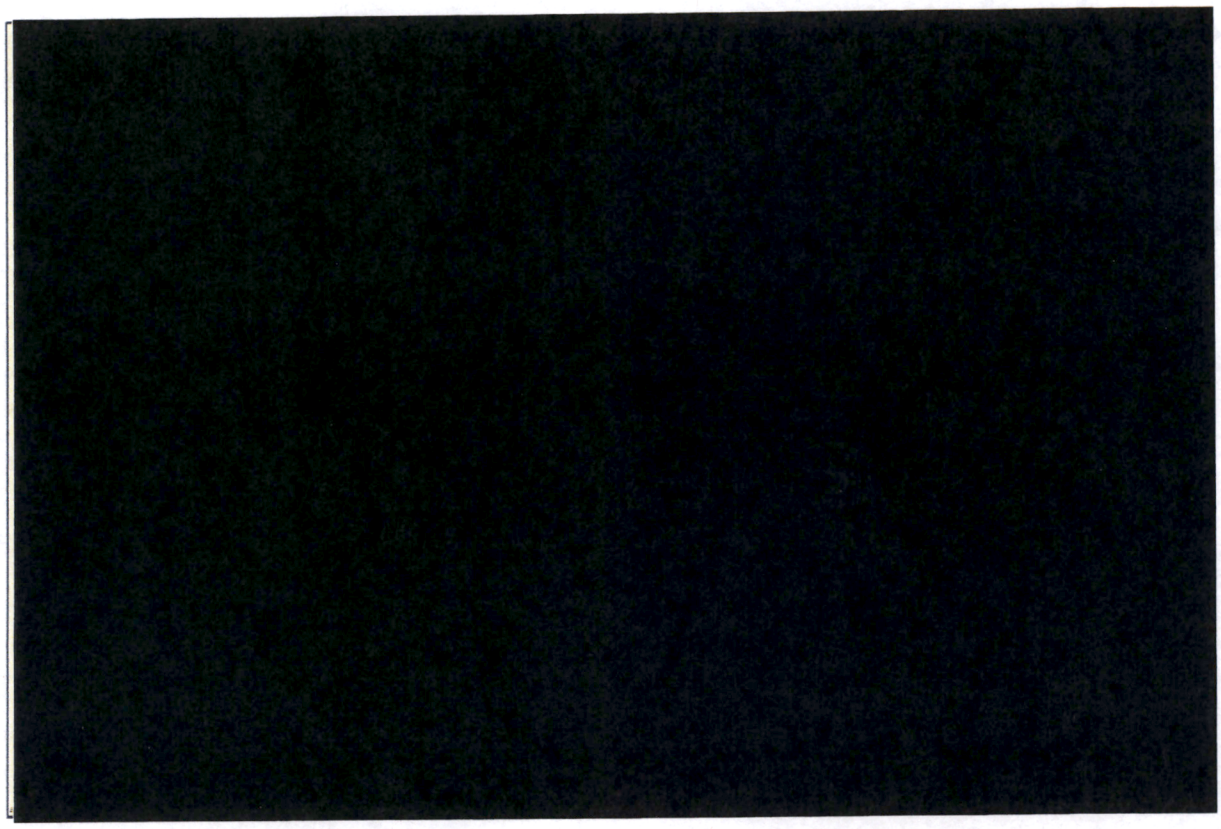

Figure 3: One-line diagram of Krotz Springs Substation

Q. PLEASE EXPLAIN THE APPLICATION OF FACTOR #7 TO THE TRANSMISSION ASSETS.

A. The methodology applied under factor #7 involved examining the transmission facilities one-line diagrams to identify the operating voltage(s) with the substation and then comparing the operating voltages for the transmission facilities with other neighboring transmission facilities in the area.

The application of the methodology showed that all the Transmission Assets fail factor #7, because they are all operated at 138 kV, and 138 kV is not a reduced voltage for the area.

Table 5 shows the highest and lowest operating voltages for each of the Transmission Assets. All the Transmission Assets operate at 138 kV and most of the step-down to a reduced voltage is 25 kV or 13.8 kV to supply power to SLEMCO's retail customers. Further, Judice, LeBlanc, and Semere Road only have 138 kV equipment and no step-down transformers which is a strong indication that 138 kV is not considered a reduced voltage in the area.

Table 5

Operating Voltages of the Transmission Assets

Substation	Highest kV	Lowest kV
Crowley	138 kV	25 kV
East Opelousas	138 kV	25 kV
Hebert	138 kV	25 kV
Judice	138 kV	138 kV
Krotz Springs	138 kV	13.8 kV
LeBlanc Bulk	138 kV	138 kV
Scanlan	138 kV	25 kV
Semere Road	138 kV	138 kV
Vatican	138 kV	25 kV

Additional evidence that 138 kV is not a reduced voltage is provided by Entergy's Attachment O filing with MISO. In Attachment O, Entergy lists transmission assets with an operating voltage from 69 kV up to 500 kV. Attachment O further shows what a

Transmission Owner and MISO consider to be transmission and are included in their ATTR, which clearly includes 138 kV.

Q. ARE THE TRANSMISSION ASSETS COMPARABLE TO SIMILAR SUBSTATIONS THAT OTHER UTILITIES IN LOUISIANA INCLUDE IN THE MISO TARIFF?

A. Yes, several of the neighboring 138 kV stations owned by Entergy are of a similar configuration. For example, Colton and Delcambre Rural have essentially the same configuration as the majority of the Transmission Assets. Both substations have two 138 kV lines coming in and out of the station and the stations have transformers that step-down the voltage from 138 kV to 13.8 kV which feed Entergy's distribution system and serve retail customers.

Entergy's Bloomfield 138 kV is another example of a similar station to the Transmission Assets. Bloomfield has three 138 kV lines coming in and out of the station but does not have any transformers to step-down the voltage to the distribution system. This configuration is similar to Judice, LeBlanc Bulk, and Semere Road.

All three of the Entergy station examples are considered transmission by Entergy and MISO since they are included in Entergy's Attachment O, Appendix H, which means that they are under MISO's functional control and are included in Entergy's ATRR.

Q. DID EACH OF THE TRANSMISSION ASSETS FAIL THE SEVEN-FACTOR TEST?

A. Yes. Each Transmission Asset failed all seven factors. Therefore, each Transmission Asset should be classified as transmission.

IV. GENERAL ORDER 1994 FACTORS

Q. PLEASE ADDRESS FACTOR 1 FROM GENERAL ORDER 1994: WHETHER THE TRANSFER IS IN THE PUBLIC INTEREST?

A. The proposed transfer of the Transmission Assets is in the public interest. For example, since the Transmission Assets are classified as part of the Bulk Electric System, they are required to comply with the applicable set of NERC Reliability Standards. NERC compliance of the Transmission Assets was previously accomplished by CLECO-Cajun but will become SLEMCO's obligation when SLEMCO acquires ownership of the assets on April 1, 2025. Transferring the Transmission Assets to GLL will provide the benefit of utilizing GLL's existing capability to own and operate these Transmission Assets in compliance with applicable NERC Reliability Standards. If SLEMCO were to retain ownership of the Transmission Assets and not transfer them to GLL, SLEMCO would have two options: (1) develop the internal resources necessary to comply with the NERC Reliability Standards or (2) hire third-party consultants to comply with the NERC Reliability Standards. The cost of these options is set forth in Table 5 of Exhibit 2. As Table 5 shows, there is considerable cost savings from the Proposed Transaction, because of GLL's ability to leverage existing NERC compliance staff, resources, and expertise.

Additionally, GLL intends to integrate the Transmission Assets into MISO which is also in the public interest. Currently, the Transmission Assets are not integrated into MISO even though the assets are physically networked into the MISO system. Since the assets are not under MISO's functional control, the Transmission Assets are a black box to MISO which results in the assets being essentially ignored in all of MISO's processes. For example, the Transmission Assets are not currently considered when MISO evaluates the future needs of

the system through their annual MTEP. The lack of integration of the Transmission Assets into MISO can result in higher cost transmission being constructed. For example, in 2019, MISO selected a transmission solution that cost $65.2M more than if certain SLEMCO system assets were integrated in MISO. Entergy, during MTEP17 and MTEP18, originally proposed a $198.9M project to address a P6 (N-1-1) condition where load shed would have been required. After approval of the Entergy projects, Entergy requested, and MISO agreed, to replace the original transmission project with a joint Entergy-Cleco project developed through the joint planning study that cost $82M (a $116.9M savings). The underlying reliability issue was the inability of the transmission system to adequately serve Entergy load as well as SLEMCO load being served from SLEMCO's Le Blanc Station. If the SLEMCO transmission assets were included in the MISO joint planning study, the least-cost solution to the underlying N-1-1 conditions could have been as simple as redistributing SLEMCO load by temporarily closing in portions of the underlying SLEMCO 138 kV system through operator actions after the initial N-1 condition occurred. A more robust solution which avoids relying on operator intervention could have been operating the SLEMCO 138 kV system as a closed loop which would require rebuilding a portion of SLEMCO's transmission lines, for an estimated cost of $16.8M. This more robust solution would have resulted in a $65.2M savings to the Louisiana transmission pricing zones when compared to the Entergy-Cleco project. Although the SLEMCO assets that would have produced the savings are not part of the current Proposed Transaction, the example demonstrates: (1) the cost savings of including more Louisiana transmission assets in MISO; and (2) the value of having GLL advocating on behalf of Louisiana for cost-effective

solutions at MISO, which can only be accomplished by GLL owning the Transmission Assets.

Q. PLEASE ADDRESS FACTOR 4 FROM GENERAL ORDER 1994: WHETHER THE PROPOSED TRANSFER WILL MAINTAIN OR IMPROVE THE QUALITY OF SERVICE TO PUBLIC UTILITY OR COMMON CARRIER?

A. The proposed transfer of the Transmission Assets to GLL will maintain or improve the quality of service associated with the Transmission Assets. The Transmission Assets are nearing the end of their useful life. In Table 6, I provide the age of each Transmission Asset.

Table 6

Transmission Assets Useful Life

Substation	**kV**	**Age**
East Opelousas	138	21
Hebert	138	45
Judice	138	42
Krotz Springs	138	42
LeBlanc 138	138	56
Scanlan	138	37
Semere Road	138	40
Vatican	138	48
Crowley	138	32

The useful life of the Transmission Assets in Table is generally considered to be 30 to 40 years. Since the initial construction of the Transmission Assets, the assets have not been

upgraded to extend their useful life or replaced. As with any element of the transmission system, ensuring the Transmission Assets are available for use is of paramount importance to ensuring that an unforced outage does not occur and impact the transmission network and customers. GLL is committed to implementing a plan to upgrade or replace, as needed, the Transmission Assets to ensure the continued reliable operation of the overall transmission grid. GLL's proposed upgrade and replacement plan is set forth in Exhibit 2.

The plan includes installing targeted breaker additions and replacements at various stations. The upgrades and replacements proposed in GLL's plan will extend the life of the Transmission Assets and increase the reliability of the system. To understand the impact of improving the reliability of the Transmission Assets, I examined 6 years of historical outage data of the Transmission Assets and then quantified the amount of load lost as a result of those outages. The historical data includes outages resulting from major events such as Hurricane Laura and Delta. Based on this historical data, I calculated the average occurrence of an outage and the average amount of load lost as a result of an outage for a given year and estimated the amount of load loss in the future assuming the historical trends continue. This estimate is conservative as it does not factor in any future load growth on the system and does not increase the rate of occurrence that will result as the Transmission Assets continue to age. GLL expects to reduce the frequency and/or duration of non-major storm outages by 37% through the upgrade and replacement plan. Additionally, GLL expects to reduce the duration of major events by 13% by implementing best practices established by our affiliate, Florida Power & Light Company and improved operational flexibility. Based on the historical outage information and GLL's expected improvement,

Louisiana customers will see loss of load amount reduced by over 1,100 megawatt hours over 10 years. Combining the projected reduced loss of load amount with MISO's current system value of lost load (VOLL), which is $35,000 MWh, I estimate a benefit of approximately $39.8M over the next 10 years.

As previously explained, the transfer of the Transmission Assets to GLL, and the operational control to MISO, will enable the Assets to be included in MISO transmission planning models and activities. MISO only has visibility into assets that are under their operational control. Therefore, transmission facilities in Louisiana, such as the Transmission Assets, that are not under the operational control of MISO not only are not visible to MISO, but the assets are also not considered in transmission planning, including solutions for reliability issues and economic constraints. Such a lost transmission planning opportunity comes at a cost. The historical example was a missed opportunity to save customers $62.5M. I do not expect joint planning to result in a more optimized transmission solution every year. The greater Lafayette area served by SLEMCO, Entergy, Cleco, and LUS continues to grow and there will be the need to increase the transmission capacity from the 500 kV north of Lafayette to the south. Although the exact need and solution is unknown at this time, if the Transmission Assets are utilized on a scale similar to the past example, we can expect a savings of $43.5M in the next 10 years.

In summary, the transfer of the Transmission Assets to GLL will benefit the Louisiana ratepayers by over $103.7M over 10 years. This estimate is based on the three categories of savings I previously described: (1) integration & compliance cost savings ($20.4M); (2)

reduced expected unserved energy savings ($39.8M); and (3) Joint planning savings ($43.5M).

Q. DOES THIS CONCLUDE YOUR PREFILED DIRECT WRITTEN TESTIMONY?

A. Yes.

BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

DOCKET NO. U-

SOUTHWEST LOUISIANA ELECTRIC MEMBERSHIP CORPORATION AND GRIDLIANCE LOUISIANA, LLC'S JOINT APPLICATION

AFFIDAVIT OF WITNESS

I, Patrick Jehring, being duly sworn, depose that the Direct Testimony in the above referenced matter on behalf of Gridliance Louisiana, LLC is true and correct to the best of my knowledge, information and belief.

Patrick Jehring

Subscribed and sworn before me on February 24, 2025

NOTARY PUBLIC SEAL STATE OF INDIANA
HEMALKUMAR PATEL
Commission Number NP0757123
My Commission Expires
June 19, 2032

Hemalkumar Patel

Southwest Louisiana Electric Membership Corporation (SLEMCO)

FERC 7 Factor Analysis

PUBLIC VERSION

GridLiance®

A NEXTERA ENERGY TRANSMISSION COMPANY

February 2025

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Executive Summary

Southwest Louisiana Electric Membership Corporation (SLEMCO) is a member owned electric cooperative with over 117,000 members serving southwestern Louisiana. SLEMCO is currently not a transmission owner in MISO and none of their transmission is under MISO's functional control. SLEMCO has several substation assets that are currently owned by Pelican South Central LLC, formerly CLECO-Cajun and will revert back to SLEMCO ownership on April 1, 2025. SLEMCO intends to sell a subset of these substation assets to GridLiance Louisiana, LLC (GLL).

As part of the transaction, GridLiance applied the FERC 7 Factor Test to each of the stations to determine if the assets should be considered Transmission and thus be eligible for inclusion to MISO. The results of applying the FERC 7 Factor Test are shown in Table 1. Each of the nine stations GLL intends to purchase fail all seven factors and should be classified a transmission.

Table 1: Summary of 7 Factor Determination for the Stations

Station	FERC 7 Factor Determination							
	1	2	3	4	5	6	7	Conclusion
Crowley	Fail	Fail	Fail	Fail	Fail	Fail	Fail	**Transmission**
East Opelousas	Fail	Fail	Fail	Fail	Fail	Fail	Fail	**Transmission**
Hebert	Fail	Fail	Fail	Fail	Fail	Fail	Fail	**Transmission**
Judice	Fail	Fail	Fail	Fail	Fail	Fail	Fail	**Transmission**
Krotz Springs	Fail	Fail	Fail	Fail	Fail	Fail	Fail	**Transmission**
LeBlanc Bulk	Fail	Fail	Fail	Fail	Fail	Fail	Fail	**Transmission**
Scanlan	Fail	Fail	Fail	Fail	Fail	Fail	Fail	**Transmission**
Semere Road	Fail	Fail	Fail	Fail	Fail	Fail	Fail	**Transmission**
Vatican	Fail	Fail	Fail	Fail	Fail	Fail	Fail	**Transmission**

Background

SLEMCO is a member owned electric cooperative with over 117,000 members serving southwestern Louisiana and an aggregate system peak of approximately 797 megawatt (MW) in December 2022 which occurs in the Winter. SLEMCO is currently not a transmission owner in MISO and none of their transmission is under MISO's functional control.

Description of Pelican Buy-back Assets

SLEMCO has several substation assets that are currently owned by Pelican South Central LLC, formerly CLECO-Cajun and SLEMCO will acquire ownership of the assets on April 1, 2025. SLEMCO intends to sell a subset of these assets to GLL. A list of the transmission assets GLL is seeking to purchase and integrate into MISO is shown in Table 2 with a detailed description of the assets provided in the subsequent sections.

Table 2: SLEMCO Transmission Assets

Station	Highest kV	Lowest kV	Year Constructed
Crowley	138 kV	25 kV	1992
East Opelousas	138 kV	25 kV	2003
Hebert	138 kV	25 kV	1979
Judice	138 kV	138 kV	1982
Krotz Springs	138 kV	13.8 kV	1982
LeBlanc Bulk	138 kV	138 kV	1968
Scanlan	138 kV	25 kV	1987
Semere Road	138 kV	138 kV	1984
Vatican	138 kV	25 kV	1976

Crowley

As shown in A1: Crowley, Crowley is in Acadia Parish and has Entergy's Richard 138 kilovolt (kV) line coming in from the northwest and Entergy's Scott 138 kV line coming in from the east. In addition to the two Entergy 138 kV lines, Crowley has a single 138/25 kV transformer which feeds SLEMCO's distribution system and serves their retail customers.

GridLiance ownership starts at the dead-end structures for the incoming Entergy 138 kV lines from Richard and Scott and ends at SLEMCO's disconnect switches on the high-side of the 138/25 kV transformer. GridLiance ownership is shown in B1: Crowley Station One-line denoted by a red bubble.

East Opelousas

As shown in A2: East Opelousas, East Opelousas is in St. Landry Parish and has Entergy's Colton 138 kV line coming in from the southwest and Entergy's Champagne 138 kV line coming in from the northeast. In addition to the two Entergy 138 kV lines, East Opelousas has two 138/25 kV transformers which feed SLEMCO's distribution system and serves their retail customers.

GridLiance ownership starts at the dead-end structures for the incoming Entergy 138 kV lines from Scott and Champagne and ends at SLEMCO's disconnect switches, labeled 5032 and 5033, on the high-side of the 138/25 kV transformers. GridLiance ownership is shown in B2: East Opelousas Station One-line denoted by a red bubble.

Hebert

As shown in A3: Hebert, Hebert is in Acadia Parish and has Entergy's Henning 138 kV line coming in from the west and Entergy's Bayou Cove 138 kV coming in from the northeast. In addition to the two Entergy 138 kV lines, Hebert has two 138/25 kV transformers which feed SLEMCO's distribution system and serves their retail customers.

GridLiance ownership starts at the dead-end structures for the incoming Entergy 138 kV lines from Bayou Cove and Lake Charles Bulk and ends at SLEMCO's disconnect switches, labeled 5070 and 5071, on the high-side of the 138/25 kV transformers. GridLiance ownership is shown in B3: Hebert Station One-line denoted by a red bubble.

Judice

As shown in A4: Judice, Judice is in Lafayette Parish and has Entergy's Scott 138 kV line coming in from the north and Entergy's Meaux 138 kV line coming in from the south. In addition to the two Entergy 138 kV lines, Judice has two radially operated 138 kV line that, one going west to Rayne and another going east to Mouton.

GridLiance ownership starts at the dead-end structures from the incoming Entergy lines from Scott and Meaux and extends to the metering equipment on the other side of the air break switch labeled 18342 and 18531. GridLiance ownership is shown in B4: Judice Station One-line denoted by a red bubble.

Krotz Springs

As shown in A5: Krotz Springs, Krotz Springs is in St. Landry Parish and has Entergy's Bobcat 138 kV line coming in from the west and Entergy's Colonial Springs 138 kV line coming in from the east. In addition to the two Entergy 138 kV lines, Krotz Springs has a radially operated 138 kV line going to the northwest to Teche Vermillion Fresh Water District pump station as well as two 138/25 kV transformers which SLEMCO's distribution system and served retail and industrial customers.

GridLiance ownership starts at the dead-end structures from the incoming Entergy 138 kV lines from Champagne and Wilbert and extends up to SLEMCO's air break switches labeled 7120, 7121, and 7122. GridLiance ownership is shown in B5: Krotz Springs Station One-line denoted by a red bubble.

LeBlanc Bulk

As shown in A6: LeBlanc Bulk, LeBlanc Bulk is in Allen Parish and has Entergy's Abbeville 138 kV line coming in from the northwest, Entergy's Delcambre Rural 138 kV line coming from the east and a connection to Entergy's adjacent Conrad 138 kV station. In addition to the three Entergy 138 kV connections, LeBlanc Bulk has a radially operated 138 kV line going north to SLEMCO's Youngsville station. LeBlanc Bulk is not electrically connected to SLEMCO's LeBlanc 69 kV although it is physically nearby.

GridLiance ownership starts at the dead-end structures from the incoming Entergy 138 kV lines from Delcambre and Abbeville and extends up to SLEMCO's air break switch labeled J0684. GridLiance ownership is shown in B6: Leblanc Bulk Station One-line denoted by a red bubble.

Scanlan

As shown in A7: Scanlan, Scanlan is in Acadia Parish and has Entergy's Acadia 138 kV line from the northwest and Entergy's Bosco 138 kV line coming from the southeast. In addition to the two Entergy 138 kV lines, Scanlan has two 138/25 kV transformers which feed SLEMCO's distribution system and serves their retail customers.

GridLiance ownership starts at the dead-end structures from the incoming Entergy 138 kV lines from Scott and Acadia and extends up to SLEMCO's air break switches labeled J0581 and 18448. GridLiance ownership is shown in B7: Scanlan Station One-line denoted by a red bubble.

Semere Road

As shown in A8: Semere Road, Semere Road is in St. Martin Parish and has Entergy's Scott 138 kV line coming from the southwest and Entergy's Cecelia 138 kV line coming from the northwest. In addition to the two Entergy 138 kV lines, Semere Road has a radially operated 138 kV line going north to SLEMCO's Cecelia station.

GridLiance ownership starts at the dead-end structures for the incoming Entergy 138 kV lines from Entergy's Cecilia and Scott stations and extends up to SLEMCO's switch labeled 18404. GridLiance ownership is shown in B8: Semere Road Station One-line denoted by a red bubble.

Vatican

As shown in A9: Vatican, Vatican is in Lafayette Parish and has Entergy's Bloomfield 138 kV line coming from the north and Entergy's Scott 138 kV line coming from the south. In addition to the two Entergy 138 kV lines, Vatican has two radially operated 138 kV lines going east to SLEMCO's East Rayne and west to U.J. Gajan as well as two 138/25 kV transformers which serves SLEMCO's distribution system and retail customers.

GridLiance ownership starts at the dead-end structures for the incoming Entergy 138 kV lines from Bloomfield and Scott and extends to the metering equipment up to SLEMCO's air break switch labeled 18529. GridLiance ownership is shown in B9: Vatican Station One-line denoted by a red bubble.

FERC 7 Factor Analysis

The FERC 7 Factor Test is a set of criteria used to determine if an electrical facility should be classified transmission or distribution. Failing a factor indicates that the facility is not distribution and should be classified transmission. Ideally, an electrical facility would fail all 7 factors and thus be considered transmission; however, even if the facility passes some factors it is possible for it to be considered transmission. Each 7 Factor Test is unique and the totality of the situation must be considered. A list of all 7 factors is shown in Table 3.

Table 3: FERC 7 Factors

Factor #	FERC Factor (per FERC Order 888)
1	Local distribution facilities are normally in close proximity to retail customers
2	Local distribution facilities are primarily radial in character
3	Power flows into local distribution systems and it rarely, if ever, flows out
4	When power enters a local distribution system, it is not re-consigned or transported on to some other market
5	Power entering a local distribution system is consumed in a comparatively restricted geographical area
6	Meters are based at the transmission/local distribution interface to measure flows into the local distribution system
7	Local distribution systems are of reduced voltage

Factor 1: Local distribution facilities are normally in close proximity to retail customers

To assess the stations from the perspective of Factor #1 their electrical configuration and physical location is reviewed to characterize their "proximity" to SLEMCO's retail customers. Per FERC's order, in ER19-776-001, FERC references the Henderson Municipal's system noting that the Henderson Municipal transmission assets are located both within and outside of the Municipal boundary, which to a degree, bounds Henderson's electric service territory. Specifically, FERC states: