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LA Public Service Commission

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November 25, 2025

VIA HAND DELIVERY

Mr. Brandon Frey
Executive Secretary
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North Fifth Street
Baton Rouge, Louisiana 70802

Re: Docket No. U-_____, Dixie Electric Membership Corporation, Amite Solar, LLC, and Amite Energy Storage, LLC, ex parte. Joint Application for Certification and Approval of Battery Energy Storage Agreement and Related Amendment No. 3 to Amite Solar Power Purchase Agreement, and Request for Expedited Review, including a Request for 15-day Intervention and Protest Period.

Dear Secretary Frey:

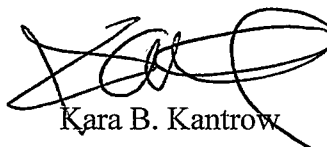
Attached please find for filing the Joint Application of Dixie Electric Membership Corporation (“DEMCO”), Amite Solar, LLC, and Amite Energy Storage, LLC (collectively, “Applicants”). In this Application, the Applicants respectfully request that the Louisiana Public Service Commission (“LPSC” or “Commission”) approve the proposed Energy Storage Agreement, Amendment No. 3 to the Amite Solar Power Purchase Agreement, and an exception from the Request for Proposals requirement of the Commission’s 1983 and Market-Based Mechanisms General Order, and establish an expedited procedural schedule. The Applicants further request publication of notice of this Application in the next LPSC Official Bulletin (No. 1364) and a **15-day intervention and protest period.**

ROUTE TO _____ ROUTE FROM _____
DEPT. Bull ^{15 day} DATE 11/26 DEPT. _____
DEPT. _____ DATE _____ DEPT. _____
DEPT. _____ DATE _____ DEPT. _____

Please note that any materials designated as Confidential or Highly Sensitive Protected Materials (“HSPM”) are **being submitted under seal pursuant to Rule 12.1 of the Commission’s Rules of Practice and Procedure.**

Should you have any questions regarding this filing or require additional information, please do not hesitate to contact me. Thank you for your consideration and attention to this matter.

Sincerely,



Kara B. Kantrow

Enclosures: as stated

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BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

DIXIE ELECTRIC MEMBERSHIP CORPORATION,
AMITE SOLAR, LLC, AND
AMITE ENERGY STORAGE, LLC,
EX PARTE

LA Public Service Commission
DOCKET NO. U-_____

In re: Joint Application for Certification and Approval of Battery Energy Storage Agreement and Related Amendment No. 3 to Amite Solar Power Purchase Agreement and Request for Expedited Review.

**JOINT APPLICATION FOR CERTIFICATION AND APPROVAL
OF BATTERY ENERGY STORAGE AGREEMENT AND RELATED AMENDMENT
NO. 3 TO AMITE SOLAR POWER PURCHASE AGREEMENT
AND REQUEST FOR EXPEDITED REVIEW**

NOW BEFORE the Commission, through undersigned counsel, come Dixie Electric Membership Corporation (“DEMCO” or “Cooperative”), a member-owned electric distribution cooperative organized and existing under the laws of the State of Louisiana and domiciled in East Baton Rouge Parish, Louisiana, Amite Solar, LLC (“Amite Solar”), a Delaware limited liability company, and Amite Energy Storage, LLC (“Amite ES”), a Delaware limited liability company¹ (collectively, “Amite Companies”; together with DEMCO, “Applicants”), who jointly submit this Application to the Louisiana Public Service Commission (“Commission”) for (1) certification and approval of a Battery Energy Storage Agreement (“ESA”) between DEMCO and Amite ES; (2) certification and approval of Amendment No. 3 to the original Amite Solar Power Purchase Agreement (“Amite Solar PPA”) between DEMCO and Amite Solar; and (3) a request for expedited review.

¹ Amite Solar and Amite ES are indirect wholly owned subsidiaries of NextEra Energy Resources, LLC.

1.

INTRODUCTION

DEMCO and the Amite Companies jointly submit this Application to the Commission for certification and approval of the ESA between DEMCO and Amite ES, and Amendment No. 3 to the Amite Solar PPA between DEMCO and Amite Solar, resulting in the Amended and Restated Amite Solar PPA (collectively, “Amendment No. 3”). Additionally, the Applicants request expedited consideration of this Application and a decision no later than the Commission’s February 2026 Business and Executive Session to enable timely interconnection, support MISO reliability planning, and enhance Louisiana’s resource adequacy ahead of the 2027/2028 winter peak season. Together, these agreements support construction of a 100-megawatt (“MW”) / 400-megawatt-hour (“MWh”) battery energy storage system (“Amite BESS”) co-located with the existing Amite Solar facility in Tangipahoa Parish. The project will enhance grid reliability, lower costs, and provide another source of physical capacity for DEMCO’s members and the Amite South region as a whole.

2.

THE PARTIES

DEMCO is a Louisiana not-for-profit electric membership cooperative serving approximately 120,000 meters across 9,200 miles of power lines in seven parishes –Ascension, East Baton Rouge, East Feliciana, Livingston, Saint Helena, Tangipahoa, and West Feliciana. The Cooperative provides safe, reliable, and affordable electricity under the direction of a 13-member Board of Directors elected by its member-owners.

Amite Solar and Amite ES are the counterparties to the Amite Solar PPA and Amite BESS ESA, respectively.

3.

BACKGROUND

In Docket No. U-36133, the Commission approved DEMCO's Full Requirements Power Supply Agreement ("FRPSA") with NextEra Energy Marketing, LLC and the Amite Solar PPA. Amendment No. 3 would integrate the Amite BESS into DEMCO's supply portfolio. DEMCO and the Amite Companies request certification and approval of these updated agreements as prudent, cost-effective additions consistent with prior Commission precedent.

This Application comes in the wake of recent reliability events within the Amite South load pocket, including the May 25, 2025, load shed event investigated by the Commission in Docket No. X-37608. Those events highlighted the region's acute transmission import limitations and demonstrated the need for fast-responding local resources capable of supporting voltage and system stability during emergencies.

The Amite South load pocket is a geographically constrained region encompassing southeastern Louisiana, including many of the parishes DEMCO serves. It is characterized by limited transmission import capability and heavy dependence on local generation to maintain reliability. MISO and Commission Staff have both recognized that during outages or high-load conditions, the Amite South load zone faces heightened risk of instability and forced load shedding.

The Amite BESS may help mitigate these constraints by providing instantaneous local dispatch capability within the Amite South load pocket, helping transmission operators manage

contingencies and support MISO's reliability operations without resorting to involuntary load shedding and thereby lowering the risk that thousands of families and businesses lose electric service.

4.

CERTIFICATION REQUIREMENT AND REGULATORY FRAMEWORK

This Application is submitted under the Commission's General Order dated September 20, 1983, as amended most recently by the Commission's Corrected General Order No. R-30517 dated May 27, 2009, (the "1983 General Order"). The 1983 General Order requires certification that long-term purchase power or capacity agreements serve the public convenience and necessity and are prudent and reasonable.

5.

PROJECT SUMMARIES

A. Amite BESS

Amite BESS is a 100 MW/400 MWh facility that will charge primarily from the MISO grid and discharge during peak demand. The facility will share existing interconnection and substation infrastructure, lowering costs, and expediting time-to-market. The ESA provides an approximate 23-year delivery term, fixed monthly payments, and a target commercial operation date in late 2027, which could be accelerated to mid-2027 if expedited Commission approval is obtained.

Amite BESS will act as a local reliability and flexibility asset for the Amite South load pocket. Located behind the same interconnection as the Amite Solar project, Amite BESS will be able to inject up to 100 MW of power to the electric grid within seconds, providing frequency

support and voltage regulation when import constraints limit external supply. During non-emergency periods, the Amite BESS will absorb excess generation, flattening peaks and reducing MISO congestion costs.

Given its location inside a constrained load pocket, this project cannot be replicated elsewhere without substantial new transmission investment. The Amite Companies' site uniquely integrates existing solar interconnection and control infrastructure, making the Amite Companies the only feasible provider capable of deploying a storage asset that can be operational within the MISO reliability window.

B. Amendment No. 3 to Amite Solar PPA

Amendment No. 3 updates the Amite Solar PPA to reflect co-located battery operations, slightly extend the delivery term, and clarify curtailment, shared facility, and financing provisions. It also adds Commission approval as a condition precedent. Together, the ESA and Amendment No. 3 ensure coordinated operation and long-term economic efficiency.

6.

REQUEST FOR EXCEPTION TO FORMAL RFP PROCESS

Pursuant to Section 3 of the Final Rule attached to the Commission's Market-Based Mechanism General Order No. R-34247 dated October 14, 2024 (the "MBM General Order"),² Applicants request an exception from the formal Request for Proposals ("RFP") process as such a process would serve no useful purpose and would not be in the public interest. The Amite Companies are the only developer capable of constructing the co-located Amite BESS because it controls the Amite Solar site and interconnection. Competitive solicitation would duplicate costs,

² The MBM General Order amends and supersedes all previous versions of the MBM General Order.

delay the project, provide no practical alternative, and not be appropriate for this unique opportunity. In addition, it is unlikely alternative projects would be able to come online as quickly or economically as Amite BESS to begin with, given the ability of a surplus-interconnected project to avoid the interconnection queue, network upgrades, and incremental infrastructure costs.

Additionally, under Section 2(g) of the Commission's MBM Order, an RFP is not required in this instance because this Application contemplates an expansion of capacity for resources previously certified by the Commission.

7.

PURPOSE, NEED, AND PUBLIC INTEREST

Amite BESS will provide measurable reliability improvements to a transmission-constrained load zone that has experienced emergency redispatch and load shed events. As detailed in the attached Pre-Filed Direct Testimonies, the Amite BESS will:

- (i) Reduce the frequency and magnitude of MISO load shed orders in the Amite South load pocket;
- (ii) Provide fast-response, grid-forming support that mitigates voltage collapse risk;
- (iii) Enhance DEMCO's compliance with the Commission's Minimum Capacity Obligation;
- and
- (iv) Strengthen local grid resilience during storm-related or transmission outages.

The integration of solar and battery storage at a single interconnection point maximizes existing infrastructure, reduces land disturbance, and represents the least-cost, most prudent solution available to DEMCO.

Further, Commission Staff's After-Action Report on the May 25, 2025, load shed event in Entergy and Cleco service territories (See LPSC Docket X-37608) underscored that "Amite South is recognized by MISO as a distinct load pocket because of its limited transmission import capability and reliance on a finite set of local generating resources to maintain reliability" (After-Action Rpt., p. 32). The Amite BESS directly addresses this need by introducing a dispatchable local capacity resource that supports MISO operations in such circumstances.

8.

CONSISTENCY WITH COMMISSION POLICY

This Application complies with the 1983 General Order and the MBM General Order. Together, these General Orders require resource certification and authorize RFP exceptions where competitive procurement would serve no useful purpose. The Amite BESS ESA and Amendment No. 3 meet these standards and advance Commission goals of prudent investment and reliable service. Further, the Amite BESS will reduce exposure to forced load shedding, promote least-cost reliability solutions, and complement MISO's ongoing transmission expansion efforts.

9.

SUPPORTING TESTIMONIES AND EXHIBITS

In support of the Application, the Applicants attach to and make part of this Application the following Pre-Filed Direct Testimonies and Exhibits:

- **Exhibit A:** CONFIDENTIAL ESA.
- **Exhibit B:** CONFIDENTIAL Amendment No. 3.
- **Exhibit C:** Confidentiality Agreement.
- **Exhibit D:** CONFIDENTIAL Pre-Filed Direct Testimony of Mr. Jeffrey J. Andry, Jr.

- **Exhibit E**: **CONFIDENTIAL** Pre-Filed Direct Testimony of Mr. Travis J. Stewart.
- **Exhibit F**: **CONFIDENTIAL** Pre-Filed Direct Testimony of Mr. Ronnie J. Donaldson.
- **Exhibit G**: Pre-Filed Direct Testimony of Mr. Karl Kremser.
- **Exhibit H**: **CONFIDENTIAL** Pre-Filed Direct Testimony of Mr. Jeffrey Plew.

10.

DEMCO BOARD APPROVAL

The requests herein have been approved by DEMCO’s Board of Directors (“Board”). The Board has a fiduciary obligation to make decisions in the best interests of the Cooperative and its members, which includes ensuring that adequate capacity resources are in place to maintain reliability of electric service to acceptable standards.

11.

NOTICES, CONFIDENTIALITY, AND INTERVENTION PERIOD

Applicants request that all notices, correspondence, filings, discovery, and other communications concerning this matter be directed to the following persons:

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 Facsimile: (225) 757-1709
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and

Thomas D. Gildersleeve
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Applicants also request that the foregoing individuals be placed on the Official Service List of this proceeding.

12.

Portions of the testimonies and exhibits supporting the Application contain information considered by the Applicants to be proprietary and confidential. Therefore, the Applicants request protective treatment and exemption from public disclosure of all information marked “Confidential” or “HSPM” pursuant to Rule 12.1 of the Commission’s Rules of Practice and Procedure.

13.

The Applicants respectfully request that notice of this filing be published in the Commission’s next Official Bulletin and that interested parties be given **fifteen (15) days** to file any notice of intervention and/or protest in this proceeding.

14.

PRAYER FOR RELIEF AND EXPEDITED CONSIDERATION

WHEREFORE, Applicants respectfully pray that the Commission:

1. Grant this Application;
2. Certify and approve the ESA between DEMCO and Amite ES;
3. Certify and approve Amendment No. 3 to the Amite Solar PPA between DEMCO and Amite Solar;
4. Grant the Amite BESS ESA an exception from the formal RFP requirement under the Commission's MBM General Order;
5. Authorize cost recovery of the Amite BESS ESA through DEMCO's Wholesale Power Cost Adjustment or other applicable mechanism;
6. Grant expedited consideration of this Application and issue an order approving DEMCO's requests in this matter before March 2026; and
7. Grant the Applicants all other general and equitable relief.

[signatures to follow]

Respectfully submitted,

MARIONNEAUX KANTROW, LLC

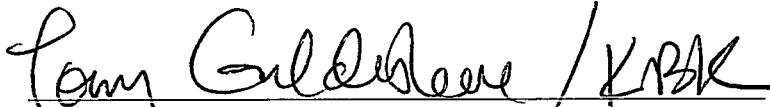


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and

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