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February 11, 2026

VIA HAND DELIVERY

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

RECEIVED

FEB 11 2026

LA Public Service Commission

Re: *In Re: Application of Entergy Louisiana, LLC for Approval to Construct Waterford 6 Power Station and Westlake Power Station, and for Cost Recovery (LPSC Docket No. U-_____)*

Dear Mr. Frey:

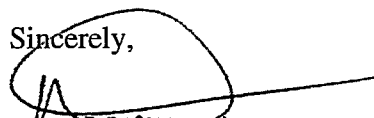
I have enclosed, on behalf of Entergy Louisiana, LLC (“ELL” or the “Company”), the original and three copies of the Company’s Application for Approval to Construct Waterford 6 Power Station and Westlake Power Station, and for Cost Recovery. The Application is supported by the Direct Testimony and Exhibits of Michael J. Plaisance, Chad J. Ladner, Jeremy Halland, Nicholas D. Pressler, Phong D. Nguyen, and Patrick A. Sullivan. Please retain the original and two copies for your files and return a date-stamped to our courier.

Please note that the filing contains information that is designated Highly Sensitive Protected Material (“HSPM”), which is being provided to you under seal pursuant to the provisions of the LPSC General Order dated August 31, 1992, and Rules 12.1 and 26 of the Commission’s Rules of Practices and Procedures. The confidential materials included in the filing consist of competitively sensitive information and customer-specific confidential information. For this reason, this material is confidential and commercially sensitive. The disclosure of the information contained herein would subject not only the Company, but also its customers, to a substantial risk of harm. Furthermore, the Application contains “CEII”. Accordingly, it is critical that both the confidential and CEII information remain confidential. This information relates to sensitive electric infrastructure information and must also be protected.

Please retain the appropriately marked Confidential Version for your files and return a date-stamped copy to me in the enclosed, self-addressed envelope. Additional copies of the Confidential Version of this filing will be provided to appropriate representatives of the LPSC Staff and made available to other interested parties once a suitable Confidentiality Agreement has been executed.

If you have any questions, please do not hesitate to call me. Thank you for your courtesy and assistance with this matter.

Sincerely,


 Michael R. Dodson

ROUTE FROM

MRD/jlc
 Enclosures
 cc: LPSC Commissioners (*public version only via electronic mail*)

DEPT. <u>Bill</u>	DATE <u>2/12/26</u>	DEPT. _____
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FEB 11 2026

BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

LA Public Service Commission

**IN RE: APPLICATION OF ENTERGY)
LOUISIANA, LLC FOR APPROVAL TO)
CONSTRUCT WATERFORD 6 POWER)
STATION AND WESTLAKE POWER)
STATION, AND FOR COST RECOVERY)**

DOCKET NO. U-_____

**APPLICATION OF ENTERGY LOUISIANA, LLC FOR APPROVAL TO CONSTRUCT
WATERFORD 6 POWER STATION
AND WESTLAKE POWER STATION, AND FOR COST RECOVERY**

Pursuant to the Rules of Practice and Procedure of the Louisiana Public Service Commission (the “LPSC” or the “Commission”), Entergy Louisiana, LLC (“ELL” or “the Company”) respectfully submits this Application seeking, among other things, approval to construct the Waterford 6 Power Station (“WF6”) and Westlake Power Station (“Westlake”) (collectively with WF6, the “Proposed Generators”), and associated cost recovery, as set forth herein. In support of this Application, ELL submits the following:

OVERVIEW OF THE APPLICATION

I.

ELL is a limited liability company duly authorized and qualified to do and doing business in the State of Louisiana, created and organized for the purposes, among others, of generating, transmitting, distributing, and selling electricity for power, lighting, heating, and other such uses; and ELL is engaged in the business thereof in fifty-eight (58) of the sixty-four (64) parishes of the State of Louisiana.

II.

Through this Application, ELL seeks authorization to construct the Proposed Generators, two 754 megawatt (“MW”) (ISO)¹ Combined Cycle Combustion Turbine (“CCCT”) units to assist with the Company’s base supply needs. As set forth in the Direct Testimony accompanying this Application, the Proposed Generators were selected from a Request for Proposals (“RFP”) issued in 2024 seeking certain resources for the region referenced by the Midcontinent Independent System Operator, Inc. (“MISO”) as Local Resource Zone 9 (LRZ 9”) (the “2024 CCCT RFP”).

III.

As set forth more fully in the Direct Testimony of Michael J. Plaisance, the 2024 CCCT RFP was conducted in accordance with certain findings included in the Company’s most recent, final version of its Integrated Resource Plan that was submitted to the Commission in 2023 (the “2023 Final IRP”), specifically, that the Company should develop or procure new CCCTs for service when large legacy dispatchable gas units were assumed to deactivate. As Mr. Plaisance also explains, since the time the 2023 Final IRP was submitted (and the 2024 CCCT RFP was conducted), the Company’s need for additional energy and capacity has increased. The Proposed Generators are critical to providing continued reliable electric service for all the Company’s customers in light of anticipated unit deactivations and load growth.

IV.

The Company supports its Application with the Direct Testimony of Michael J. Plaisance, Nicholas D. Pressler, Chad J. Ladner, Jeremy Halland, Phong D. Nguyen, and Patrick A. Sullivan as well as the exhibits attached to each witness’s testimony. The Company asks that the

¹ ISO refers to the applicable standard set by the International Organization for Standardization. Company witness Nicholas D. Pressler discusses the ISO standard in his Direct Testimony.

Commission timely certify that construction and deployment of the Proposed Generators is in the public interest and necessity pursuant to the provisions of the Commission’s 1983 General Order.²

THE PROPOSED GENERATORS AND THE 2024 CCCT RFP

V.

The Company seeks approval to construct two new CCCT generators: the Waterford 6 Power Station (“WF6”) at the Company’s existing Waterford site near Killona, Louisiana, and the Westlake Power Station (“Westlake”) at the Company’s existing Roy S. Nelson site in Westlake, Louisiana. If approved, the Proposed Generators would add approximately 1,500 MW of CCCT capacity and energy to ELL’s generation portfolio—and importantly would add such capacity and energy in certain load pockets referred to by the Company as the Amite South Planning Area and the West of the Atchafalaya Basin (“WOTAB”) Planning Area, both of which are currently served (in part) by aging generation and are experiencing substantial industrial load growth.

VI.

As Mr. Plaisance explains, the Company determined in its 2023 Final IRP that the “Portfolio 1” evaluated in that IRP was the planned portfolio that offered the most economic and reliable combination of resources satisfying the Company’s then-applicable forecasted load requirements. Portfolio 1 notably included, among other potential resource additions, the addition of new CCCTs when large legacy dispatchable gas units were assumed to deactivate.

VII.

As relevant here, and as Mr. Plaisance also explains, the Amite South and WOTAB Planning Areas are served, in part, by such large legacy dispatchable gas units that have exceeded

² The 1983 General Order was amended by General Order dated May 27, 2009, in LPSC Docket No. R-30517, *In re: Possible modifications to the September 20, 1983 General Order to allow (1) for more expeditious certifications of limited-term resource procurements and (2) an exception for annual and seasonal liquidated damages block energy purchases.*

their original expected useful lives. Specifically, Amite South is served in part by Little Gypsy Units 2 and 3, while WOTAB is served in part by Nelson Station, Unit 6 (“N6”).

VIII.

Since the time the 2023 Final IRP was submitted to the Commission, the Company’s energy and capacity needs have grown. As Mr. Plaisance explains, market conditions in LRZ 9 have tightened considerably in recent years, and the Company is anticipating a significant need for additional capacity and energy in the future. Indeed, as Mr. Plaisance describes in his Direct Testimony, assuming all pending resources (which do not include the Proposed Generators) are approved by the Commission,³ and using ELL’s Summer Season Accredited Capacity (“SAC”), ELL will need additional capacity over the next decade under normal business planning conditions.⁴

IX.

As Mr. Plaisance explains, a significant amount of growth is happening in the Amite South and WOTAB load pockets specifically. In the Amite South region, Hyundai Motor Group announced a decision in March 2025 to construct a \$5.8 billion, ultra-low carbon steel production mill to be located on approximately 1,700 acres in Donaldsonville, Louisiana,⁵ while CF Industries, Inc. (the world’s largest producer of ammonia) and its partners announced in April 2025 an approximately \$4 billion final investment decision to establish a low-carbon ammonia facility

³ This does not include the demand response (“DR”) resources that are the subject of the Application in Docket No. U-37595, *In re: Request for approval of Demand Response Programs, and Cost Recovery*.

⁴ ELL also recently submitted its January 21, 2026, ELL 2027 IRP Data Filing in LPSC Docket I-37764, in which the Company demonstrated that its peak load forecast—consisting of MISO Summer Season coincident peak estimates from the Company’s Business Plan 2026 (“BP26”)—includes an expectation of 13,915 MW of peak load in 2030 and 14,740 MW in 2035—a significant increase from the load forecasts included in the Final 2023 IRP. The final version of the next iteration of the Company’s IRP will be submitted in 2027.

⁵ See March 24, 2025, Louisiana Economic Development, “Louisiana Wins Again,” Governor Jeff Landry & LED Secure \$5.8 Billion Hyundai Steel Mill, available at <https://www.opportunitylouisiana.gov/news/louisiana-wins-again-governor-jeff-landry-led-secure-5-8-billion-hyundai-steel-plant>.

on the West Bank of Ascension Parish, Louisiana—an ammonia facility that will be the largest facility of its kind in the world.⁶ In the WOTAB region, Woodside Energy Group recently announced its \$17.5 billion final investment decision to establish a new LNG production and export facility in Calcasieu Parish, Louisiana (the same parish in which Lake Charles is located).⁷

X.

Following submission of the 2023 Final IRP to the Commission, and recognizing the need for additional capacity, the Company conducted, among other RFPs,⁸ the 2024 CCCT RFP that targeted up to 2,000 MW of capacity, capacity-related benefits, energy, other electric products, and environmental attributes from CCCT generation resources located in MISO LRZ 9. The 2024 CCCT RFP specified that the resources sought by the RFP should have a service commencement date no later than January 1, 2031,⁹ and should provide a minimum of 600 MW (and up to 800 MW), summer rating, of capacity, energy, and related products from a single new-build CCCT.

⁶ See April 8, 2025, Louisiana Economic Development, *Another Louisiana Win: CF Industries, JERA and Mitsui Announce \$4 Billion Final Investment Decision to Construct World's Largest Ammonia Facility in Ascension Parish*, available at <https://www.opportunitylouisiana.gov/news/another-louisiana-win-cf-industries-jera-and-mitsui-announce-4-billion-final-investment-decision-to-construct-worlds-largest-ammonia-facility-in-ascension-parish>.

⁷ See April 27, 2025, Louisiana Economic Development, *Historic Investment Woodside Energy Announces \$17.5 Billion Final Investment Decision for LNG Facility in Southwest Louisiana; Becomes Largest Foreign Direct Investment in State History*, available at <https://www.opportunitylouisiana.gov/news/historic-investment-woodside-energy-announces-17-5-billion-final-investment-decision-for-lng-facility-in-southwest-louisiana-becomes-largest-foreign-direct-investment-in-state-history>.

⁸ As Mr. Plaisance explains, the Company has conducted (and continues to conduct) RFPs seeking a wide variety of resources. Mr. Plaisance provides additional details concerning those RFPs in his Direct Testimony.

⁹ As Company witness Phong D. Nguyen explains, the RFP provided that the Guaranteed Commercial Operation Date for any PPA or Tolling Agreement was required to occur no later than January 31, 2031. The Guaranteed Substantial Completion date for any Build-Own-Transfer proposals was required to occur no later than December 31, 2030.

XI.

In accordance with the requirements of the Order dated October 29, 2008 in LPSC Docket No. R-26172, Sub-Docket C (the “MBM Order”),¹⁰ ESL issued a notice to the LPSC on July 23, 2024, of the Company’s intent to issue a Request for Proposals for Long-Term Developmental Combined-Cycle Combustion Turbine Resources. The Commission assigned Docket No. X-37450 to the proposed RFP. On November 11, 2024, ELL posted draft RFP documents that included the above requirements for the proposals and that further specified that the resources would be required to have a quantity of energy resource interconnection service (“ERIS”) and network resource interconnection service (“NRIS”) that met certain thresholds included in the draft documents.

XII.

As Mr. Plaisance explains, the final RFP documents for the 2024 CCCT RFP were posted on January 27, 2025. Selections from the RFP were announced in August 2025.

XIII.

Company witness Phong D. Nguyen provides details concerning the conduct of the 2024 CCCT RFP, including a description of the RFP evaluation process and the various RFP Evaluation Teams (specifically, the Economic Evaluation Team, the Viability Assessment Team, the Accounting Evaluation Team, and the Transmission Evaluation Team). Mr. Nguyen provides detail and explains the proposals submitted in response to the 2024 CCCT RFP. Mr. Nguyen

¹⁰ See LPSC Docket No. R-26172, Sub-Docket C, *In re: Possible suspension of, or amendments to, the Commission’s General Order dated November 3, 2006 (Market Based Mechanisms Order) to make the process more efficient and to consider allowing the use of on-line auctions for competitive procurement*, as amended October 29, 2008. As Company witness Patrick A. Sullivan also discusses in his Direct Testimony, the MBM Order was amended in October 2024, but those amendments applied prospectively and thus did not apply to the 2024 CCCT RFP, which was initiated before the amendments were approved by the Commission. See generally General Order 10-14-2024 (R-34247) (Oct. 14, 2024), LPSC Docket No. R-34247, *In re: Rulemaking to consider changes to Commission General Order dated October 29, 2008 (Docket No. R-26172 Subdocket C) (“Market Based Mechanisms Order”) to incorporate formal complaint procedures*.

explains the manner in which the proposals submitted in response to the 2024 CCCT RFP were evaluated as well as the various safeguards that were implemented to ensure that the evaluations were performed in a fair and impartial manner. Mr. Nguyen further explains that the Company retained an Independent Monitor (“IM”), Merrimack Energy Group, Inc.—whose final report is attached to Mr. Nguyen’s Direct Testimony—to oversee the conduct of the RFP.

XIV.

As explained by Mr. Nguyen, the evaluation of the proposals submitted in response to the 2024 CCCT RFP revealed that the Proposed Generators consistently deliver the lowest Total Supply Cost and greatest Customer Net Benefits to ELL customers and provide better overall economics than the other proposals evaluated across numerous metrics and sensitivities evaluated. Indeed, as Mr. Nguyen explains, the Proposed Generators were projected to result in net economic benefits to ELL’s customers; Mr. Nguyen also compares these economic results to those of other resource(s) submitted in the 2024 CCCT RFP.

XV.

Notwithstanding the results of the economic evaluation of the proposed tolling agreement, the Company decided to select the Proposed Generators and the tolling agreement—on the basis that the Company has a significant need for additional capacity that the tolling agreement (with the Proposed Generators) could help with satisfying, at least in part, and for additional reasons explained by Mr. Nguyen.

XVI.

As Mr. Plaisance explains in his Direct Testimony, after selections were announced, the Company was unable to reach commercial terms with the third party that proposed the tolling agreement. The Company is thus seeking approval from the Commission to move forward with

construction of the other resources selected as cost-effective options from the 2024 CCCT RFP—specifically, the Proposed Generators.

ADDITIONAL DETAILS CONCERNING THE PROPOSED GENERATORS

XVII.

Company witness Nicholas D. Pressler, who was a member of the Self-Build Commercial Team responsible for preparing the WF6 and Westlake Self-Build Commercial Option Proposals, provides additional detail concerning the Proposed Generators in his Direct Testimony.

XVIII.

As Mr. Pressler explains, CCCT technology provides efficient, around the clock, reliable generating capability that satisfies, in part, the supply needs identified in the Company's 2023 Final IRP and is considered throughout the industry to be the best available technology for limiting greenhouse gas emissions when combusting fossil fuels for electrical generation.

XIX.

As Mr. Pressler describes, each of the Proposed Generators is expected to provide approximately 754 MW (ISO) of CCCT generating capacity and will consist of one Mitsubishi Power Americas ("MPA") 501 JAC combustion turbine ("CT"), one Nooter Eriksen Heat Recovery Steam Generator ("HRSG") with duct firing and selective catalytic reduction ("SCR"), and one MPA steam turbine generator ("STG") in a 1x1 combined-cycle configuration, together with other balance of plant equipment, including the use of an air-cooled condenser ("ACC") for closed-cycle cooling operations. By design, the MPA 501 JAC CT is capable of approximately 30% hydrogen co-firing, with the capability of supporting 100% hydrogen firing in the future with upgrades. In addition, the layouts of the sites for the Proposed Generators can accommodate carbon capture and storage ("CCS") infrastructure and operations in proximity to the site. These

two design capabilities—for hydrogen co-firing and CCS—provide important optionality and help ensure that the CCCT units will be able to provide sustained value for ELL customers for decades to come. Company witness Jeremy Halland also discusses some of the emissions-related practices and features associated with the Proposed Generators in his Direct Testimony, as well as other environmental and permitting-related considerations.

XX.

Both Mr. Pressler and Company witness Chad J. Ladner describe certain characteristics of the locations identified for each of the Proposed Generators. As explained in the testimony accompanying the Application, ELL chose the proposed locations at the existing Waterford and Nelson sites in anticipation of potentially using the MISO replacement generator process to secure NRIS rights for WF6 and Westlake, respectively. Mr. Ladner and Mr. Pressler discuss the replacement generator process in greater detail; at a high level, MISO has established a process pursuant to which load serving entities (like ELL) can use existing interconnection service rights from retiring generation for new, replacement generators, provided (generally) that the new, replacement generator interconnects at the same point of interconnection as the former, retiring unit. As Mr. Pressler explains, locating WF6 at Waterford—across the Mississippi River from the Company’s existing Little Gypsy site—allows for construction of new generation to replace Little Gypsy Units 2 and 3, and therefore to utilize the existing interconnection rights at the Little Gypsy substation from those two legacy units. Similarly, the original intent in selecting the Nelson site for Westlake was to use existing interconnection rights at the Nelson substation from N6; as Mr. Pressler and Mr. Plaisance explain, however, the Company continues to evaluate operations at N6 and is no longer assuming that it will use the replacement generator process to secure NRIS rights at Westlake.

XXI.

As Mr. Pressler explains in detail, although the Company is no longer assuming it will use the replacement generator process for Westlake, the Nelson site remains the most reasonable option for locating a new CCCT generator to serve WOTAB—especially because the Company owns land at Nelson that it can use. As to WF6, both Mr. Pressler and Mr. Ladner discuss that the generator tie-ins for that unit will extend across the Mississippi River to interconnect at the Little Gypsy substation. As Mr. Pressler explains, the Waterford site remains the most reasonable location for siting a new CCCT to serve Amite South, primarily because there is not sufficient land available on the same side of the river as Little Gypsy for the new CCCT and because interconnecting at other locations in Amite South would be expected to trigger significant costs from MISO for upgrades to secure NRIS rights—costs that are otherwise avoided through using the MISO replacement generator process.

XXII.

As Mr. Ladner explains in detail in his Direct Testimony, the anticipated benefits from locating WF6 and Westlake in Amite South and Westlake are unique to those load pockets. According to Mr. Ladner, the Proposed Generators are expected to (1) make the transmission system in the selected areas less dependent on importing power from remote generating resources; (2) provide additional operational flexibility during system restoration following major storm events such as hurricanes; and (3) add dynamic reactive power to the system. These benefits for Amite South and WOTAB would not be realized absent siting the Proposed Generators in those regions.

XXIII.

As set forth by Mr. Ladner in his Direct Testimony, the Company thus proposes certain Generator Tie-Ins for each of the Proposed Generators and also proposes certain Interconnection Upgrades for Westlake to secure NRIS rights. Mr. Ladner also discusses the processes by which ELL is seeking review of the interconnection requests for each of the Proposed Generators by MISO—specifically, the replacement generator process for WF6 and the Expedited Resource Addition Study (“ERAS”) process for Westlake.

XXIV.

As set forth in Mr. Pressler’s testimony, the projected in-service date for WF6 is July 31, 2030, assuming a December 2026 certification from the LPSC and a June 2027 FNTF. The projected in-service date for Westlake is October 31, 2030, assuming a December 2026 certification from the LPSC and a February 2027 FNTF.

XXV.

Mr. Pressler explains that ELL has extensive experience with constructing CCCTs, including by constructing and placing in service J. Wayne Leonard Power Station in 2019 and Lake Charles Power Station in 2020—two CCCTs that, although larger in scale, are substantially similar in design to the Proposed Generators. In addition, ELL completed Ninemile 6 Power Station, another self-build combined-cycle facility, in 2015, roughly 10% under budget and months ahead of its projected in-service date. The Company thus has significant experience on which it can draw in building the Proposed Generators.

XXVI.

As Mr. Pressler also explains, the Company has leveraged results from two other RFPs—an RFP to identify a manufacturer for Power Island Equipment (“PIE”) and to identify potential

Engineering, Procurement, and Construction (“EPC”) contractors (the “EPC RFP”)—for the benefit of the Proposed Generators. In particular, as Mr. Pressler explains, the Company has entered into an Exclusivity Agreement with MPA pursuant to which ELL has secured production queue spots for certain, critical equipment with its preferred provider, and it has also identified two EPC contractors—The Industrial Company (“TIC”)¹¹ for WF6 and Zachry Industrial, Inc. (“ZII”) for Westlake—to complete the work on the Proposed Generators. Indeed, as Mr. Pressler explains, the EPC contractors selected for the Proposed Generators will form an EPC Consortium for each project with MPA, thus allowing for full coordination and scheduling for delivery of the PIE to meet the fixed schedule provided in the pertinent EPC agreements. The EPC Consortiums will also provide a “wrap” (*i.e.*, guarantee) of the schedule and performance commitments for the entirety of each project, providing for risk mitigation if there are delays or performance shortfalls. Moreover, as to WF6, Mr. Pressler explains that the EPC contractor selected for that project is also contracted to perform EPC services for an adjacent plant, Waterford 5, and ELL expects to benefit from having the same contractor for both projects at the Waterford site.

XXVII.

More generally, as Mr. Pressler details in his Direct Testimony, the Company has decided to move forward with EPC contractors for the two projects in order to take advantage of a cost-effective and common practice within the power generation industry. As Mr. Pressler explains, large construction projects such as the Proposed Generators are substantial undertakings, and the Company does not have the in-house capability necessary to execute the scope of the EPC for such a project given the market conditions that we see today.

¹¹ As set forth in Mr. Pressler’s testimony, TIC has formed a joint venture with Sargent & Lundy (“S&L”) named TSL Power Partners (“TSL”), and TSL will be the EPC contractor for WF6.

XXVIII.

As Mr. Pressler explains, the Company worked with the EPC Consortiums for each of the Proposed Generators to prepare updated cost estimates from those that were submitted in response to the 2024 CCCT RFP. Mr. Pressler describes the information that is included in preparing the estimates as well as the process by which the estimates were prepared. As Mr. Pressler sets forth in his Direct Testimony, the total project cost for WF6 is currently estimated to be approximately \$2.027 billion. The total project cost for Westlake is currently estimated to be approximately \$2.091 billion. Mr. Pressler explains that the current estimates are reasonable estimates of the costs for both of the Proposed Generators.

XXIX.

As noted, Mr. Pressler explains the reasons for which the current cost estimates are higher than the estimates submitted in response to the 2024 CCCT RFP. Importantly, Company witness Phong D. Nguyen explains in his Direct Testimony that, even with the updated project costs, both resources are economic and show positive net economic benefits for ELL's customers. As Mr. Nguyen explains, the Proposed Generators would still have been selected out of the 2024 CCCT RFP.

PROPOSED COST RECOVERY

XXX.

Company witness Patrick A. Sullivan provides the estimated first-year revenue requirements for each of the Proposed Generators, including for the Generator Tie-Ins for each unit and, as to Westlake, for the estimated Interconnection Upgrades.

XXXI.

Mr. Sullivan also describes the Company's proposal for recovery of the costs incurred to construct the Proposed Generators. Specifically, as Mr. Sullivan explains, the Company proposes to recover the costs of the Proposed Generators—including the costs of the Generator Tie-Ins, but exclusive of the costs for the Westlake Interconnection Upgrades—pursuant to the provisions and processes associated with the Additional Capacity Mechanism ("ACM") in the Company's current Formula Rate Plan ("FRP"). As to those costs, Mr. Sullivan explains that there would be interim adjustments to rates, followed by a true-up, in accordance with the terms of the ACM. After the true-up, the Evaluation Report for the applicable FRP and corresponding prospective rates will reflect the realignment of the relevant revenue requirements and will be taken into account within the bandwidth calculation of the applicable FRP (*i.e.*, inside of sharing) through the subsequent FRP Evaluation Period with any required change in rates taking effect with the corresponding Evaluation Period rate effective date. As Mr. Sullivan explains, this recovery plan will allow for the synchronization in rates of the costs of the Proposed Generators with the normal FRP cycle, and coordinates recovery from customers of the non-fuel costs at the same time customers receive the fuel savings from the Proposed Generators being placed in service.

XXXII.

As to the costs for the Interconnection Upgrades, the Company proposes that those costs should be recovered through the Transmission Recovery Mechanism ("TRM") and in the normal course of the FRP. Mr. Sullivan also explains that the final cost to customers and associated bill impacts of the Interconnection Upgrades will be less than presented in the testimony due to the inclusion of those upgrades in the Company's MISO Attachment O billings and the collection of

revenues, on account of the upgrades, from wholesale customers taking transmission service in the ELL transmission pricing zone.

XXXIII.

As Mr. Sullivan further explains, in the event that the FRP does not exist in its current or similar form when the Proposed Generators are placed in service, or cost recovery is delayed beyond the dates on which the Proposed Generators are placed in service, the Company requests that it be allowed to defer all non-fuel costs, including a full return on the investment, until such time as those costs are reflected in rates. Such a deferral would include the accrual of carrying charges at the full Commission-authorized rate of return, and the Company proposes that the deferred costs would be recovered over a two-year period beginning contemporaneously with the time that the costs of the Proposed Generators begin to be recovered from customers through rates.

XXXIV.

Similarly, in the event that the FRP does not exist in its current or similar form when the Interconnection Upgrades are placed in service, or cost recovery is delayed beyond the date on which FRP cost recovery would have otherwise commenced, the Company proposes that the retail revenue requirement associated with the actual prudently incurred costs of the Interconnection Upgrades, an estimate of which is provided by Mr. Pressler and Mr. Ladner in their respective testimony, should be deemed eligible for recovery through the creation and authorization of a regulatory asset in the amount of these costs, with interest to be accrued thereon at the full Commission-authorized rate of return, beginning from the date on which the Interconnection Upgrades are placed into service and accruing until such time that the costs can be reflected in rates. As with the alternative-cost recovery proposal described above for the costs associated with the Proposed Generators, ELL proposes that it should be authorized to recover such regulatory

asset over a two-year period, beginning contemporaneously with the time that the costs reflected in that regulatory asset begin to be recovered from customers through rates.

COMPLIANCE WITH COMMISSION ORDERS

XXXV.

Mr. Sullivan explains in detail in his Direct Testimony the reasons for which the Company asserts the Commission should find that the Company has complied with the requirements of the 1983 General Order and the applicable version of the MBM Order. With respect to the MBM Order in particular, Mr. Sullivan explains that the conduct of the 2024 CCCT RFP (and the selection of the Proposed Generators as the most cost-effective options from that RFP) support a finding by the Commission that the Proposed Generators should be certified.

XXXVI.

Mr. Sullivan further discusses the reasons for which the Company asserts the Commission should find that certification of the Proposed Generators is in the public interest. As Mr. Sullivan sets forth in his testimony, the Proposed Generators provide much needed energy and capacity in two load pockets that are experiencing significant economic growth. Moreover, as Mr. Sullivan highlights, the testimony of Michael J. Plaisance details ELL's systemwide need for capacity—a need for which the Proposed Generators are critical. Moreover, Mr. Sullivan explains that the Proposed Generators are projected to result in net economic benefits for the Company's customers (as supported by the testimony of Mr. Nguyen) and—perhaps most importantly—that the Proposed Generators will facilitate continued economic development for the State of Louisiana. Mr. Sullivan accordingly asserts that the Commission should find that certification of the Proposed Generators is in the public interest.

COMPANY WITNESS TESTIMONY

XXXVII.

In support of this Application, the Company presents testimony supporting a finding that construction and deployment of the Proposed Generators is in the public interest and necessity and, therefore, prudent. The testimony accompanying the Application describes the Company's resource planning process and needs, the 2024 CCCT RFP, certain key aspects of the agreements governing the relationship between ELL and the EPC contractors, and the anticipated costs and benefits associated with the Proposed Generators.

XXXVIII.

The Direct Testimony and associated exhibits for the following witnesses supporting the requested relief are attached hereto and filed herewith as part of this Application. It is anticipated that these witnesses, as well as any necessary rebuttal witnesses, will be called to testify at the hearing of this matter on the subjects indicated below:

- Michael J. Plaisance, who is employed by ELL as Senior Manager, Resource Planning, provides an overview of the Company's Application and request for relief as well as descriptions of the 2024 CCCT RFP, the Company's current resource portfolio and plans to meet the long-term supply needs of its customers, and the manner in which construction of the Proposed Generators is significant to fulfilling the Company's supply plan and resource needs. Mr. Plaisance further describes the Company's proposed Monitoring Plan that would be implemented during construction of the Proposed Generators.

- Nicholas D. Pressler, who is employed by ESL as Director, Power Development, provides details concerning the Proposed Generators, including CCCT technology generally and the proposals to construct the Proposed Generators that were submitted in response to the 2024 CCCT RFP, as well as the current cost estimates for completing the Proposed Generators, the estimated non-fuel operation and maintenance (“O&M”) costs for the Proposed Generators, the process for selecting the EPC contractors chosen to construct the Proposed Generators, and certain characteristics of the EPC contracts.
- Chad J. Ladner, who is employed by ESL as Senior Manager, Power Delivery Planning, provides an overview of the Company’s transmission system in Louisiana, including facilities relevant to the Proposed Generators, as well as a general description of the facilities proposed to interconnect the Proposed Generators to the Company’s transmission system, the upgrades currently anticipated by the Company that will be required by MISO to obtain NRIS rights at Westlake, and the proposed MISO interconnection process for both WF6 and Westlake.
- Jeremy Halland, who is employed by ESL as Manager, Environmental Project Services, testifies concerning the federal and state environmental regulations applicable to the construction and operation of the Proposed Generators as well as the permitting plans (and environmental due diligence and initial permitting performed at my direction) for the Proposed Generators.
- Phong D. Nguyen, who is employed by ESL as Director, Advanced Economic Planning, testifies concerning the conduct and results of the 2024 CCCT RFP and provides a net economic benefits analysis for each of the Proposed Generators.

- Patrick A. Sullivan, who is employed by ELL as Manager, Regulatory Affairs, presents the Company's proposed cost-recovery methodology for the construction of the Proposed Generators and associated, transmission-related projects and discusses the rationale for seeking such cost recovery through the ACM and TRM contained within the Company's FRP. Mr. Sullivan further provides the first-year revenue requirement associated with the Proposed Generators, identifies the regulatory approvals required under Commission General Orders, and explains the reasons for which the Commission should find that ELL has complied with the LPSC's Orders and for which the Proposed Generators should be found to be in the public interest.

REQUEST FOR TIMELY TREATMENT

XXXIX.

As explained in the Direct Testimony of Michael J. Plaisance and Nicholas D. Pressler, the Company is seeking timely approval of its Application in order to maintain the current project schedules for the Proposed Generators. In particular, as explained by Mr. Pressler, the Company is currently planning on issuing a Final Notice to Proceed ("FNTP") for each of the Proposed Generators in 2027, with the first FNTP scheduled to be issued in February 2027. As Mr. Plaisance and Mr. Sullivan explain, a delay in the project schedule could lead to additional costs for constructing the Proposed Generators, including additional EPC costs, and could also delay the additional capacity and energy from the Proposed Generators, which could potentially lead to additional costs in the MISO marketplace. The Company therefore asks that the Commission consider ELL's Application at or before its December Business & Executive Session meeting scheduled for December 16, 2026, in order that, if the Commission certifies construction of the

Proposed Generators, the Commission's Order will be final by the February 2027 FNTF date for Westlake.

SERVICE OF NOTICE AND PLEADINGS

XL.

The Company requests that notices, correspondence, and other communications concerning this Application be directed to the following persons:

Lawrence J. Hand, Jr.
Patrick A. Sullivan
4809 Jefferson Highway
Mail Unit:-JEF-357
Jefferson, Louisiana 70121
Telephone: (504) 840-2528
Facsimile: (504) 840-2681
lhand@entergy.com
psulli2@entergy.com

Matthew T. Brown
Harry M. Barton
Michael R. Dodson
639 Loyola Avenue
Mail Unit L-ENT-26E
New Orleans, Louisiana 70113
Telephone: (504) 576-4645
Facsimile: (504) 576-5579
mbrow12@entergy.com
hbarton@entergy.com
mdodso1@entergy.com

ELL requests that the foregoing persons be placed on the Official Service List for this proceeding, and respectfully requests that the Commission permit the designation of more than one person to be placed on the Official Service List for service in this proceeding.

REQUEST FOR CONFIDENTIAL TREATMENT

XLI.

Certain materials and/or information that may be produced in connection with this matter could contain information considered by the Company and/or third parties to be proprietary and confidential. Disclosure of certain information may present an unreasonable risk of harm to ELL, its customers, and third parties. Therefore, in light of the sensitive nature of such information, the Company intends to submit two versions of any such confidential and proprietary materials and/or information, one marked "Non-Confidential Redacted Version" and the other marked

“Confidential Version.” The Confidential Versions will bear the designation “Highly Sensitive Protected Materials” or words of similar import. Although confidential information and documents that may be produced in discovery in this matter may be viewed by appropriate representatives of the LPSC Staff and intervenors pursuant to the terms and conditions of a suitable confidentiality agreement once such an agreement has been executed in this Docket, this confidential information also is being provided pursuant to, and shall be exempt from public disclosure pursuant to, the Commission’s General Order dated August 31, 1992 and Rule 12.1 of the Rules of Practice and Procedure of the Commission.

PRAYER FOR RELIEF

XLII.

THEREFORE, Entergy Louisiana, LLC respectfully requests that the Commission, subject to the fullest extent of its jurisdiction, grant relief and give its approval as follows:

1. Find that the Company’s construction of the Proposed Generators, including the Generator Tie-Ins and Interconnection Upgrades, serves the public convenience and necessity and is in the public interest, and is therefore prudent, in accordance with the Commission’s 1983 General Order;
2. Find that the selection of the Proposed Generators through the 2024 CCCT RFP is consistent with the terms of the Commission’s then-applicable MBM Order;
3. Find that the retail revenue requirement associated with the Proposed Generators (to be determined in a subsequent revenue requirement filing, and including the costs for the Generator Tie-Ins, but excluding the costs for the Interconnection Upgrades, which are discussed below) is deemed eligible for recovery in the first billing cycle of the month following commercial operation of each of the Proposed Generators in accordance with the

terms of the Company's then-effective FRP, outside of the FRP sharing mechanism and outside of any applicable cap;


4. In the alternative, if ELL does not have an FRP in place at the time the Proposed Generators are placed in service (or if recovery is delayed beyond the commercial operation dates for the Proposed Generators), authorize (i) a deferral of the non-fuel revenue requirement (*i.e.*, costs that are not eligible to be recovered through the FAC, including the costs for the Generator Tie-Ins, but excluding the costs for the Interconnection Upgrades, which are discussed below) associated with the Proposed Generators and creation of an associated regulatory asset until such time as the costs of the Proposed Generators are reflected in the Company's retail rates, and (ii) the accrual of carrying charges at the full Commission-authorized rate of return on the deferred costs, commencing on the relevant date of commercial operation of each of the Proposed Generators and continuing until such time as such costs of the Proposed Generators are reflected in the Company's retail rates;
5. Find that the retail revenue requirement associated with the actual prudently incurred costs of the Interconnection Upgrades, an estimate of which is provided by Mr. Pressler and Mr. Ladner in their respective testimony, is deemed eligible for recovery through the applicable mechanisms of the FRP to the extent the Company remains subject to an FRP at the time the referenced facilities are placed in service, or in the alternative, if ELL does not have an FRP in place at the time the referenced facilities are placed in service or cost recovery is delayed beyond the date on which FRP cost recovery would have otherwise commenced, through the creation and authorization of a regulatory asset in the amount of these costs, with interest to be accrued thereon at the full Commission-authorized rate of return,

- beginning from the date on which the Interconnection Upgrades are placed into service and accruing until such time that the costs are reflected in the Company's retail rates;
6. Authorize the recovery, over a two-year period, of the regulatory asset referenced in Paragraph 4 above beginning contemporaneously with the time that the costs of the Proposed Generators begin to be recovered from customers through rates;
 7. Authorize the recovery, over a two-year period, of the regulatory asset referenced in Paragraph 5 above beginning contemporaneously with the time that the costs of the Interconnection Upgrades begin to be recovered from customers through rates;
 8. Approve recovery, through the FAC, of the variable expenses incurred under the LTSAs applicable to the Proposed Generators;
 9. Approve the Monitoring Plan under which the Company will report to Commission Staff on a quarterly basis the status of the Proposed Generators and Interconnection Upgrades, including schedule, costs, and other critical associated activities;
 10. Rule that, with respect to the Proposed Generators described in the Application, the Company has complied with, or is not in conflict with, the provisions of all applicable LPSC Orders;
 11. Find, as provided in the Commission's Special Order No. 7-2000, dated March 22, 2000, that the confidential testimony, exhibits, and other materials referenced in the Application shall be exempt from public disclosure pursuant to the Commission's General Order dated August 31, 1992 and Rule 12.1 of the Rules of Practice and Procedure of the Louisiana Public Service Commission;
 12. Direct that the period for interventions and protests be shortened to fifteen (15) days;

13. Direct the Administrative Hearings Division to adopt a procedural schedule necessary to facilitate a decision no later than the Commission's December 2026 Business and Executive Session;
14. Direct that notice of all matters in these proceedings be sent to Matthew T. Brown, Harry M. Barton, and Michael Dodson as counsel of record for the Company, and to Lawrence J. Hand and Patrick A. Sullivan as representatives of the Company; and
15. Order such other general and equitable relief as to which the Company may show itself so entitled.

Respectfully submitted,

By:



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Harry M. Barton, La. Bar No. 29751
Michael R. Dodson, La. Bar No. 37450
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**ATTORNEYS FOR
ENTERGY LOUISIANA, LLC**