BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

EX PARTE: **APPLICATION OF**	)	
ENTERGY LOUISIANA, LLC	)	
FOR APPROVAL OF THE MONDU	)	
SOLAR POWER PURCHASE	)	**DOCKET NO. U-37071**
AGREEMENT, EXPANSION OF THE	)	
GEAUX GREEN OPTION, COST	)	
RECOVERY AND RELATED RELIEF	)	

DIRECT TESTIMONY

OF

LAURA K. BEAUCHAMP

ON BEHALF OF

ENTERGY LOUISIANA, LLC

PUBLIC REDACTED VERSION

DECEMBER 2023

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EXHIBIT LIST

Exhibit LKB-1	Listing of Previous Testimony
Exhibit LKB-2	Business Plan 2023 – Load & Capacity, Energy Coverage (HSPM)
Exhibit LKB-3	Mondu Power Purchase Agreement (HSPM)

I. INTRODUCTION

Q1. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

A. My name is Laura Beauchamp. I am employed by Entergy Louisiana, LLC ("ELL" or the "Company") as the Director, Resource Planning and Market Operations, a role I assumed in March 2022. My business address is 4809 Jefferson Highway, Jefferson, Louisiana 70121.

Q2. ON WHOSE BEHALF ARE YOU FILING THIS DIRECT TESTIMONY?

A. I am filing this Direct Testimony on behalf of ELL.

Q3. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

A. In 2000, I earned a Bachelor of Science in Management degree with a concentration in Finance and in 2004 I was awarded a Master of Business Administration degree with a concentration in Energy Finance; both of these were granted by Tulane University's A. B. Freemen School of Business.

I have been employed by affiliates of Entergy Corporation since 2000 and have held various roles of increasing responsibility in Accounting, Finance, Regulatory, and Innovation. From 2009 through 2014, I served as the Manager of Regulatory Affairs for Entergy Louisiana, LLC and Entergy Gulf States Louisiana, L.L.C. ("EGSL"), a role in which I was responsible for providing regulatory support services to those utilities, including in rate proceedings and associated regulatory filings with the Louisiana Public Service Commission ("LPSC"). Later, from 2016 through 2018, I

served as the Finance Director for ELL. From 2018 through 2022 I held roles as the Director of Utility Finance and Strategy for Entergy Services, LLC and as Director of Innovation Strategy and Consulting at KeyString Labs, Entergy's innovation center.

Q4. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.

A. As the Director of Resource Planning and Market Operations for ELL, I am responsible for managing the planning of generation, transmission, and wholesale power activities for ELL. This involves working closely with Entergy Services, LLC's ("ESL") generation and transmission planning organizations on these activities.

Q5. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE COMMISSION?

A. Yes. A list of my prior testimonies is attached as Exhibit LKB-1.

Q6. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. Through my Direct Testimony, I describe ELL's 2022 Request for Proposal ("RFP") for Long-Term Renewable Generation Resources (the "2022 Renewables RFP"), including the basis for the Company's selection of the Power Purchase Agreement ("PPA") for the Mondu Facility[1] from that RFP (the "Mondu PPA"). I further explain the benefits that the Mondu PPA is expected to provide to ELL's customers and the ELL customer needs that it addresses, the long-term resource planning decisions and past investments that have placed ELL's customers in a position to realize the benefits of

[1] The Mondu Facility is the subject of a PPA executed between ELL and Mondu Solar, LLC ("Seller"), which is an indirect wholly-owned subsidiary of NextEra Energy Capital Holdings.

integrating solar resources into ELL's generation mix, and the reasons that the Company asks that the Commission find, among other things, that the Mondu PPA serves the public convenience and necessity, is in the public interest, and therefore, is prudent.

II. RESOURCE PLANNING NEEDS MET BY THE 2023 SOLAR PORTFOLIO

Q7. WHAT IS THE GOAL OF ELL'S RESOURCE PLANNING?

A. ELL's resource planning efforts are driven by the fundamental goal to deliver a sustainable resource portfolio that is centered on customer outcomes. Building a sustainable portfolio requires that ELL carefully balance three key objectives: reliability, affordability, and environmental stewardship. This balance looks at both the near-term and long-term benefits and risks associated with each key objective.

ELL's development of a sustainable portfolio places an emphasis on customer needs and preferences. ELL recognizes that customer expectations for electric service will continue to change alongside advancements in technology and evolving market and policy considerations both in and out of the traditional utility framework. Accordingly, ELL aims to meet customers' needs for reliable, reasonably priced electric services and energy solutions both today and in the future.

Q8. PLEASE ELABORATE ON THE THREE KEY OBJECTIVES YOU MENTIONED FOR BUILDING A SUSTAINABLE PORTFOLIO.

A. Reliability as a planning objective means ensuring that the stability of the grid is maintained through adequate resources to meet customers' capacity and energy needs

along with adequate transmission and distribution systems to ensure that power is reliably delivered to them. Ensuring that there are adequate resources to meet customer demand is more than just supplying a certain number of megawatts or zonal resource credits. Resource adequacy must consider the diversity of the supply portfolio – both in technology type and operational characteristics – combined with customer-targeted energy efficiency and demand-side resources. It also must consider the location of resources, proximity of those resources to customer load, and the availability of those resources under various conditions. The ability of the transmission and distribution system to deliver those resources to customers is also a key aspect of maintaining reliability, and the careful integration of generation, transmission, and distribution ensures that this reliability can be delivered at the lowest reasonable cost.

Affordability as a planning objective means keeping customer costs reasonable, considering current and future cost impacts of infrastructure improvements made on behalf of our customers and taking advantage of scale to provide cost synergies. ELL recognizes the importance of maintaining affordable rates for customers and prides itself on the ability to maintain some of the lowest rates in the country. This requires balancing of various cost components such as capital investment, operations and maintenance expense, and fuel costs. Cost stability requires that ELL examine its portfolio over a variety of futures to ensure the long-term supply productivity of the resource.

Environmental stewardship as a planning objective refers to the use and protection of the natural environment, ensuring compliance with existing and likely regulations, adaptability of resources, and paths towards a lower-carbon economy.

Portfolios that are capable of adapting and remaining sustainable over the long-term horizon bring customers increased benefits and help to manage long-term cost-stability. When considering our environmental stewardship objective, we also monitor customers' desire for decarbonization through lower emission generation, local renewables, and offerings that allow customers to meet their own sustainability goals in partnership with their utility. With our ability to provide broad access to customers, ELL stands in a unique position to enable and extend a lower carbon economy to customers and the communities it serves.

Appropriately balancing these three objectives with consideration of the near-term and long-term risks associated with each results in the lowest reasonable cost portfolios for customers.

Q9. PLEASE DESCRIBE ELL'S LONG-TERM RESOURCE PLANNING PROCESS.

A. The core elements of ELL's resource planning process are: (1) a determination of the capability of the Company's current resources, (2) a forecast of the peak load plus reserve margin and energy that the Company expects to serve over the planning horizon, and (3) a determination of the amount and types of additional supply-side and demand-side resources that will be needed to meet the Company's load and energy requirements.

As part of its resource planning efforts, ELL has developed and continues to refine an Integrated Resource Plan ("IRP"), which is filed at the LPSC pursuant to the

Commission's IRP rules.[2] ELL's most recent submission of an IRP to the Commission was on May 22, 2023 (ELL's "Final 2023 IRP") and reflects inputs and assumptions that were established based on ELL's Business Plan 2022.[3] Given the uncertainty and fluidity inherent in long-term resource planning, ELL's IRP provides a framework for the Company to plan for resources over the next several years but does not and cannot reasonably serve as a prescriptive plan to address ELL's long-term generation needs and options for meeting those needs. Circumstances necessarily will change and, to be reasonable and prudent, resource procurement decisions must be made based on the best information reasonably available at the time those decisions are made. ELL presents those decisions and the support for them to the Commission when seeking resource certifications required under applicable General Orders and does not seek certification via the IRP (nor, per my understanding of the Commission's IRP rules, does the Commission's acknowledgement of an IRP confer such approval). ELL also has presented results of certain aspects of its continuous resource planning efforts outside of the formal IRP process to the Commission. For example, ELL recently received LPSC approval for its 2021 Solar Portfolio, which consists of four solar photovoltaic resources with a total nameplate capacity of 475 megawatts as well as ELL's Geaux Green Option ("Rider GGO" or "GGO") green tariff.[4] Further, the

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[2] *See* Corrected General Order (April 20, 2012), *LPSC, ex parte, In re: Development and Implementation of Rule for Integrated Resource Planning for Electric Utilities*, Docket No. R-30021.

[3] *See* Final 2023 IRP (May 22, 2023), *2023 Integrated Resource Plan-Final Report for Entergy Louisiana, LLC Pursuant to the General Order No. R-30021,* Docket No. I-36181.

[4] *See* Order No. U-36190 (October 14, 2022), *In re: Application for Certification and Approval of the 2021 Solar Portfolio, Rider Geaux Green Option, Cost Recovery and Related Relief,* Docket No. U-36190. The facilities are 1) the Sunlight Road Facility, 2) the Vacherie Facility, 3) the Elizabeth Facility, and 4) the St. Jacques Facility.

Company has an application pending before the Commission to expand Rider GGO to include additional resources from ELL's 2022 Solar Portfolio in Docket No. U-36685.[5]

As described in detail in ELL's Final 2023 IRP, the record in Commission Docket No. U-36190 (in which the Commission approved ELL's 2021 Solar Portfolio[6]), and ELL's applications and testimony in Docket Nos. U-36685 and U-36697,[7] ELL is projected to need additional long-term generating capacity over the course of the long-term planning horizon to replace deactivated capacity and address load growth in order to reliably serve customers. In each of those assessments, solar resources were identified as an economic option to address ELL's long-term capacity and energy needs, owing in part to the declining cost of solar resources, as well as to ELL's recent investments in dispatchable, gas-fired generation, which serves as the foundation for ELL's ability to integrate intermittent resources like solar into its resource portfolio without jeopardizing reliability or shifting cost responsibility for serving the Company's customers to the customers of other utilities.

[5] *See* Docket No. U-36685 (February 28, 2023), *Ex Parte: Application of Entergy Louisiana, LLC for Approval of the 2022 Solar Portfolio, Expansion of the Geaux Green Option, Cost Recovery and Related Relief.* The resources at issue in that docket are the Iberville Facility and the Sterlington Facility.

[6] *See* Order No. U-36190 (October 14, 2022), *In re: Application for Certification and Approval of the 2021 Solar Portfolio, Rider Geaux Green Option, Cost Recovery and Related Relief,* Docket No. U-36190.

[7] Docket No. U-36697 (March 13, 2023), *In re: Application of Entergy Louisiana, LLC for Approval of Alternative Process to Secure up to 3,000 MW of Solar Resources, Certification of those Resources, Expansion of the Geaux Green Option, Approval of a New Renewable Tariff, and Related Relief.*

Q10. PLEASE DESCRIBE THE COMPANY'S CURRENT RESOURCE PORTFOLIO.

A. ELL controls 11.8 Gigawatts ("GW") of in-service capacity through direct ownership, capacity contracts with third parties, life-of-unit contracts with other Entergy Operating Companies, and Demand Response Resources. Over the last fifteen years, ELL has transformed and modernized its generation portfolio to support existing customers' needs and address significant current and expected industrial load growth in Louisiana by adding reliable and more efficient combustion turbine ("CT") and combined cycle gas turbine ("CCGT") generating units to meet its supply needs. More recently, ELL has begun its transition to more renewable resources with the 50-Megawatt ("MW") Capital Region Solar facility in Port Allen, Louisiana. In addition, in 2022, the LPSC approved a 475 MW solar portfolio that consists of 4 solar resources to be developed in the State of Louisiana.

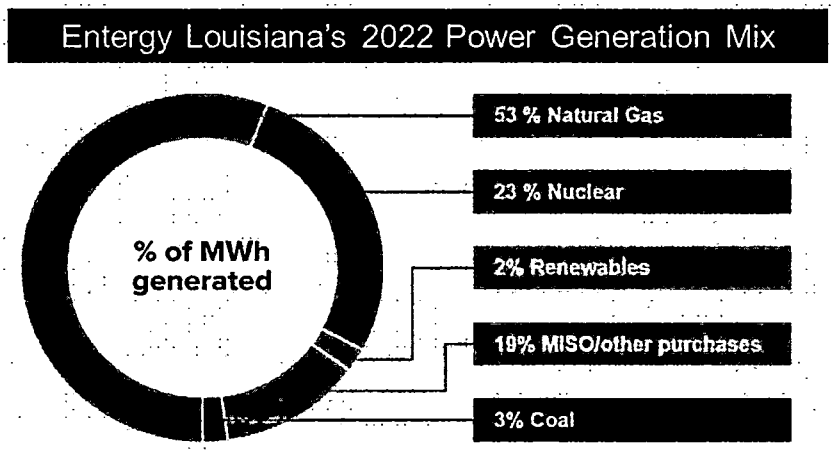
Table 1 below shows ELL's current (as of 2022) resources by fuel type, including demand-side resources and supply-side resources owned by ELL and under contract through PPAs.

Table 1

2022 ELL Resource Portfolio			
		Unforced Capacity ("UCAP") MW[8]	**UCAP %**
Coal		378	3.2%
Nuclear		1,986	16.7%
CCGT		4,880	41.1%
CT		1,275	10.7%
Legacy Gas-Steam		2,776	23.4%
Renewable		268	2.3%
Load Modifying Resources ("LMRs")		301	2.5%
Total		**11,864**	**100.0%**

Figure 1 below shows ELL's energy mix in 2022 by generation type.

Figure 1



[8] The amount of UCAP MW shown in Table 1 is in accordance with MISO capacity accreditation rules reflected in the MISO Energy, *Business Practices Manual Resource Adequacy,* Legal (October 31, 2022), *Available at* http://www.misoenergy.org/legal/business-practice-manuals/, *Id.* at Section 4.2.1.5.2.

Approximately 23% of the capacity in the Company's current resource portfolio is comprised of legacy generation units that have been in-service for over 48 years with the oldest being in operation for 57 years. While the Company has made and will continue to make investments to maintain these generators when economic to do so, many of these generators are expected to reach the end of their economic useful lives and become deactivated during the next eight years.[9]

Q11. HOW DO MISO RESOURCE ADEQUACY REQUIREMENTS INFLUENCE THE COMPANY'S RESOURCE NEEDS?

A. ELL's resource planning efforts are primarily focused on the planning objectives I noted above to deliver the right type and amount of generating capacity to reliably serve customers. In doing so, ELL must also account for the resource adequacy requirements set out by the Midcontinent Independent System Operator, Inc. ("MISO") for the prompt Planning Year to ensure that the results of ELL's planning efforts meet those requirements.

While MISO has no responsibility to build or provide capacity, it nevertheless assigns resource adequacy requirements to load-serving entities in its footprint, including ELL. Historically, MISO provided annual resource adequacy requirements; however, MISO has implemented its new Seasonal Resource Adequacy Construct for

[9] For example, ELL deactivated Waterford 1 during the first quarter of 2021. *See* LPSC Docket No. X-35751 (October 1, 2020), *Entergy Louisiana, LLC, ex parte, In re: Notice of Informational Filing Pursuant to Commission General Order dated October 19, 2018 (Docket No. R-34407) Regarding Retirement of the Waterford Plant 1 Generating Unit. See also, e.g.,* Entergy Louisiana 2023 Integrated Resource Plan (Final Report), LPSC Docket No. I-36181 (May 22, 2023), *Entergy Louisiana, LLC, ex parte, 2021 Request to Initiate Integrated Resource Planning Process Pursuant to the General Order (Corrected) in Docket No. R-30021, Id.* at p. 27.

the 2023-2024 Planning Year. For this new resource adequacy construct, MISO has conducted seasonal assessments to evaluate potential resource adequacy risks for the upcoming season. These assessments evaluate projected near-term available capacity under probable and extreme peak load forecasts, as well as historical generator outage conditions for each season. The assessments also highlight potential issues in the upcoming seasons to help system operators and stakeholders prepare for potential strained system conditions and develop preventative actions.[10]

As part of its resource adequacy requirements, MISO determines how much capacity must be located within each Local Resource Zone ("LRZ") defined by MISO relative to how much capacity can be "imported" from other LRZs. In the event a load-serving entity's resources fall short of those annual requirements, either in total or in-zone, that load-serving entity is exposed to the zonal clearing price for MISO's annual capacity auction for that shortfall, which clearing price can approach and ultimately reach the cost of new entry ("CONE") as market conditions tighten.[11] Notably, LRZs 1 through 7 cleared at or near CONE in the 2022-23 MISO Planning Year Resource Auction, or $236.66/MW-day.[12] The same 2022-23 MISO Planning Year Resource Auction yielded a clearing price for LRZ 9, the LRZ that ELL belongs to, of $2.88/MW-day.[13] The 2023 Planning Resource Auction ("PRA") Results for the 2023-

[10] MISO Energy, Resource Adequacy, *Available at* https://www.https://www.misoenergy.org/planning/resource-adequacy.org/planning/resource-adequacy.

[11] The "cost of new entry" represents the regional, annualized capital cost of building a new combustion turbine.

[12] 2022/2023 Planning Resource Auction (PRA) Results, MISO Energy (April 14, 2022), available at https://cdn.misoenergy.org/2022%20PRA%20Results624053.pdf.

[13] *Id.*

2024 MISO Planning year represent the first time MISO has released PRA results based on its new Seasonal Accreditation Construct. While no load zone cleared at CONE in any season, significant tightening was noted in LRZ 9 in the Fall season, which cleared at $59.21/MW-day, and in Winter, which cleared at $18.88/MW-day.[14] In fact, MISO's data show that the capacity surplus that MISO LRZ 9 previously enjoyed was reduced by nearly 40% on an annual basis from the previous year, and the surplus completely disappeared during the 2023 PRA for the summer season, where the Zone's Planning Reserve Margin Requirement ("PRMR") was higher than the capacity included in the offers that were submitted.[15] Indeed, LRZ 9, in which Louisiana sits, is the only Zone in MISO to have experienced elevated pricing in the most recent MISO PRA, and it experienced this elevated pricing in two out of the four seasons.[16]

As I noted, ELL's planning efforts carefully consider the location of resources and the proximity of those resources to customer load and therefore are aligned with these MISO zonal requirements. This alignment serves to mitigate the level of exposure to capacity shortfalls and places an emphasis on securing adequate in-zone resources.

[14] MISO Energy, *2023/2024 Planning Resource Auction (PRA) Results* (May 19, 2023), *available at* https://cdn.misoenergy.org/2022%20PRA%20Results624053.pdf.

[15] *Id.*

[16] *Id.* at 4.

Q12. DOES THE COMPANY NEED ADDITIONAL LONG-TERM GENERATING CAPACITY TO SATISFY ITS PLANNING OBJECTIVES?

A. Yes. Projected load (plus planning a reserve margin) exceeds the capacity of ELL's existing and LPSC-approved resources, which indicates a need for additional long-term capacity. My exhibit, LKB-2, which contains Highly Sensitive Protected Materials ("HSPM"), reflects ELL's resources relative to forecasted load for 2023 – 2034, with the redline depicting the resource deficit from year to year. HSPM Exhibit LKB-2 was prepared using the load forecast from ELL's Business Plan 2023 ("BP23"), with consideration of current owned and contracted resources as well as those future resources that have been approved by the LPSC. In terms of resource availability, HSPM Exhibit LKB-2 reflects unit deactivation assumptions from BP23, and existing PPAs that are assumed to expire on stated expiration dates. As seen in HSPM Exhibit LKB-2, ELL will need approximately [redacted]

Q13. WHAT ARE ELL'S CURRENT PLANS TO MEET ITS LONG-TERM CAPACITY NEEDS?

A. As noted above, the Company has developed and continues to refine an IRP that considers generation and transmission and is expected to meet customer needs in the lowest-reasonable-cost manner. The Company continues to need long-term capacity over the planning horizon, and the plan to meet ELL's needs includes a combination of new-build generation, PPAs, and acquisitions from a diverse set of resources that will provide efficient operating flexibility to serve evolving customer demands. In

recognition of the improving cost-effectiveness and numerous benefits that renewable resources can provide, the analyses conducted in ELL's most recent IRP cycle identified a significant amount of solar additions as an economic option to address ELL's near-term planning needs and provide customer benefits. Further, ELL continues to see significant demand for incremental renewable energy resources to meet customer interest for its green tariff offerings.

Q14. DOES THE MONDU PPA SUPPORT ELL'S THREE KEY PLANNING OBJECTIVES FOR BUILDING A SUSTAINABLE PORTFOLIO?

A. Yes. In terms of reliability, the Mondu PPA will serve to meet the Company's long-term capacity needs that I discussed above as well as address the energy needs of our customers. As seen in HSPM Exhibit LKB-2, ELL's energy coverage [redacted] The Mondu PPA [redacted] It will add beneficial diversity to a portfolio that currently contains approximately 2% renewable[17] capacity. Regarding affordability, the Mondu PPA was determined to provide the lowest reasonable cost resource that could meet the supply needs of customers targeted in the 2022 Renewables RFP and will provide a hedge against fuel costs in the peak load months of summer. As to environmental stewardship, the Mondu PPA consists of a zero-carbon-emitting solar resource. The addition of this resource will reduce ELL's carbon emissions and is

[17] As noted above in Table 1, renewable resources comprise only 2% of ELL's 2022 portfolio on a UCAP capacity basis. Additionally, as noted above in Figure 1, renewable resources comprised approximately 2% of ELL's 2022 resource mix on an energy basis.

a critical step toward meeting customers' desire for a lower-carbon resource portfolio, which Company witness Ms. Elizabeth Ingram explains in her Direct Testimony. Finally, as to mitigation of risks, the design requirements ELL has required of this resource – including the requirement that the facility be designed and constructed to withstand certain windspeeds – mitigate the risk of damage caused by unforeseen events such as the hurricanes that have affected ELL's service territory over the last several years.

Q15. IN RESPONSE TO QUESTION 7, YOU STATED THAT ELL'S DEVELOPMENT OF A SUSTAINABLE PORTFOLIO PLACES AN EMPHASIS ON CUSTOMER NEEDS AND PREFERENCES. DOES THE MONDU PPA ADDRESS THE NEEDS AND PREFERENCES OF ELL'S CUSTOMERS?

A. Yes, as explained by Ms. Ingram, ELL's customers are increasingly seeking renewable resource options to meet their planning objectives and the desires of their own customers, and increasingly, the availability of such renewable resource options is a significant factor in existing and prospective customers' assessment of the State of Louisiana as an attractive site to locate or expand their operations. The 2021 Solar Portfolio approved in 2022 by the LPSC was a significant step toward integrating renewable resources into ELL's resource portfolio.[18] Coupling the 2021 Solar Portfolio with Rider GGO has enabled ELL to provide a direct method for customers to address their preference for renewable options. In fact, as Ms. Ingram explains, the initial

[18] *See* Order No. U-36190 (October 14, 2022), *In re: Application for Certification and Approval of the 2021 Solar Portfolio, Rider Geaux Green Option, Cost Recovery and Related Relief*, Docket No. U-36190.

allocation of Rider GGO subscriptions for large commercial and industrial customers was fully reserved within minutes, and total interest in the offering is over 2.0 GW. ELL hopes to continue to respond to this customer interest by including both the 2022 Solar Portfolio (which is the subject of Docket No. U-36685) and the Mondu PPA in the GGO Portfolio, as Ms. Ingram describes.

Q16. HAVE THERE BEEN ANY IMPEDIMENTS TO THE EXISTING SOLAR PORTFOLIO AND/OR FUTURE SOLAR DEVELOPMENT?

A. Yes. In February 2022, less than one month after ELL made the initial selections from the 2021 Solar RFP, a domestic solar manufacturer petitioned the U.S. Department of Commerce ("USDOC") to investigate whether solar panels imported from four Asian countries (Malaysia, Thailand, Vietnam, and Cambodia) were circumventing existing tariffs by using parts and components from China. Approximately eighty percent (80%) of the solar panels in use for US utility-scale solar installations originate in those countries. On March 28, 2022, the USDOC announced its decision to investigate the allegations made in the petitions. After the announcement, the importation of panels from these countries largely stopped, and many new solar projects reliant on those panels were cancelled or placed on hold. The investigation has also increased the demand for, and price of, panels sourced from manufacturers and geographic regions that do not have the potential to be affected by the investigation.

In December 2022, the USDOC issued a preliminary finding that circumvention was occurring through each of the four Southeast Asian countries. This finding does not constitute a ban on imports from those countries; however, companies will be

required to certify that they are not circumventing existing tariffs. The USDOC conducted audits of eight companies to verify the information that was the basis of its finding and in August 2023 concluded that five Chinese solar panel companies have been skirting US tariff laws by routing their operations through four other Southeast Asian countries and therefore should have additional tariffs imposed on them.

In an effort to ease the issues created by the tariff investigation, President Biden issued a Presidential Proclamation on June 6, 2022, stating that duties will not be collected on any solar module and cell imports from these four countries until June 2024, as long as the imports are consumed in the U.S. market within six months of the termination of the President's Proclamation. Despite this proclamation, the many months of uncertainty and turmoil in the market has continued to cause supply issues. In addition, inflation and increasing interest rates have influenced the ability of developers to finance projects, increasing risk, and causing increases in project pricing.

Finally, concerns from some stakeholders at the local level have also constrained solar development in Louisiana. For example, two of the resources approved by LPSC Order No. U-36190 as part of the 2021 Solar Portfolio are facing uncertainty in St. James Parish. In particular, a solar moratorium was instituted by St. James Parish, affecting both the St. Jacques and Vacherie solar facilities, which has caused uncertainty and delays in construction of these projects. On November 8, 2023, the St. James Parish Council voted to lift this moratorium, and the projects are now able to apply for permitting to move forward subject to modifications that may be needed to comply with the new zoning requirements.

Notwithstanding these near-term impediments, ELL and Mondu Solar, LLC were able to negotiate the terms of a PPA; the addition of Mondu Solar to ELL's supply-side resource mix will contribute to the fulfillment of ELL's long-term resource planning objective and provide benefits to ELL's customers.

III. 2022 RENEWABLES RFP

Q17. PLEASE DESCRIBE ELL'S 2022 RENEWABLES RFP.

A. ELL provided advance notice of its 2022 Renewables RFP to the Commission, which was received by the Commission on February 10, 2022. On April 13, 2022, ELL issued its public Notice of Intent to issue the RFP,[19] and following the posting of draft RFP documents on April 14, 2022,[20] ELL posted the final RFP Notice and documents on June 14, 2022.[21]

Q18. WHAT WERE THE OBJECTIVES OF THE 2022 RENEWABLES RFP?

A. The 2022 Renewables RFP is one component of the Action Plan set out in ELL's 2019 Integrated Resource Plan ("2019 IRP") and ELL's plans to continue to integrate renewable generation into its resource portfolio. After robust stakeholder engagement

[19] Entergy, *Notice of Intent to Issue a Request for Proposals 2022 Entergy Louisiana, LLC Solar RFP*, Entergy (April 13, 2022), *available at* https://spofossil.entergy.com/ENTRFP/SEND/2022ELLRenewablesRFP/Documents/ELL%20Public%20Notice%20of%20RFP.pdf.

[20] Entergy, *Notice of Release of Draft RFP Documents and Bidders Conference,* Entergy (April 14, 2022), *available at* https://spofossil.entergy.com/ENTRFP/SEND/2022ELLRenewablesRFP/Documents/Notice%20of%20Draft%20Documents%20and%20LPSC%20Technical%20Bidder%20Conference.pdf.

[21] Entergy, *Notice of Release of Final RFP Documents and Bidder Registration,* Entergy (June 14, 2022), *available at* https://spofossil.entergy.com/ENTRFP/SEND/2022ELLRenewablesRFP/Documents/Notice%20of%20Final%20Documents%20&%20Bidder%20Registration%20Period.pdf.

and analysis, ELL's 2019 IRP recognized ELL customers' increasing interest in renewable generation and the improving cost-effectiveness and benefits of renewable, solar generation. As such, it set out a plan to evaluate the market for renewable resources by issuing renewable RFPs for the benefit of ELL's customers. The 2022 Renewables RFP is an important step in that plan, and it furthers the ability to add cost-effective renewable generation, which is a key component of ELL's strategy to provide reliable service at a reasonable cost. ELL's 2019 IRP Action Plan also noted the Company's intention to "continue to monitor the cost and performance of storage technologies and seek opportunities for deployment within ELL's service territory."[22] As I discuss below, the 2022 Renewables RFP also furthered this objective.

The initial Notice of Intent indicated that ELL sought to procure the following types of resources with in-service dates no later than September 30, 2025:

- Up to 1,500 MW of new-build solar photovoltaic ("Solar PV") resources capable of providing cost-effective energy supply, fuel diversity, and other benefits to ELL's customers.
- PPAs for wind resources (located in either MISO or the Southwest Power Pool ("SPP")).
- In furtherance of ELL's ongoing efforts to evaluate the economics of battery storage technologies, the RFP also allowed for the submission of commercially proven lithium-ion battery energy storage systems ("BESS") as a separately priced option to accompany proposals for Solar PV facilities.

[22] *See* Docket No. I-34694, *2017 Integrated Resource Planning ("IRP") Process for Entergy Louisiana, LLC Pursuant to the General Order No. R-30021, Dated April 20, 2012* (May 23, 2019).

Q19. DID THE RFP RESTRICT THE LOCATION OF SOLAR RESOURCES?

A. Yes. The RFP included a requirement that any solar resources proposed be interconnected to the ELL Transmission System and be located within the Louisiana portion of MISO South, with a preference for resources in the Southeastern Louisiana Planning Area ("SELPA") region or West of the Atchafalaya Basin ("WOTAB") planning region.

Q20. WERE THERE OTHER RESTRICTIONS INCLUDED IN THE RFP?

A. Yes. Among other conditions, the RFP required that bidders have a fully executed Generator Interconnection Agreement ("GIA") with MISO or be active in the 2019, 2020, or 2021 Cycle 1 Definitive Planning Phase ("DPP") studies.

Q21. WHAT STEPS WERE TAKEN TO ENCOURAGE MARKET PARTICIPATION IN THE 2022 RENEWABLES RFP?

A. The 2022 Renewables RFP was widely publicized within the industry, and potential bidders were given ample notice and a reasonable opportunity to participate. As noted above, notice of intent to issue the RFP was posted on a public website on April 13, 2022, draft documents were posted on April 14, 2022, and the final RFP was posted June 14, 2022. Simultaneously with the posting on the website, ESL provided notice by electronic mail to its extensive list of potentially interested parties, including bidders that had either participated in previous RFPs or with which ESL had transacted in the

recent past, as well as a significant number of parties who have requested to receive RFP notifications from the Company.

Q22. WHAT INFORMATION WAS MADE AVAILABLE TO MARKET PARTICIPANTS IN THE 2022 RENEWABLES RFP?

A. In addition to the information available on ESL's public RFP website, ESL used many different means to make information about the 2022 Renewables RFP available to market participants. A virtual public bidders conference was conducted on May 12, 2022 to describe the RFP and to address questions and receive comments from market participants relating to the RFP. After presentations were made, ESL personnel answered specific questions about the bidder registration process, electronic proposal submission process, evaluation process, technical issues, product terms and conditions, and responded to other pertinent information requests and concerns. Written responses to questions asked at the conference were posted on the public website after the conference. Potential bidders were also provided an opportunity to submit written questions anonymously at the Bidders' and Technical conference and through the RFP inbox and/or anonymously through the LPSC Staff directly, and ESL posted these questions along with written answers on the RFP website.

Q23. HOW MANY PROPOSALS WERE SUBMITTED TO THE 2022 RENEWABLES RFP?

A. Initial participation was robust with 45 proposals (including 33 PPA proposals and 12 Build-Own-Transfer ("BOT") proposals) from 9 bidders being registered and 36 proposals from 7 bidders being evaluated. The proposals included five (BESS) options.

Q24. WAS AN INDEPENDENT MONITOR INVOLVED IN ELL'S 2022 RENEWABLES RFP?

A. Yes. This RFP did not preclude consideration of self-build options that may be submitted on behalf of ELL or any proposals that may be submitted by Entergy Regulated Affiliates and Entergy Competitive Affiliates. As such, ELL retained Mr. Wayne Oliver of Merrimack Energy Group to serve as the Independent Monitor ("IM") for the RFP, the same IM that oversaw ELL's 2020 and 2021 Solar RFPs.

Q25. WHAT IS THE COMMISSION'S MARKET-BASED MECHANISMS ORDER?

A. The current version of the Market-Based Mechanisms Order ("MBM Order")[23] was adopted by the Commission on October 29, 2008, and established various procedures and requirements for the market testing of any proposed capacity acquisition. The

[23] *See* General Order (October 29, 2008), General Order, Docket No. R-26172, Subdocket A, *In re: Development of Market-Based Mechanisms to Evaluate Proposals to Construct or Acquire Generating Capacity to Meet Native Load*, which Supplements the September 20, 1983 General Order, dated February 16, 2004, as amended by General Order, Docket No. R-26172, Subdocket B, dated November 3, 2006, and further amended by the April 26, 2007 General Order, and the amendments approved by the Commission at its October 15, 2008 Business and Executive Meeting, and now in General Order, Docket No. R-26172, Subdocket C, dated October 29, 2008, *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.*

MBM Order augments the procedures of the 1983 General Order and requires a utility proposing to acquire or build new generating capacity to "employ a market-based mechanism" consisting of a "Request For Proposal ("RFP") competitive solicitation process."[24] The utility must present the results and analysis from this RFP to the Commission as part of the "justification" required by Paragraph (2) of the 1983 General Order.[25] In addition, the MBM Order prescribes procedures to be followed by the utility in conducting the RFP process and presenting the results of that process to the Commission Staff.[26] The procedures required by the MBM Order include, among other things, the use of an IM to track the utility's conduct of the RFP process in which self-build proposals are competing, and the obligation to alert the Staff to any irregularities in the RFP process or any concerns.[27] Finally, the MBM Order provides a number of procedural safeguards designed to protect against changes to the self-build cost estimate during the RFP evaluation and selection process.[28]

Q26. WAS THE 2022 RENEWABLES RFP CONDUCTED IN A MANNER CONSISTENT WITH THE MBM ORDER?

A. Yes. ESL conducted the 2022 Renewables RFP in accordance with the process outlined in the MBM Order, including posting the draft 2022 Renewables RFP for comment by

[24] *See* General Order (October 29, 2008), *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,* Docket No. R-26172, *Id.* at p. 5..

[25] *Id.*

[26] *Id.* at pp. 6-7.

[27] *Id.* at p. 8.

[28] *Id.* at pp. 8-9.

market participants and Commission Staff; obtaining and responding to such comments; conducting a Bidders' and Technical Conference to present the draft 2022 Renewables RFP and respond to questions from market participants; identifying clearly the resource needs and the products for which proposals were sought to meet those needs; engaging the services of the IM to oversee the design and conduct of the 2022 Renewables RFP; ensuring that the IM had full access to all 2022 Renewables RFP processes and evaluations and the opportunity to provide comment and direction regarding those matters; designing processes appropriately to safeguard confidential information, including confining the dissemination of information to only those persons engaged in the 2022 Renewables RFP process and in accordance with practices approved by the IM; and conducting the 2022 Renewables RFP in a manner that was fair and impartial to all bidders and resulted in selecting the lowest reasonable cost resources that could meet the supply needs of customers targeted in the 2022 Renewables RFP. Also, as required by the MBM Order, ESL kept the Commission Staff informed of the development and implementation of the 2022 Renewables RFP and resource selection.

Q27. PLEASE PROVIDE AN OVERVIEW OF THE EVALUATION PROCESSES USED DURING THE 2022 RENEWABLES RFP.

A. Following the Bidder Registration Period, a high-level credit screening analysis was performed by the Credit Evaluation Team ("CET") to determine whether a Bidder's Parent Guarantor was acceptable for an offset to the liquid credit support, which in turn would reduce a bidder's credit requirements and, in theory, the cost associated with

their proposal. Bidders were informed of this determination within two weeks of their registration for the RFP.

After proposals were received, analyses were performed by separate teams to evaluate the economics, viability, transmission requirements, and accounting effects of each proposal. Company witness Mr. Daniel Boratko discusses each evaluation in his testimony, including the functional separation that was maintained among the evaluation teams to help ensure the integrity of the evaluation process.

Q28. WAS THE LPSC STAFF INVOLVED IN THE EVALUATION PROCESSES?

A. Yes, ELL kept the LPSC Staff apprised of RFP development throughout the process. Prior to the issuance of the Final RFP Documents, LPSC Staff participated in the virtual Bidders' and Technical Conference on May 12, 2022, to review proposed evaluation and elimination processes. On July 25, 2022, the LPSC Staff participated in a walkthrough of the Viability Assessment Team ("VAT") scorecard as well as the Economic Evaluation Team's ("EET") model and assumptions prior to the model being finalized and the Bidder's submission of their proposals. Prior to the notification of the Selections being provided to Bidders, ELL conducted a virtual meeting with the LPSC Staff, on March 14, 2023, to review the results of the analyses conducted by the VAT and EET, as well as the proposals designated for the Selection List.

Q29. WHAT DEVELOPMENTS OCCURRED AFTER THE SELECTIONS OF PROPOSALS?

A. After ELL selected proposals and reviewed those proposals with LPSC Staff, a Notice of Final Results was posted on a public website on March 17, 2023,[29] and negotiations began. ELL had selected nearly 2,000 MW of renewable resources in response to this RFP. Given the various challenges in the solar market described above (Q17), however, and for a number of reasons, many of the proposals selected did not come to fruition in terms of executed contracts.[30] First, following the RFP selections, a number of bidders made material changes to their proposals for the reasons I previously discussed, such as issues concerning supply constraints, permitting, federal and local governmental actions, and insurance and financial considerations, which in some instances caused bidders to transition discussions from previously offered PPAs to potential BOT options.[31] In some cases, the revised terms rendered proposals uneconomic for customers, and ELL terminated negotiations. In other cases, bidders simply withdrew their proposals. Certain proposals do remain in negotiation, and should Definitive Agreements be reached, ELL will make the required certification

[29] Entergy, *Notice of Final Results of the Entergy Louisiana, LLC's 2022 Request for Proposals for Solar Resources*, Entergy (March 17, 2023), *available at* https://spofossil.entergy.com/ENTRFP/SEND/2022ELLRenewablesRFP/Documents/2022%20ELL%20Renewables%20RFP%20Notice%20of%20Selections.pdf.

[30] ELL's experience in the 2022 Renewables RFP informed, and underscores, why a streamlined process is needed to support the ability to transact in the fast-moving renewable resource market, and ELL has proposed an alternative process in Docket No. U-36697 (March 13, 2023), *In re: Application for approval of an alternative market-based mechanism process seeking to secure up to 3,000 MW of solar resources, including certification of those resources, expansion of the Geaux Green Option Rider, and approval of a new renewable tariff.*

[31] In the case of bidders changing offers from PPAs to BOTs, ELL has notified the IM where appropriate and continues to evaluate viable options to ensure future contracts are favorable to customers. The Company strives to have an appropriate portfolio mix between PPA and BOT resources to ensure that ELL's portfolio is not over-weighted to PPAs causing credit implications that would increase the Company's cost of capital.

filings with the LPSC. At this time, however, ELL is seeking certification of the one proposal from the 2022 Renewables RFP that has resulted in an executed contract, the 100 MW Mondu PPA.

IV. THE MONDU PPA

Q30. PLEASE DESCRIBE THE MONDU PPA.

A. The Mondu Facility is a 150 MW_{AC} solar PV resource located on a 1,574-acre greenfield site in Pointe Coupee Parish, Louisiana. ELL proposes to enter into a 20-year PPA with the developer of this facility, Mondu Solar, LLC. Under the PPA, ELL will purchase two-thirds of the total nameplate capacity of the facility, which amounts to an expected 100 MW of unit-contingent, as-available capacity, capacity-related benefits, energy, environmental attributes, and other electric products (voltage support or ancillary services) from the facility.[32] The Mondu PPA, which is designated as HSPM, is attached to my testimony as HSPM Exhibit LKB-3.

Q31. WHAT ARE THE ENVIRONMENTAL ATTRIBUTES OF THE MONDU FACILITY?

A. The environmental attributes of the Mondu Facility include renewable energy credits ("REC"), as well as other renewable energy or environmental benefits, or

[32] The remaining 50 MW of capacity from the Mondu Facility is the subject of two 25-MW PPAs between the owner of the facility (NextEra Energy Marketing, LLC and Mondu Solar, LLC) and Concordia Electric Cooperative, Inc. (which are the subject of Docket No. U-36514) and Pointe Coupee Electric Membership Corp. (which is the subject of Docket No. U-36515). Ms. Ingram addresses those pending dockets in her Direct Testimony.

characteristics associated with capacity and/or energy or otherwise attributable to the facilities comprising the portfolio, and could include benefits such as emission allowances, credits for avoidance of greenhouse gases, etc. Additionally, as Ms. Ingram discusses in her Direct Testimony, when deployed in conjunction with Rider GGO, the Mondu PPA also will help ELL's customers to achieve their own environmental sustainability goals.

Q32. WHAT ARE THE BENEFITS OF THIS RESOURCE?

A. The Mondu PPA will provide benefits in the form of fuel price stability and flexibility, supply diversity, and a new, clean resource for our customers. As described by Ms. Ingram, there is significant demand for renewable resources for our customers, and this resource is a critical addition to our Rider GGO portfolio. As Mr. Boratko explains, the Mondu PPA is expected to provide net economic benefits under the current capacity accreditation for solar resources in MISO South and may also provide net economic benefits under MISO's proposed revised capacity accreditation methodology.[33] Further, as Mr. Boratko explains in his Direct Testimony, the Mondu PPA is projected to provide variable supply cost, capacity, fuel price stability, and REC benefits to customers (see HSPM Exhibit DCB-4). Moreover, as Mr. Boratko explains in Q26 of his Direct Testimony, by comparison to the renewable resources submitted in the 2022 Renewables RFP, and further by comparison to other solar resources within MISO South, the Mondu PPA is an economic option to provide these benefits to customers.

[33] *See* HSPM Exhibit DCB-4.

Q33. PLEASE SUMMARIZE THE BASIC PRICING TERMS AND EXPECTED ANNUAL ENERGY QUANTITIES FOR THE MONDU PPA.

A. Table 2 below provides this information:

Table 2
Key Pricing Terms for Mondu PPA
HIGHLY SENSITIVE PROTECTED

Capacity Payments	[redacted]
Energy Price	[redacted]
Discount Energy	[redacted]
Other Electric Products, Environmental Attributes, and Capacity-Related Benefits	[redacted]
Interconnection and Transmission Services	[redacted]
Decommissioning Bond Costs	In connection with Seller's obligation to post a decommissioning bond (Louisiana R.S. 30:1154(A)(9), as amended and reenacted by Acts 2022, No. 555), [redacted]
Insurance Cost	[redacted]
Estimated Commercial Operation Date	[redacted]

Q34. PLEASE DESCRIBE ANY OBLIGATIONS OF THE PARTIES TO THE MONDU PPA OWING TO THE AS-AVAILABLE NATURE OF THE RESOURCES.

A. [redacted]

Q35. WILL THE SELLER UNDER THE MONDU PPA BE SUBJECT TO PENALTIES IF THE FACILITY DOES NOT MEET THE ANNUAL GUARANTEED ENERGY QUANTITY?

A. [redacted]

Q36. DOES THE MONDU PPA ALLOW ELL TO CURTAIL ENERGY DELIVERIES FOR ECONOMIC REASONS?

A. [redacted]

Q37. HOW DOES THE MONDU PPA ADDRESS COSTS AND RISKS ASSOCIATED WITH A CHANGE RELATED TO ACCOUNTING TREATMENT REQUIRED UNDER THE PPA?

A. [redacted]

[redacted]

[redacted].

Q38. WHICH ENTITY WILL SERVE AS THE MARKET PARTICIPANT ("MP") UNDER THE MONDU PPA?

A. [redacted]

Q39. WHAT ARE THE REQUIREMENTS OF THE MONDU PPA THAT GOVERN THE REQUIRED TIME FOR ELL'S RECEIPT OF REGULATORY APPROVALS?

A. ELL's power purchase commitments under the Mondu PPA are contingent upon the satisfaction or waiver of various conditions precedent in the PPA, including LPSC approval of the PPA on terms that are acceptable to the Company. Should such regulatory approval not be granted, [redacted]

[redacted]

Q40. ARE THERE PROVISIONS IN THE MONDU PPA RELATED TO TRANSMISSION SERVICE FOR THE FACILITY?

A. [redacted]

Q41. UNDER WHAT CONDITIONS COULD ELL OR THE SELLER TERMINATE THE MONDU PPA?

A. ELL has a right to terminate the PPA [redacted]

[redacted]

Q42. ARE THERE PROVISIONS IN THE MONDU PPA RELATED TO PROPERTY INSURANCE THAT ARE UNIQUE TO THIS PPA?

A. [redacted]

[redacted]

Q43. DOES THE MONDU PPA INCLUDE ANY PROVISION THAT WOULD PROVIDE FOR A PRICE INCREASE WITHOUT COMMISSION APPROVAL BUT NOT SYMMETRICALLY PROVIDE FOR A PRICE DECREASE WITHOUT COMMISSION APPROVAL?

A. [redacted][34][redacted]

[redacted]

[34] *See* Ms. Ingram's Direct Testimony at Q26; Docket No. U-36514 (September 14, 2023), *Concordia Electric Cooperative, Inc. et al., In re: Joint application for approval of long-term power supply agreements*, Proposed Recommendation of the Administrative Law Judge at 17; Docket No. U-36515 (September 14, 2023), *Pointe Coupee Electric Membership Corp. et al., In re: Joint application for approval of long-term power supply agreements*, Proposed Recommendation of the Administrative Law Judge at 17.

[redacted]

V. CONCLUSION

Q44. WHY SHOULD THE MONDU PPA BE ADDED TO ELL'S SUPPLY-SIDE RESOURCE MIX?

A. The Mondu PPA represents another important step forward in the development of the energy future of the State of Louisiana, ELL, and its customers. As I have noted above, ELL's resource planning efforts and ELL's customers' past investment, as approved by the Commission, in new, spinning-mass, dispatchable generation have laid the groundwork for renewable resources, to be incorporated into ELL's generation mix in a way that preserves the reliability of electric service in Louisiana and that does not shift costs to customers of other utilities. As such, ELL's customers are poised to enjoy the benefits of the Mondu PPA, which includes (i) 100 MW of carbon-free nameplate generating capacity, (ii) benefits related to variable supply cost, capacity, fuel price stability, and RECs, as Mr. Boratko describes, (iii) economic benefits arising from the construction of the resources, and (iv) when coupled with Rider GGO, optionality for meeting customers' sustainability goals, which is necessary to support the continued growth of Louisiana's economy. For these reasons, the reasons I describe above, and the reasons expounded upon by other Company witnesses, ELL urges the Commission to approve the Company's Application and the Mondu PPA.

Q45. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, at this time.

AFFIDAVIT

STATE OF LOUISIANA

PARISH OF JEFFERSON

NOW BEFORE ME, the undersigned authority, personally came and appeared, **Laura K. Beauchamp**, who after being duly sworn by me, did depose and say:

That the above and foregoing is her sworn testimony in this proceeding and that she knows the contents thereof, that the same are true as stated, except as to matters and things, if any, stated on information and belief, and that as to those matters and things, she verily believes them to be true.

Laura K. Beauchamp

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 7 DAY OF DECEMBER 2023

NOTARY PUBLIC

My commission expires: at death

LAWRENCE J. HAND, JR., 23770
Notary Public in and for
the State of Louisiana.
My Commission is for Life.

Listing of Previous Testimony Filed by Laura K. Beauchamp

DATE	TYPE	SUBJECT MATTER	REGULATORY BODY	DOCKET NO.
06/03/2011	Settlement	Little Gypsy Securitization	LPSC	U-31894
07/07/2011	Direct	Carville-Calpine 2011 PPA	LPSC	U-32031
09/16/2011	Settlement	EGSL Fuel Adjustment Clause (1995-2004)	LPSC	U-27103
12/21/2011	Rebuttal	Carville-Calpine 2011 PPA	LPSC	U-32031
01/26/2012	Settlement	Retail Effects of FERC Opinion Nos. 468 and 468-A and Related Orders	LPSC	U-31099
03/02/2012	Settlement	Carville-Calpine 2011 PPA	LPSC	U-32031
02/15/2013	Direct	EGSL Base Rate Case	LPSC	U-32707
02/15/2013	Direct	ELL Base Rate Case	LPSC	U-32708
03/28/2013	Direct	ELL-Algiers 2013 Rate Case	CCNO	UD-13-01
09/27/2013	Settlement	MISO Implementation	LPSC	U-32675
02/18/2014	Rebuttal	ELL-Algiers 2013 Rate Case	CCNO	UD-13-01
03/22/2019	Adopting	ENOL 2018 Rate Case	CCNO	UD-18-07
06/06/2022	Adopting	ELL Solar Portfolio and Green Tariff	LPSC	U-36190
02/28/2023	Direct	ELL Solar CCN Application	LPSC	U-36685
03/13/2023	Direct	ELL 3,000 MW Solar Application	LPSC	U-36697
08/30/2023	Direct	ELL Regulatory Blueprint	LPSC	U-36959

BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

EX PARTE: **APPLICATION OF**	)	
ENTERGY LOUISIANA, LLC	)	
FOR APPROVAL OF THE MONDU	)	
SOLAR POWER PURCHASE	)	**DOCKET NO. U-____**
AGREEMENT, EXPANSION OF THE	)	
GEAUX GREEN OPTION, COST	)	
RECOVERY AND RELATED RELIEF	)	

EXHIBIT LKB-2

HIGHLY SENSITIVE PROTECTED MATERIAL

INTENTIONALLY OMITTED

DECEMBER 2023

BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

EX PARTE: **APPLICATION OF**	)	
ENTERGY LOUISIANA, LLC	)	
FOR APPROVAL OF THE MONDU	)	
SOLAR POWER PURCHASE	)	**DOCKET NO. U-____**
AGREEMENT, EXPANSION OF THE	)	
GEAUX GREEN OPTION, COST	)	
RECOVERY AND RELATED RELIEF	)	

EXHIBIT LKB-3

HIGHLY SENSITIVE PROTECTED MATERIAL

INTENTIONALLY OMITTED

DECEMBER 2023