entergy

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March 22, 2024

BY HAND DELIVERY
Mr. Brandon Frey
Louisiana Public Service Commission
602 North Fifth Street
Baton Rouge, Louisiana 70802

Re: Application of Entergy Louisiana, LLC for Exemption and/or Certification of the West Bank 230kV Transmission Project in Accordance with Louisiana Public Service Commission General Order Dated October 10, 2013 (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 Exemption and/or Certification of the West Bank 230kV Transmission Project in Accordance with Louisiana Public Service Commission General Order Dated October 10, 2013. The Application is supported by the Direct Testimony and Exhibits of Phillip R. May, Laura K. Beauchamp, Daniel Kline, Bradley D. Skok, Catherine R. Ward, and Ryan D. Jones. Please retain the original and two copies for your files and return a date-stamped copy to our courier.

I have also enclosed five copies of the Confidential Version of the referenced filing, which is being provided 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 Practice and Procedure. The confidential materials included in the filing consist of competitively sensitive market information or sensitive infrastructure information, the disclosure of which may create an artificial target for suppliers/vendors or create physical security risks. 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. Accordingly, it is critical that this information remain confidential.

Please retain the appropriately marked Confidential Version for your files and return a date-stamped copy to our courier. 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,

Matthew T. Brown

Enclosures
cc: LPSC Commissioners (*public version only via electronic mail*)
Phillip R. May
Lawrence J. Hand, Jr.

BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

APPLICATION OF ENTERGY LOUISIANA, LLC FOR EXEMPTION AND/OR CERTIFICATION OF THE WEST BANK 230kV TRANSMISSION PROJECT IN ACCORDANCE WITH LOUISIANA PUBLIC SERVICE COMMISSION GENERAL ORDER DATED OCTOBER 10, 2013	)	**DOCKET NO. _____**

APPLICATION

OF

ENTERGY LOUISIANA, LLC

MARCH 2024

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APPLICATION OF ENTERGY LOUISIANA, LLC FOR EXEMPTION AND/OR CERTIFICATION OF THE WEST BANK 230kV TRANSMISSION PROJECT IN ACCORDANCE WITH LOUISIANA PUBLIC SERVICE COMMISSION GENERAL ORDER DATED OCTOBER 10, 2013

Entergy Louisiana, LLC ("ELL" or the "Company") respectfully submits this Application seeking, consistent with the Commission's Transmission Siting Order,[1] an exemption from certification by the Louisiana Public Service Commission (the "Commission" or "LPSC") with respect to the construction of the portfolio of transmission projects required to add (1) a new 500/230kV Substation ("Commodore Substation") on the West Bank of the Mississippi River ("West Bank") in ELL's Amite South Planning Region ("Amite South")[2] in Iberville Parish, Louisiana and (2) approximately 60 miles of new 230kV transmission line to connect the existing Waterford Substation to the new Commodore Substation (the "West Bank 230kV Project" or the "Project"), on the basis that the Project is being undertaken by the Company for the primary purpose of accommodating electric service to two new industrial block loads to be located on the West Bank, one associated with the expansion of existing customer facilities and the other associated with a new industrial plant (together, the "New 230kV Block Loads").

Alternatively, in the event the Commission determines that the West Bank 230kV Project or any part of the Project does not qualify for an exemption under the Transmission

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1 *See* General Order (October 10, 2013), *In re: Determination as to Whether the Commission Should Issue a General Order Asserting Jurisdiction Over the Certification of Utility Transmission Projects and the Determination of Whether Those Projects Are in the Public Interest* ("Transmission Siting Order"), *Docket No. R-26018, Id.* at Section VIII(6).

2 The Amite South planning region is generally described as the area extending east from the Baton Rouge metropolitan area to the Mississippi state line and extending south from the Amite Substation to the Gulf of Mexico.

Siting Order, the Company requests certification by the Commission, under the Transmission Siting Order, that the public convenience and necessity would be served by the completion and siting of the Project.

The Company's Application, including its supporting testimony and exhibits, provides (1) the information required to support the application of the exemption established at Section VIII(6) of the Transmission Siting Order or, alternatively, (2) the information required pursuant to Section V of the Transmission Siting Order for timely certification that the public convenience and necessity will be served by the completion and siting of the Project. In addition to the requested finding of an exemption and/or certification, the Company respectfully requests a finding that the actual retail revenue requirement associated with the prudently incurred costs of the West Bank 230kV Project is deemed eligible for recovery by the Company through the appropriate recovery mechanism at the time that the components of the West Bank 230kV Project are placed in service, and the development of a schedule and procedures to permit this Application to be considered on a timely basis. The Company shows as follows:

I. INTRODUCTION

ELL is a limited liability company duly authorized and qualified to do business in the State of Louisiana, created and organized for the purposes, among others, of manufacturing, generating, transmitting, distributing, and selling electricity for power, lighting, heating, and other such uses.

The portfolio of transmission projects that comprise the West Bank 230kV Project, which is currently estimated to cost $498.8 million, will provide the injection of a new 230 kilovolt ("kV") transmission line into the Amite South region, for which the Company has load

additions of 5,000 megawatts ("MW") under study by Entergy Services, LLC's ("ESL")[3] for the commencement of service between 2023 and 2030. As discussed by Company witnesses Phillip R. May and Laura K. Beauchamp, this filing is a critical step in seizing a generational opportunity for economic resurgence currently presented for the State of Louisiana, the Amite South planning region that the Company serves, and the Commission. This opportunity arises from the burgeoning needs of businesses and industries who already call Louisiana home or seek to do so. The Amite South region is undergoing substantial industrial growth and is poised for even greater economic expansion if the Company, with the Commission's oversight and support, provides the transmission capacity and resources necessary to accommodate the electrical needs of the various companies seeking to locate or expand their facilities in the region.

The West Bank 230kV Project is part of a multi-phased initiative by the Company to ensure it has adequate transmission and generation capacity to accommodate these new bulk loads in a timely and efficient manner. In a series of filings before the Commission, including this Application, the Company seeks the Commission's approval to move forward with (or provides the Commission with notice of) a necessary and comprehensive portfolio of transmission projects in Amite South (the "Amite South Transmission Project" or "ASTP") required to accommodate the significant load growth presented by this generational

[3] ESL is the service company affiliate of the Entergy Operating Companies ("EOCs") that provides engineering, planning, accounting, technical, regulatory, and other administrative support services to each of the EOCs. The EOCs include ELL; Entergy Mississippi, LLC ("EML"); Entergy Arkansas, LLC ("EAL"); Entergy New Orleans, LLC ("ENO"); and Entergy Texas, Inc. ("ETI").

opportunity.[4] Each of the Company's transmission projects being presented to the Commission in this series of filings has been approved by the Midcontinent Independent System Operator, Inc. ("MISO").

Importantly, the window of time in which to act is limited. Businesses and industries presently pursuing new locations or expansions in the Amite South region have the option to expand or locate their businesses – and the jobs and other community benefits that come with them – elsewhere. The Company and the Commission must act now to secure the benefits offered by this opportunity. Those benefits will be transformative for the economy of Louisiana and the lives of its citizens and difficult to overstate. The industrial load growth that comes with the economic expansion in the Amite South region will be responsible for the creation of good-paying jobs for Louisiana residents and revenues for local governments and our communities — all of which increase the quality of life for Louisiana citizens. Recognized Louisiana economist, Dr. Loren Scott, has concluded that the positive economic impact of the new and expanding industries associated with the industrial growth in Amite South will be immense to both the region and the State of Louisiana, including an estimated:

- 8,356 new jobs annually;
- $29.8 billion in new sales at businesses in the River Region; and

[4] The ASTP includes transmission projects on the West Bank and East Bank of the Mississippi River in Amite South, with the largest growth projected to occur on the West Bank given the availability of land ready for development. Summarizing the major parts, the West Bank projects include the West Bank 230kV Project (providing a new substation and new 60-mile 230kV transmission line) and the West Bank 500kV Project (providing a new 88-mile 500kV line). The East Bank projects include a new substation (the Audubon Substation) and new 21-mile 230kV transmission line (Willow Glen-Conway-Audubon). In addition to its Company-wide transmission construction plan (of which the ASTP is a vital part), ELL will also be moving forward with other strategic projects that include its generation portfolio expansion and grid resilience plan, all of which will be needed to accommodate the industrial growth that results from this generational opportunity.

- $1.1 billion in new revenues to local government.[5]

The areas in which this growth would occur include areas that have historically struggled with high levels of poverty and the accompanying challenges. The jobs and revenues to local businesses and governments that would flow from these investments present an historic opportunity to reduce that poverty, to provide needed revenues to invest in roads, schools, and other infrastructure, and to improve the lives of the Louisianans who live and work in these areas.

The Commission can enable this growth opportunity by establishing a regulatory environment in Louisiana that leverages the Amite South region's inherent advantages, such as the Mississippi River and deepwater port access, and that clears the way for the Company to develop the infrastructure needed for these businesses to follow through on their plans to select southeast Louisiana as the location for their monumental investments, thereby unlocking the sizable benefits discussed in the report by Dr. Scott.

Appropriate governmental entities within Louisiana, including the State's executive branch, are taking proactive steps to position Louisiana for economic growth. As the regulatory body overseeing the development of the State's electrical infrastructure, the LPSC plays a paramount role in setting policies and regulations that will influence Louisiana's economic future. Many of ELL's actions with respect to this generational opportunity for economic resurgence will involve – and are subject to the oversight of – the Commission. As noted above, this is one of a series of applications the Company has filed or will file before the Commission seeking its consent and support to expand and update ELL's load-serving

[5] *See* Dr. Loren Scott, Stringing Lines: The Economic Case for Incremental Entergy Louisiana Infrastructure, at 14 (2023).

infrastructure in order to accommodate and capitalize upon this tremendous economic growth opportunity for the State of Louisiana and the Amite South region. The outcomes of these proceedings will be critical to whether the State and ELL remain competitive and attractive to businesses looking to expand in or locate in Louisiana. It is reasonable to conclude that, if the Company's load-serving capability in the region is not increased, there is a substantial risk that prospective industrial customers planning to locate or expand in the region will seek another site with another supplier, with the likely result of locating their new facilities outside of Louisiana.

II. COMPANY WITNESSES

With this Application, the Company submits the Direct Testimonies of Phillip R. May, Laura K. Beauchamp, Daniel Kline, Bradley D. Skok, Catherine Ward, and Ryan D. Jones. The purpose of the testimony of each witness is as follows:

- **Phillip R. May** – Mr. May is the President and Chief Executive Officer ("CEO") of ELL. In his Direct Testimony, he describes the significance of this Application before the Commission. In doing so, he explains why this filing is a critical step in seizing a generational opportunity for economic resurgence currently presented for the State of Louisiana, the Amite South planning region, and the Commission; and he describes the Commission's important role in overseeing and facilitating the expansion of the Company's infrastructure to accommodate and foster this economic growth.

- **Laura K. Beauchamp** – Ms. Beauchamp is the Director, Resource Planning and Market Operations, for the Company. She identifies the other ELL witnesses whose Direct Testimony supports this filing and provides a summary of their testimony. She also describes the anticipated and unprecedented load growth in Amite South, which anticipated load growth is a key driver of the need for substantial transmission infrastructure development in Amite South; and she describes how the West Bank 230kV Project is a significant step with respect to a larger transmission portfolio to enhance existing transmission infrastructure and build new infrastructure necessary to provide additional load-serving capability in Amite South, ensure reliability in the corridor, and drive economic development for the State.

- **Daniel Kline** – Mr. Kline is the Director, Power Delivery Planning, within the Project and Portfolio Development group of the ESL Power Delivery Organization and is responsible for the analysis and identification of transmission projects that are needed to reliably serve the EOCs' customers. He provides an overview of the Entergy Transmission System and ELL's Transmission System. He also provides an overview of the various steps in the transmission planning process employed to develop transmission projects such as the West Bank 230kV Project, including the role of MISO.

- **Bradley D. Skok** – Mr. Skok is the Manager, Transmission Planning, within the Power Delivery Planning group of the ESL's Power Delivery Organization and is responsible for the analysis and identification of new transmission facilities needed to reliably serve new electrical load, such as the New 230kV Block Loads. He explains the Company's and MISO's analyses that demonstrate the necessity of the West Bank 230kV Project for ELL to reliably serve the New 230kV Block Loads, including a discussion of the documentation showing that the purpose of the Project is to accommodate the needs of the New 230kV Block Loads. Mr. Skok further explains that all components of the ASTP, including the West Bank 230kV Project, are necessary for ELL to provide electric service to the block load additions incorporated in the studies that led to the development of the ASTP.

- **Catherine Ward** – Ms. Ward is the Director, Project Management – Capital Projects in ESL's Capital Projects organization and is responsible for developing and delivering large transmission projects in areas served by the EOCs, including ELL. Ms. Ward discusses the Company's plan for designing and constructing the new transmission facilities that make up the West Bank 230kV Project, along with a schedule outlining the Project's milestones. She further provides a general description of each component of the West Bank 230kV Project, as well as the current estimated cost of constructing the new facilities, their proposed locations, maps, and illustrations of the new transmission facilities.

- **Ryan D. Jones** – Mr. Jones is the Manager, Regulatory Affairs, for ELL. He describes the requirements of the Siting Order and how the testimony and exhibits included with the Company's Application provide (1) the information that shows that the West Bank 230kV Project qualifies for an exemption to the certification requirement under the Siting Order and (ii) in the alternative, the information required for the Commission to certify that the West Bank 230kV Project serves the public convenience and necessity and is in the public interest in compliance with the Siting Order. In addition, Mr. Jones provides the estimated revenue requirement of the Project as well as a discussion of the potential bill effects associated with the Project.

Through this Direct Testimony and accompanying exhibits, the Company provides all of the information necessary to establish and support the basis for a determination that the West Bank 230kV Project is exempt from certification under Section VIII(6) of the Transmission Siting Order, as well all of the information required by Section V of the Transmission Siting Order to establish and support a Commission determination that the public convenience and necessity will be served by the completion and siting of the Project.

III. COMPONENTS OF THE WEST BANK 230KV PROJECT

As described by Company witness Catherine R. Ward, the West Bank 230kV Project includes the following components:[6]

- **Commodore 500/230kV Substation**
  - Build a new 500/230kV substation with the 230kV configured in a breaker and a half scheme with nine 230kV circuit breakers.
  - 500kV to be configured in a four-breaker ring including a 500/230kV autotransformer bank including one spare phase.
  - New property acquisition is required in Iberville Parish, including an estimated 46 acres of land for substation and line cut-ins.
  - The substation will cut-in to the following existing transmission lines: Richardson-Wise 230kV line, Iberville-Derrick 230kV line, and Bayou LaButte-Webre 500kV line.
  - Remote end relay and settings upgrades required at the following substations: Derrick 230kV, Iberville 230kV, Webre 500 kV, and Bayou LaButte 500kV. Settings-only upgrades required at the following substations: Richardson 230 kV and Wise 230kV.

[6] As explained by Ms. Beauchamp and Mr. Skok in their Direct Testimony, the instant Application concerns the 230kV elements of the Company's West Bank Waterford to Commodore transmission project. The Company will file a separate certification application regarding the 500kV portion of the Amite South Reliability Project selected by MISO in the MTEP23 process.

- **Waterford 230kV Substation Upgrade**
  - Upgrade relay panels and settings at the existing substation. At this point we do not anticipate that an expansion of the substation is necessary.
  - No property acquisition required; work to be constructed on Company-owned property.
- **Waterford – Commodore 230kV Transmission Line**
  - Build a new 60-mile 230kV Line from Waterford 230kV Substation to Commodore 500/230kV Substation.
- **Right of Way ("ROW") Acquisition for Waterford – Commodore 230kV and 500kV Transmission Lines**
  - Acquire approximately 60 miles of new ROW for both the 230kV and 500kV lines between the Commodore and Waterford Substations. The lines will predominantly run parallel; new ROW to be acquired includes an estimated 2,023 acres between Commodore and Waterford Substations.
  - Acquire new 500kV ROW between Waterford Substation and Churchill Substation. Estimated length is 28 miles.
- **Iberville – Commodore 230kV Line Rebuild**
  - Rebuild approximately 3.6 miles of line to > 1900A.
- **Distribution Lines**
  - Distribution lines located in the Project location are under evaluation to determine if they meet required clearances with the installation of the new facilities.
  - The distribution scope includes routing temporary construction power (approximately 0.7 mile) to the Commodore Substation from an existing nearby distribution line and to provide a 300kVA transformer for permanent power to the substation. Construction will be predominantly overhead to the west of Commodore Substation and will transition to underground as the line approaches the substation.

IV. LOCATION AND MAPPING OF THE PROJECT

To illustrate the location and construction of the components of the West Bank 230kV Project, Ms. Ward's Direct Testimony includes the following exhibits:

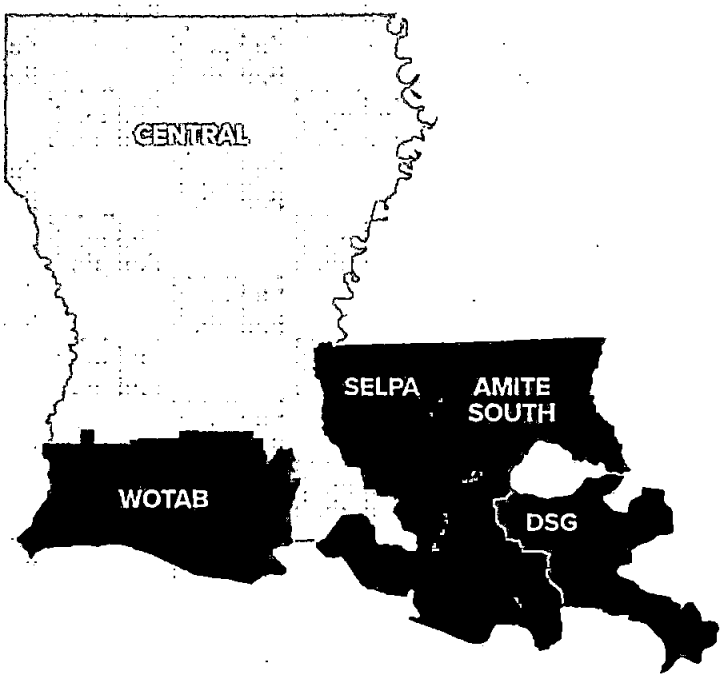
- **Exhibit CRW-1 (HSPM):** This is a generalized substation-to-substation routing of the new and modified substations and transmission lines in the Project. The general locations of the new and/or modified substations and transmission lines associated with the Project are in St. Charles Parish, St. John the Baptist Parish, St. James Parish, Assumption Parish, Ascension Parish, Iberville Parish, and Jefferson Parish, Louisiana. Exhibit CRW-1, which contains highly sensitive protected materials ("HSPM"), includes illustrations of the routing of both the components of the West Bank 230kV Project included in this Application as well as the additional components that will compose the remainder of the ASTP to be included in a subsequent filing (which additional components are described in the Direct Testimonies of Ms. Beauchamp and Company witness Bradley Skok).
- **Exhibit CRW-2:** This is a scoping diagram of the Project components.
- **Exhibit CRW-3:** This includes illustrations of the standard typical pole sections that will be used for the construction of the new and rebuilt transmission line sections.
- **Exhibit CRW-4:** This includes diagrams of the new Commodore Substation, including both the 230kV and 500kV elements.

V. ECONOMIC RESURGENCE OF THE AMITE SOUTH REGION

The Amite South region is experiencing unprecedented load growth, particularly with respect to forecasted block load increases in the industrial sector.

ELL's service area, divided into its five planning areas, is depicted in **Figure 1** below. Amite South is a sub-region of the Southeast Louisiana Planning Area ("SELPA") and is a historical load pocket, in which the capability of the transmission system is inadequate to import sufficient energy and capacity, such that ELL must rely on local generation to meet demand and reliably maintain system stability within that load pocket. Included within Amite South is the Downstream-of-Gypsy ("DSG") sub-region that is also its own load pocket. Amite South contains the State's largest metropolitan area as well as a significant amount of existing and potential high load factor industrial customers, and it relies substantially on local generation and imports to serve the region's peak load and transmission requirements.

Figure 1



As discussed by Ms. Beauchamp, the Company has roughly 5,000 MW of load additions on the West Bank in Amite South being evaluated by ESL for electric service commencing during the period between 2023 and 2030. If all 5,000 MW were to materialize, it would constitute a 300% increase in the region's current load. Additionally, as forecasted in January of this year, Mr. May's Exhibit PRM-3 (Ms. Beauchamp's Exhibit LKB-2) shows eighteen (18) new block loads totaling nearly 3,900 MW set to develop along the West Bank in Amite South.

While the Company cannot say with certainty that every one of these new block loads will materialize, the preponderance of interest in the region clearly indicates that it is eminently reasonable to conclude that a critical mass of these new loads will in fact materialize as long as the right infrastructure is put in place to accommodate their needs. As Ms. Beauchamp explains in her Direct Testimony, this wave of development is driven by a significant surge in projects designed to address clean energy initiatives spurred by tax credits made available under the Inflation Reduction Act. These clean energy projects are ideally suited for the Amite South region in conjunction with Louisiana's traditional competitive advantages, such as a comprehensive pipeline network, the Mississippi River, deep water ports, railways and airports. Louisiana also has an available and adaptable workforce as well as educational institutions that are preparing the workforce of the future.

New industry development is also driving load growth in areas such as liquefied natural gas ("LNG") exports, chemical manufacturing and, increasingly, energy transition investment focused on reduced carbon intensity. According to the Louisiana State University ("LSU") Center for Energy Studies' 2024 Gulf Coast Energy Outlook, the Gulf Coast has seen over

$262 billion in announced energy manufacturing investment since 2013, of which, Louisiana's share is $144 billion or 55%.[7]

The above-identified factors indicate that both the State of Louisiana and the Amite South region have a real opportunity not only to maintain the strength of Louisiana's industrial sector, but also to help it grow exponentially. The necessary infrastructure must be in place to timely meet that growth.

VI. DEVELOPMENT OF THE PROJECT

A. Transmission Planning Process

1. Overview of Entergy and ELL Transmission Systems

As Company witness Daniel Kline explains, the Entergy Transmission Facilities span portions of five states (Arkansas, Louisiana, Mississippi, Texas, and Missouri) and are comprised of approximately 16,000 circuit miles of transmission lines. In addition to the lines, there are more than 1,500 substations across the system. Employees and assets based at various locations throughout the areas served by the Entergy Operating Companies are used to plan, operate, and maintain these facilities.

The ELL transmission system is comprised of approximately 5,267 circuit miles of transmission lines. The ELL transmission system is composed of 69 kV, 115 kV, 138 kV, 230 kV, 345 kV, and 500 kV transmission lines and substations, and it extends across the footprint of the State of Louisiana.

The Entergy Transmission Facilities are used to move high-voltage bulk electric power produced by market participants within MISO across an interconnected system of transmission

[7] Upton, Gregory B., Dismukes, David E., and Albrecht, Greg, *Gulf Coast Energy Outlook,* LSU Center for Energy Studies (2023), *available at* https://www.lsu.edu/ces/publications/2023/gceo_2024.pdf, at p. 25.

lines and substations to distribution points for delivery to the approximately 3 million retail customers of the EOCs, as well as to other transmission system users such as municipalities and cooperatives, and to points of delivery into other transmission systems. The Entergy Transmission Facilities also deliver power directly, at transmission-level voltages, to a number of large commercial and industrial retail customers of the EOCs. These transmission-level retail customers include refineries, chemical plants, oil and gas processing facilities, pumping stations, and large manufacturing sites vital to the economies of the Amite South region, the State of Louisiana, and the nation. The New 230kV Block Loads are transmission-level customers.

2. Entergy's Planning Process

Reliable transmission infrastructure is critical to ensure that ELL can reliably support industries locating in the areas of Louisiana that the Company serves, to ensure that inadequate infrastructure does not become an impediment to that development and the economic benefits to Louisiana associated with that development, and to continue to reliably serve all customers. As Mr. Kline explains, to meet these goals, in addition to its own internal standards, the Entergy Transmission System is planned, designed and operated in accordance with national and regional reliability standards and guidelines.

Transmission planning is performed to ensure that the interconnected Entergy Transmission System: (1) remains compliant with applicable North American Electric Reliability Corporation ("NERC") Reliability Standards, standards of the SERC Reliability Corporation ("SERC"), and each EOC's local planning criteria; and (2) is designed to deliver energy efficiently to end-use customers at the lowest reasonable cost. Expansion of, and enhancements to, transmission facilities must be planned well in advance of the need for such

improvements given that regulatory processes, permitting processes, and construction activities can take multiple years to complete.

As a Transmission Owner in MISO, the Company's transmission system is planned in accordance with the MISO Open Access Transmission, Energy and Operating Reserve Markets Tariff ("MISO Tariff"). On behalf of the Company, ESL oversees the preparation of annual assessments of the Company's transmission facilities and conducts local reliability planning through MISO's reliability planning process. To do so, ESL applies the NERC and SERC reliability standards and local planning criteria to identify upgrades needed to maintain reliable service to existing customers and accommodate future load growth. The product of this process is a local reliability plan that is approved by the EOCs and provided to MISO for use in its overall regional planning process.

3. Role of MISO

As Mr. Kline explains, the process of planning the transmission grid in the MISO region is guided by four different, but related, points of view: (1) top-down regional (or MISO-wide) planning, (2) bottom-up (or locally driven) planning, (3) access planning (which includes transmission-service-request and generator interconnection-driven transmission planning), and (4) state/federal policy-driven planning. The result of this process is a plan for the enhancement of the transmission grid in MISO. This plan is referred to as the MISO Transmission Expansion Plan ("MTEP").

The MTEP process includes opportunities for input from various stakeholders and participants, including meetings and the submission of written comments. Local reliability-driven projects are generally developed in the bottom-up process, which relies on the identification of need by the local Transmission Owners and analyzes that need (and the

proposed solution) with significant stakeholder review and input. Transmission access planning is driven by customers requesting generator interconnection and transmission service.

No matter how a project is developed, the MTEP process relies on MISO's broad analysis of the MISO transmission system (and its neighboring systems), stakeholder review of and input on that analysis and proposed projects, and, ultimately, a decision from the MISO Board of Directors (the "MISO Board") regarding approval of any projects recommended to it.

As Mr. Kline further explains, each MISO MTEP planning cycle is an 18-month process that begins in June of each year and concludes in December of the following year. For example, MTEP23 began its process in June 2022 with a requirement that Transmission Owners submit their proposed MTEP23 projects to address reliability no later than mid-September 2022. With respect to reliability planning, projects generally are proposed to MISO by a Transmission Owner. Based on its significant knowledge of and experience planning for its transmission system, a MISO Transmission Owner's proposal identifies reliability deficiencies on the transmission system (*i.e.*, instances in which a project is needed to address a violation of an applicable NERC standard, local planning criterion, or other reliability requirement) and recommends projects needed to address the violation. MISO selects the preferred method to mitigate any reliability deficiencies that have been identified in the proposals. MISO's study of the proposed projects is part of its annual MTEP process, which includes review of the projects with stakeholders at scheduled sub-regional planning meetings throughout the year in order to share information about the needs and drivers of the proposed projects and obtain robust stakeholder input on the proposed projects. If appropriate, MISO also optimizes the plans submitted by different stakeholders, selecting alternative projects that

may address identified needs more efficiently than those proposed by individual stakeholders. At the conclusion of the MTEP planning cycle, the MISO Board considers for approval the projects recommended by the MISO planning staff that are determined to effectively and efficiently meet reliability needs.

Mr. Kline explains that the West Bank 230 kV Project was developed by ESL through the bottom-up process described above, proposed to MISO, and approved, through the MTEP23 process.[8] As noted above, the West Bank 230kV Project is one component of a larger project that MISO approved as the "Amite South Reliability Project – Phase 1" in MTEP23. The Company will address the balance of the components of the Phase 1 Project as well as certain other projects that were approved in MTEP23 and that are necessary to serve the projected load growth in the Amite South region in filings that are expected to be made later, as appropriate, in 2024.

B. Development of the Amite South Transmission Project (including the West Bank 230kV Project)

Reliable transmission infrastructure is critical to the Amite South region to ensure ELL can reliably continue to meet the energy needs of the industries locating there, to ensure that inadequate infrastructure does not become an impediment to that development, and to continue to reliably serve all customers in southeast Louisiana. As Mr. Skok explains, transmission studies by both ESL, on behalf of ELL, and MISO have led to the determination that additional and substantial transmission infrastructure is necessary to accommodate electric service to the

[8] *See* MISO MTEP23 Appendix A – New Projects recommended for approval, *available at* https://cdn.misoenergy.org/MTEP23%20Appendix%20A%20-%20New%20Projects%20recommended%20for%20approval629964.xlsx, MISO Project 25242. As noted below, "Amite South Reliability Project - Phase 1" is the name of the Company's submission to MISO that included the West Bank 230 kV Project as a component part.

forecasted block load additions in Amite South over the next ten years. These studies resulted in the development of ASTP to accommodate industrial load growth in Amite South. The West Bank 230kV Project is part of the ASTP and is necessary to accommodate service to the New 230kV Block Loads, which require electric service from the Company during the early part of that period, prior to the in-service dates associated with other parts of the West Bank portion of the ASTP.

Mr. Skok explains that, currently, the transmission system in the Amite South region in the industrial corridor between Baton Rouge and New Orleans is highly constrained, meaning that the Company is unable to serve incremental load in some locations without the Company providing increased load-serving capability through additional facilities or upgrades to the transmission system, and this includes the region along the West Bank where the New 230kV Block Loads are locating. There will be no additional load-serving capability in Amite South after ELL begins service to customers for which ELL has an executed Electric Service Agreement. While there have been no violations of NERC Reliability Standards identified along the area's transmission system under current system conditions, any additional load on the system will likely create a violation. Additionally, the transmission system in this area is also a critical path for importing power into Amite South. The possible acceleration of generator deactivations in the Amite South region due to environmental rule changes would further constrain the transmission system in this corridor, as it would necessarily increase the power imports through that path.

During the transmission planning process associated with the development of MTEP23, the PDP group modeled twelve (12) industrial block load additions totaling 2,190 MW of increased load in Amite South, including the New 230kV Block Loads. An initial

study based on the current configuration of the system with the twelve block load additions incorporated as the major change in the model indicated that numerous transmission facilities would overload and low voltages would occur as a result of various transmission contingency events. Based on the Company's evaluation of the overload/low-voltage conditions identified, the PDP group developed corrective action to resolve the violations consisting of substantial transmission infrastructure improvements and new construction on the East and West Bank in Amite South. The infrastructure improvements and new construction, described below, constitute the ASTP and include the components of the West Bank 230kV Project. A subsequent study incorporating the twelve block load additions (of 2,190 MW) and the components of the ASTP verified the necessity of the ASTP to resolve the violations.

As described by Mr. Skok and Ms. Beauchamp, for the Company's submission to MISO for MTEP23, the components of ASTP were divided into phases, with Phases 1 and 2 consisting of the improvements and new construction on the West Bank and East Bank, respectively.[9] The West Bank 230kV Project, along with other components, is included in Phase 1 of the ASTP. All components of Phase 1 and Phase 2 of the ASTP, with those included in the West Bank 230kV Project identified, are as follows:

- ASTP Phase 1 – West Bank 230kV Project (included in this Application):
  - New Commodore 500/230kV Substation;
  - Upgrade of the Waterford 230kV Substation;
  - New Waterford – Commodore 230kV Transmission Line; and
  - Rebuild of the Iberville – Commodore 230kV Transmission Line.

[9] The ASTP also includes a Phase 3, which MISO is still evaluating. Phase 3 is not needed for service to the New 230kV Block Loads.

- ASTP Phase 1 – West Bank 500kV Projects (to be included in a future filing):
  - Waterford 500kV Substation Expansion;
  - Churchill 500/230kV Substation;
  - New 88-mile Commodore – Churchill 500kV Line; and
  - Convert the existing 230kV Waterford – Churchill Line to 500kV.
- ASTP Phase 2 – East Bank Projects:
  - New Audubon Substation and 7.8 miles of new transmission line for the purpose of serving a new industrial customer load on the East Bank, which are the subject of a recent ELL filing at the Commission.[10]
  - New 21-mile Willow Glen – Conway – Audubon 230kV line (to be included in a future filing).

As Mr. Skok explains in his testimony, MISO has performed an independent evaluation of the assumptions and inputs modeled in the Company's studies that provide the basis of the ASTP and the West Bank 230kV Project. As a result of its evaluation, MISO has approved all construction projects made part of Phase 1 (including the West Bank 230kV Project) and Phase 2 of the ASTP.[11]

Additionally, as Mr. Skok also explains, the Company has conducted an additional transmission study separate from the study that resulted in the Company proposing the ASTP

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[10] *See* Notice of Exemption (January 31, 2024), *Entergy Louisiana, LLC's Notice of Exemption Regarding the Audubon Substation and Related Transmission Facilities Consistent with Louisiana Public Service Commission General Order Dated October 10, 2013, Docket No. S-37113.*

[11] *See* MISO MTEP23 Appendix A – New Projects recommended for approval, *available at* https://cdn.misoenergy.org/MTEP23%20Appendix%20A%20-%20New%20Projects%20recommended%20for%20approval629964.xlsx, MISO ID 25242. As noted above, ELL will be addressing the remaining components of ASTP Phase 1 and Phase 2 in filings to be made later in 2024. Phase 3 of the ASTP is still under consideration by MISO, but is not needed for service to the New 230kV Block Loads.

and submitting it to MISO for approval. This additional study (Exhibit BDS-4) evaluated the capability of the transmission system with only the New 230kV Block Loads modeled as incremental load (instead of all twelve of the block load additions incorporated in the study resulting in the ASTP) and demonstrates that the West Bank 230kV Project is not only necessary but is also sufficient to accommodate electric service to the New 230kV Block Loads without the other projects and facilities included in the ASTP.

The Company is submitting this filing for the West Bank 230kV Project separately from the 500kV components because both of the new industrial loads that make up the New 230kV Block Loads currently take, or will take, electric service at 230kV. Further, as discussed below and by Mr. Skok, the extension of service to the two New 230kV Block Loads requires the addition of only the West Bank 230kV Project – not the entirety of ASTP Phase 1. The Company is moving forward now with the West Bank 230kV Project component of ASTP Phase 1 to position itself to obtain regulatory approval of the Project in time to meet the customer project in-service date needs of the New 230kV Block Loads, subject to their timely execution of Electric Service Agreements.

The 230kV and 500kV components of the ASTP are both required to achieve the broader planning objectives described in the direct testimonies of Mr. Kline and Mr. Skok. However, there are benefits of completing the 230kV work in advance of the 500kV work – principally, the ability to serve the New 230kV Block Loads. It is currently anticipated that the construction of both lines will commence in July 2025 (although work on the Commodore Substation will start earlier, in February 2025). As noted below in Section VI, the planned in-service date for the 230kV line is December 2026, which will enable ELL to accommodate the in-service dates for the New 230kV Block Loads, as described by Ms. Beauchamp. The

planned in-service date of the 500kV line will be 16 months later because construction of the line will continue all the way to Churchill Substation (whereas the 230kV line will terminate at Waterford Substation). As Ms. Ward explains, it is the Company's intent to develop and construct the 230kV and 500kV lines in a carefully coordinated fashion to leverage the efficiencies and customer savings that can be achieved from that approach.

VII. TRANSMISSION SITING ORDER AND ITS EXEMPTIONS

A. Transmission Siting Order and Its Exemptions

As discussed by Mr. Jones, the Transmission Siting Order was the result of the LPSC rulemaking initiated in Docket No. R-26018. According to the Transmission Siting Order, a Transmission Facility is "a system of structures, wires, insulators and associated hardware, but not including switching or substations, that carry electric energy over distances and that are located in whole or in part within the State of Louisiana and furnish electric service within the state, that would be constructed and operated at or above a nominal 100kV, exceeds one mile in length, and the estimated cost to construct exceeds $20 million."[12] The Transmission Siting Order provides that any utility seeking to construct a transmission project meeting the definition of Transmission Facility must first obtain LPSC certification that the project serves the public convenience and necessity, unless it qualifies for certain enumerated exemptions.

[12] *See* Transmission Siting Order, Section II.A., at 9-10. The Commission initiated a proceeding in October 2021 in Docket No. R-36199 to consider whether the Transmission Siting Order should be modified so that the Commission may retain its jurisdictional authority over transmission siting in light of changes in law and transmission planning practices since the time that the Transmission Certification Order was adopted. As of the date of this testimony, no modifications to the Transmission Siting Order have been adopted.

B. The West Bank 230kV Project Qualifies for an Exemption Because It Is Being Undertaken by ELL for the Primary Purpose of Accommodating the Needs of the New 230kV Block Loads

The West Bank 230kV Project qualifies for an exemption from the certification requirement. Section VIII(6) of the Transmission Siting Order exempts "[n]ew transmission point-of-delivery facilities, including radial lines, loop flow lines, switching stations, substations, and any other transmission projects undertaken for the primary purpose of accommodating the needs of a new or expanding industrial load or set of industrial loads located in Louisiana."[13]

In their Direct Testimonies, Mr. Skok, Ms. Beauchamp and Company witness Ryan Jones explain that the West Bank 230kV Project is being undertaken for the primary purpose of accommodating the needs of a new or expanding industrial load or set of industrial loads located in Louisiana (*i.e.*, the New 230kV Block Loads); and they further explain why the Project is necessary for the Company to be able to provide reliable electric service to these new and expanding industrial loads. The Project includes a new substation and several related transmission components designed to provide electric service to this new set of industrial loads. As Mr. Skok explains, the Project has been undertaken for the primary purpose of enabling the Company to serve the New 230kV Block Loads and, as demonstrated in his Exhibit BDS-2, transmission studies conducted by both ESL and MISO have confirmed that the West Bank 230kV Project is necessary for ELL to accommodate the needs of the New 230kV Block

[13] The Commission Staff has proposed changes to the Siting Order, including modifications to the exemption at issue in this filing (Section VIII(6) of the Siting Order). Staff's proposal remains pending before the Commission. *See* Initial Staff Report and Recommendation for a Revised Siting Order (September 1, 2023), *In re: Review and Possible Modification of the Commission's General Order Dated October 10, 2013 Governing Transmission Certification and General Siting, Docket No. R-36199.*

Loads.[14] Additionally, as noted above and as demonstrated in his Exhibit BDS-4, the Company has conducted an additional transmission study separate from the study that demonstrates that the West Bank 230kV Project is not only necessary but is also sufficient to accommodate electric service to the New 230kV Block Loads without the other projects and facilities included in the ASTP.

As such, the primary purpose of the Project is to accommodate the needs of a new set of industrial loads located in Louisiana, and the Project therefore qualifies for exemption under Section VIII(6) of the Commission's Siting Order.[15]

VIII. PUBLIC INTEREST DETERMINATION

A. The West Bank 230kV Project Will Serve the Public Convenience and Necessity

As noted above, if the Commission determines that the West Bank 230kV Project (or any component of the Project) does not qualify for the exemption from certification under Section VIII(6) of the Transmission Siting Order, the Company requests that the Commission

[14] Those studies further confirm that the entire ASTP (including the West Bank 230kV Project) is necessary to accommodate electric service to the twelve industrial block load additions identified in Exhibit BDS-1, including the New 230kV Block Loads.

[15] While the facts support that all components of the Project qualify for an exemption under Section VIII(6), certain individual components of the Project may also qualify under various other provisions of the Siting Order, including Sections VIII(1) (exempting new substations), VIII(5) (exempting projects needed to address violations of NERC standards), and VIII(7) (exempting projects that are in the nature of rebuilds, upgrades, or modernization or reconstruction of equipment to increase its capacity).

find that the public convenience and necessity would be served the by construction of the Project and that the Project is therefore in the public interest.[16]

As Mr. Jones explains, in issuing the Transmission Siting Order, the Commission acknowledged that it would certify a project it finds "to be in the public interest and the interests of affected ratepayers, enhances reliability of service, and/or provides economic benefits."[17] Moreover, "[i]n making that determination the Commission may consider the expected impact of such Transmission Facility on costs, retail rates, service reliability, reduction of congestion, the interstate or intrastate benefits expected to be achieved, and whether the proposed Transmission Facility is consistent with public policy."[18] In addition, the Commission may consider "whether construction of this Transmission Facility (as opposed to construction of another transmission facility or construction of generation, for example) is a reasonable and cost-effective solution to the problem being addressed in the Application."[19]

The West Bank 230kV Project surpasses these standards. As explained by Mr. Skok, the Project provides needed transmission capacity in the Amite South area, thereby maintaining and enhancing the reliability of service to all customers – both existing and future – in that

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16 While the Company believes the Project to be exempt from certification under the Transmission Siting Order, it is making this filing seeking confirmation of the same due to the financial significance and operational importance of the Project and recognizing that, because of those attributes, the Commission may wish to examine the Project in greater detail. There is also the potential that the Commission may find that not all components are exempted, and, in that case, commencement of construction prior to Commission certification could potentially constitute a violation of the Transmission Siting Order. Therefore, the Company is also submitting with this Filing sufficient information for the Commission to certify, as an alternative to granting the exemption, that the Project would serve the public convenience and necessity. This will ensure that there is no unnecessary delay in the execution timeline that would put at risk the realization of economic development opportunities described by Company witnesses Ms. Beauchamp and Mr. May.

17 *See* Transmission Siting Order, Section IV, at 10.

18 *Id.*

19 *Id.* at 10-11.

area. It will also facilitate opportunities to grow Louisiana's economy by providing a new 230kV source (and subsequently, a new 500 kV transmission source) into the Amite South area where, as explained by Ms. Beauchamp, the Amite South region has roughly 5,000 MW of load additions along the West Bank under study by ESL for the commencement of service during the period between 2023 and 2030, an increase of approximately 300% over the current load in Amite South if all 5,000 MW of load materialized. That growth is driven by several significant projects in Louisiana's economic development pipeline that, if brought to fruition, will bring tens of billions of dollars in additional capital investment. As Ms. Beauchamp, Mr. Kline and Mr. Skok discuss in their Direct Testimonies, reliable transmission infrastructure is critical to growing the region and the state economy and to ensuring that the industries locating here have access to the reliable power delivery systems that are needed to support their operations.

Mr. Kline and Mr. Skok also describe the studies conducted by ESL and MISO that led to the determination that the Project (together with the 500kV transmission line that will be the subject of a future certification application by the Company) is the most effective project for meeting the reliability needs of the Amite South area and will be necessary to serve the forecasted load growth in the Amite South area. Mr. Skok explains how those studies indicate that, unless the West Bank 230kV Project is completed, the Company will not be able to accommodate the needs of the New 230kV Block Loads in the Amite South area while remaining compliant with NERC standards. In addition, Mr. Skok describes how the different components of the Project provide solutions to accommodate the high area economic growth and to secure the reliability of the area's transmission grid.

The Company's witnesses demonstrate that failure to construct the West Bank 230kV Project and the remaining components of Phase 1 of the ASTP would significantly jeopardize the ability of the Company and the Commission to accommodate the economic resurgence of the Amite South region. As Mr. Skok explains, all components of the ASTP, including the West Bank 230kV Project, are necessary for ELL to provide electric service to the twelve (12) block load additions incorporated in the studies that led to the development of the ASTP. Accordingly, as Mr. May discusses, in addition to serving the two New 230kV Block Loads, the West Bank 230kV Project is an essential step to facilitate a generational industrial growth opportunity on the West Bank and make possible the economic and reliability benefits it provides.

This historically significant economic development is expected to bring about increases in residential and commercial load as well. So again, considering the magnitude of the expected investment associated with the Project and the operational and economic significance of the Project, the Company believes that, if it is determined the Project is not exempted from certification, it would be appropriate for the Commission to make the necessary public interest determination without the need for further filings by the Company and the resulting delay.

In addition, MISO's planning staff independently evaluated the system performance for its ability to meet applicable reliability standards without the proposed project and found that the Project is needed to meet applicable reliability standards. Like the Company, MISO also evaluated other alternatives to the Project and concluded that the Project is the best alternative to address the projected reliability issues in the Amite South area. Based on all these factors, the Project is firmly in the public interest and should be certified as such by the Commission.

B. Information Required in Certification Filing

Through the Direct Testimonies of its witnesses, the Company has provided the information required by the Transmission Siting Order as follows:

- Requirement V.1: ELL is the Applicant in this proceeding and the only entity participating in the construction of the Project.
- Requirement V.2: Ms. Ward provides a description of each component of the Project.
- Requirement V.3: Ms. Beauchamp, Mr. Kline and Mr. Skok provide detailed explanations of the justification for the Project. In addition, Mr. Skok describes the analyses performed by ELL and MISO to determine that the Project is needed to improve reliability, accommodate projected load growth, and increase load-serving capability in a transmission-constrained region of the area served by ELL.
- Requirement V.4: Ms. Ward provides the general proposed location of each component of the Project.
- Requirement V.5: Ms. Ward discusses the anticipated source of funding for the Project.
- Requirement V.6: Ms. Ward provides the Company's current best estimate of the cost of each component of the Project, which she explains is a Class 3 estimate and is subject to change as the project is more fully developed and refined.
- Requirement V.7: Mr. Jones provide a discussion of the effect that the Project will have on customer rates.

- Requirement V.8: As an exhibit to her Direct Testimony, Ms. Ward provides single-line drawings of the typical structures anticipated to be used in constructing the Project.
- Requirement V.9: Ms. Ward discusses the current schedule and timeline for completing construction of each component of the Project and placing them in service.
- Requirement V.10: Ms. Ward explains the Company's current plans for right-of-way acquisition.
- Requirement V.11: Mr. May and Ms. Beauchamp provide other information that the Company considers relevant to support a public interest determination (*e.g.*, the need to expand the Company's infrastructure and transmission capacity to accommodate the significant industrial expansion underway in the Amite South region).

IX. RIGHT-OF-WAY ACQUISITION

In her Direct Testimony, Ms. Ward explains that the Company anticipates using existing ROW or paralleling existing ROW where possible. Additionally, the Company will acquire approximately 60 miles of new ROW for the Waterford – Commodore 230kV line. The width of ROW acquired will account for the new 230kV and 500kV lines running parallel from Commodore Substation to a tie point near Waterford Substation, roughly 60 miles. The Company will also acquire an additional 28 miles of ROW to be used for the Commodore – Churchill 500kV line (which will be the subject of a future certification filing at the Commission). The Company has started discussions with certain landowners along the potential routes for the new transmission line. Initial discussions include permissions for

access, survey, and soil borings. The Company has also started to issue offers for ROW acquisition along the route. The Company has also been negotiating with landowners for the properties needed to build Commodore Substation.

Ms. Ward further explains that the Company is working to acquire the ROW for the combined 230kV and 500kV lines concurrently in order to minimize the impact to landowners. The ROW width required to accommodate both lines together is narrower than would be required if the ROW width were measured separately for the two lines. In acquiring the ROW, it is more efficient to acquire the full ROW width rather than doing so in separate transactions. That approach minimizes the transaction costs, negotiation efforts and acquisition processes required to obtain the necessary ROW.

X. PROJECT SCHEDULE

The timelines for each component of the West Bank 230kV Project are detailed below (as included in Table 1 of Ms. Ward's testimony):

Event	Start Date	Completion
Board Approval for Project	N/A	January 2024
Commodore Substation – Land Acquisition	February 2024	August 2024
Commodore Substation – Permitting	November 2024	February 2025
Commodore Substation – Construction	February 2025	November 2026
Commodore Substation – Proposed In-Service Date		November 2026
Waterford 230kV Substation Upgrade	October 2026	November 2026
Waterford-Commodore 230kV Line – ROW Acquisition	December 2023	January 2025
Waterford-Commodore 230kV Line – Permitting	June 2024	June 2025
Waterford-Commodore 230kV Line – Construction	July 2025	December 2026
Waterford-Commodore 230kV Line – Proposed In-Service Date		December 2026
Iberville-Commodore 230kV Line Rebuild	September 2025	October 2025

XI. PROJECT COSTS

Ms. Ward explains that the current cost estimate for the West Bank 230kV Project is $498.8 million, which is the amount for which the Company has approved funding and is comprised of preliminary estimates of project costs based on the information currently available. As the Project is further developed, more refined cost estimates will be completed. Ms. Ward's testimony also summarizes the Project costs by component (in HSPM Exhibit CRW-6) and by category (in HSPM Exhibit CRW-7).

XII. REVENUE REQUIREMENT AND ESTIMATED BILL EFFECTS

The Transmission Siting Order requires that a certification application include "[a]n analysis, with supporting data, of the estimated effects on costs to ratepayers attributable to the proposed Transmission Facility, including an estimate of the impact of the cost of the Transmission Facility on rates of all the entity's customers within Louisiana."[20] To comply with this requirement, Mr. Jones provides the estimated revenue requirement of the Project, based on the current estimated cost of the Project, as well as the estimated effect on a residential customer bill for a customer using 1,000 kilowatt hours ("kWh") in the area served by ELL, assuming that the Project revenue requirement were recovered on a dollar-for-dollar basis. Mr. Jones's calculations produce a total retail revenue requirement of $57.754 million for the Project, prior to consideration of any offsets for other revenue received from transmission wholesale customers. Assuming the revenue requirement for the Project is reflected in rates on a dollar-for-dollar basis, a residential customer using 1,000 kWh per month would experience a bill increase of approximately $1.50.

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[20] *See* Transmission Siting Order, Section V.7, at 12.

The Company is not requesting any specific rate treatment of the costs of the Project at this time, as that will ultimately be addressed in the context of a rate proceeding such as an annual Formula Rate Plan ("FRP") Evaluation Report Filing, a filing to extend the FRP or some other base rate proceeding. Accordingly, the Company is not asking for Commission approval of specific recovery of the Project revenue requirement outside of the normal course of ratemaking. In this proceeding, the Company is only requesting that the costs be deemed eligible for recovery, by virtue of a Commission finding that construction of the Project is in the public interest, through the FRP to the extent the Company remains subject to one, or in the alternative to authorize the creation of a regulatory asset until such time that the costs can be reflected in rates in order to mitigate the effects of regulatory lag in the alternative where there is no FRP. In other words, if the Company's FRP is still effective at the time that the Project is placed in service, and the Company has not received approval of some specific alternative recovery for the Project, the Company would recover the revenue requirement of the Project through the normal FRP recovery mechanisms. If instead the Company is not subject to an FRP and the costs have been recorded to an approved regulatory asset, it would seek separate Commission approval for any recovery of the proposed regulatory asset through a future rate proceeding. Since no specific recovery is being requested at this time, the estimated bill effects provided by Mr. Jones may not be representative of the actual customer impact that will be seen, through an FRP or otherwise, associated with the Project, although they are reasonable estimates of those effects.

XIII. STATUS REPORTS

In its Order approving the Lake Charles Transmission Project ("LCTP") in Docket No. U-33645, the Commission adopted the Company's agreement (in a stipulated settlement)

to file into the record and serve on the parties to the proceeding semi-annual monitoring and status reports reflecting updates on the status of the LCTP construction and costs.[21] The Company filed monitoring reports beginning with the six-month period immediately following Commission approval of the LCTP and continue through completion of the Project. The Company also agreed to file a post-construction report. In the event the Commission determines that the Project is not exempt from the certification requirement under the Transmission Siting Order, the Company is willing to agree to submit similar status reports and a post-construction report following Commission certification of the Project in this docket.

XIV. REQUEST FOR TIMELY TREATMENT

As Ms. Beauchamp and Mr. Jones explain, the Company is not seeking expedited consideration of this Application by the Commission. The Company believes an exemption from the certification requirement is warranted for the reasons explained by Mr. Jones and described above. However, in the event the Commission does not grant the Company's requested exemption, then to the extent that the Company's Application is uncontested by LPSC Staff or Intervenors, the Company respectfully requests that the Commission exercise its authority under the Transmission Siting Order such that the Commission may consider and issue a ruling on the Company's certification request within 90 days of the filing of the Application. If the exemption is not granted and the Company's Application is contested, then the Company respectfully requests that the Commission consider and issue a ruling on the Company's certification request within 180 days of the filing of the Application, but in any event, no later than the Commission's December 2024 Business & Executive Session. Both

[21] *See* Order No. U-33645 (January 6, 2016), *In re: Application for Certification of the Lake Charles Transmission Project, Docket No. U-33645,* Sections VI(6) and (9), at pp. 6-7.

requested approval time frames provide for adequate review by all parties under the Transmission Siting Order. The anticipated in-service dates for the New 230kV Block Loads are identified in Ms. Beauchamp's Direct Testimony. Approval of the exemption or certification request by the Commission within the review period established by the Siting Order (*i.e.*, within 180 days of filing, if the Application is contested) would be sufficient to enable the Company to complete construction of the Commodore Substation, the new Waterford – Commodore 230kV line and other components of the Project by December 2025 (under the Project timeline presented in Ms. Ward's Direct Testimony), which would enable the Company to meet the in-service dates for the New 230kV Block Loads.

XV. SERVICE OF NOTICES AND PLEADINGS

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

Lawrence J. Hand, Jr.
Stacy Castaing
4809 Jefferson Highway
Mail Unit L-JEF-357
Jefferson, Louisiana 70121
Telephone: (504) 840-2528
Facsimile: (504) 840-2681
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mstrain@dwmrlaw.com

L. Richard Westerburg, Jr.
6119 Willowcrest Court
Spring, Texas 77389
Telephone: (512) 913-2483
lrwjr54@yahoo.com

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

XVI. REQUEST FOR CONFIDENTIAL TREATMENT

Portions of the Direct Testimonies and exhibits supporting the Application contain information considered by the Company to be proprietary and confidential. Disclosure of certain portions of this information may expose the Company and its customers to an unreasonable risk of harm, including creating an artificial target for suppliers/vendors or creating physical security risks. Therefore, in light of the nature of such information, which includes commercially or competitively sensitive market information and sensitive infrastructure information, the Company has submitted two versions of the Direct Testimonies of Ms. Beauchamp, Mr. Kline, Mr. Skok, and Ms. Ward, one marked "Non-Confidential Redacted Version" and the other marked "Confidential Version." In anticipation of the execution of a suitable confidentiality agreement in this Docket, the Confidential Versions bear the designation "Highly Sensitive Protected Materials" or words of similar import. Although the confidential information and documents included with this Application may be reviewed by appropriate representatives of the LPSC Staff and interested parties 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 LPSC.

XVII. PRAYER FOR RELIEF

WHEREFORE, for the foregoing reasons, Entergy Louisiana, LLC respectfully requests that, after due and lawful proceedings are held, the Commission, subject to the fullest extent of its jurisdiction, grant relief and give its approval of the Application. In particular, the Company requests that the Commission:

1. Find that the portfolio of projects that comprise the West Bank 230kV Project is exempt from the certification requirements of the Commission's General Order dated October 10, 2013 in Docket No. R-26018 (the "Transmission Siting Order") by virtue of the fact that the West Bank 230kV Project is being undertaken by the Company for the primary purpose of accommodating electric service to two new industrial block loads to be located in Louisiana on the West Bank of the Mississippi River, including one new block load associated with the expansion of existing customer facilities and the other new block load associated with a new industrial plant (together, the "New 230kV Block Loads"); or

2. In the alternative, if the Commission finds that the West Bank 230kV Project, or any component of that Project, is not exempt from the certification requirements of the Commission's Transmission Siting Order, then find that the construction, completion and siting of the portfolio of projects that comprise the West Bank 230kV Project will serve the public convenience and necessity and be in the public interest and are therefore approved, including principally the following Project components described herein above and in the testimony of Company witness Catherine Ward:

   a. Commodore 230/500kV Substation;
   b. Waterford 230kV Substation Upgrade;
   c. Waterford – Commodore 230kV Transmission Line;
   d. Right-of-Way Acquisition for the Waterford – Commodore 230kV and 500kV Transmission Lines (including the generalized substation-to-substation corridor proposed by the Company for the new Waterford – Commodore 230kV line); and
   e. Iberville – Commodore 230kV Line Rebuild;

   and further find that undertaking the construction of each those Project components would therefore be prudent and in accordance with the Transmission Siting Order and other applicable Commission orders; and

3. Find that under the circumstances described in the Company's Application, the Commission's public interest determination prior to ELL's construction of the

West Bank 230kV Project would be beneficial to the Commission and ultimately to customers;

4. Find that the generalized siting of the West Bank 230kV Project is appropriate and that its construction is a reasonable and cost-effective solution to provide reliable electric service as a result of the contracted and forecasted load growth in the Amite South region as described in the Company's Application;

5. Find that the actual retail revenue requirement associated with the prudently incurred costs of the West Bank 230kV Project, an estimate of which is provided by Company witness Ryan Jones in his Direct Testimony, is deemed eligible for recovery by the Company through the appropriate recovery mechanism at the time that the components of the West Bank 230kV Project are placed in service;

6. Find that, as provided in the Commission's Special Order No. 7-2000, dated March 22, 2000, the confidential testimony, exhibits, and other materials referenced in this 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;

7. Direct that the period for interventions and protests be shortened to 15 days;

8. Direct the procedural steps necessary to facilitate a Commission decision on the Company's Application within 180 days of the filing of the Application (consistent with Section X of the Commission's Transmission Siting Order) but, in any event, no later than the Commission's December 2024 Business & Executive Session;

9. Direct that notice of all matters in these proceedings be sent to Lawrence J. Hand, Jr., Stacy Castaing, Matthew T. Brown, D. Skylar Rosenbloom, Meta Danzey, Mark Strain, and L. Richard Westerburg, Jr. as representatives of the Company; and

10. Grant such other relief to which the Company shows itself to be entitled.

Respectfully submitted,

By: _____

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