



U-36105

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JUL - 8 2021

July 7, 2021

VIA HAND DELIVERY

Mr. Brandon Frey
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North 5th Street
Baton Rouge, LA 70802

LA Public Service Commission

Re: Application of Entergy Louisiana, LLC for Certification to Deploy Natural Gas-Fired Distributed Generation and Authorization to Implement Rider UODG (LPSC Docket No. U-36105)

Dear Mr. Frey:

I have enclosed the original and three copies of the Application of Entergy Louisiana, LLC ("ELL"), for Certification to Deploy Natural Gas-Fired Distributed Generation and Authorization to Implement Rider UODG. With this Application, ELL seeks approval of its new Rate Schedule Utility-Owned Distributed Generation Rider, as well as approval of cost recovery through Rider UODG and its Formula Rate Plan Rider Schedule. This filing is supported by the Direct Testimony and Exhibits of Jonathan R. Bourg and Crystal K. Elbe. Please retain the original and two copies for your files and return a date-stamped copy to me in the enclosed stamped self-addressed envelope.

I have also enclosed five copies of the Confidential Version of the referenced filing, which is being provided to you under seal pursuant to the provisions of the LPSC General Order dated August 31, 1992, and Rules 12.1 and 26 of the Commission's Rules of Practice and Procedures. The confidential materials included in the filing consist of competitively sensitive information. For this reason, this material is confidential and commercially sensitive. The disclosure of the information contained herein would subject not only the Company, but also its customers and vendors, to a substantial risk of harm. Accordingly, it is critical that this information remain confidential.

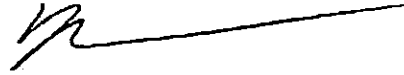
Please retain the original Confidential Version for your files and return a date-stamped copy in the self-addressed stamped envelope provided. Additional copies of the Confidential Version of this filing will be provided to the appropriate representatives of the Louisiana Public Service Commission Staff and made available to intervenors once a suitable Confidentiality Agreement has been executed by the parties.

ROUTE TO	<i>15 days</i>	ROUTE FROM
DEPT. <i>Bull</i>	DATE <i>7/19</i>	DEPT. _____
DEPT. _____	DATE _____	DEPT. _____
DEPT. _____	DATE _____	DEPT. _____
DEPT. _____	DATE _____	DEPT. _____
	<i>F12</i>	<i>6/10/19</i>

Mr. Frey
July 7, 2021
Page 2

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Rosenbloom', with a long horizontal line extending to the right.

D. Skylar Rosenbloom

DSR/ddm
Enclosure
cc: Commissioners (*via e-mail*)

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**IN RE: APPLICATION OF ENTERGY)
LOUISIANA, LLC FOR)
CERTIFICATION TO DEPLOY)
NATURAL GAS-FIRED DISTRIBUTED)
GENERATION AND AUTHORIZATION)
TO IMPLEMENT RIDER UODG)**

DOCKET NO. U- _____

**APPLICATION OF ENTERGY LOUISIANA, LLC FOR
CERTIFICATION TO DEPLOY NATURAL GAS-FIRED DISTRIBUTED
GENERATION AND AUTHORIZATION TO IMPLEMENT RIDER UODG**

Pursuant to the Rules of Practice and Procedure of the Louisiana Public Service Commission (“LPSC” or the “Commission”), Entergy Louisiana, LLC (“ELL” or “Company”) respectfully submits this Application relative to its proposed deployment of certain natural gas-fired distributed generation (“DG”), which is an innovative opportunity to satisfy a portion of ELL’s peaking and reserve capacity needs while providing additional reliability and resiliency benefits to the distribution grid, local communities, and host commercial and industrial customers.

Moreover, this Application is filed in accordance with the General Order dated September 20, 1983 (the “1983 General Order”),¹ and ELL requests certification thereunder that the public convenience and necessity would be served by ELL’s ownership and operation of a fleet of DG located at the premises of host customers (referred to as the “Power Through” fleet). The Company also requests a finding that its deployment of the Power Through fleet does not implicate the

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

Market-Based Mechanisms General Order (“MBM Order”)² because each of the Power Through generators will be less than 50 MW in size or, in the alternative, that an exemption to the MBM Order is warranted.

Further, ELL seeks Commission approval of its new Rate Schedule Utility-Owned Distributed Generation Rider (“Rider UODG”), as well as approval of cost recovery through Rider UODG and its Formula Rate Plan Rider Schedule (“Rider FRP”). In addition, the Company seeks timely Commission consideration and all other appropriate relief to which it may be entitled, as more fully set forth below.

INTRODUCTION

I.

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

II.

The 2020 hurricane season and 2021 winter storm were harsh reminders of the importance of electric service. To that end, technology advancements are changing the way energy is generated and supplied. With such advancements, DG has become more prevalent across the

² 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 Meeting Native Load, 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 & Executive Meeting and now in recently issued General Order, Docket No. R-26172, Subdocket C dated October 29, 2008).

utility industry, with the expectation of providing additional reliability and resiliency benefits to customers, in particular during severe weather events.

III.

To better serve all of its customers, ELL proposes through this Application to own and operate up to 120 MW of natural gas-fired DG located at commercial and industrial host customers' premises and installed on the Company's side of the electric meter.

IV.

These DG resources, as discussed by Company Witness Jonathan R. Bourg, will act as "microgrids" installed throughout ELL's distribution system that serve the dual functions of 1) meeting a portion of the capacity and energy needs of ELL's broader customer base during normal operations, and 2) the backup power needs of host commercial and industrial customers during a grid outage and in many instances, allow those customers to continue to provide vital goods and services to the community while electric service to the larger area is being restored.

V.

Thus, the Power Through fleet will efficiently meet the needs of host customers and all other customers alike by providing backup electric service to host customers during a grid outage and being available to provide power to the electric grid at all other times.

VI.

Through this Application, ELL is taking necessary steps to implement its supply plan and satisfy its obligation to be prepared to reliably and efficiently serve all load that materializes in its service area, as discussed by Mr. Bourg. The deployment of the Power Through fleet is indicative of the innovative, customer-centric approach ELL employs in its resource planning to respond and

adapt to a constantly shifting utility landscape, to promote price stability and supply diversity, and also to modernize further its supply portfolio.

VII.

As discussed by Mr. Bourg, the Power Through fleet is an important part of ELL's supply plan. ELL is currently short of peaking and reserve resources and is expected to continue to be short of such resources for the foreseeable future. The Power Through fleet is expected to operate in that role based on its operating characteristics. The associated incremental capacity will better assure that ELL will be able to continue to provide reliable service to its customers.

VIII.

The Power Through fleet fits squarely within the scope of integrating a diverse mix of resources. The deployment of the fleet will shift a portion of supply from large, central station generation to smaller, localized generation that is well suited to support integration of renewable resources and at the same time address a portion of ELL's long-term resource needs.

IX.

The Power Through fleet further addresses evolving needs of some customers for enhanced reliability and resiliency, which in turn addresses the needs of communities for uninterrupted access to goods and services provided by such customers, as discussed by Mr. Bourg. Moreover, the fleet complements ELL's grid modernization efforts in that ELL will have the ability to model the benefits of DG in its distribution system planning and optimization efforts, which may eventually avoid or defer some distribution infrastructure costs.

X.

Mr. Bourg further explains in his testimony that the Power Through fleet will be operated as supply-side resources on the distribution system during periods of peak demand in order to

reduce reliance on higher-cost MISO market supply-side resources using the bulk transmission system. The additional, in-region capacity will also mitigate ELL's exposure to the potential risk of volatility of MISO capacity auction clearing prices. Moreover, the diversified nature of the fleet provides additional risk mitigation against localized price spikes, fuel deliverability, and outages caused by equipment failure or extreme weather events.

XI.

Further, the Power Through fleet will provide larger customers an opportunity to align their sustainability objectives with their desires for enhanced reliability by utilizing cleaner-burning natural gas resources to supply backup electric service as opposed to diesel backup generators.

XII.

The cost of the Power Through fleet that ELL proposes be borne by its broader customer base will be limited to the capacity value provided by a new-build combustion turbine ("CT"), which is currently a standard planning assumption for the lowest-cost known option for adding long-term capacity that will serve in a peaking and reserve supply role, as adjusted for avoided line losses.

XIII.

ELL's sister Operating Company, Entergy Texas, Inc., has proven the value of this new service with an experimental set of 1.2 MW of utility-owned DG located at a major grocery store, which provides dedicated backup electric service to the grocery store when needed and is used to serve the broader grid when it is economic or otherwise beneficial to do so.

XIV.

On a temporary and localized basis, ELL currently makes use of mobile diesel generation sets following major storms to support restoration efforts and serve critical loads until power is

restored. The Power Through fleet, however, is intended to facilitate installation of permanent, cleaner resources throughout its system that can do more than support system restoration, as discussed by Mr. Bourg.

XV.

In addition to those benefits, the community resiliency benefits to be derived from services like gas stations, grocery stores, first responders, and medical facilities having the capability to operate during an outage, especially during an outage that lasts for more than a few hours to several days, cannot be overstated.

XVI.

One need look no further than the extended outages that occurred following the severe 2020 hurricane season and February 2021 winter storm to understand the community benefits of having infrastructure in place that is able to do more than support short-term outages and instead support critical community functions during longer-term grid outages caused by severe weather emergencies, which are only expected to increase over the ensuing years.

XVII.

Accordingly, ELL believes the time is right to own and operate natural gas-fired DG in a manner that benefits the grid in Louisiana, as well as host commercial and industrial customers.

XVIII.

With this Application, the Company submits the testimony of the following witnesses:

- **Jonathan R. Bourg** – Mr. Bourg is the Director, Resource Planning and Market Operations, for ELL. He testifies about the Company's current plans to meet the supply needs of its customers, and, in particular, describes the Power Through fleet. He also discusses how the Company plans to use the Power Through fleet to serve

the larger grid and support host customer operations during an outage event, yielding benefits for ELL's customers. Mr. Bourg explains that the Company's request for approval of the fleet complies or is consistent with applicable Commission Orders, including the 1983 General Order.

- **Crystal K. Elbe** – Ms. Elbe is a Manager, Utility Pricing and Analysis, with Entergy's Regulatory Services group. In her testimony, she discusses cost recovery and ratemaking issues concerning the Power Through fleet, and describes the Company's proposal to recover costs through its new Rider UODG. Ms. Elbe also discusses the treatment of fuel costs and certain accounting issues.

OVERVIEW OF THE POWER THROUGH FLEET

XIX.

As discussed by Mr. Bourg in his testimony, ELL intends to deploy up to 120 MW of natural gas-fired generators (reciprocating internal combustion engines) ranging in sizes of 100 kW up to 10 MW that ELL will install, operate, and maintain on customers' premises, but located on the Company's side of the electric meter.

XX.

The generators will be equipped with switching and controls to provide automatic backup power to the host customer during outages and the ability to be remotely dispatched to provide energy to or reduce load on the distribution grid at all other times.

XXI.

ELL plans to deploy the Power Through fleet over a period of five years beginning in 2022. Within that time frame, ELL expects that, in most circumstances, a generator can be sourced and installed at a host customer site in less than three months.

XXII.

Based on information from vendors, ELL understands that 20 years is a reasonable estimation of the useful life of the natural gas-fired generators contemplated for the Power Through fleet. However, their useful life will vary depending upon how frequently the equipment is called upon for operations and the duration of each run.

XXIII.

ELL selected up to 120 MW for several reasons that reflect ELL's resource needs, level of customer interest, and analysis of the market for DG solutions of this type. 120 MW is a meaningful amount that will help address ELL's resource needs. The Power Through fleet will be controlled via a dispatch system that can be integrated with the other grid modernization systems as they are placed in service.

XXIV.

The Company is proposing the size range of 100 kW up to 10 MW to 1) provide options to match the generator size with host commercial and industrial load, and 2) due to the cost effectiveness of the greater than or equal to 100 kW resources and the reduced complexities associated with implementation, permitting, and interconnection requirements for those resources below or equal to 10 MW.

XXV.

While the generators will typically be sized to meet all of the host customer's load during an outage, as discussed by Mr. Bourg, host commercial and industrial customers will be able to increase or decrease the size of the generator based on their needs.

XXVI.

Host customers will also be able to select from various ELL-certified generator manufacturers to select the type of generator that will be used to supply backup electric service to the host customer. ELL will use only certified installers, selected via a Request for Proposals (“RFP”) process, to install the fleet at host customers’ premises. Using only certified installers reasonably ensures compliance with installation standards, worksite safety standards, minimum customer service requirements, and bonding requirements.

XXVII.

The exact location of each DG resource will be determined through collaboration between the host commercial and industrial customer, the certified vendor installing the generator and ELL, considering the host customer’s business needs and preferences and the location of existing gas and electrical service, available rights-of-way, accessibility, and any other relevant site-specific attributes.

XXVIII.

The proposed Power Through fleet offers a relatively quiet operation, smaller total footprint, and lower emissions, which will make running the natural gas-fired generation less noticeable to the host customers’ operations and surrounding area than traditional, diesel-fired backup generators.

XXIX.

The fleet will utilize the existing infrastructure of the local natural gas distribution company to supply fuel and will not require the additional footprint and human interaction of local fuel storage that would be needed for other fuel sources.

XXX.

Full installation costs, at the high-end of the range, for commercial-scale generators up to 10 MW are expected to be less than \$10,000,000 per installation. At the low end of the range, some of the smallest units could be below \$50,000. However, each installation will be unique, so costs could vary from those book-end estimates.

XXXI.

ELL estimates, as discussed by Ms. Elbe, that the total invested capital for 120 MW being used in calculating the estimated revenue requirement is \$156.2 million.

XXXII.

Typical maintenance activities likely will include testing (including emissions testing as applicable), periodic site inspections, scheduled maintenance (*e.g.*, oil changes), and replacement of wearable parts (*e.g.*, air and oil filters and spark plugs). The specific frequency and list of scheduled maintenance items will vary by generator size and manufacturer. ELL's estimated O&M costs will be allocated between the host customer and all customers in the UODG rate, as discussed by Ms. Elbe.

XXXIII.

Maintenance on the fleet is currently expected to be outsourced under ELL's direction and oversight to ensure the generators are effectively maintained. The associated maintenance strategy and contracts will be continually reassessed by ELL as the fleet is deployed and operated for cost efficiencies and to ensure compliance with worksite safety standards, training and certification on approved equipment, and that the maintenance provider meets minimum customer service requirements.

XXXIV.

Major cost components include: (1) the generator or generators; (2) the switch gear; (3) control devices; (4) site work; (5) distribution interconnection study; (6) gas interconnection infrastructure; and (7) warranty (as applicable). As discussed by Ms. Elbe, the portion of these costs that exceeds the capacity benefit of the generator will be recovered from the host customer.

XXXV.

A distribution interconnection study will be conducted by ELL prior to installation of each DG resource. As a practical matter, ELL does not expect that distribution upgrades will be necessary to site a unit at the host customer's premises because the generators will in most instances be sized to serve the customer's existing load, and the corresponding distribution feeder and transformer should already be sized to serve that load.

XXXVI.

Distribution upgrades may be necessary if the host customer desires a larger generator to accommodate expected growth in its load. Regardless, under the cost allocation proposed by ELL, which is discussed in the testimony of Ms. Elbe, any interconnection or distribution upgrade cost required for a generator will be included in that portion of the project cost that will be used to calculate the host customer's monthly charge for backup electric service.

XXXVII.

The Company currently plans, as discussed by Mr. Bourg, to register the generators as both Load Modifying Resources ("LMRs") and Demand Response Resources ("DRRs") in MISO. As LMR(s), the fleet will be used to satisfy the annual resource adequacy requirements imposed on the Company by MISO. As DRR(s), the fleet (or subsets thereof) will be offered into MISO's day-ahead and real-time energy and ancillary services markets.

XXXVIII.

When MISO selects a DRR offer, the generators will deliver energy using the local distribution system and thereby reduce the load placed on the bulk transmission system and market supply-side resources. The addition of LMRs will help to mitigate against increases in the clearing price for capacity in ELL's LRZ in MISO's capacity auction.

COST RECOVERY

XXXIX.

Because host customers enjoy the availability of the DG resources during an outage, the Company proposes that host customers be charged for backup electric service availability. As discussed by Ms. Elbe, ELL proposes to do so by including the entire cost of purchasing, installing, operating, and maintaining the generators in its overall revenue requirement and charging the host customers a separate fee for backup electric service supplied by the DG. The revenues received from host customers would be included as an offset to ELL's revenue requirement when setting rates in any subsequent rate proceeding. This approach is consistent with the longstanding cost recovery treatment for Additional Facilities and corresponding revenues received from Schedule AFC.

XL.

In order to make the arrangements for backup electric service supplied by the Power Through fleet, it is critical that ELL be able to inform interested customers of the estimated cost of that service and how those costs would be charged. Thus, successful deployment of a fleet of Company-owned DG requires that the Commission also approve in this proceeding how host customers will be charged for backup electric service availability supplied by the fleet. For this reason, ELL requests approval of Rider UODG as part of this proceeding, as discussed by Ms. Elbe.

XXI.

Rider UODG, which is attached as Exhibit CKE-1 to Ms. Elbe's testimony, is designed to charge host customers for backup electric service provided by Power Through generators, which charge is determined based on the capital and non-fuel Operations and Maintenance ("O&M") and related property taxes and insurance associated with Power Through resources.

XXII.

Specifically, a host customer will be charged monthly under Rider UODG based on the non-fuel costs of a Power Through generator installed on its premises that exceed the non-fuel costs the Company would otherwise incur for a commensurate amount of peaking and reserve capacity.

XXIII.

In addition, recognizing that both the host customer and ELL's overall customer base contribute to the recovery of the capital and O&M costs of a Power Through generator, ELL proposes that any energy margins earned by a Power Through generator be allocated proportionally between the host customer and all other customers. The host customers' allocation of energy margins would be reflected as a credit on their electric bill, and the portion of energy margins attributable to all customers would reduce ELL's monthly fuel expense. ELL requests an exception to Fuel Adjustment Clause General Order³ to allow for this sharing of energy margins. The non-fuel revenues from Rider UODG will be used to offset the total costs of owning and operating the Power Through resources when establishing ELL's non-fuel revenue requirement.

³ *In re: Development of standards governing the treatment and allocation of fuel costs by electric utility companies*, Docket No. U-21497, General Order at 8 (Nov. 6, 1997).

XLIV.

It is currently anticipated that a host customer's bills for electric service will include the monthly charge for backup electric service and energy margin credits, either as separate line items or condensed into one monthly charge line item, which will be calculated by subtracting any energy margin credits from the monthly charge each month. Alternatively, separate bills for normal electric service and this backup electric service could be used in the future.

XLV.

As discussed by Ms. Elbe, the total estimated first full year revenue requirement for the Power Through fleet is approximately \$24.9 million, excluding estimated Rider UODG revenues that will offset that amount. The estimated revenue requirement for the Power Through fleet is based on the total estimated distributed generation equipment, installation, interconnection costs, plus estimated annual non-fuel O&M expenses in the first full year with 120 MW of installed capacity.

TREATMENT OF COSTS

XLVI.

As explained by Ms. Elbe, the Company plans to record the costs of the Power Through generators to account 344 – Generators with a 20-year life, and the program development costs to intangible account 303. The non-fuel O&M expenses associated with the Power Through generators will be recorded to Other Power Generation in accounts 546 through 554.

XLVII.

Moreover, similar to any other Company-owned generator, charges incurred for the supply and delivery of natural gas to Power Through generators will be included in the Company's Fuel Adjustment Clause. Except for outage conditions affecting the Host Customer, the Power Through generators will be dispatched to meet the needs of all ELL's customers. These fuel costs will also

include the cost of fuel consumed when the Power Through generator is providing backup electric service to a host customer during an outage. This is appropriate because, during a grid outage, the host customer will continue to be billed for the power being produced by the generator operating as a backup power source pursuant to its applicable retail rate schedule, including the Fuel Adjustment Clause. Thus, the fact that the host customer's meter continues to record usage, and that usage is in turn included in bills, serves to offset the cost of the fuel being consumed by the generator operating in a backup mode.

COMPLIANCE WITH APPLICABLE COMMISSION RULES AND ORDERS

XLVIII.

Although the Commission's 1983 General Order, as amended, does not require ELL to seek certification of resources that are 5 MW or less, the proposed Power Through fleet may ultimately include generators that exceed this threshold. Therefore, the Company seeks Commission approval and certification for the entire proposed Power Through Fleet, through installations of up to 120 MW of DG located at the premises of hosting industrial and commercial customers. For the reasons discussed herein, and as explained by Mr. Bourg, the Power Through fleet serves the public convenience and necessity and is in the public interest, and therefore prudent, and deployment of Power Through generators should be certified in accordance with the Commission's 1983 General Order. The Power Through fleet satisfies the Order because it secures for ELL's customers needed peaking and reserve capacity. Additionally, as discussed by Mr. Bourg and Ms. Elbe, the fleet is expected to, among other things, provide additional reliability and resiliency benefits to the distribution grid, local communities, and host commercial and industrial customers. ELL has evaluated the proposed fleet, and determined that it will be beneficial to the Company's customers. Thus, consistent with the terms of the 1983 General Order, the Company

is requesting that the Commission find that this evaluation of the Power Through fleet, up to 120 MW of DG, satisfies the justification requirement of the 1983 General Order.

XLIX.

The MBM Order augments the procedures of the 1983 General Order, and generally requires a utility proposing to acquire or build new generating capacity to “employ a market-based mechanism” consisting of an RFP competitive solicitation process. ELL believes the MBM Order is not applicable because each of the Power Through generators will be less than 50 MW in size. In the alternative, for all the reasons mentioned herein, and as further discussed by Mr. Bourg and Ms. Elbe in testimony, while it was not selected through an RFP process, the proposed fleet meets the objective of the MBM Order and an exemption, if necessary, would be appropriate.⁴

REQUEST FOR TIMELY TREATMENT

L.

The Company is requesting that the Commission direct or establish a Procedural Schedule in accordance with the 120-day certification period set forth in the 1983 General Order.

⁴ As explained by Mr. Bourg, the Company does not believe that an exemption to the MBM Order is required in this case. Nevertheless, if the Commission determines that a formal exemption to the MBM Order or any other LPSC Order is necessary in this proceeding, the Company requests such a finding and believes that the evidence presented demonstrates that such an exemption is in the public interest.

SERVICE OF NOTICES AND PLEADINGS

LI.

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

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

REQUEST FOR CONFIDENTIAL TREATMENT

LII.

Portions of the supporting Direct Testimony and Exhibits contain information considered by the Company to be proprietary and confidential. Disclosure of certain information may present an unreasonable risk of harm to ELL and its customers. Therefore, in light of the sensitive nature

of such information, the Company has submitted two versions of the Direct Testimony and Exhibits containing proprietary or confidential information, one marked "Public Version" and the other marked "Highly Sensitive Protected Material" ("HSPM"). Although the confidential and sensitive information and documents included with the Application may be reviewed by appropriate representatives of the Commission Staff and intervenors pursuant to the terms and conditions of a suitable confidentiality agreement once such an agreement has been executed in this docket, this confidential information also is being provided pursuant to, and shall be exempt from public disclosure pursuant to, the Commission's General Order dated August 31, 1992, and Rule 12.1 of the Rules of Practice and Procedure of the Louisiana Public Service Commission.


PRAYER FOR RELIEF

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

1. Finding that the proposed deployment of the Power Through fleet complies with, is consistent with, or is not in conflict with all applicable orders, including the 1983 General Order and MBM Order, or, in the alternative, finding that the Power Through fleet warrants an exemption from the MBM Order or any other applicable order;
2. Finding that Rider UODG is in the public interest and approved;
3. Finding that the retail revenue requirement associated with the Power Through fleet is deemed eligible for recovery through the Company's Rider FRP;
4. Finding that an exception to the Fuel Adjustment Clause General Order is warranted to allow for the sharing of energy margins earned by Power Through generators;
5. Finding that the costs of the Power Through fleet will be recorded to account 344 – Generators with a 20-year life; the program development costs will be recorded to intangible account 303; and the non-fuel O&M expenses associated with the distributed generators will be recorded to Other Power Generation in accounts 546 through 554.
6. Finding that charges incurred for the supply and delivery of natural gas to Power Through generators will be included in the Company's Fuel Adjustment Clause.

7. Finding, as provided in the Commission's Special Order No. 7-2000, dated March 22, 2000, that the confidential testimony, exhibits, and other materials referenced in 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 LPSC;
8. Directing that the period for interventions and protests be shortened to 15 days and that a scheduling conference be held the week following the close of the intervention period;
9. Developing and implementing appropriate procedures to facilitate a Commission decision on the Company's Application consistent with the 120-day requirement in the Commission's 1983 General Order;
10. Directing that notice of all matters in these proceedings be sent to Mark Kleehammer, Elizabeth C. Ingram, Lawrence J. Hand, and D. Skylar Rosenbloom as representatives of the Company; and
11. Ordering such other general and equitable relief as to which the Company may show itself entitled.

Respectfully submitted,


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**ATTORNEYS FOR
ENERGY LOUISIANA, LLC**