

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**APPLICATION OF ENTERGY)
LOUISIANA, LLC FOR APPROVAL OF)
NATURAL GAS COST STABILIZATION) DOCKET NO. U-____
PROGRAM)**

DIRECT TESTIMONY

OF

RYAN DANIEL JONES

ON BEHALF OF

ENTERGY LOUISIANA, LLC

PUBLIC REDACTED VERSION

MAY 2024

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EXHIBITS

<u>Name</u>	<u>Description</u>
Exhibit RDJ-1	List of Prior Testimony
Exhibit RDJ-2	Fuel Stabilization Program Rider (clean and redline versions)

I. INTRODUCTION

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

A. My name is Ryan Daniel Jones. I am employed by Entergy Louisiana, LLC (“ELL” or the “Company”) as a Manager, Regulatory Affairs. My business address is 4809 Jefferson Highway, Jefferson, Louisiana 70121.

Q2. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

A. I hold a Bachelor of Science in Management degree with a major in Finance from Tulane University in New Orleans, Louisiana. I also hold a Master of Management in Energy from Tulane University. I began working for Entergy Services, LLC (“ESL”) in 2015 as a Financial Analyst where I maintained the budget and components of the financial model and provided additional support for utility operations support groups within ESL. In 2018, I transferred to work for Louisiana Regulatory Affairs and have accepted roles of increasing responsibility since that time. In my current capacity as Manager, Regulatory Affairs I am responsible for providing regulatory support services to ELL and for coordinating various dockets and filings before the Louisiana Public Service Commission (“LPSC” or “Commission”). I am also responsible for providing insight and guidance to various organizations across ELL and ESL on regulatory matters and compliance with Orders of the Commission.

Q3. HAVE YOU PREVIOUSLY TESTIFIED IN ANY REGULATORY PROCEEDING?

A. Yes. A listing of the cases in which I have previously testified is attached hereto as Exhibit RDJ-1.

Entergy Louisiana, LLC
Direct Testimony of Ryan Daniel Jones
LPSC Docket No. U-_____

1 Q4. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

2 A. I am testifying on behalf of ELL.
3

4 Q5. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

5 A. The purpose of my testimony is to support the Company's Application for a permanent
6 long term gas hedging program under the parameters proposed in that Application and
7 supporting testimony, as well as to support the Company's request that the costs and
8 benefits of the program be reflected in the appropriate program rider, the proposed Fuel
9 Stabilization Program Rider ("Rider FSP"), which is simply a minimally updated version
10 of the current Fuel Stabilization Pilot Program Rider ("FSPP Rider").¹ Under ELL's
11 proposed long term Natural Gas Cost Stabilization Program (the "Stabilization Program"),
12 which is discussed in more detail in the Direct Testimony of Company witness Michael J.
13 Goin, ELL intends to purchase swaps (a type of forward contract for the financial
14 instrument) [REDACTED]

15 [REDACTED]
16 [REDACTED] As described in more detail below, ELL's Stabilization Program proposes a
17 systematic approach to securing financial instruments for the purpose of stabilizing the
18 natural gas costs for the benefit of ELL's customers, consistent with the stated goals of the
19 Commission.² This Program has been developed through robust analyses and ELL's
20 experience from the pilot phase of the program that concluded at the end of March 2024.

¹ As noted later in my testimony, the proposed Rider FSP only contains minor, non-substantive revisions to the FSPP Rider. A redline and clean version of the proposed Rider FSP is attached to my testimony as RDJ-2.

² See e.g., LPSC Order No. U-34735 (November 8, 2018), *In re: Application for Approval of Long Term Natural Gas Procurement Proposal*, Docket No. U-34735, pp.1-2, See also, LPSC General Order No. R-32975 (July 13, 2015), *In re: Examination of Long-Term Natural Gas Hedging Proposals*, Docket No. R-32975, pp. 1, 23.

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1 My testimony also supports ELL's request to modify minimally the existing FSPP Rider –
2 to be re-named Rider FSP – and to use the proposed Rider FSP to address the costs and
3 benefits of the Stabilization Program for eligible customers. In this regard, my testimony
4 discusses why the use of a rider (Rider FSP) to address the costs and benefits of the
5 Program – as was done with the Fuel Stabilization Pilot Program ("Pilot Program") –
6 continues to be a reasonable ratemaking approach.
7

8 Q6. WOULD YOU SUMMARIZE THE RELIEF REQUESTED IN THE COMPANY'S
9 APPLICATION?

10 A. Yes. Through its Application, the Company seeks a finding that its proposed Stabilization
11 Program, including the volumes and instruments proposed for the Stabilization Program,
12 is in the public interest and therefore prudent. The Company further requests that the
13 Commission approve the proposed procurement procedures and monitoring plan and rule
14 that the proposed FSP Rider is the appropriate mechanism to flow the costs and benefits of
15 the program to customers.
16

17 Q7. WOULD YOU PROVIDE BACKGROUND ON ELL'S CURRENT PROGRAM?

18 A. Yes. ELL's recently expired program, the Pilot Program, is a five-year program that was
19 established in 2019 and which expired at the end of March 2024. The Pilot Program was
20 designed and implemented with the goal of stabilizing the cost of natural gas for electric
21 power generation on a long-term basis. In contrast, prior to the implementation of the Pilot

1 Program, ELL had in place a short-term, seasonal hedging program,³ which was suspended
2 concurrent with the approval of the Pilot Program. The seasonal hedging program was
3 proposed in June 2001 in response to extreme price volatility experienced in the winter of
4 2000-2001.⁴ While the intent of the seasonal hedging program was similar to the Pilot
5 Program in that it was intended principally to promote stability of fuel costs in rates, it did
6 not seek to do so on a long-term basis. The approach to hedging under the seasonal hedging
7 program was systematic, in that ELL would procure financial swaps for equal amounts of
8 the target hedged volume of thirty-three percent (33%) of its anticipated gas needs in each
9 month leading up to the upcoming season (winter season being November through March
10 and the summer season being April through October). However, the program was not long
11 term in nature, and the seasonal hedges were procured only during the months leading up
12 to that season. ELL's Pilot Program, on the other hand, addressed price volatility over the
13 long term. ELL proposed the Pilot Program in response to the LPSC's General Order dated
14 July 13, 2015, in Docket R-32975 ("LTHP Order") and consistent with direction provided
15 by the Commission in LPSC Order No. X-34341 dated October 24, 2017 ("Guidance
16 Order"). Collectively, the LTHP Order and the Guidance Order informed ELL's
17 development of its Pilot Program, proposed in its January 16, 2018, Application and
18 approved by LPSC Order No. U-34735 issued on November 8, 2018.

³ See LTHP Order at 2.

⁴ See LPSC Docket No U-25729, *In re: Louisiana Gas Service Company Rate Stabilization Plan; Trans Louisiana Gas Company PGA Rate Stabilization Plan; Joint Application of Entergy Louisiana, Inc. and Entergy Gulf States, Inc. for Prior Approval of a Plan to Employ Risk Management Tools for the Purpose of Stabilizing their Respective Fuel and/or Purchased Gas Adjustment Clauses.*

1 Q8. WOULD YOU DESCRIBE THE PILOT PROGRAM IN MORE DETAIL?

2 A. Yes. The Pilot Program utilized a mixture of specific financial instruments with established
3 transaction parameters to provide additional price stability for a portion of the natural gas
4 that is used to generate electricity for ELL's non-industrial customers.⁵ Specifically, the
5 program utilized no-margin swaps and call options to stabilize the cost of [REDACTED]
6 [REDACTED] of natural gas. As I said previously, the Pilot Program was approved for a term of
7 five years, which ended at the end of March 2024.
8

9 Q9. HOW WERE THE INSTRUMENTS FOR THE PILOT PROGRAM PROCURED?

10 A. The instruments were procured according to the specific procedures laid out in the
11 Guidance Order and in the settlement agreement approved by the Commission in Order U-
12 34735. Those procedures established a relatively short period for the purpose of soliciting
13 bids for and transacting on the instruments authorized in the Commission's Orders.
14 Contracts for each month of the entire five-year period were executed during that short
15 period.
16

17 Q10. HAS THE COMPANY KEPT THE COMMISSION APPRISED OF UPDATES
18 REGARDING THE PILOT PROGRAM?

19 A. Yes. The Company has submitted annual Compliance Reports to keep the Commission
20 apprised of the performance of the program and to allow for an evaluation of whether a

⁵ Certain of ELL's large industrial customers were "carved-out" of the Pilot Program and excluded from FSPP Rider applicability pursuant to the Guidance Order and Order U-34735. Consequently, natural gas exposure associated with sales to those customers was also "carved-out" for purposes of determining the appropriate volumes to be stabilized.

larger program would be prudent based upon the experience of the Pilot Program. These reports have also included information on the creditworthiness of contract counterparties including whether there had been any requests for new collateral requirements.

Q11. HOW HAS THE PILOT PROGRAM PERFORMED TO DATE?

A. Highly Sensitive Protected Materials (“HSPM”) Table 1 below provides a summary of the annual results reported to the Commission for each year of the Pilot Program. Negative numbers represent net proceeds from the hedging program, while positive numbers represent a net cost. ELL has not yet provided its report to the Commission for program year 5 and will provide the additional information required for that report on June 30, 2024.

Table 1 (HSPM)

	Year 1	Year 2	Year 3	Year 4	Year 5	TOTAL
Swap Settlements						
Call Option Premium						
Call Option Settlements						
Administrative Costs						
Total Program Cost						

It is worth noting that the annual reports the Commission directed ELL to file focused on the financial performance of the instruments purchased under the Pilot Program. However, the degree to which the Pilot Program provided price stabilization benefits was not a feature

1 of the reports. As ELL has discussed in previous filings and as discussed by Mr. Goin in
2 his Direct Testimony supporting ELL's Application in this proceeding, the purpose of
3 procuring the proposed financial instruments is to provide natural gas price stability for
4 ELL's non-industrial customers; these instruments may indeed produce savings, but that is
5 not that purpose of pursuing them. Nevertheless, the instruments that ELL recommends
6 procuring through its Proposed Stabilization Program will continue to meet the
7 Commission's desire for electric utilities to have a long-term hedging program "designed
8 to provide gas price stability on a portion of the Electric IOUs' fuel portfolios."⁶
9

10 II. THE PROPOSED STABILIZATION PROGRAM

11 Q12. PLEASE DESCRIBE ELL'S PROPOSED STABILIZATION PROGRAM.

12 A. ELL's proposed Stabilization Program is a systematic approach to stabilizing the cost of
13 natural gas for the benefit of customers, consistent with the objectives of the Commission
14 and the Company. The program is designed and intended to stabilize customer rates by
15 reducing the volatility of fuel costs, improve customer satisfaction by providing
16 predictability to rates, and reduce the risk of sporadic natural gas price fluctuations for
17 ratepayers. The proposed Stabilization Program has been developed through robust
18 analysis and by applying experience gained during the Pilot Program. In his Direct
19 Testimony, ELL witness Goin discusses in greater detail the key parameters analyzed by
20 ELL and the results of the analyses supporting ELL's recommendations for the longer-term
21 hedging program.

⁶ LTHP Order at 23.

1 Q13. WHY IS ELL PROPOSING A PERMANENT STABILIZATION PROGRAM?

2 A. ELL believes it is important to maintain a program that is designed to achieve fuel price
3 stability, and which reduces the risk of natural gas price spikes to customers. The
4 Commission has also repeatedly encouraged, without substituting its judgement, utilities
5 to engage in these sorts of programs to reduce price volatility for customers.⁷ ELL's Pilot
6 Program was an opportunity for the Commission and the Company to assess the
7 effectiveness of a long-term natural gas price stabilization program, and experience
8 suggests that these programs have been and can be beneficial for customers. Further, the
9 sometimes-volatile nature of natural gas prices, and the potential for sharp increases in the
10 cost of gas to quickly and significantly increase the cost of electricity makes a compelling
11 case for implementing a program that reduces these risks and mitigates the bill effects of
12 gas price spikes.

13
14 Q14. WOULD YOU PROVIDE ANY EXAMPLES OF HOW NATURAL GAS PRICE
15 INCREASES HAVE AFFECTED CUSTOMERS IN THE PAST?

16 A. Certainly. Within the last several years Louisiana utility customers have witnessed and
17 experienced the effects that short term, intra-month and longer-term seasonal spikes in
18 natural gas prices have had on their bills. For example, in the month of February 2021,
19 during Winter Storm Uri, ELL incurred incremental fuel cost month-over-month of
20 approximately \$161 million, more than a 150% increase, that had an extended months-long
21 impact on customer rates as those costs were spread over a 4-month period in order to

⁷ See e.g., LPSC Order No. U-34735 (November 8, 2018), *In re: Application for Approval of Long Term Natural Gas Procurement Proposal*, Docket No. U-34735, pp. 1-2. See also, LTHP Order at 1, 22.

1 mitigate the effects on customer bills. Even still, ELL customers experienced a 45%
2 increase in fuel costs which was sustained over a five-month period as a result. Cleco and
3 SWEPCO experienced similar increases of \$54 million (approximately 280%) and \$580
4 million (approximately 970%), respectively.⁸ In 2022, average monthly natural gas prices
5 rose to levels not seen since 2008 and remained at elevated levels for over 5 months. As a
6 result, ELL customers saw the cost of fuel and purchased power increase by over \$900
7 million, or 54% over the prior year. Again, ELL attempted to mitigate the effect of these
8 increases on customer rates by spreading the recovery of those costs over an extended
9 period. Even still, customers saw rates during the hottest months of the year that were
10 nearly double what they had been only months prior. Some other LPSC jurisdictional
11 utilities saw similar increases. In summary, the Staff's conclusion in the LTHP Order that
12 "[d]espite an abundance of supply, the natural gas market remains volatile"⁹ remains valid,
13 as demonstrated by these examples experienced over the past several years.

14
15 Q15. WILL ELL'S STABILIZATION PROGRAM ELIMINATE THE RISK OF NATURAL
16 GAS PRICE INCREASES CAUSING BILL INCREASES FOR NON-INDUSTRIAL
17 CUSTOMERS?

18 A. No; it will mitigate but not eliminate this risk. ELL's proposed Stabilization Program is
19 not intended to completely eliminate this risk, nor could it. However, through its proposed

⁸ Such amounts are derived from publicly available Fuel Adjustment Clause filings for the February 2021 cost month published on the LPSC website. According to SWEPCO's 10-K filed February 24, 2022, SWEPCO had a total deferred regulatory asset for February 2021 natural gas and purchased power expenses of \$430 million, of which \$148 million was being recovered from Louisiana customers over a five-year period.

⁹ LTHP Order at 5.

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1 Stabilization Program, ELL would continue to take steps designed to meaningfully reduce
2 this risk, just as the Pilot Program has done. Under the proposed Stabilization Program, a
3 modest increase is recommended in the total hedged volumes so as not to overly-commit
4 ELL's natural gas price position, among other reasons discussed in greater detail in Mr.
5 Goin's Direct Testimony. The program is also gradual in nature, which provides an
6 opportunity to ramp up or otherwise modify the program if appropriate. Mr. Goin's
7 analysis of the extent to which the proposed Stabilization Program is expected to reduce
8 risk is discussed in his Direct Testimony.

9
10 Q16. CAN YOU COMPARE AND CONTRAST ELEMENTS OF THE PILOT PROGRAM
11 TO ELL'S PROPOSED STABILIZATION PROGRAM?

12 A. Yes. At a high level, the proposed Stabilization Program features higher overall volumes,
13 albeit lower volumes to be hedged on an annual basis using a ladder approach, utilizes
14 only no-margin swaps as opposed to a combination of swaps and call options, and attempts
15 to expedite the procurement process to capture additional benefits for customers. Mr. Goin
16 describes how ELL arrived at the parameters of ELL's proposed Long-Term Stabilization
17 Program, also providing current projections of ELL's non-industrial customer usage over
18 the next ten years. As Mr. Goin describes, the proposed parameters are designed to achieve
19 the greatest price stabilization benefit and manage risk through dollar-cost-averaging and
20 more efficient solicitations. The proposed laddering approach also provides flexibility in
21 the volume of gas purchases that ELL may secure in the future.

1 Q17. IS ELL PROPOSING TO MAINTAIN THE EXISTING REPORTING OBLIGATIONS?

2 A. Yes, ELL is not proposing any change to its current annual reporting obligations. ELL will
3 continue to submit Annual Compliance Reports with information on the performance of
4 the program and on the creditworthiness of its counterparties, including any other relevant
5 information of which the Company believes the Commission should be apprised.
6

7 Q18. WILL THE COMMISSION HAVE AN OPPORTUNITY TO REVISIT THE PROGRAM
8 IN THE FUTURE?

9 A. Yes. Both the Commission and the Company should have the opportunity to revisit and
10 propose changes to the Program in the future. While there is no specific procedure
11 proposed through which this will occur, the program is designed in a way that will not
12 overly commit the Company to a particular strategy in terms of instruments or volumes
13 and to allow for continued assessment of the program in light of new or changing
14 circumstances. The natural gas markets and the macroeconomic landscape are ever-
15 changing, and the Company, in coordination with the Commission, always is and will
16 continue to be looking for ways to optimize its strategies for providing customers with
17 reliable power and serving its customers at the lowest reasonable cost.

18 **III. RIDER FSP**

19 Q19. PLEASE DESCRIBE THE EXISTING FSPP RIDER.

20 The existing FSPP Rider is the mechanism through which ELL flowed through to eligible
21 customers the net costs or benefits of its Pilot Program pursuant to LPSC Order No. U-
22 34735. The FSPP Rider was updated monthly and billed or credited to eligible customers
23 as a dollar-per-kilowatt-hour charge/credit.

1

2 Q20. WHAT IS THE COMPANY PROPOSING WITH RESPECT TO THE EXISTING FSPP
3 RIDER?

4 A. The Company proposes that the FSPP Rider should be maintained in its current substantive
5 form and should continue to be used to flow through the net costs and/or benefits of the
6 Stabilization Program on a monthly basis, with only minor modifications and a name
7 change to Rider FSP to reflect that the Fuel Stabilization Program is no longer in a pilot
8 phase. As was the case with the FSPP Rider, Rider FSP is intended to be a complement to
9 the Fuel Adjustment Clause ("FAC"). The Company proposes to continue to redetermine
10 Rider FSP Rates automatically on a monthly basis just as the FAC rates are redetermined
11 monthly. The Rider FSP Rate would continue to be a kilowatt-hour rate like the FAC rates.
12 The kilowatt-hours used as the denominator for the Rider FSP Rate will be a subset of the
13 kilowatt-hours used in the calculation of the same month's FAC rate. This subset excludes
14 the expected usage of the industrial customers included in the industrial carve-out, which
15 I explain further below.

16

17 Q21. WHY DOESN'T THE COMPANY INCLUDE THE COST OF ITS STABILIZATION
18 PROGRAM IN THE FUEL ADJUSTMENT CLAUSE?

19 A. ELL previously had reflected the cost of its seasonal hedging program in the FAC.
20 However, the FAC does not provide a means to "carve-out" certain large industrial
21 customers from participation in the Stabilization Program as proposed and as is the case
22 for the Pilot Program. This Industrial "Carve-Out" lead to the creation of the FSPP Rider.

1

2 Q22. WHAT IS THE INDUSTRIAL “CARVE-OUT”?

3 A. The Industrial “Carve-Out” originally proposed and agreed to in LPSC Docket No. X-
4 34341 was made part of the FSPP Rider by LPSC Order No. U-34735.

5

6 Q23. IS THE COMPANY PROPOSING TO MAINTAIN THE INDUSTRIAL “CARVE-OUT”
7 WITHIN RIDER FSP?

8 A. Yes. This “Carve-Out” was a component of the program design, as described by Mr. Goin,
9 and thus should remain within the Rider. In fact, there are no substantive modifications
10 from to the FSPP Rider to Rider FSP as part of the Company’s proposal. A clean and
11 redline version of the proposed Rider FSP is attached to my testimony as Exhibit RDJ-2.
12 As noted in Exhibit RDJ-2, the Industrial Carve-Out consists of customers receiving
13 electric service pursuant to a special contract or the following rate schedules: Experimental
14 Electrochemical Curtailment Service (Legacy ELL), Experimental Curtailment Service
15 (Legacy ELL), Large Load High-Load Factor Power Service (Legacy ELL), Large
16 Industrial Power Service (Legacy ELL), Large Industrial Service (Legacy ELL),
17 Experimental Schedule to Electrochemical Energy Intensive Industries (Legacy EGSL),
18 Electric Service to Energy Intensive Industries (Legacy EGSL), High-Load Factor Service
19 (Legacy EGSL), Large Power High-Load Factor Service (Legacy EGSL), Large Power
20 Service (Legacy EGSL), Qualified Facility Standby Service Rate Schedule QFSS-L, and
21 Standby and/or Maintenance Service for Qualifying Facilities Larger than 100 KW SMQ-
22 G. Accordingly, Rider FSP would not apply to the industrial customers that receive electric
23 service pursuant to rate schedules listed above but would apply to all other customers that
24 are not receiving electric service under a special contract.

Entergy Louisiana, LLC
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LPSC Docket No. U-_____

1

2 Q24. ARE THERE ANY OTHER ASPECTS OF RIDER FSP THAT YOU WOULD LIKE TO
3 DISCUSS?

4 A. Yes. Consistent with the FSPP Rider, ELL proposed that the expenses from this
5 proceeding and, assuming the proposed program is approved, any incremental expenses
6 incurred in conjunction with the implementation of the proposed program, be deferred with
7 carrying charges and recovered through the Rider FSP. Recovery of these administration
8 costs through the Rider FSP is necessary to prevent these costs from being borne by
9 customers falling within the Industrial Carve-out. Additionally, recovery of these
10 administration costs through the Rider FSP is consistent with the recovery of certain costs
11 associated with conduct of FAC audits through the FAC as provided in section VI.A.4 of
12 the Commission's November 6, 1997, General Order governing the development of
13 standards governing the treatment and allocation of fuel costs by electric utility companies.

14 Q25. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

15 A. Yes, at this time.

AFFIDAVIT

STATE OF LOUISIANA

PARISH OF JEFFERSON

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


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



Ryan D. Jones

SWORN TO AND SUBSCRIBED BEFORE ME

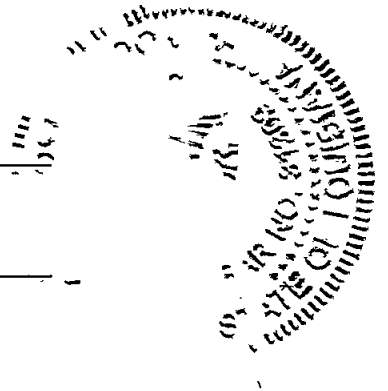
THIS 17th DAY OF May 2024



NOTARY PUBLIC

My commission expires: Dec

Stylar Rosenbleom
Notary Public
State of Louisiana
Louisiana Bar Roll # 31389
My Commission is issued for Life



Listing of Previous Testimony Filed by Ryan D. Jones

<u>DATE</u>	<u>TYPE</u>	<u>JURISDICTION</u>	<u>DOCKET NO.</u>
08/22/2019	Affidavit	LPSC	U-35370
06/17/2021	Settlement	LPSC	U-35584
12/08/2021	Direct	LPSC	U-36222
4/21/2022	Direct	LPSC	U-36338
11/14/2022	Settlement	LPSC	U-36222
11/15/2022	Rebuttal	LPSC	U-36338
12/29/2022	Settlement	LPSC	U-36338
10/31/2023	Affidavit	LPSC	U-34951, U-35205, U-35581, U-36092, U-36381
12/11/2023	Direct	LPSC	S-37079
1/31/2024	Affidavit	LPSC	S-37113
3/5/2024	Direct	LPSC	U-37131
3/22/2024	Direct	LPSC	U-37143
5/3/2024	Direct	LPSC	U-37193

ENTERGY LOUISIANA, LLC
ELECTRIC SERVICE
SCHEDULE FSP
Revision #2

Page 134.1
First Revised
Effective Date: XX/XX/20XX
Supersedes: 6/15/2021
Authority: LPSC Order No. U-XXXXX

FUEL STABILIZATION PROGRAM RIDER

Fuel Stabilization Program Rider ("FSP Rider"), approved Louisiana Public Service Commission Order No. U-XXXXX, dated [Date], is applicable to service to all Customers of Entergy Louisiana, LLC ("ELL" or the "Company"), except those taking service under a special contract or pursuant to Excluded Rate Schedules* identified below.

FSP Rider Adjustment Rate for the current Month for applicable Rate Schedules* shall be calculated in accordance with Attachment A, attached hereto.

*Pursuant to LPSC Order X-34341, dated October 24, 2017, Order No. U-34735, dated November 8, 2018, and Order No. U-XXXXX dated [Date] the following rate schedules are excluded from FSP Rider: Experimental Electrochemical Curtailment Service (EECS-L), Large Load High-Load Factor Power Service (LLHLFPS-L), Large Industrial Power Service (LIPS-L), Large Industrial Service (LIS-L), Experimental Schedule to Electrochemical Energy Intensive Industries (EEIS-G), Electric Service to Energy Intensive Industries (EIS-G), High-Load Factor Service (HLFS-G), Large Power High-Load Factor Service (LPHLF-G), Large Power Service (LPS-G), Qualified Facility Standby Service Rate Schedule (QFSS-L), Standby and/or Maintenance Service for Qualifying Facilities Larger than 100 KW (SMQ-G), Experimental Supplemental Short Term Service (SSTS-G) and applicable Special Contracted Rates.

Note: Generally, unless otherwise specified herein, capitalized terms used throughout this document are as defined in the Company's Terms and Conditions.

MONTHLY FUEL STABILIZATION PROGRAM CHARGE REPORT
COMPANY: **ENTERGY LOUISIANA, LLC**
DATA BASED ON OPERATIONS MONTH OF XXXXXXXXXX
APPLIED TO BILLS FOR MONTH OF XXXXXXXXXX

Attachment A
Page 1 of 3

FUEL STABILIZATION PROGRAM COSTS

1. FINANCIAL SWAP		
Monthly Financial Settlement	\$	0.00
2. LPSC ADMINISTRATION COST	\$	0.00
3. NET FUEL STABILIZATION PROGRAM COSTS / BENEFITS (Ln 1 + Ln 2)	\$	0.00
4. LA RETAIL INTEREST ADJUSTMENT ON FUEL STABILIZATION PROGRAM OVER/UNDER RECOVERY (Ln 6 of Interest Adjudgment on FSP Over/(Under) Recovery Report	\$	0.00
5. TOTAL LA RETAIL RECOVERABLE FUEL STABILIZATION PROGRAM COSTS (LN 3 + LN 4)	\$	0.00

FUEL STABILIZATION PROGRAM KWH ALLOCATION

6. TOTAL ELL RETAIL KWH SALES		0.00
7. TOTAL KWH ASSOCIATED WITH CUSTOMERS NOT SUBJECT TO FSP RIDER (INDUSTRIAL CARVE-OUT) (LPSC Order No. X-34341)		0.00
8. KWH SUBJECT TO FSP CURRENT MONTH (LN 6 - 7)		0.00

FUEL STABILIZATION PROGRAM KWH ADJUSTMENT RATE

9. LA RETAIL RECOVERABLE FUEL STABILIZATION PROGRAM COST PER KWH SALES (\$/KWH) (LN 5 / LN 8)	✓	#DIV/0!
10. LA RETAIL FSP SURCHARGE PER KWH FOR OVER/(UNDER)	✓	#DIV/0!
11. LA RETAIL FSP ADJUSTMENT RATE PER KWH PER APPLICABLE RATE SCHEDULE (LN 9 + LN 10)	✓	#DIV/0!

FUEL STABILIZATION PROGRAM OVER / (UNDER) SURCHARGE COMPUTATION REPORT
COMPANY: **ENTERGY LOUISIANA, LLC**
DATA BASED ON OPERATIONS MONTH OF XXXXXXXXXX
APPLIED TO BILLS FOR MONTH OF XXXXXXXXXX

Attachment A
Page 2 of 3

1. FSP CUMULATIVE OVER / (UNDER) FROM PREVIOUS MONTH	\$	0.00
2. SALES TO LA RETAIL JURISDICTION SUBJECT TO FSP ADJUSTMENT (12 Month Cumulative)		0.00
3. TOTAL FUEL STABILIZATION PROGRAM EXPENSE FOR RECOVERY (Ln 3 of FSP Report)	\$	0.00
4. ACTUAL COLLECTION FROM OPERATING MONTH FOR FUEL STABILIZATION PROGRAM EXPENSE	\$	0.00
5. LESS: INTEREST APPLIED SECOND PREVIOUS MONTH	\$	0.00
6. ACTUAL COLLECTION FROM OPERATING MONTH WITHOUT INTEREST (LINE 4 - LINE 5)	\$	0.00
7. OVER / (UNDER) COLLECTION FOR OPERATING MONTH (LINE 6 - LINE 3)	\$	0.00
7A. ADJUSTMENT TO CUMULATIVE OVER / (UNDER)	\$	0.00
7B. 7B. TOTAL (LINE 7 + LINE 7A)	\$	0.00
8. CUMULATIVE OVER / (UNDER) FOR OPERATING MONTH (LINE 1 + LINE 7B)	\$	0.00
9. SURCHARGE FOR BILLING MONTH (LINE 8 / LINE 2)		#DIV/0!

INTEREST ADJUSTMENT ON FUEL STABILIZATION PROGRAM OVER / (UNDER) SURCHARGE COMPUTATION REPORT Attachment A
COMPANY: **ENTERGY LOUISIANA, LLC** Page 3 of 3
DATA BASED ON OPERATIONS MONTH OF XXXXXXXXXX
APPLIED TO BILLS FOR MONTH OF XXXXXXXXXX

1)	LA RETAIL CUMULATIVE OVER / (UNDER) FOR OPERATING MONTH (LINE 8 OF SURCHARGE CALCULATION)	\$	0.00
2)	MONTHLY INTEREST APPLIED PREVIOUS MONTH	\$	<u>0.00</u>
3)	a) LA RETAIL CUMULATIVE OVER / (UNDER) FOR OPERATING MONTH (LINE 1 + LINE 2)	\$	0.00
4)	PRIME RATE FOR OPERATING MONTH		0.00%
5)	ANNUAL INTEREST AMOUNT (LINE 3 x LINE 4)	\$	0.00
6)	LA RETAIL MONTHLY INTEREST AMOUNT (LINE 5 / 12 MONTHS)	\$	0.00

ENTERGY LOUISIANA, LLC
ELECTRIC SERVICE
SCHEDULE FSPPFSP
Revision #12

Page 134.1
First Revised
Effective Date: 16/15/2021-XX/XX/20XX
Supersedes: 1/2/20196/15/2021
Authority: Staff Acceptance Letter on
6/15/2021LPSC Order No. U-XXXXX

FUEL STABILIZATION PILOT-PROGRAM RIDER

Fuel Stabilization Pilot-Program Rider ("FSPPFSP Rider"), approved Louisiana Public Service Commission Order No. U-34735XXXXX, dated November 8, 2018, [Date], is applicable to service to all Customers of Entergy Louisiana, LLC ("ELL" or the "Company"), except those taking service under a special contract or pursuant to Excluded Rate Schedules* identified below.

FSPPFSP Rider Adjustment Rate for the current Month for applicable Rate Schedules* shall be calculated in accordance with Attachment A, attached hereto.

*Pursuant to LPSC Order X-34341, dated October 24, 2017-and, Order No. U-34735, dated November 8, 2018, and Order No. U-XXXXX dated [Date] the following rate schedules are excluded from FSPPFSP Rider: Experimental Electrochemical Curtailment Service (EECS-L), Large Load High-Load Factor Power Service (LLHLFPS-L), Large Industrial Power Service (LIPS-L), Large Industrial Service (LIS-L), Experimental Schedule to Electrochemical Energy Intensive Industries (EEIS-G), Electric Service to Energy Intensive Industries (EIS-G), High-Load Factor Service (HLFS-G), Large Power High-Load Factor Service (LPHLF-G), Large Power Service (LPS-G), Qualified Facility Standby Service Rate Schedule (QFSS-L), Standby and/or Maintenance Service for Qualifying Facilities Larger than 100 KW (SMQ-G), Experimental Supplemental Short Term Service (SSTS-G) and applicable Special Contracted Rates.

Note: Generally, unless otherwise specified herein, capitalized terms used throughout this document are as defined in the Company's Terms and Conditions.

MONTHLY FUEL STABILIZATION PILOT PROGRAM CHARGE REPORT
COMPANY: ENTERGY LOUISIANA, LLC
DATA BASED ON OPERATIONS MONTH OF XXXXXXXXXX
APPLIED TO BILLS FOR MONTH OF XXXXXXXXXX

Attachment A
Page 1 of 3

FUEL STABILIZATION PILOT PROGRAM COSTS

1. FINANCIAL SWAP

Monthly Financial Settlement \$ 0.00

2. CALL OPTION

2a. Option Premium Revenue Requirement (Return on / Return of) \$ 0.00

2b. Monthly Settlement \$ 0.00

2c. Net Call Option Costs/ Benefits (2a + 2b) \$ 0.00

3. LPSC ADMINISTRATION COST

\$ 0.00

4. NET FUEL STABILIZATION PILOT PROGRAM COSTS / BENEFITS (Ln 1 + Ln 2c + Ln 3)

\$ 0.00

5. LA RETAIL INTEREST ADJUSTMENT ON FUEL STABILIZATION PILOT PROGRAM OVER/UNDER RECOVERY
(Ln 6 of Interest Adjudgment on FSPP Over/(Under) Recovery Report) \$ 0.00

6. TOTAL LA RETAIL RECOVERABLE FUEL STABILIZATION PILOT PROGRAM COSTS (LN 4 + LN 5) \$ 0.00

FUEL STABILIZATION PILOT PROGRAM KWH ALLOCATION

7. TOTAL ELL RETAIL KWH SALES 0.00

8. TOTAL KWH ASSOCIATED WITH CUSTOMERS NOT SUBJECT TO FSPP RIDER (INDUSTRIAL CARVE-OUT)
(LPSC Order No. X-34341) 0.00

9. KWH SUBJECT TO FSPP CURRENT MONTH (LN 7 - 8) 0.00

FUEL STABILIZATION PILOT PROGRAM KWH ADJUSTMENT RATE

10. LA RETAIL RECOVERABLE FUEL STABILIZATION PILOT PROGRAM COST PER KWH SALES (\$/KWH) (LN 6 / LN 9) #DIV/0!

11. LA RETAIL FSPP SURCHARGE PER KWH FOR OVER/(UNDER) #DIV/0!

12. LA RETAIL FSPP ADJUSTMENT RATE PER KWH PER APPLICABLE RATE SCHEDULE (LN 10 + LN 11) #DIV/0!

FUEL STABILIZATION PILOT PROGRAM OVER / (UNDER) SURCHARGE COMPUTATION REPORT
COMPANY: **ENTERGY LOUISIANA, LLC**
DATA BASED ON OPERATIONS MONTH OF XXXXXXXXXX
APPLIED TO BILLS FOR MONTH OF XXXXXXXXXX

Attachment A
Page 2 of 3

1. FSPP CUMULATIVE OVER / (UNDER) FROM PREVIOUS MONTH	\$	0.00
2. SALES TO LA RETAIL JURISDICTION SUBJECT TO FSPP ADJUSTMENT (12 Month Cumulative)		0.00
3. TOTAL FUEL STABILIZATION PILOT PROGRAM EXPENSE FOR RECOVERY (Ln 4 of FSPP Report)	\$	0.00
4. ACTUAL COLLECTION FROM OPERATING MONTH FOR FUEL STABILIZATION PILOT PROGRAM EXPENSE	\$	0.00
5. LESS: INTEREST APPLIED SECOND PREVIOUS MONTH	\$	0.00
6. ACTUAL COLLECTION FROM OPERATING MONTH WITHOUT INTEREST (LINE 4 - LINE 5)	\$	0.00
7. OVER / (UNDER) COLLECTION FOR OPERATING MONTH (LINE 6 - LINE 3)	\$	0.00
7A. ADJUSTMENT TO CUMULATIVE OVER / (UNDER)	\$	0.00
7B. 7B. TOTAL (LINE 7 + LINE 7A)	\$	0.00
8. CUMULATIVE OVER / (UNDER) FOR OPERATING MONTH (LINE 1 + LINE 7B)	\$	0.00
9. SURCHARGE FOR BILLING MONTH (LINE 8 / LINE 2)		#DIV/0!

INTEREST ADJUSTMENT ON FUEL STABILIZATION PILOT PROGRAM OVER / (UNDER) SURCHARGE COMPUTATION REPORT Attachment A
COMPANY: ENTERGY LOUISIANA, LLC Page 3 of 3
DATA BASED ON OPERATIONS MONTH OF XXXXXXXXXX
APPLIED TO BILLS FOR MONTH OF XXXXXXXXXX

1)	LA RETAIL CUMULATIVE OVER / (UNDER) FOR OPERATING MONTH (LINE 8 OF SURCHARGE CALCULATION)	\$	0.00
2)	MONTHLY INTEREST APPLIED PREVIOUS MONTH	\$	0.00
3)	a) LA RETAIL CUMULATIVE OVER / (UNDER) FOR OPERATING MONTH (LINE 1 + LINE 2)	\$	0.00
4)	PRIME RATE FOR OPERATING MONTH		0.00%
5)	ANNUAL INTEREST AMOUNT (LINE 3 x LINE 4)	\$	0.00
6)	LA RETAIL MONTHLY INTEREST AMOUNT (LINE 5 / 12 MONTHS)	\$	0.00

MONTHLY FUEL STABILIZATION PROGRAM CHARGE REPORT
COMPANY: ENTERGY LOUISIANA, LLC
DATA BASED ON OPERATIONS MONTH OF XXXXXXXXXX
APPLIED TO BILLS FOR MONTH OF XXXXXXXXXX

Attachment A
Page 1 of 3

FUEL STABILIZATION PROGRAM COSTS

1. FINANCIAL SWAP		
Monthly Financial Settlement	\$	0.00
2. LPSC ADMINISTRATION COST	\$	0.00
3. NET FUEL STABILIZATION PROGRAM COSTS / BENEFITS (Ln 1 + Ln 2)	\$	0.00
4. LA RETAIL INTEREST ADJUSTMENT ON FUEL STABILIZATION PROGRAM OVER/UNDER RECOVERY (Ln 6 of Interest Adjudment on FSP Over/(Under) Recovery Report	\$	0.00
5. TOTAL LA RETAIL RECOVERABLE FUEL STABILIZATION PROGRAM COSTS (LN 3 + LN 4)	\$	0.00

FUEL STABILIZATION PROGRAM KWH ALLOCATION

6. TOTAL ELL RETAIL KWH SALES		0.00
7. TOTAL KWH ASSOCIATED WITH CUSTOMERS NOT SUBJECT TO FSP RIDER (INDUSTRIAL CARVE-OUT) (LPSC Order No. X-34341)		0.00
8. KWH SUBJECT TO FSP CURRENT MONTH (LN 6 - 7)		0.00

FUEL STABILIZATION PROGRAM KWH ADJUSTMENT RATE

9. LA RETAIL RECOVERABLE FUEL STABILIZATION PROGRAM COST PER KWH SALES (\$/KWH) (LN 5 / LN 8)	#	DIV/0!
10. LA RETAIL FSP SURCHARGE PER KWH FOR OVER/(UNDER)	#	DIV/0!
11. LA RETAIL FSP ADJUSTMENT RATE PER KWH PER APPLICABLE RATE SCHEDULE (LN 9 + LN 10)	#	DIV/0!

FUEL STABILIZATION PROGRAM OVER / (UNDER) SURCHARGE COMPUTATION REPORT
COMPANY: ENTERGY LOUISIANA, LLC
DATA BASED ON OPERATIONS MONTH OF XXXXXXXXXX
APPLIED TO BILLS FOR MONTH OF XXXXXXXXXX

Attachment A
Page 2 of 3

1. FSP CUMULATIVE OVER / (UNDER) FROM PREVIOUS MONTH	\$	0.00
2. SALES TO LA RETAIL JURISDICTION SUBJECT TO FSP ADJUSTMENT (12 Month Cumulative)		0.00
3. TOTAL FUEL STABILIZATION PROGRAM EXPENSE FOR RECOVERY (Ln 3 of FSP Report)	\$	0.00
4. ACTUAL COLLECTION FROM OPERATING MONTH FOR FUEL STABILIZATION PROGRAM EXPENSE	\$	0.00
5. LESS: INTEREST APPLIED SECOND PREVIOUS MONTH	\$	0.00
6. ACTUAL COLLECTION FROM OPERATING MONTH WITHOUT INTEREST (LINE 4 - LINE 5)	\$	0.00
7. OVER / (UNDER) COLLECTION FOR OPERATING MONTH (LINE 6 - LINE 3)	\$	0.00
7A. ADJUSTMENT TO CUMULATIVE OVER / (UNDER)	\$	0.00
7B. 7B. TOTAL (LINE 7 + LINE 7A)	\$	0.00
8. CUMULATIVE OVER / (UNDER) FOR OPERATING MONTH (LINE 1 + LINE 7B)	\$	0.00
9. SURCHARGE FOR BILLING MONTH (LINE 8 / LINE 2)		#DIV/0!

INTEREST ADJUSTMENT ON FUEL STABILIZATION PROGRAM OVER / (UNDER) SURCHARGE COMPUTATION REPORT
COMPANY: ENTERGY LOUISIANA, LLC
DATA BASED ON OPERATIONS MONTH OF XXXXXXXXXX
APPLIED TO BILLS FOR MONTH OF XXXXXXXXXX

Attachment A
Page 3 of 3

1)	LA RETAIL CUMULATIVE OVER / (UNDER) FOR OPERATING MONTH (LINE 8 OF SURCHARGE CALCULATION)	\$	0.00
2)	MONTHLY INTEREST APPLIED PREVIOUS MONTH	<u>\$</u>	<u>0.00</u>
3)	a) LA RETAIL CUMULATIVE OVER / (UNDER) FOR OPERATING MONTH (LINE 1 + LINE 2)	\$	0.00
4)	PRIME RATE FOR OPERATING MONTH		0.00%
5)	ANNUAL INTEREST AMOUNT (LINE 3 x LINE 4)	\$	0.00
6)	LA RETAIL MONTHLY INTEREST AMOUNT (LINE 5 / 12 MONTHS)	\$	0.00