BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

IN RE: APPLICATION **OF ENTERGY LOUISIANA, LLC FOR APPROVAL TO CONSTRUCT VOTAW AND SEGNO SOLAR FACILITIES, AND FOR COST RECOVERY**	))))	**DOCKET NO. U-_____**

DIRECT TESTIMONY

OF

MICHAEL J. PLAISANCE

ON BEHALF OF

ENTERGY LOUISIANA, LLC

PUBLIC REDACTED VERSION

NOVEMBER 2025

TABLE OF CONTENTS

EXHIBIT LIST

I. INTRODUCTION AND QUALIFICATIONS

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

A. My name is Michael J. Plaisance. I am the Senior Manager, Resource Planning for Entergy Louisiana, LLC ("ELL" or the "Company"). My business address is 4809 Jefferson Highway, Jefferson, Louisiana 70121.

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

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

Q3. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

A. In 2000, I earned a Bachelor of Arts degree in English Writing from Loyola University New Orleans. That same year, I began working as a natural gas accountant for Engage Energy, which was consolidated into El Paso Merchant Energy, L.P. I left that position in 2001 to join the real-time power trading desk at BP Energy Company, in which role I traded and scheduled power transactions on a daily and monthly basis throughout the Western Interconnection and with the Electric Reliability Council of Texas for the North America Gas & Power Business Unit. In addition, I scheduled and developed the daily resource plan for two plants totaling 2,000 MW per day.

I left BP to seek a Juris Doctor degree from Loyola University New Orleans, from which I graduated in 2007. Upon graduation, I practiced law as a regulatory attorney for

Entergy Services, LLC ("ESL")[1] for which I served as counsel for numerous matters before the Louisiana Public Service Commission ("LPSC" or "Commission") including integrated resource plans, transmission certifications, resource procurements, fuel audits, and a variety of rulemakings. In 2019, I left ESL to create the legal and risk function at Ampirical Solutions, LLC, an engineering firm focusing on the electric utility industry. I returned to ESL in 2023 as a Commercial Originator, Senior Advisor in the System Planning & Operations organization. In 2024, I earned a Master of Laws in Compliance and Enterprise Risk Management from Loyola University Chicago. This year, I transitioned to my present role as Senior Manager, Resource Planning for ELL.

Q4. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.

A. As the Senior Manager, Resource Planning for ELL, I am responsible for managing the planning of generation for the Company. This involves working closely with the generation planning organizations of ESL on these activities.

Q5. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE LPSC?

A. No, I have not.

[1] ESL is an affiliated service company that provides engineering, planning, accounting, legal, technical, regulatory, and other administrative support services to each of the Entergy Operating Companies ("EOCs"). The EOCs are ELL, Entergy Arkansas, LLC, Entergy Mississippi, LLC, Entergy New Orleans, LLC, and Entergy Texas, Inc. ("ETI").

Q6. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. My Direct Testimony supports the Application of ELL for, among other things, approval of the Votaw Solar Facility and Segno Solar Facility (collectively, the "Proposed Solar Facilities"), both of which were selected from two different Requests for Proposals ("RFPs") conducted by ESL for ETI[2] and which are proposed (subject to certain ongoing discussions that I describe below) to be designated as part of the Initial Renewable Subscription Amount contemplated by the Corporate Sustainability Rider ("CSR") for Laidley LLC—the customer whose large and economically transformative data center project was the subject of the proceeding in LPSC Docket No. U-37425. My testimony first provides an overview of the Application and a brief description of the CSR. I then explain ELL's resource-planning objectives and process before explaining the manner in which the Proposed Solar Facilities satisfy the Company's resource-planning objectives. I conclude by explaining the reasons for which the Proposed Solar Facilities contribute to satisfying the Company's customers' needs for sustainable generation options.

Q7. DO YOU SPONSOR ANY EXHIBITS?

A. Yes, I sponsor the exhibit listed in the Table of Contents.

[2] As I explain below, ETI transferred the Proposed Solar Facilities to ELL after deciding against pursuing further development of those resources.

II. OVERVIEW OF APPLICATION

Q8. PLEASE PROVIDE AN OVERVIEW OF ELL'S APPLICATION.

A. The Company's Application seeks, among other things, a certification by the LPSC that construction of the Proposed Solar Facilities is in the public interest as well as a finding that the Proposed Solar Facilities can be allocated to the Initial Renewable Subscription Amount described in the CSR.[3] The Proposed Solar Facilities are two resources that ELL proposes to use as system resources and that, as I explain further below and as is also explained in detail in the Direct Testimony of Company witness Elizabeth C. Ingram, can fulfill, in part and if agreed by Laidley, the Initial Renewable Subscription Amount included in the CSR with Laidley. If Laidley agrees to subscribe to the Proposed Solar Facilities, Laidley will pay the subscription fees for the resources and, through those fees, will cover the vast majority of the facilities' costs during the term of Laidley's subscription. The result is that all of ELL's customers would be receiving certain benefits from the availability of these system resources while the costs are covered to a significant extent[4] by Laidley during the length of Laidley's subscription.

In addition to my testimony, the Company's Application is supported by testimony from three other witnesses:

---

[3] As I explain further below, Laidley [redacted]; in any event, ELL is asking that the resources be certified as system resources such that they will be part of ELL's supply plan. As Company witness Elizabeth C. Ingram explains in her Direct Testimony, the Company does not believe that Commission approval is required for ELL's proposed allocation, but ELL is seeking such approval out of an abundance of caution under the circumstances of this case.

[4] As Ms. Ingram explains in her testimony, costs for the Renewable Capacity Credits provided for the Proposed Solar Facilities will remain to be paid by other customers, and those costs will be offset by the full avoided capacity costs and the load payment component of variable supply costs savings from the resources.

- Robert J. Fluth, who is employed by ESL as Director, Power Development, provides details of the Proposed Solar Facilities as well as the Company's current cost estimates for the Proposed Solar Facilities and details concerning the Engineering, Procurement, and Construction ("EPC") contracts for constructing the Proposed Solar Facilities.
- Elizabeth C. Ingram, who is employed by ESL as Director, Regulatory Strategy, testifies concerning the CSR; the Initial Renewable Subscription Amount, which is Laidley's Group 3 subscription to Rider Geaux Zero ("Rider GZ"); and the proposed allocation of the Proposed Solar Facilities to the Initial Renewable Subscription Amount. Ms. Ingram further explains the Company's requested ratemaking treatment (which is the same as ratemaking treatment for resources allocated to subscriptions under Rider GZ), the reasons for which certification of the Proposed Solar Facilities serves the public interest (including the fact that, as demonstrated by the analysis presented by Company witness Phong D. Nguyen, the Proposed Solar Facilities fall below the Breakeven Parameters established as part of the Commission's June 14, 2024 Order Number U-36697 (Corrected)[5] (the "3GW Order")), and the reasons for which selection of the Proposed Solar Facilities from the two RFPs conducted by ESL on behalf of ETI should be viewed as an

[5] *See* LPSC Docket No. U-36697, *In re: Application for approval of an alternative market-based mechanism process seeking to secure up to 3,000 MW of solar resources, including certification of those resources, expansion of the Geaux Green Option Rider, and approval of a new renewable tariff.*

acceptable alternative market-based mechanism under the Commission's Market-Based Mechanisms Order (the "MBM Order").[6]

- Phong D. Nguyen, who is employed by ESL as Director, Advanced Economic Planning for the System Planning & Operations organization, testifies concerning the analysis performed by ESL for the Proposed Solar Facilities that demonstrates the resources fall below the Breakeven Parameters established as part of the Commission's 3GW Order. In addition, Mr. Nguyen describes the 2021 Request for Proposals for Solar Photovoltaic Resources for Entergy Texas, Inc. (the "2021 Solar RFP") from which Votaw was selected and the 2022 Request for Proposals for Renewable Resources for Entergy Texas, Inc. (the "2022 Renewables RFP") from which Segno was selected, including the manner in which each RFP was conducted and the analyses that led to the selection of the Proposed Solar Facilities from those RFPs.

[6] *See* General Order (February 16, 2004), *In re: Development of Market-Based Mechanisms to Evaluate Proposals to Construct of Acquire Generating Capacity to Meeting Native Load, Supplements the September 20, 1983 General Order*, Docket No. R-26172 Subdocket A, as amended by General Order, Docket No. R-26172 Subdocket B, dated November 3, 2006 and further amended by the April 26, 2007 General Order and the amendments approved by the Commission at its October 15, 2008 Business and Executive Meeting; the October 29, 2008 General Order No. R-26172, Subdocket C; and the October 14, 2024 General Order No. R-34247.

Q9. YOU REFERENCED ABOVE THAT THE PROPOSED SOLAR FACILITIES WERE ORIGINALLY SELECTED FROM REQUESTS FOR PROPOSALS THAT WERE CONDUCTED FOR ETI'S BENEFIT. HOW IS IT THAT ELL, RATHER THAN ETI, IS SEEKING CERTIFICATION OF THESE RESOURCES?

A. ETI originally filed a request with the Public Utility Commission of Texas for approval to amend its certificate of convenience and necessity to allow for construction of the Proposed Solar Facilities. In a recent filing in which it asked to withdraw that application, ETI explained that it no longer intended or sought approval to construct, own, or operate the facilities due to that EOC's need to optimize other capital investments for the benefit of its customers. In light of ETI's capital-optimization needs and its decision to no longer pursue construction of the Proposed Solar Facilities, ELL recognized an opportunity to acquire those resources, which were identified as falling below the Breakeven Parameters in the 3GW Order and as two resources that could potentially help with fulfilling, in part, the Initial Renewable Subscription Amount in the CSR. ELL thus entered into agreements that allow for the transfer of the Proposed Solar Facilities from ETI to ELL[7] and that allow for ELL to seek certification of those resources for the Company's purposes. Mr. Fluth describes the agreements between ETI and ELL in greater detail in his Direct Testimony.

[7] As Mr. Fluth explains, the assignment of the Votaw assets will be completed in full upon receipt of satisfactory regulatory approvals in this proceeding. The Segno assets were assigned, effective September 30, 2025, pursuant to an Assignment and Assumption Agreement between ELL and ETI.

Q10. YOU MENTIONED THAT THE COMPANY IS STILL IN DISCUSSIONS WITH LAIDLEY CONCERNING POTENTIAL SUBSCRIPTIONS FOR THE PROPOSED SOLAR FACILITIES. PLEASE EXPLAIN THE REASON FOR, AND STATUS OF, THOSE DISCUSSIONS.

A. As I described above, ELL entered into an agreement to acquire the Proposed Solar Facilities from ETI after ETI stated it decided against pursuing the projects based on capital-optimization needs. ELL identified the Proposed Solar Facilities as resources that could potentially assist with fulfilling its customers' needs for sustainable resources—including in particular the commitments made by Laidley through its Initial Renewable Subscription Amount in the CSR and certain other commitments included in the Company's settlement agreement in LPSC Docket No. U-37425.[8]

The CSR provides that, before a particular resource can be added to Laidley's Initial Renewable Subscription Amount (which is a Group 3 subscription under Rider GZ), [redacted]. The discussions between ELL and Laidley involve the provisions in the CSR concerning pricing and Laidley's ability, under circumstances defined in the CSR, [redacted]

Related to that point, the estimated costs for the Proposed Solar Facilities have been updated given the time that has elapsed following ETI's decision and the transaction to transfer the Proposed Solar Facilities to ELL. Mr. Fluth describes those considerations and updated cost estimates in greater detail in his Direct Testimony. ELL has recalculated the

[8] *See* LPSC Docket No. U-37425, *In re: Application for approval of generation and transmission resources in connection with service to a single customer for a project in North Louisiana.*

pricing that would be charged to Laidley as part of Laidley's Group 3 subscription under Rider GZ. The updated costs for both of the Proposed Solar Facilities were below the Breakeven Parameters established by the 3GW Order; [redacted]. ELL has submitted both resources to Laidley for its consideration and [redacted] As of the date of this filing, the discussions have not concluded; ELL will supplement this Application once Laidley has made its decision.

Q11. IF ELL AND LAIDLEY ARE UNABLE TO REACH AN AGREEMENT ON A SUBSCRIPTION FOR THE PROPOSED SOLAR FACILITIES, WILL ELL CONTINUE TO SEEK CERTIFICATION?

A. Yes. If ELL and Laidley are unable to agree on terms for a subscription to the Proposed Solar Facilities, ELL will evaluate all options at that time, but because the resources fall below the Breakeven Parameters included in the 3GW Order, ELL anticipates continuing to seek certification. Regardless of Laidley's decision, additional solar generation would enhance ELL's portfolio and offer its customers benefits from low-cost energy, fuel diversity, and sustainability—and the pricing of these solar resources is competitive as shown from their position relative to the Breakeven Parameters. As mentioned above, ELL will supplement this Application with additional information once a decision has been made by Laidley with respect to the Proposed Solar Facilities.

Q12. WHY IS ELL FILING AN APPLICATION THAT SEEKS RELIEF WITH RESPECT THE PROPOSED SOLAR FACILITIES BEFORE LAIDLEY HAS MADE ITS DECISION?

A. Preliminarily, it bears emphasizing that the estimated costs for both of the Proposed Solar Facilities fall below the Breakeven Parameters included in the 3GW Order. Thus, had the resources been located in Louisiana and procured through the process specified in the 3GW Order, ELL could have applied for (and been entitled to) expedited certification of the resources. ELL therefore anticipates continuing with its request for certification of the Proposed Solar Facilities even if Laidley decides against moving forward with both of the Proposed Solar Facilities.

The reason for beginning the regulatory proceeding while Laidley considers the Proposed Solar Facilities centers on certain federal tax credits for which the Proposed Solar Facilities are or could be eligible and which are critical to maintaining the current subscription pricing. As explained in greater detail in Mr. Fluth's Direct Testimony, the Company has taken steps to ensure that the Proposed Solar Facilities remain eligible for certain tax credits that were first made available under the Inflation Reduction Act of 2022 (the "IRA") and that have recently been limited by the One, Big, Beautiful Bill Act of 2025 (the "OBBBA"). In order to ensure that the Proposed Solar Facilities continue to be eligible for those tax credits, the Company must complete construction of the Proposed Solar Facilities in 2029, which in turn requires that the Company issue a Final Notice to Proceed to its EPC contractor for each facility by September 1, 2026. The Company is accordingly asking that its Application be considered by the Commission within 120 days, consistent with the Commission's 1983 General Order, and in any event, no later than the

Commission's August 2026 Business and Executive Session. In light of these timing considerations, ELL is filing the Application now, even though discussions with Laidley concerning the Proposed Solar Facilities are ongoing.

Q13. DOES ELL REQUEST A PARTICULAR TIMELINE FOR CONSIDERATION OF THIS APPLICATION?

A. Yes. As explained above, the Company is asking that its Application be considered by the Commission within 120 days and, in any event, no later than the Commission's August 2026 Business and Executive Session in order that, if approved, the Company can issue Final Notices to Proceed for the Proposed Solar Facilities by September 1, 2026.

III. RESOURCE PLANNING NEEDS MET BY THE PROPOSED SOLAR FACILITIES

Q14. WHAT IS THE GOAL OF ELL'S RESOURCE PLANNING?

A. ELL's resource planning is driven by the fundamental goal to deliver a resource portfolio that is centered on customer outcomes and the safe, reliable delivery of electricity at the lowest reasonable costs. Building a robust portfolio of resources requires that ELL carefully balance three key objectives: reliability, affordability, and environmental stewardship. This balance looks at both the near-term and long-term benefits and risks associated with each key objective.

ELL's portfolio development places an emphasis on customer needs and preferences. ELL recognizes that customer expectations for electric service will continue to change alongside advancements in technology and evolving market and policy

considerations. Accordingly, ELL aims to meet customers' needs for reliable, reasonably priced electric services and energy solutions both today and in the future.

Q15. PLEASE ELABORATE ON THE THREE KEY OBJECTIVES YOU MENTIONED FOR BUILDING A SUSTAINABLE PORTFOLIO.

A. Reliability as a planning objective means ensuring that the stability of the grid is maintained through adequate resources to meet capacity and energy needs along with adequate transmission and distribution systems to ensure that power is reliably delivered to customers. Ensuring that there are adequate resources to meet forecasted future customer demand is more than just supplying a certain number of megawatts or Zonal Resource Credits ("ZRCs") with respect to the Midcontinent Independent System Operator, Inc. ("MISO") wholesale market. Resource adequacy must also consider the diversity of the supply portfolio—both in technology type and operational characteristics—combined with customer-targeted energy efficiency and demand-side resources. Planning also must consider the location of resources, proximity of those resources to customer load, and the availability of those resources under various conditions. The ability of the transmission and distribution system to deliver those resources to customers also is a key aspect of maintaining reliability, and the careful integration of generation, transmission, and distribution ensures that adequate reliability can be delivered at the lowest reasonable cost.

Affordability as a planning objective means keeping customer costs reasonable, considering current and expected cost impacts of infrastructure improvements made on behalf of ELL's customers and taking advantage of scale to provide cost synergies. ELL

recognizes the importance of maintaining affordable rates for customers and prides itself on the ability to maintain rates well below the national average. Maintaining affordable rates requires a balancing of various cost components such as capital investment, operations and maintenance expenses, and sometimes-volatile fuel and purchased power costs. Maintaining cost stability over time requires that ELL examine its portfolio over a variety of futures to ensure that long-term supply will adequately meet future customer needs.

Environmental stewardship as a planning objective refers to the use and protection of the natural environment, ensuring compliance with existing and likely regulations, adaptability of resources, and paths towards a lower-carbon intensity economy. Portfolios of supply-side and demand-side resources that are capable of adapting and remaining sustainable over the long-term horizon bring customers increased benefits and help to manage long-term cost stability. When considering ELL's environmental stewardship objective, the Company also monitors customers' desire for decarbonization through lower emission generation, investment in cost-effective renewable energy resources, and a broad range of offerings that allow customers to meet their own, unique sustainability goals in partnership with their utility. Many of ELL's larger customers have publicly stated their intent to reduce the carbon intensity of their businesses and operations. With the Company's ability to provide broad access to renewable energy and other options for customers, ELL stands in a unique position to enable and extend a lower carbon economy to customers and the communities it serves.

Appropriately balancing these three objectives with consideration of the near-term and long-term risks associated with each should result in the lowest reasonable cost portfolios of resources to meet customers' needs.

Q16. PLEASE DESCRIBE ELL'S LONG-TERM RESOURCE PLANNING PROCESS.

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

As part of its resource-planning efforts, ELL has developed and continues to refine an Integrated Resource Plan ("IRP"), which is periodically filed at the LPSC pursuant to the Commission's IRP rules.[9] ELL's most recent submission of an IRP to the Commission was on May 22, 2023 (ELL's "Final 2023 IRP") and reflects inputs and assumptions that were established based on ELL's Business Plan 2022.[10] Given the uncertainty and fluidity inherent in long-term resource planning, ELL's IRP provides a framework for the Company to plan for resources over the next several years but does not and cannot reasonably serve as a prescriptive plan to address ELL's long-term resource needs and potential options for meeting those needs. Circumstances will necessarily change, and to

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

[10] *See* ELL's IRP Final Report (May 22, 2023), *Ex Parte: In re: 2021 Integrated Resource Planning Process for Entergy Louisiana, LLC pursuant to the General Order No. R-30021*, Docket No. I-36181. The Final 2023 IRP was acknowledged by the LPSC on February 21, 2024.

be reasonable and prudent, resource-procurement decisions must be made based on the best information reasonably available at the time those decisions are made. ELL presents those decisions and the support for them to the Commission when seeking resource certifications required under applicable General Orders and does not seek certification via the IRP (nor, per my understanding of the Commission's IRP rules, does the Commission's acknowledgement of an IRP confer such approval).

Further, an overarching consideration in ELL's long-term resource-planning process is the current expectation with respect to load growth and the generation portfolio. As described in ELL's Final 2023 IRP and the record of Docket Nos. U-36190, U-36685, U-36697, U-37071, and U-37425, ELL is projected to need additional long-term capacity over the course of the long-term planning horizon to replace deactivated capacity and address load growth in order to reliably serve customers.

ELL has also presented the Commission with results of certain aspects of its continuous resource-planning efforts outside of the formal IRP process. For example, ELL received approvals in 2024 from the Commission in Docket No. U-37071 (which concerned ELL's 2023 Solar Application, specifically the Power Purchase Agreement for the Mondu Solar Facility) and Docket No. U-36697 (which was ELL's 3GW filing).[11]

Finally, there are instances in which ELL's resource-planning process addresses (but the IRP may not contemplate) unique load-serving issues and solutions that arise from time to time—an issue that arose, for example, with the proposed resources at issue in

[11] *See* Order No. U-37071 (September 6, 2024), *In re: Application for Approval of the Mondu Solar Power Purchase Agreement, Expansion of the Geaux Green Tariff, and Cost Recovery*, Docket No. U-37071; *see also generally* 3GW Order.

Docket No. U-37425, in which Laidley requested service to a large new load (its data center), and the request was received by ELL after the latest IRP was filed. Under the circumstances present in that Application, ELL was unable to include the proposed load (or the corresponding solution) in its IRP and instead fulfilled the Commission's planning requirements by seeking certification of certain resources in the Application itself.

Q17. PLEASE DESCRIBE THE COMPANY'S CURRENT RESOURCE PORTFOLIO.

A. ELL currently controls approximately 11 GW of in-service capacity through direct ownership, capacity contracts with third parties, life-of-unit contracts with other EOCs, and demand response ("DR") resources. Over the last twenty years, ELL has transformed and modernized its generation portfolio to support customers' evolving needs and address significant current and expected industrial load growth in Louisiana by adding reliable and more efficient combustion turbine ("CT") and combined cycle combustion turbine ("CCCT") generating units to meet its supply needs. More recently, ELL has pursued additional renewable resources. Table 1 below shows ELL's current (as of 2025) resources by fuel type, including demand-side resources and supply-side resources owned by ELL and under contract through PPAs.

Table 1

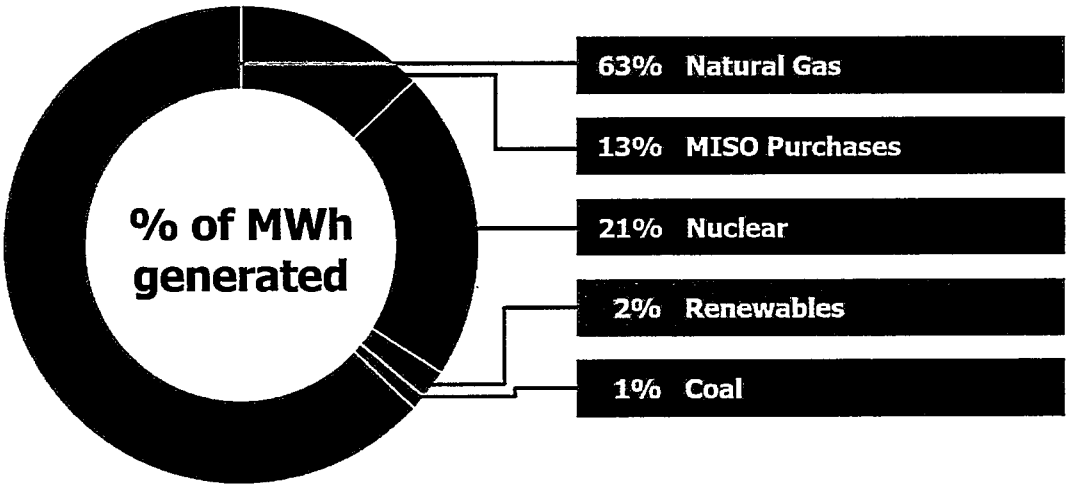
2025 ELL Resource Portfolio		
	Summer Seasonal Accredited Capacity ("SAC")	**SAC %**
Coal	343	3.1%
Nuclear	1,581	14.5%
CCCT	5,331	49.0%
CT and Other	773	7.1%

2025 ELL Resource Portfolio		
	Summer Seasonal Accredited Capacity ("SAC")	**SAC %**
Legacy Gas	2,332	21.4%
Renewable	247	2.3%
Load Modifying Resources ("LMRs")	272	2.5%
Total	**10,879**	**100.0%**

Figure 1 below shows ELL's energy mix in 2024 by generation type.[12]

Figure 1

Entergy Louisiana's 2024 Power Generation Mix



Approximately 21% of the capacity in the Company's resource portfolio is composed of legacy fossil generation units that have been in service for more than 50 years, with the

[12] Figure 1 includes all generation used to serve ELL's load (including both owned and contracted resources) as well as purchases made from MISO's energy market.

oldest having been in operation for approximately 59 years. While the company has made and will continue to make investments to maintain these legacy generators when economical to do so, many of these generators are expected to reach the end of their economically useful lives and be deactivated in the near term.[13]

Q18. HOW DO MISO RESOURCE ADEQUACY REQUIREMENTS INFLUENCE THE COMPANY'S RESOURCE NEEDS?

A. ELL's resource planning efforts are primarily focused on the planning objectives I noted above that seek to deliver the right type and amount of capacity to reliably serve ELL's customers in Louisiana. In doing so, ELL must also account for the resource adequacy requirements set out by MISO for the Planning Year to ensure that the results of ELL's planning efforts reasonably meet those requirements.

While MISO has no responsibility to build or provide capacity, it nevertheless assigns resource adequacy requirements to load-serving entities in its footprint, including ELL. MISO historically provided annual resource adequacy requirements but in recent years has implemented its Seasonal Accredited Capacity ("SAC") construct, which began with the 2023-2024 Planning Year. Under this revised resource adequacy construct, MISO conducts seasonal assessments to evaluate potential resource adequacy risks for the various seasons. These assessments evaluate seasonal loss-of-load risk by modeling near-term

[13] For example, ELL deactivated Waterford 1 during the first quarter of 2021. *See* ELL's Compliance Filing (March 30, 2022), *In re: Notification of Deactivation and Retirement Decisions pursuant to Louisiana Public Service Commission's Deactivation General Order (Docket No. R-34407)*, Docket No. X-35751; *see also, e.g.*, ELL's IRP Final Report (May 22, 2023), *Ex Parte: In re: 2021 Integrated Resource Planning Process for Entergy Louisiana, LLC pursuant to the General Order No. R-30021 Dated April 20, 2012*, Docket No. I-36181, p. 27.

capacity in the face of historic outage conditions and by modeling a wide range of potential load-forecast and weather scenarios, including extreme weather scenarios. The assessments performed by MISO also highlight potential issues in the upcoming seasons to help MISO, load-serving entities, regulators, and other stakeholders prepare for potentially strained system conditions and develop preventative actions.[14]

As part of its resource adequacy requirements, MISO also determines Local Clearing Requirements ("LCRs")—the amount of capacity that must be physically located within each Local Resource Zone ("LRZ") (as defined by MISO) accounting for how much load is present within each LRZ and how much capacity can be "imported" from other LRZs. In the event a load-serving entity's resources fall short of its seasonal requirements, that load-serving entity is exposed to the zonal clearing price for MISO's annual capacity Planning Resource Auction ("PRA") for the shortfall. The clearing price can approach and ultimately reach the cost of new entry ("CONE")[15] multiplied by four if an individual LRZ cannot meet its LCR, which may occur as market conditions tighten across MISO's footprint. Notably, LRZs 1 through 7 cleared at or near CONE, or $236.66/MW-day, in the 2022-2023 MISO PRA.[16]

As I noted above, MISO has recently implemented various changes to the design of the PRA, and these have had an impact on the PRA results. The PRA results for the

---

[14] MISO Energy, *Resource Adequacy*, Midcontinent Independent System Operator, Inc., *available at* https://www.misoenergy.org/planning/resource-adequacy2/resource-adequacy.

[15] The "cost of new entry" represents the regional, annualized capital cost of building a new CT.

[16] MISO Energy, *2022/2023 Planning Resource Auction (PRA) Results*, Midcontinent Independent System Operator, Inc. (April 14, 2022), *available at* https://cdn.misoenergy.org/2022%20PRA%20Results624053.pdf. The same 2022-2023 MISO PRA yielded a clearing price for LRZ 9—the LRZ in which ELL's load and generation (including the Proposed Solar Facilities) are sited—of $2.88/MW-day.

2023-2024 MISO Planning Year, released in the Spring of 2023, represented the first time MISO released PRA results based on its new SAC construct. Results for the 2025-2026 MISO Planning Year (the PRA for the current Planning Year that commenced on June 1, 2025) represented the first time MISO included its Reliability-Based Demand Curve ("RBDC"), which resulted in an amount of capacity clearing in the PRA that exceeded the seasonal Planning Reserve Margin ("PRM") targets published in MISO's 2025-2026 LOLE Study report. Across the MISO region as a whole, declining surplus capacity, coupled with emerging risks due to fleet transition and new load additions, continue to pressure resource adequacy. While LRZ 9 (in which Louisiana and the Proposed Solar Facilities sit), did not clear at CONE in any season, its Summer season cleared at the highest value to date, which was $666.50/MW-day, and the remaining seasons cleared at their highest values since MISO began seasonal accreditation.[17] In the Fall, LRZ 9 cleared at $74.09/MW-day, in the Winter it cleared at $33.20/MW-day, and in the Spring it cleared at $69.88/MW-day.[18] LRZ 9 has experienced elevated pricing in the most recent MISO PRAs and is expected to continue to see elevated pricing in the coming years.[19]

The significantly tightening supply of capacity within LRZ 9 is evident from the detailed results underlying the elevated Summer season clearing prices in the 2025-2026 PRA. Those results show that, in Summer, the quantity of supply offered into the auction (20,499 MW) exceeded the LCR for LRZ 9 (19,615 MW) by only 884 MW.[20] In other

---

17 *See* MISO Energy, *Planning Resource Auction Results for Planning Year 2025-26* (April 2025), *available at* https://cdn.misoenergy.org/2025%20PRA%20Results%20Posting%2020250529_Corrections694160.pdf.

18 *See id.*

19 *See id.*

20 *See id.*, at 18.

words, if the amount of capacity offered in LRZ 9 in the Summer season had been roughly 4% lower, then LRZ 9 would have cleared at four times CONE for that season.

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

Q19. DOES ELL PROPOSE TO OFFER THE PROPOSED SOLAR FACILITIES TO MISO?

A. Yes. If approved, the Proposed Solar Facilities will be offered to MISO as system resources, meaning that ELL will make the capacity from the Proposed Solar Facilities available in MISO's capacity markets.

Q20. IS MISO CHANGING ITS METHODOLOGY FOR ACCREDITING SOLAR RESOURCES LIKE THE PROPOSED SOLAR FACILITIES?

A. Yes. MISO has received approval to implement a new capacity accreditation methodology known as Direct Loss of Load ("DLOL") beginning with the 2028-2029 Planning Year. Generally speaking, the expectation is that all resources—including solar resources like the Proposed Solar Facilities—will see a decline in accredited capacity compared to the former capacity accreditation methodology, referred to as Unforced Capacity ("UCAP"). The Proposed Solar Facilities can be expected to receive some capacity credit, although a lower

amount under DLOL than under UCAP.[21] The Proposed Solar Facilities nevertheless contribute capacity toward meeting ELL's needs and comprise a valuable part of the Company's overall supply plan because of the fuel diversity and low-cost energy they provide.

Q21. DOES THE COMPANY NEED ADDITIONAL LONG-TERM GENERATING CAPACITY, LIKE THE PROPOSED SOLAR FACILITIES, TO SATISFY ITS PLANNING OBJECTIVES?

A. Yes. ELL's projected load (plus a planning reserve margin) exceeds the capacity of ELL's existing and LPSC-approved resources, which indicates a need for additional long-term capacity—a need that is further pronounced with the addition of several new high-profile loads that have been announced by the company over the last twelve months. Exhibit MJP-1, which contains Highly Sensitive Protected Material ("HSPM") and is designated as such, reflects ELL's resources relative to the forecasted load for 2025-2035, with the red line depicting ELL's load requirement with those new loads. HSPM MJP-1 takes into account currently owned and contracted resources and those future resources that have been approved by the Commission, and the underlying data is drawn from ELL's Business Plan 26 ("BP26").[22]

The resource surplus/deficit from year to year with the anticipated new loads is the difference between the red line and the bar for each year on the X-axis, which represents

[21] Notably, the decrease in solar capacity should also reduce ELL's seasonal requirements (*i.e.*, the Planning Reserve Margin Requirements for ELL assigned by MISO) because the PRMs will be stated in DLOL terms.

[22] Exhibit MJP-1 does not include the DR resources that are the subject of the Application in Docket No. U-37595, *In re: Request for approval of Demand Response Programs, and cost recovery.*

ELL's existing resources, approved resources, conditionally approved resources, and resources pending LPSC approval.

In terms of resource availability, HSPM Exhibit MJP-1 also reflects slight modifications to unit-deactivation assumptions from BP24 that were discussed in ELL's most recent IRP, as well as existing PPAs that are expected to expire on their stated expiration dates. Certain unit-deactivation dates have been modified to balance ELL's ability to meet its energy and capacity needs with achieving customer affordability, the time needed to build new resources, and the ability to ramp to serve certain customer loads. As seen in HSPM Exhibit MJP-1, using ELL's Spring SAC, ELL will need [redacted].

Q22. WHAT ARE ELL'S CURRENT PLANS TO MEET ITS LONG-TERM CAPACITY NEEDS?

A. As noted above, the Company has developed and continues to refine an IRP that considers generation and transmission and is expected to meet customer needs in the lowest-reasonable-cost manner. The Company's IRP has also been supplemented with the information included in the Application in Docket No. U-37425. The Company continues to need long-term capacity over the planning horizon, and the plan to meet ELL's needs includes a combination of new-build generation, PPAs, and acquisitions from a diverse set of resources that will provide efficient operating flexibility to serve evolving customer demands. Further, ELL continues to see significant demand for incremental renewable energy resources to meet customer interest for its green tariff offerings—a consideration

that is particularly important here, where the Proposed Solar Facilities have been identified as resources that could potentially assist with fulfilling, in part, the Initial Renewable Subscription Amount included in the CSR with Laidley, and which would accordingly help with advancing Laidley's transformational data center project in Northeast Louisiana.

Q23. HAS THE RECENTLY ENACTED OBBBA IMPACTED THE OUTLOOK FOR SOLAR RESOURCES?

A. Yes. As discussed briefly above, the cost-effectiveness of solar resources has rested historically, in part, on the availability of certain tax credits made available under the IRA. Through the OBBBA, eligibility for those tax credits has been limited, and there are certain requirements that must be met in order to ensure that solar resources placed into service after 2027 are eligible to receive those credits. As Company witness Robert J. Fluth explains in his Direct Testimony, the Company has performed certain work—and is anticipating work on the Proposed Solar Facilities to be completed timely—such that the Company believes the Proposed Solar Facilities will remain eligible for potential tax credits. That said, removal of, or limitations on, the tax credits that were previously available for solar resources could impact the viability of those resources moving forward.

Q24. HOW DOES THE IMPACT OF THE OBBBA ON SOLAR RESOURCES AFFECT THE OUTLOOK FOR SOLAR RESOURCES TO FULFILL THE INITIAL RENEWABLE SUBSCRIPTION AMOUNT?

A. The Company continues to assess this issue, including in connection with the ongoing Procurement Window 3 that is being conducted pursuant to the 3GW Order. The Company

remains committed to soliciting and procuring beneficial solar resources to meet customer needs; however, the impact of the OBBBA's provisions on tax credits for solar resources could limit the number of solar resources that might be considered cost-effective and, thus, pursued for ELL's customers. In ELL's view, it is therefore particularly important to capture opportunities like the Proposed Solar Facilities at the present time.

Q25. DO THE PROPOSED SOLAR FACILITIES SUPPORT ELL'S THREE KEY PLANNING OBJECTIVES FOR BUILDING A SUSTAINABLE PORTFOLIO?

A. Yes. As set forth above, the three key planning objectives for resource planning are reliability, affordability, and environmental stewardship. The relief sought in this Application—and, specifically, certification of the Proposed Solar Facilities—satisfies each of these planning objectives.

Q26. HOW DOES THE RELIEF SOUGHT IN THIS DOCKET SUPPORT ELL'S RELIABILITY PLANNING OBJECTIVE?

A. The Proposed Solar Facilities will assist with meeting the Company's long-term capacity needs as well as address the energy needs of our customers while also adding diversity to the Company's generation portfolio. As I discussed above, approximately 21% of the capacity in the Company's current resource portfolio is composed of legacy generation units that have been in service for more than 50 years, with the oldest having been in operation for approximately 59 years. Moreover, ELL has seen elevated pricing in LRZ 9—the Local Resource Zone in which ELL's load and generation (including the Proposed Solar Facilities) are sited—in the most recent MISO PRAs, and the Company continues to

anticipate elevated pricing in future PRAs. As I noted above, the detailed results for LRZ 9 in the PRA for the 2025-2026 Planning Year show very tight market conditions, particularly in the Summer season, and market conditions are expected to continue tightening as Louisiana experienced ongoing significant growth in economic activity and, thus, demand for electricity. ELL is thus exploring all reasonable options for increasing capacity, including the addition of new generation resources like the Proposed Solar Facilities. As system resources, the Proposed Solar Facilities are expected to provide additional capacity to help with ensuring continued, reliable delivery of electricity to Louisiana's growing load. Although the contribution toward capacity needs of solar resources such as the Proposed Solar Facilities is less than for a comparably sized dispatchable resource, the Proposed Solar Facilities are cost-competitive, can be deployed within a timeframe faster than dispatchable resources, and provide a meaningful contribution to ELL's capacity needs during this period and in the future.

Q27. HOW DOES THE RELIEF SOUGHT IN THIS DOCKET SUPPORT ELL'S AFFORDABILITY PLANNING OBJECTIVE?

A. As I note above, ELL is proposing that the Proposed Solar Facilities be allocated to the Initial Renewable Subscription Amount under the CSR, which, if Laidley agrees to add the Proposed Solar Facilities to the Initial Renewable Subscription Amount and the Commission approves allocating both resources to Laidley, would mean that the vast majority of the costs for the Proposed Solar Facilities would be paid by Laidley during the

term of the subscription through subscription fees.[23] If the Commission approves ELL's request that the resources be treated as system resources and allocated to the Initial Renewable Subscription Amount, the Proposed Solar Facilities will provide capacity at low cost to ELL's other customers. Moreover, as discussed in greater detail by Company witness Phong D. Nguyen, the Proposed Solar Facilities were selected from two different RFPs conducted by ESL. As Mr. Nguyen further explains, the costs for the Proposed Solar Facilities fall below the Breakeven Parameters established by the Commission in the 3GW Order; thus, even if Laidley does not agree to include both of the Proposed Solar Facilities in the Initial Renewable Subscription Amount, ELL's customers nonetheless will be receiving resources that, had they been located in Louisiana and procured through the procurement process set forth in the 3GW Order, would have been eligible for expedited certification. Finally, the Proposed Solar Facilities will provide zero-variable cost energy that will enhance affordability on ELL customer bills.

Q28. HOW DOES THE RELIEF SOUGHT IN THIS DOCKET SUPPORT ELL'S ENVIRONMENTAL STEWARDSHIP PLANNING OBJECTIVE?

A. Both of the Proposed Solar Facilities are zero-carbon-emitting solar resources. The addition of these resources will reduce ELL's carbon emissions and could assist with meeting customers' desire for lower-carbon resources.

[23] As discussed above, ELL and Laidley are in ongoing discussions concerning whether Laidley will agree to the Proposed Solar Facilities being added to the Initial Renewable Subscription Amount.

Q29. YOU MENTIONED THAT ELL'S DEVELOPMENT OF A SUSTAINABLE PORTFOLIO PLACES AN EMPHASIS ON CUSTOMER PREFERENCES. DO THE PROPOSED SOLAR FACILITIES ADDRESS CUSTOMER PREFERENCES?

A. Yes. ELL has consistently explained in applications seeking certification of solar resources that the Company's customers are increasingly seeking renewable resource options to meet both their planning objectives and the desires of their own customers. The Company has further asserted that answering those calls for renewable resources is important to positioning Louisiana for economic growth. This customer-centric focus is squarely at issue with the Proposed Solar Facilities: Laidley is considering whether to accept the Proposed Solar Facilities as part of the Initial Renewable Subscription Amount in the CSR, and, as explained in connection with Docket No. U-37425, the CSR was an important consideration for Laidley in its decision to build its transformative data center project in North Louisiana. A major customer and economic development opportunity has thus made clear that the availability of renewable resources was an important consideration in its decision to do business in Louisiana; approving the Proposed Solar Facilities will facilitate the continued progress towards meeting customer demand for renewable resources in the state.

IV. CONCLUSION

Q30. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, at this time.

AFFIDAVIT

STATE OF LOUISIANA

PARISH OF JEFFERSON

NOW BEFORE ME, the undersigned authority, personally came and appeared, Michael Plaisance, 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.

Michael J. Plaisance

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 14TH DAY OF NOVEMBER 2025

NOTARY PUBLIC

My commission expires: Death

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