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FEB 14 2023

LA Public Service Commission

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February 14, 2023

**VIA HAND DELIVERY**

Ms. Terri Bordelon  
Louisiana Public Service Commission  
Post Office Box 91154  
Baton Rouge, La 70821-9154

*Re: Docket No. U-\_\_\_\_\_ — In re: Application of Southern Spirit Transmission LLC for Certification of the Southern Spirit Transmission Project in Accordance With the Commission's General Order Dated October 10, 2013.*

Dear Ms. Bordelon:

Enclosed please find the Application of Southern Spirit Transmission LLC for Certification of the Southern Spirit Transmission Project in Accordance with the Louisiana Public Service Commission's General Order Dated October 10, 2013 (the "Application") to be filed into the record in the above-referenced matter. The Application includes the following attachments:

1. Testimony of Mr. Cary Kottler
  - i. CK-1. SCT Certificate of Formation
  - ii. CK-2. Delaware Secretary of State Name Change Certificate
  - iii. CK-3. Delaware Certificate of Good Standing
  - iv. CK-3. Louisiana Certificate of Good Standing
  - v. CK-3. Louisiana Secretary of State Formation Documents and Amendments
  - vi. CK-4. Amended and Restated Operating Agreement (CONFIDENTIAL)
  - vii. CK-4. 2<sup>nd</sup> Amended & Restated Operating Agreement (CONFIDENTIAL)
  - viii. CK-5. Cary Kottler Resume
  - ix. CK-6. DeSoto Legal Description & Survey

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*hand*

Ms. Teri Bordelon  
Southern Spirit Transmission LLC Application  
February 14, 2023

2. Testimony of Mr. Deral Danis
  - i. DD-1. Deral Danis Resume
  - ii. DD-2. Typical Structure Drawings
3. Testimony of Dr. David Loomis
  - i. DL-1. Dr. David Loomis Resume
  - ii. DL-2. Economic Impact Analysis of the Southern Spirit Transmission Project on the State of Louisiana
4. Testimony of Mr. Tim Barton
  - i. TB-1. Tim Barton Resume
  - ii. TB-2. 2017 Routing Report (*provided via thumb drive only*)
  - iii. TB-3. Revised Routing Report (*provided via thumb drive only*)
  - iv. TB-4. Louisiana Route Map
5. Testimony of Ms. Shannon Gwin
  - i. SG-1. Shannon Gwin Resume

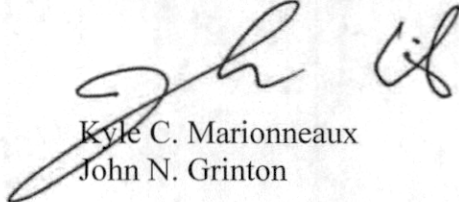
Please note that the documents labeled CK-4 are considered confidential information and are being submitted confidentially under seal pursuant to Rule 12.1 of the Rules of Practice and Procedure of the Commission.

Should you have any questions or need anything further from us, please do not hesitate to contact me.

With thanks and kindest regards, I remain,

Sincerely yours,

**MARIONNEAUX KANTROW, LLC**



Kyle C. Marionneaux  
John N. Grinton

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LA Public Service Commission

BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

APPLICATION OF SOUTHERN SPIRIT TRANSMISSION LLC FOR CERTIFICATION OF THE SOUTHERN SPIRIT TRANSMISSION PROJECT IN ACCORDANCE WITH THE COMMISSION'S GENERAL ORDER DATED OCTOBER 10, 2013

DOCKET NO. \_\_\_\_\_

LOUISIANA PUBLIC SERVICE COMMISSION

**APPLICATION OF SOUTHERN SPIRIT TRANSMISSION LLC FOR CERTIFICATION OF THE SOUTHERN SPIRIT TRANSMISSION PROJECT**

NOW BEFORE the Louisiana Public Service Commission (the "LPSC" or "Commission"), through undersigned counsel, comes Applicant, Southern Spirit Transmission LLC ("Southern Spirit," "SST" or "Applicant"), who files this application for certification that the public convenience and necessity will be served through the authorization for siting and construction of a 324-mile high voltage direct current ("HVDC") transmission line further described herein (hereinafter referred to as the "Southern Spirit Project" or the "Project"). This application is being filed pursuant to the LPSC's General Order dated October 10, 2013, Docket R-26018, *In Re: Determination As To Whether the Commission Should Issue A General Order Asserting Jurisdiction Over The Certification of Utility Transmission Projects and the Determination of Whether Those Projects Are In The Public Interest* (the "October 10, 2013 General Order").

Through this application, Southern Spirit seeks an order from the LPSC certifying that the public convenience and necessity would be served through the completion and siting of the Southern Spirit Project, which is a  $\pm$  500-600 kilovolt (kV) HVDC transmission line with a base load capacity of 3,000 megawatts ("MW") (delivered in either direction after losses) that will

connect the Electric Reliability Council of Texas (ERCOT) with SERC Reliability Corporation (SERC) and Midcontinent Independent System Operator (MISO), thus allowing for all of these independent system operators to utilize low-cost, reliable energy when they need it and to transport excess power in either direction. As described in more detail below and in the attached testimonies, the benefits of the Project to ERCOT, MISO, and SERC include the production and utilization of additional renewable energy, economic development, regional power market economic benefit, and increased electrical reliability through providing access to the diverse generation resources in each region. In support of this application, the Applicant shows the following:

1.

Southern Spirit<sup>1</sup> is a Delaware limited liability company created for the purpose of transmitting electricity for power, lighting, heating, and other such uses. Its principal business address is 1088 Sansome St., San Francisco, CA 94111 and the email address for the Applicant is [southernspirit@patternenergy.com](mailto:southernspirit@patternenergy.com). Southern Spirit is an affiliate of Pattern Energy Group LP (“Pattern”), an independent, fully integrated company that develops, constructs, owns, and operates high-quality wind, solar, transmission, and energy storage projects worldwide. Pattern’s global development portfolio is 15 GW, with 5.9 GW of installed capacity and over 1,100 miles of HVDC and HVAC in operation and under development. Pattern is currently developing transmission, wind and solar projects in the United States, Canada, Mexico, South America and Japan.

2.

As a company providing interstate electric transmission service, SST will become a public

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<sup>1</sup> Southern Spirit Transmission LLC was previously known as Southern Cross Transmission LLC. All references to Southern Spirit hereinafter refer to the company in its prior name also.



utility under Federal law subject to the plenary jurisdiction of the Federal Energy Regulatory Commission (“FERC”) over the transmission of electric energy in interstate commerce and all facilities for such transmission. *See* 16 U.S.C. § 824(b) and (e). SST is not and will not be a public utility under Louisiana law and consequently will not be subject to the Commission’s public utility jurisdiction. However, FERC’s jurisdiction does not extend to the siting of the Southern Spirit Project. Instead, this Commission has siting authority, which it exercises through the application of its October 10, 2013 General Order. SST is thus seeking, to the extent required, a Certificate of Public Convenience and Necessity (“Certificate” or “CPCN”) for siting and constructing the portion of the Southern Spirit Project located in Louisiana.

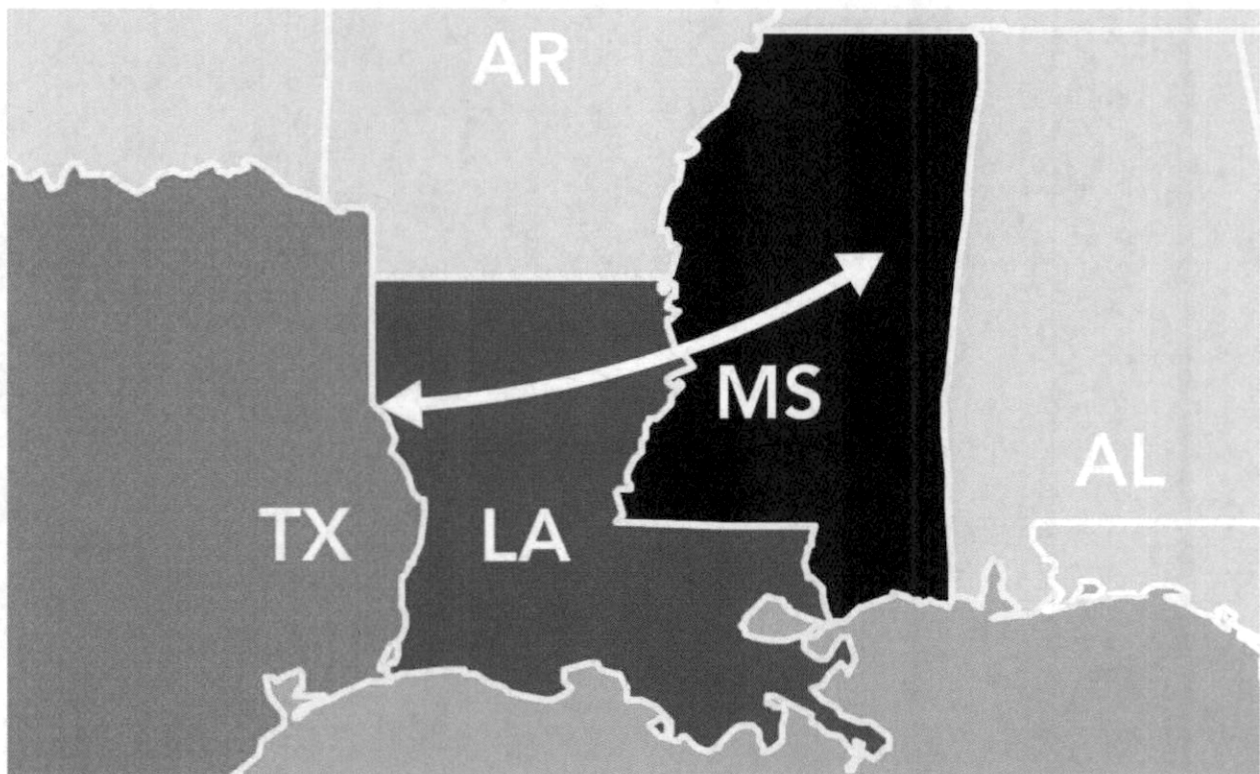
3.

Under Federal law, as implemented by FERC in its orders regarding the Southern Spirit Project, SST will be obligated to offer open-access, non-discriminatory transmission service to potential subscribers at rates that are just and reasonable. Consequently, SST will provide common carriage services, offering to sell electric transmission service over the Project facilities at such rates, charges, terms and conditions that will promote the economically efficient transmission of electricity in a just, reasonable and not unduly discriminatory or preferential manner. As described below, SST has authorization from FERC to offer transmission service through a FERC-authorized open solicitation capacity allocation process (“Open Solicitation”). As part of the Open Solicitation process, whatever transmission capacity is not allocated through the initial subscription process will be made available for sale pursuant to an Open Access Transmission Tariff (“OATT”) to be filed with FERC.

4.

The proposed Southern Spirit Project will consist of transmission facilities in Louisiana

and Mississippi, including an HVDC converter station located at the Texas border in DeSoto Parish, Louisiana (the “Louisiana Converter Station”); approximately 200 miles of  $\pm$  500-600 KV HVDC transmission across Louisiana to the Mississippi River;<sup>2</sup> a Mississippi River crossing into Issaquena County, Mississippi; approximately 122 miles of HVDC transmission line across the Mississippi Delta to Choctaw County, Mississippi (the “Mississippi Transmission Line”); an HVDC converter station located in Choctaw County (the “Mississippi Converter Station”); a 500 kVac switching station (the “Mississippi Switching Station”) adjacent to the Mississippi Converter Station; and a short AC transmission line (the “AC Transmission Line”) interconnecting the Mississippi Switching Station to the nearby Wolf Creek Substation owned by Entergy Mississippi.



Because of the bi-directional nature of the Project, the function of each converter station will be to convert AC power being input into the transmission line into DC power for transmission

<sup>2</sup> A drawing of the proposed typical structure of the transmission facility is attached to the testimony of Mr. Tim Barton as Exhibit TB-3 at Figures 2-1 and 2-2.

along the transmission facilities, and then to convert DC power into AC power for delivery at the other end after being transmitted through the Project.

5.

There are several reasons why the Project is designed using HVDC technology. First, as a result of regulatory requirements and the fact that the ERCOT electric grid is not synchronized with the grids within SERC, DC is the only viable way to interconnect ERCOT with SERC. Second, HVDC technology allows for large power transfers over long distances while adding built-in redundancy to meet the reliability standards of the North American Electric Reliability Corporation (“NERC”). Third, HVDC technology is inherently capable of bidirectional power flow, providing significant grid reliability and resiliency benefits during scarcity events in either region as well as opportunities for utilities in Louisiana and the Southeast and their ratepayers to have greater access to renewable generation and to benefit from increased competition and pricing opportunities, as discussed in greater detail *infra*. Finally, HVDC technology allows the Project to operate initially at a lower voltage and MW delivery capacity while being designed for expansion without requiring additional or larger transmission facilities.

6.

The estimated total construction cost of the Project across all three states is approximately \$2.68 Billion. The Project is currently targeted to begin construction in 2025 and to conclude in 2028.

7.

The subject HVDC transmission line will begin in Louisiana at the Texas border with a western HVDC converter station located in DeSoto Parish, and then extend approximately 200 miles across northern Louisiana to the Louisiana-Mississippi border, where it will cross the

Mississippi River, and enter the state of Mississippi. In Mississippi, the Southern Spirit Project will extend another approximately 200 miles and terminate at an eastern HVDC converter station in Choctaw County, Mississippi. The Project's transmission structures will be designed for operation at  $\pm 600$  kV but the Project will initially operate at a lower voltage. The design of the transmission structures for a higher operating voltage is intended to allow the baseload capacity of the line to be increased in the future without requiring additional right of way ("ROW") or new transmission line facilities, and only upgrading each converter station or constructing additional AC transmission lines to interconnect those utilities. If any such additional facilities will be owned by SST, they would be the subject of a CPCN filing by SST.

8.

Associated with the Southern Spirit Project is the Rusk to Panola Transmission Line Project ("RPTL Project"), a double-circuit 345-kV AC transmission line in Texas that will be owned by Garland Power & Light ("Garland"), the utility of the City of Garland, Texas. When completed, the RPTL Project, together with two 345 kV switchyards to be constructed by Garland and Oncor Electric Delivery Company, LLC, an electric transmission and distribution company in Texas, will interconnect the ERCOT AC transmission grid to the Southern Spirit Project. An amendment to Garland's Certificate of Convenience and Necessity for the RPTL Project was approved by the Public Utility Commission of Texas ("PUCT") in Docket No. 45624, *Application of the City of Garland to Amend a Certificate of Convenience and Necessity for the Rusk to Panola Double-Circuit 345-KV Transmission Line in Rusk and Panola Counties*.

9.

Concurrent with its May 27, 2017 order granting Garland's certificate amendment for the RPTL Project, the PUCT directed ERCOT to further study specific aspects of the SST Project and

modify its rules, procedures and systems as necessary to ensure reliable interconnection and operation. ERCOT's analysis included system planning and operations considerations, technical standards and performance requirements, and market design impacts, among other issues. On September 30, 2022, the PUCT accepted all of ERCOT's conclusions and closed the oversight proceeding.<sup>3</sup>

10.

The Southern Spirit Project has been under development for several years and has achieved significant milestones since that time. On December 15, 2011, FERC entered an order pursuant to Sections 210, 211 and 212 of the Federal Power Act conditionally directing the physical interconnection between the ERCOT transmission system and the Southern Spirit Project and the provision of transmission service over the ERCOT system to the Project facilities by certain ERCOT utilities (the "Proposed Interconnection Order").<sup>4</sup> The studies and agreements required by the Proposed Interconnection Order were finalized by early 2014, and in May 2014, FERC issued its Final Order Directing Interconnection and Transmission Service directing the physical interconnection with, and the provision of transmission services for power flowing into and out of, the ERCOT system over the Project (the "Final Interconnection Order").<sup>5</sup> In granting these orders, FERC determined, as required by Section 210 of the Federal Power Act, that the interconnection

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<sup>3</sup> Public Utility Commission of Texas, P.U.C. Project No. 46304, *Oversight Proceeding Regarding ERCOT Matters Arising Out of Docket No. 45624 (Application of the City of Garland to Amend a Certificate of Convenience and Necessity for the Rusk to Panola Double-Circuit 345-kV Transmission Line in Rusk and Panola Counties)*, Order Closing Project, Sep. 30, 2022. See also Electric Reliability Council of Texas, P.U.C. Project No. 46304, ERCOT's Eleventh Status Update, Aug. 31, 2022.

<sup>4</sup> See Proposed Order Directing Interconnection and Transmission Services and Conditionally Approving Settlement Agreement. *Southern Cross Transmission LLC, Pattern Power Marketing LLC*, 137 FERC ¶ 61, 206 (2011). In the order, FERC found that the provision of such service does not affect the general exemption of ERCOT and ERCOT utilities from FERC regulation under the Federal Power Act, conditioned upon the completion of the necessary interconnection and reliability studies, the final identification of the necessary interconnection facilities and the parties finalizing the terms and conditions of the interconnection agreements within ERCOT.

<sup>5</sup> See Final Order Directing Interconnection and Transmission Service, *Southern Cross Transmission LLC*, 147 FERC ¶ 61,113 (2014).

between ERCOT and the Project (which creates an interconnection with SERC) was in the public interest by increasing power supply options and improving competition. In these and other FERC orders, a project of up to 3,000 MW in bidirectional transmission capacity has been authorized.

11.

Also on December 15, 2011, FERC issued an order granting SST the authority to sell transmission service over the Project facilities at negotiated rates with the ability to allocate to subscribing anchor tenant customers up to seventy-five percent of the Project's capacity with the remaining capacity to be allocated through an open season auction (the "Negotiated Rate Order").<sup>6</sup> In this order, FERC found that SST (although it will operate as a "public utility" as defined in the Federal Power Act and, therefore, is subject to FERC's plenary jurisdiction) should not be treated as a traditional utility providing service to captive customers at cost-based rates. Instead, FERC found that the Project is a "merchant transmission project," since SST assumes the full market risk associated with the Project and has no captive customers from which to recover the cost of the Project (i.e., no entity is obligated to purchase transmission service and will voluntarily do so only if it is cost-effective). FERC is committed to fostering the development of such projects where protections are in place to preserve open access principles and the resulting rates are found to be just and reasonable. By granting negotiated rate authority, FERC recognized that merchant transmission developers face financing issues different than those faced by traditional public utilities, that securing long-term bilateral negotiated capacity sales contracts with customers is necessary to support financing for the Project, and that the negotiated rate authority will result in transmission rates that are just and reasonable. SST is also required to file an OATT, pursuant to which SST will provide non-discriminatory, open-access transmission service, with FERC no later

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<sup>6</sup> See Order Authorizing Proposal, *Southern Cross Transmission LLC*, 137 FERC ¶ 61,207 (2011).

than one year prior to commercial operation of the Project.

12.

SST has successfully worked with Garland to obtain all necessary PUCT approvals for the RPTL Project in Texas, which is necessary to interconnect the Project with ERCOT, and has worked with ERCOT to successfully complete ERCOT's study of the Project and necessary modification as directed by the PUCT. With the change in HVDC technology, additional study work will commence with ERCOT in 2023.

13.

As described in greater detail in the testimony of Deral Danis, SST will be subject to applicable NERC reliability standards and will be under the jurisdiction of the SERC Reliability Corporation Regional Entity. Registration with NERC, either directly or through third party contractors, will be required and compliance with NERC reliability standards will be mandated to perform functions which include: Reliability Coordinator, Transmission Owner, Transmission Service Provider, Transmission Operator, Balancing Authority and Planning Coordinator.

14.

Since 2012, Applicant has focused on marketing the Southern Spirit Project to potential capacity subscribers and initiating and completing interconnection studies with the interconnecting utilities, along with completion of the PUCT's directives to ERCOT discussed previously. Interconnection studies will be required at both ends of the Project. At the western end of the Project, initial study work was completed by ERCOT in 2019, and will be re-initiated in 2023 to update the 2019 studies to reflect the additional flexibility and capabilities of newer technology which are now part of the Project.



At the eastern end of the Project, interconnection studies by MISO are required to interconnect the Project with MISO. Interconnection and injection rights applications were submitted to MISO in September 2022, pursuant to which MISO will study the exchange of energy between the Project and MISO to identify any constraints and required mitigation measures.

Finally, SST has initiated efforts to study an interconnection with the Southern Company service territory in Mississippi, which is anticipated to ultimately result in a wires-to-wires interconnection request with Southern Company at a location that optimizes the reliability and energy deliverability benefits to the grid in the Southeastern U.S. beyond MISO South. Formal interconnection study work is expected to begin in 2023.

15.

Southern Spirit's activities in Louisiana will consist of constructing and maintaining the HVDC transmission line and converter station within the state. As stated above, construction is projected to begin in 2025. The Project is currently projected to be put in service in 2028. Southern Spirit will operate exclusively as a provider of transmission capacity to interested parties, including but not limited to generators and load serving entities. The Southern Spirit Project is expected to provide substantial benefits to Louisiana with no cost to Louisiana ratepayers. The Southern Spirit Project's total investment in Louisiana is conservatively expected to be approximately \$337 million, and these investments will provide tax benefits to the numerous parishes across the state on an annual basis throughout the life of the Project. Southern Spirit worked closely with ERCOT and Louisiana stakeholders and ensured that the \$579 million western converter station is located in Louisiana, as opposed to being located in Texas at the project's interconnection point with Oncor in ERCOT. This decision to locate the converter station in Louisiana will result in an increase in

the benefits to Louisiana residents. Finally, as further described in the attached testimony of Dr. David Loomis, the project will induce numerous additional benefits for the state, including the creation of 2,032 full-time equivalent jobs during construction and 256 local long-term jobs. These jobs are expected to result in earnings of over \$537 million during the construction and first forty (40) years of operation, and over \$2.2 billion in total output for the State of Louisiana.

16.

As stated above, the Project will provide these benefits to Louisiana without cost to Louisiana retail or wholesale customers. Costs of the Project would only be reflected or recovered in the retail or wholesale rates to be assessed to customers of any LPSC-regulated electric public utility if the utility became a transmission capacity subscriber on the Project in the future. Thus, no costs of the Southern Spirit Project will be reflected in the retail or wholesale rates of any Louisiana ratepayer as a result of the LPSC's granting of this application for a Certificate of Public Convenience and Necessity.

17.

The Commission has stated in its October 10, 2013 General Order that it "intends to exercise its jurisdiction and authority over any Transmission Facility if the costs of the Transmission Facility, and the costs of any associated retail rate impacts, will be reflected or recovered in the retail or wholesale rates to be assessed to customers of Louisiana electric public utilities or cooperatives." The October 10, 2013 General Order also states in the "Exemption" section that projects are exempt from the Certification process when "the costs of the Transmission Facility, and the cost of any associated System Impacts, will not be reflected or recovered in the retail or wholesale rates to be assessed to customers of Louisiana electric utilities or cooperatives."

18.

Southern Spirit anticipates that the Project's capacity will be afforded and available for delivery of power into MISO South, which could include Louisiana utilities. Accordingly, Southern Spirit hereby seeks LPSC approval of this certificate application in the event that, at some point in the life of the Project, under either a long-term arrangement or under Southern Spirit's OATT, a Louisiana electric public utility becomes a transmission subscriber to the Project.

19.

The October 10, 2013 General Order states that a "Transco," as defined by the aforementioned General Order, must consent to the jurisdiction of the Commission in order to file an application for and obtain a Certificate of Public Convenience and Necessity under the order. Southern Spirit's transmission rates are subject to FERC regulation, and Southern Spirit will not provide electric service in Louisiana. Southern Spirit will operate an electric transmission line extending across Louisiana, along with the Louisiana converter station, and believes that the extent of jurisdiction exercised by the LPSC will include, at minimum, compliance with LPSC general orders applicable to owners and operators of electric transmission and distribution lines within the State of Louisiana. Those general orders presently include the LPSC's General Orders dated September 21, 1977 and November 16, 1992, *In Re: Emergency Service Plans for Electric Utilities and Cooperatives*; the LPSC's General Order dated September 13, 1993, *In re: Investigation of Utility Line Clearing Practices in Louisiana*; and the LPSC's General Order (R-31813) dated 5/23/11, *In Re: Study of the feasibility of formally adopting the provisions of the National Electric Safety Code or any other, similar safety code as the standard for the safe installation, operation and maintenance of overhead and underground electrical facilities and utility poles to be*

*applicable to industries owning, leasing or using utility poles in the State of Louisiana.* With this understanding, Southern Spirit will consent to the jurisdiction of the LPSC, if the LPSC considers this request to be required or allowed by the October 10, 2013 General Order. Southern Spirit further seeks a determination from the LPSC as to the extent of the jurisdiction exercised over the Southern Spirit Project after the Project is in operation.

20.

Southern Spirit agrees that no territorial rights shall accrue to it under the “300 Foot Rule”, as provided for in La. R.S. 45:123 and the LPSC’s General Order (R-28269) dated 10/6/05, *In Re: Modification to the May 17, 2004 General Order, regarding the 300-foot rule, in order to add a prescription limitation for 300-foot rule complaints.*

21.

In support of this Application, Southern Spirit attaches testimonies of the following witnesses in support of a finding that the Southern Spirit Transmission Project will serve the public convenience and necessity, which are incorporated into this Application:

- Cary Kottler – Pattern Chief Development Officer – Project overview and information.
- Deral Danis – Pattern Senior Director of Transmission – Overview and technical/engineering information about the Project;
- Tim Barton – Burns & McDonnell Engineering Company, Inc. Senior Project Manager – Routing, public involvement, and permitting issues;
- Shannon Gwin – Pattern Senior Land Manager – Routing, landowner and community outreach and interaction; and
- Dr. David Loomis – Strategic Economic Research, LLC and Professor of Economics at Illinois State University – Economic benefits to Louisiana.

All testimony and exhibits attached thereto are incorporated into this Application as if

set forth herein *in toto*.

22.

The cost to construct the Project will be funded entirely by SST, and SST will be responsible for the costs to construct and maintain the Project, including cost overruns, if any. Also, an itemized estimate of the costs of the proposed Transmission Facility, including land and/or right of way acquisition costs, and carrying costs during construction, is provided in the supporting testimonies and attached exhibits. Rights of way will have to be acquired for the construction of the Transmission Facility.

23.

The supporting testimony and attached exhibits also provide a drawing of the proposed typical structure of the Transmission Facility; an estimated timeline, with milestones, for the completion of the Southern Spirit Project; and other relevant information in support of the Public Interest determination, all in full compliance with the eleven (11) requirements set forth in the October 10, 2013 General Order, but with the Applicant reserving all rights to any and all exemptions as set forth in the General Order.

24.

As an alternative to issuing a Certificate of Public Convenience and Necessity for this Transmission Facility, to the extent that the LPSC determines that Southern Spirit's request is unnecessary by exemption due to the lack of current or expected Louisiana retail or wholesale rate recovery associated with the Southern Spirit Project, Southern Spirit respectfully seeks a determination by the LPSC that the Southern Spirit Project is exempt from the application process provided for in the October 10, 2013 General Order and that Southern Spirit has met all LPSC regulatory requirements in relation to the Southern Spirit Project.

25.

The October 10, 2013 General Order also provides in Section IX that the LPSC may coordinate with the regulatory bodies of the other affected states and affected regional transmission organizations, power pools or independent coordinators of transmission in order to reduce costs and to work toward a consensual resolution of any interstate or multi-jurisdictional issues related to the proposed project in the event that the Transmission Facility will be located in more than one state or jurisdiction. In consideration of this, Southern Spirit provides notice to the LPSC that the Southern Spirit Project is subject to a petition to obtain a facility Certificate of Public Convenience and Necessity before the Mississippi Public Service Commission in Docket No. 2017-UA-79. As noted previously, Garland has already obtained a CCN from the PUCT for the RPTL Project interconnection facilities in Texas.

26.

All communications and pleadings in this docket should be directed to:

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WHEREFORE, Southern Spirit Transmission LLC respectfully requests that the Commission:

- 1) Certify that the public convenience and necessity will be served through the certification and approval of the siting and construction of the Southern Spirit Project by the Applicant;
- 2) Certify that Southern Spirit Transmission LLC has fully complied with any and all the

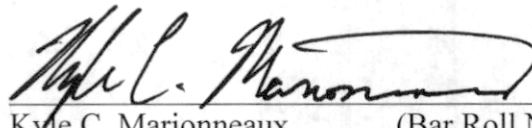
requirements of the October 10, 2013 General Order;

3) Determine the applicability of the October 10, 2013 General Order to the Southern Spirit Project and the extent of jurisdiction exercised by the LPSC over Southern Spirit Transmission LLC in relation to the Southern Spirit Project after the Project is in operation; and/or

4) In the alternative, determine that the Southern Spirit Project is exempt from the application process provided for in the October 10, 2013 General Order and that Southern Spirit has met all LPSC regulatory requirements.

**Respectfully submitted,**

**MARIONNEAUX KANTROW, LLC**



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