

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

***IN RE:* APPLICATION OF ENTERGY)
LOUISIANA, LLC FOR APPROVAL TO)
CONSTRUCT WATERFORD 6 POWER)
STATION AND WESTLAKE POWER)
STATION, AND FOR COST RECOVERY)**

DOCKET NO. U-_____

DIRECT TESTIMONY

OF

CHAD J. LADNER

ON BEHALF OF

ENTERGY LOUISIANA, LLC

PUBLIC REDACTED VERSION

FEBRUARY 2026

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LIST OF EXHIBITS

Exhibit CJL-1	List of Prior Testimony
Exhibit CJL-2 (CEII)	Diagram of WF6 and Westlake Transmission Upgrades
Exhibit CJL-3	Flowchart of MISO DPP Interconnection Process
Exhibit CJL-4	Flowchart of MISO ERAS Interconnection Process

1

I. INTRODUCTION AND BACKGROUND

2 Q1. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND EMPLOYER?

3 A. My name is Chad J. Ladner. My business address is 6540 Watkins Drive, Jackson,
4 Mississippi 39213. I am a Senior Manager, Power Delivery Planning at Entergy
5 Services, LLC (“ESL”).¹

6

7 Q2. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

8 A. I am submitting this Direct Testimony to the Louisiana Public Service Commission
9 (“Commission” or “LPSC”) on behalf of Entergy Louisiana, LLC (“ELL” or “the
10 Company”).

11

12 Q3. WHAT ARE YOUR RESPONSIBILITIES AS SENIOR MANAGER, POWER
13 DELIVERY PLANNING?

14 A. As Senior Manager of Power Delivery Planning, I am responsible for the leadership
15 and oversight of a team of engineers who study the bulk electric system and the electric
16 distribution network to identify transmission and distribution projects necessary to
17 meet the customer service needs of the EOCs, ensure the reliability of service to
18 customers, interconnect new generation, and maintain compliance with certain North
19 American Electric Reliability Corporation (“NERC”) reliability standards governing
20 transmission planning as well as Entergy’s internal criteria for transmission and

¹ ESL is an affiliate of the Entergy Operating Companies (“EOCs”) that provides engineering, planning, accounting, legal, technical, regulatory, and other administrative support services. The EOCs are Entergy Arkansas, LLC, Entergy Louisiana, LLC, Entergy Mississippi, LLC, Entergy New Orleans, LLC (“ENO”), and Entergy Texas, Inc. (“ETI”).

1 distribution planning. Our team works with the EOCs to develop necessary
2 transmission and distribution projects and provide support through the regulatory
3 permitting process. We also maintain local planning criteria specific to Entergy's
4 transmission and distribution assets and conduct studies to ensure compliance with
5 those criteria. My team also engages in the Midcontinent Independent System Operator,
6 Inc. ("MISO") stakeholder process on policy matters that affect transmission and
7 distribution systems.

8

9 Q4. PROVIDE THE COMMISSION WITH A BRIEF SUMMARY OF YOUR
10 EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

11 A. I received a Bachelor of Science in Electrical Engineering in May 2009 from
12 Mississippi State University in Starkville, Mississippi. I worked for Entergy Services,
13 Inc., the predecessor to ESL, as a Transmission Operations Planning Engineer from
14 2009 until 2014 and then as the Strategic Transmission Planning Engineer for
15 Louisiana and Texas from 2014 to 2017. From 2017 to 2018, I worked for ESL as the
16 Transmission Planning Coordinator for Arkansas, Louisiana, and Mississippi. From
17 2018 to 2021, I worked for ESL as the Transmission Planning Manager for Arkansas,
18 North Louisiana, and Mississippi. In 2021, I started in my current role as the Senior
19 Manager of Power Delivery Planning for Louisiana and Texas, in which role I am now
20 responsible for the long-term transmission and distribution planning activities for ELL,
21 ENO, and ETI.

22

1 Q5. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY BEFORE A
2 REGULATORY COMMISSION?

3 A. Yes. Exhibit CJL-1 contains a list of the proceedings in which I have submitted
4 testimony.

5

6 **II. OVERVIEW OF TESTIMONY**

7 Q6. PROVIDE A BRIEF OVERVIEW OF THE REQUEST FOR PROPOSALS WHICH
8 LED TO THE PROJECTS?

9 A. In LPSC Docket No. X-37450, ELL provided notice of its intent to conduct a request
10 for proposal (“RFP”) seeking resources in MISO’s Local Resource Zone 9 (“LRZ 9”)
11 for delivery of power by January 1, 2031 (the “2024 CCCT RFP”).² The 2024 CCCT
12 RFP sought up to 2,000 megawatts (“MW”) of generation in the LRZ 9 region with
13 individual resource capacity required to be in the range of 600 MW to 800 MW
14 (summer conditions) and self-build options. [REDACTED] were submitted in
15 response to the 2024 CCCT RFP— [REDACTED]
16 [REDACTED]. ELL selected [REDACTED]; as Company
17 witness Michael J. Plaisance explains, however, the Company was unable to reach
18 commercial terms with respect to the tolling agreement proposal. The Company’s
19 Application in this matter seeks approval from the Commission to proceed with
20 construction of the two self-build proposals.

² As Company witness Phong D. Nguyen explains, the RFP provided that the Guaranteed Commercial Operation Date for any PPA or Tolling Agreement was required to occur no later than January 31, 2031. The Guaranteed Substantial Completion date for any Build-Own-Transfer proposals was required to occur no later than December 31, 2030.

1 Q7. WHAT ARE THE TWO PROJECTS AT ISSUE IN THIS MATTER?

2 A. The two projects at issue are: (1) the Waterford 6 Power Station (“WF6”), a 754 MW
3 (ISO)³ 1x1 Combined Cycle Combustion Turbine (“CCCT”) generator to be located at
4 ELL’s existing Waterford site near Killona, Louisiana, and (2) the Westlake Power
5 Station (“Westlake”), a 754 MW (ISO) 1x1 CCCT generator to be located at ELL’s
6 existing Roy S. Nelson site in Westlake, Louisiana. For ease of discussion, I will refer
7 at times to WF6 and Westlake collectively as the “Proposed Generators.”

8
9 Q8. PLEASE DESCRIBE THE ROLE OF THE TRANSMISSION PLANNING GROUP
10 IN THE 2024 CCCT RFP.

11 A. The Transmission Planning Group was part of the Transmission Evaluation Team
12 (“TET”) that had responsibility to evaluate any transmission-related impacts resulting
13 from the proposals submitted in response to the RFP. The Transmission Planning
14 Group was specifically tasked with: (1) review of the projects and costs associated with
15 transmission upgrades pertaining to Energy Resource Interconnection Service
16 (“ERIS”) and Network Resource Interconnection Service (“NRIS”) that were
17 submitted by the bidders; and (2) assessment of the reliability impact resulting from
18 the resources proposed by the bidders. The purpose of this analysis was to identify
19 reliability constraints that result from the interconnection of the proposed resources.

20

³ ISO refers to the applicable standard set by the International Organization for Standardization. Company witness Nicholas D. Pressler discusses the ISO standard in his Direct Testimony.

1 Q9. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

2 A. My testimony is submitted in support of the Company's Application. In my testimony,
3 I provide an overview of the ELL transmission system in Louisiana, including facilities
4 relevant to the Proposed Generators. I then provide a general description of the
5 transmission-related projects that are anticipated for the Proposed Generators and detail
6 the planning evaluation that was performed to assess the costs, and necessity of, those
7 transmission-related projects. I explain why the proposed transmission-related projects
8 are a reasonable solution for interconnecting the Proposed Generators with the ELL
9 transmission system. I conclude by explaining the MISO transmission interconnection
10 process for the Proposed Generators and its impact on the transmission-related analysis.

11

12 Q10. DO YOU SPONSOR ANY EXHIBITS?

13 A. Yes. I sponsor the exhibits listed in the Table of Contents.

14

15 **III. ELL TRANSMISSION SYSTEM**

16 Q11. BRIEFLY DESCRIBE THE ELL TRANSMISSION SYSTEM.

17 A. The ELL transmission system includes 69 kV, 115 kV, 138 kV, 230 kV, 345 kV,⁴ and
18 500 kV transmission lines across portions of Louisiana. Major load centers served by
19 the ELL transmission system include the cities of Lake Charles, Lafayette, Baton
20 Rouge, West Monroe, and Metairie/Kenner. Industrial loads make up a significant

⁴ ELL owns and operates a 345 kV line beginning at the Arkansas state line and terminating at Sarepta substation in North Louisiana as well as a short portion of the Sarepta – Longwood 345 kV line in Webster Parish, Louisiana.

1 portion of the total load for ELL. These industrial loads are primarily located in Lake
2 Charles and the Mississippi River corridor between Baton Rouge and New Orleans,
3 though there are significant load additions contemplated in North Louisiana to serve
4 the data center in connection with which resources were approved in LPSC Docket No.
5 U-37425.

6

7 Q12. PLEASE DESCRIBE THE LOAD POCKETS, PLANNING AREAS, AND
8 EXISTING TRANSMISSION LINES IN THE LOUISIANA GULF COAST
9 REGION.

10 A. The Gulf Coast region of Louisiana includes the cities of Lake Charles, Lafayette,
11 Baton Rouge, and New Orleans. As Company witness Michael J. Plaisance explains
12 in greater detail, the region is divided into various Planning Areas used by ELL for
13 planning purposes, including the Amite South Planning Area that encompasses a large
14 portion of the Southeast Louisiana industrial corridor along the Mississippi River⁵ and
15 the West of the Atchafalaya Basin (“WOTAB”) Planning Area that encompasses Lake
16 Charles, Louisiana.⁶ Amite South and WOTAB include population centers with

⁵ Amite South is a geographical region in southeastern Louisiana that generally encompasses the areas south of the Amite River watershed. The region is bounded on the west by the eastern edge of the Baton Rouge metropolitan area and on the east by the Mississippi state line. For purposes of this testimony, Amite South refers to the Louisiana portion of this area located south of the Amite River corridor, stretching from the Mississippi state boundary westward across Tangipahoa, Livingston, and surrounding parishes, and extending south to the Louisiana Gulf Coast.

⁶ WOTAB is a geographical region generally encompassing southwest Louisiana and southeast Texas that is bounded on the east by the Atchafalaya River basin and bounded on the west by regions administered by the Electric Reliability Council of Texas and Southwest Power Pool in Texas. For the purposes of this testimony, WOTAB refers to the Louisiana portion of WOTAB, which is bounded on the west by the Louisiana/Texas state line and on the east by the Atchafalaya Basin, and which stretches from the Louisiana Gulf Coast to the northern edge of the area served by ELL in southwest Louisiana.

1 significant industrial infrastructure, and each is a load pocket—a concept I describe in
2 greater detail below.⁷ The primary transmission corridor servicing the Louisiana Gulf
3 Coast region between the Lake Charles area and the greater Baton Rouge area runs a
4 short distance north of, and parallel to, Interstate 10 and includes a series of 500 kV
5 extra-high voltage (“EHV”) transmission lines. This WOTAB EHV transmission
6 corridor is supported by underlying 138 kV transmission lines when moving power
7 across the Louisiana Gulf Coast region.

8 The Southeast Louisiana Planning Area (“SELPA”) is another of the
9 Company’s unofficial Planning Areas and includes both the smaller Amite South and
10 Downstream-of-Gypsy (“DSG”) Planning Areas. SELPA is effectively defined by
11 geographic constraints and state boundaries. The Atchafalaya Basin, a large wetland
12 area, lies to the west of SELPA. The Louisiana/Mississippi border is the upper bound
13 of SELPA, and SELPA is bordered to the south and southeast by the Gulf. Four 500
14 kV EHV transmission lines provide most of the import and export capability for the
15 SELPA region. In addition to the previously mentioned WOTAB EHV corridor, two
16 EHV lines connect the region to Entergy Mississippi, LLC’s transmission system, and
17 one EHV line terminates east of SELPA in the service area of Mississippi Power
18 (Southern Company).

19

⁷ Exhibit CJL-2, which contains Critical Electrical Infrastructure Information (“CEIP”) and is labeled as such, includes one-line topological representations of Amite South and WOTAB and information concerning the transmission-related projects proposed in connection with construction of the Proposed Generators.

1 Q13. HOW IS THE INCREASING DEMAND FOR LOAD IN LRZ 9 IMPACTING THE
2 TRANSMISSION SYSTEM IN LOUISIANA?

3 A. ELL is committed to providing secure, reliable, and resilient service for the future of
4 Louisiana and has forecasted significant load growth as industrial customers expand.
5 Meeting the long-term need for capacity and energy forecasted in LRZ 9 will require
6 significant investments in generation, transmission, and distribution assets throughout
7 Louisiana. In the case of the Proposed Generators, ELL is proposing two new
8 generation resources that will support ELL's resource plan. These generation resources
9 are not being proposed in connection with extending service to a specific customer, but
10 rather to support ELL's baseline forecasts, which include substantial forecasted growth.

11

12 Q14. HOW HAS ELL SOUGHT TO UPGRADE AND EXPAND THE TRANSMISSION
13 SYSTEM IN LOUISIANA OVER THE PAST SEVERAL YEARS?

14 A. ELL recently obtained approval in LPSC Docket No. U-37425 to proceed with
15 construction of the Mt. Olive to Sarepta 500 kV transmission line and related facilities,
16 which are an essential building block to allow the development of the data center in
17 Richland Parish, Louisiana that was at issue in that docket.⁸ ELL has also recently filed
18 an application seeking certification of the Babel to Webre 500 kV Project (LPSC
19 Docket No. U-37812), an approximately 150-mile line which was included in the
20 MISO Transmission Expansion Plan 2025 ("MTEP25") as a baseline reliability project

⁸ The project at issue in Docket No. U-37425 includes several additional transmission projects that were exempt from Commission certification under General Order 09-10-2024 (R-36199).

1 following ELL’s project submission (Project ID 50350) in September 2024.⁹ Previous
2 to the Babel to Webre Project, ELL also sought certification from the Commission for
3 all three phases of the Amite South Transmission Project (“ASTP”)¹⁰ which were
4 included in the MISO Transmission Expansion Plan 2023 (“MTEP23”) as other
5 reliability projects following ELL’s project submissions in September 2022.
6

7 Q15. WHAT ARE THE TYPES OF TRANSMISSION-RELATED PROJECTS AND
8 COSTS EXPECTED IN CONNECTION WITH THE INTERCONNECTION OF
9 GENERATION RESOURCES SUCH AS THE PROPOSED GENERATORS?

10 A. There are three categories of transmission-related projects and associated costs that
11 may be identified for interconnecting generators like the Proposed Generators:

- 12 • Projects required for interconnection to the switchyard (“Generator Tie-Ins”);
- 13 • Projects likely to be identified through the studies that are part of the MISO
14 interconnection process that are necessary to designate the resource as an
15 Energy Resource (*i.e.*, for the resource to be granted ERIS); and

⁹ Both of these projects were contemplated by ELL before the Laidley project, as reflected in the BP24 Long Range Transmission Study submitted in support of the Laidley project.

¹⁰ The Company has presented the ASTP projects (Phases 1-3) to the Commission in the following dockets:

- Docket No. S-37113: Audubon Substation and Related Facilities (part of ASTP Phase 2)
- Docket No. U-37143: West Bank 230kV Project (part of ASTP Phase 1)
- Docket No. U-37467: West Bank 500kV Project (part of ASTP Phase 1)
- Docket No. U-37527: East Bank Geismar 230kV Project (part of ASTP Phase 2). The procedural schedule in this docket has been suspended to allow ELL an opportunity to reassess the scope, costs, timing and needs for the East Bank Geismar 230kV Project. *See* Ruling on Unopposed Motion (Dec. 15, 2025).
- Docket No. U-37563: Adams Creek – Robert 230kV Project (ASTP Phase 3)

- 1 • Projects likely to be identified through the studies that are part of the MISO
2 interconnection process that are necessary to designate the resource as a
3 Network Resource (*i.e.*, for the resource to be granted NRIS) (“Interconnection
4 Upgrades”).

5

6 Q16. PLEASE EXPLAIN THE DIFFERENCE BETWEEN ERIS AND NRIS.

7 A. ERIS grants a resource the right to interconnect to the MISO electric grid, inject energy
8 into the system, and participate in the Day-Ahead and Real-Time energy markets.
9 However, in order for the resource to contribute its capacity benefits (*i.e.*, to be eligible
10 for participation in the MISO PRA and be granted Zonal Resource Credits), the
11 resource is required to have NRIS. Participation in the MISO Planning Resource
12 Auction (“PRA”) (also informally referred to as the capacity auction) makes the
13 resource eligible to receive the Auction Clearing Price for capacity in the LRZ in which
14 the resource is located, if the resource partially or wholly clears the capacity auction.

15 When the resource requesting interconnection agrees to fund the projects that
16 are identified by MISO in its System Impact Study as necessary to obtain ERIS, the
17 resource is granted ERIS for the number of MW that have been interconnected to the
18 system. Similarly, where the resource requesting interconnection funds the projects
19 that are identified by MISO in its System Impact Study for NRIS deliverability, it is
20 granted NRIS for the number of MW that have been interconnected to the system.

21 ELL has requested NRIS for Westlake, in addition to ERIS, to ensure that the
22 resource is eligible to receive capacity-related credit/revenue from MISO. As I explain
23 further below, ELL also has plans to transfer rights from existing generators to WF6

1 using MISO's replacement generator process so that WF6 is also eligible to receive
2 capacity-related credit/revenue from MISO. The Company anticipates that Westlake
3 will likely require transmission upgrades to obtain full NRIS, while there are no
4 transmission upgrades expected for WF6 to secure network service.

5

6 Q17. WOULD ELL BE ABLE TO MOVE FORWARD WITH THE PROPOSED
7 GENERATORS. WITHOUT COMPLETING THE ASSOCIATED
8 TRANSMISSION-RELATED PROJECTS?

9 A. No. The transmission-related projects proposed in this matter are necessary to integrate
10 the new generation resources into the electric grid. The facilities include upgrades
11 needed for local interconnection (the Generator Tie-Ins) and, as to Westlake, upgrades
12 that MISO may require for NRIS (the Interconnection Upgrades).

13

14 Q18. COULD ELL MEET ITS BASE ENERGY RESOURCE PLAN FORECAST WITH
15 A TRANSMISSION-ONLY OR ENERGY (ERIS)-ONLY SOLUTION?

16 A. No. As Mr. Plaisance also discusses in his Direct Testimony, ELL will require
17 additional generation to meet its long-term need for additional capacity and energy in
18 LRZ 9. The central function of the transmission grid is to enable the transportation of
19 a large amount of power from resource to load and/or between different regions of the
20 electric grid. While the transmission system is instrumental in facilitating the
21 movement of electric power, it cannot produce electrical energy or capacity. Without
22 additional generation, ELL customers will face increases in reliability risk and higher
23 costs.

1 As company witness Michael J. Plaisance also discusses, the need for additional
2 generation is caused by tightening capacity supply and demand balances in Louisiana
3 and the MISO South region generally. Tighter supply and demand balances cause
4 clearing prices in MISO’s PRA to trend higher. MISO’s implementation of the
5 “Reliability Based Demand Curve” beginning in the 2025-2026 Planning Year has
6 magnified the risk of higher clearing prices in the PRA—and thus the risk of having
7 insufficient capacity resources to cover ELL’s planning reserve obligations. If ELL
8 were to invest in a transmission-only solution under these conditions to increase its
9 ability to import power into the Amite South and WOTAB load pockets, ELL will not
10 meaningfully mitigate its need for additional generation capacity and, therefore,
11 ultimately would incur both the costs of the transmission upgrades incremental to
12 MISO’s current MTEP plan and the cost of building new generation resources.

13 A similar result would arise if ELL were to invest only in those transmission
14 upgrades needed for ERIS, as this would render the resource ineligible for capacity
15 credit for that portion of its output. This would leave ELL customers exposed to
16 significant risk, as Mr. Plaisance discusses in more detail.

17

18 Q19. WOULD ELL BE ABLE TO MEET ITS BASELINE RESOURCE NEEDS SOLELY
19 BY ADDING GENERATION WITHOUT TRANSMISSION UPGRADES?

20 A. No. As I mentioned earlier, the proposed transmission-related projects are needed to
21 interconnect the Proposed Generators to the electric grid and, as to Westlake, to secure
22 NRIS. The proposed facilities represent reasonable and cost-effective solutions for
23 meeting transmission requirements for the Proposed Generators.

1 **IV. OVERVIEW OF PROPOSED TRANSMISSION-RELATED PROJECTS**

2 **A. WF6 TRANSMISSION-RELATED PROJECTS**

3 Q20. BRIEFLY DESCRIBE THE TRANSMISSION-RELATED PROJECTS REQUIRED
4 FOR WF6.

5 A. ELL will need to complete certain transmission-related projects to interconnect WF6
6 to the electric grid. Additional projects will not be required to designate the resource
7 as an energy resource and as a network resource, because ELL plans to pursue a
8 replacement Generation Interconnection Agreement (“GIA”) that would transfer
9 existing transmission service rights from two nearby units, Little Gypsy Units 2 and 3.

10

11 Q21. WHAT PROJECTS DOES ELL INTEND TO COMPLETE TO INTERCONNECT
12 WF6 TO THE ELECTRIC GRID?

13 A. ELL is planning two Generator Tie-Ins for WF6, both of which will cross the
14 Mississippi River. ELL will expand the existing Little Gypsy 115kV Substation and
15 construct a new 115kV transmission line from WF6 to the Little Gypsy 115 kV
16 Substation. ELL also will expand the Little Gypsy 230kV Substation and construct a
17 new 230 kV transmission line from WF6 to the Little Gypsy 230 kV Substation. Both
18 transmission lines will be constructed for extreme wind of 150 mph for lower structures
19 and 175 mph for structures taller than 135 feet. A visual depiction of these projects is
20 included in CEII Exhibit CJL-2. The cost estimates for each of these projects are listed
21 in Table 1 below; note that I have rounded the interconnection project estimates for
22 consistency with the other estimates provided in my testimony.

1
2

Table 1
HSPM Cost Estimates for WF6 Generator Tie-Ins

Project	Estimated Cost (\$M)
Little Gypsy 115 kV Substation expansion	■
Little Gypsy 230 kV Substation expansion	■
WF6 to Little Gypsy 115kV Transmission Line	■
WF6 to Little Gypsy 230kV Transmission Line	■

3

4 Q22. WHY DOES ELL PROPOSE TO CONSTRUCT RIVER CROSSINGS TO
5 INTERCONNECT WF6 TO THE LITTLE GYPSY SUBSTATION?

6 A. As mentioned, the Company intends to pursue MISO's replacement generator process
7 to secure NRIS for WF6. Specifically, the Company intends to use the NRIS rights
8 currently available from Little Gypsy Units 2 and 3—two aging, legacy generators that
9 have exceeded their original useful lives—for WF6. In order to secure replacement
10 generator rights, the Company generally must interconnect the replacement generator
11 at the same point of interconnection as the previous generators. ELL is thus
12 constructing new generator tie-ins across the Mississippi River to interconnect the
13 output from WF6 to the existing points of interconnection for Little Gypsy Units 2 and
14 3. The configuration of these new transmission lines is depicted in CEII Exhibit CJL-
15 2. Company witness Nicholas D. Pressler includes additional detail in his Direct
16 Testimony concerning the Company's intentions with respect to the replacement

1 generator process and the analysis performed in determining that river crossings are the
2 best solution for interconnecting WF6 to the bulk electric system.

3

4 Q23. PLEASE PROVIDE ADDITIONAL DETAIL CONCERNING THE COST
5 ESTIMATES FOR THE WF6 INTERCONNECTION PROJECTS.

6 A. As set forth above, the total cost for the WF6 interconnection projects is expected to be
7 [REDACTED] based on a Class 3 Estimate. Multiple contracts will be required to
8 execute the projects, most of which will be handled through the normal Entergy Supply
9 Chain bidding process utilizing qualified contractors. Contracts will be issued to secure
10 Professional Contract Project Management, Owner's Engineering, Construction
11 Management Services, Professional Land Agent Services for Right of Way ("ROW")
12 acquisition, Surveying for ROW Acquisition, and Professional Legal Services to
13 prepare and execute ROW expropriation. ELL will also arrange for completion of land
14 surveying, geotechnical investigation, environmental compliance, and permitting.

15

16 **B. WESTLAKE TRANSMISSION-RELATED PROJECTS**

17 Q24. BRIEFLY DESCRIBE THE TRANSMISSION-RELATED PROJECTS THAT ARE
18 PROPOSED FOR WESTLAKE.

19 A. As with WF6, ELL will need to complete certain projects (which are also Generator
20 Tie-Ins) in order to interconnect Westlake to the electric grid. In addition, the Company
21 anticipates (and has included estimates for) certain potential system upgrades
22 (Interconnection Upgrades) that the Company expects will be required by MISO to
23 designate Westlake as a network resource.

1 Q25. WHAT TRANSMISSION-RELATED PROJECTS DOES ELL PROPOSE TO
2 COMPLETE FOR WESTLAKE?

3 A. As detailed in Table 2 below, to interconnect Westlake, ELL will need to install a single
4 new high-voltage transmission line, complete system modifications to the L-652 (230
5 kV) transmission line running between Carlyss Substation and the Nelson Substation
6 to accommodate line crossings, and complete new substation equipment upgrades to
7 accommodate a new line bay. A visual depiction of these projects is included in CEII
8 Exhibit CJL-2. As with the cost estimates for the WF6 interconnection projects, I have
9 rounded the interconnection cost estimates for consistency with the other estimates
10 provided in my testimony.

11 **Table 2**
12 **HSPM Cost Estimates for Westlake Generator Tie-Ins**

Project	Estimated Cost (\$M)
Nelson 230 kV Station Upgrades	■
Westlake to Nelson 230 kV line	■
L-652 Carlyss to Nelson System Modification	■

13
14 As mentioned, Westlake is also expected to require certain network upgrades in order
15 to qualify for NRIS. Table 3 includes the cost estimates for two potential
16 Interconnection Upgrades that are expected to be identified by MISO as needed for
17 NRIS during the Expedited Resource Addition Study Process (“ERAS”)—a process

1 ELL is utilizing for Westlake and that I describe in additional detail below. These
2 potential network upgrades are provided for informational purposes only, reflect
3 internal planning assumptions and preliminary assessments by ELL, and do not
4 represent a formal MISO determination; rather, MISO will inform ELL in the future as
5 to the projects MISO will require for Westlake to secure NRIS.

6 **Table 3**
7 **HSPM Westlake Anticipated Interconnection Upgrades**

Project	Estimated Cost (\$M)
J1669 POI to Henning 138 kV line rebuild	██████████
Big Cajun to Fancy Point 500 kV river crossing rebuild	██████████

8

9 Q26. PLEASE PROVIDE ADDITIONAL DETAIL CONCERNING THE COST
10 ESTIMATES FOR THE WESTLAKE INTERCONNECTION PROJECTS.

11 A. As set forth in Tables 2 and 3 above, the total cost for the Westlake transmission-related
12 projects is expected to be ██████████ based on a combination of Class 4 Estimates
13 associated with the Generator Tie-Ins and Planning Level Estimates associated with the
14 Interconnection Upgrades. As with the WF6 projects, multiple contracts will be
15 required to execute these projects, most of which will be handled through the normal
16 Entergy Supply Chain bidding process utilizing qualified contractors. Contracts will
17 be issued to secure Professional Contract Project Management, Owner's Engineering,
18 Construction Management Services, Professional Land Agent Services for ROW
19 acquisition, Surveying for ROW Acquisition, and Professional Legal Services to

1 prepare and execute ROW expropriation. As with WF6, ELL will also arrange for
2 completion of land surveying, geotechnical investigation, environmental compliance,
3 and permitting.

4
5 **V. TRANSMISSION PLANNING AND IDENTIFIED BENEFITS**

6 Q27. PLEASE DESCRIBE THE TRANSMISSION PLANNING PROCESS
7 UNDERTAKEN IN CONNECTION WITH THE PROPOSED GENERATORS.

8 A. As I mentioned earlier, the Transmission Planning Group was responsible for: (1)
9 identifying a reasonable, cost-effective solution for interconnecting the Proposed
10 Generators and securing ERIS and NRIS for each unit, considering load profile, the
11 electric system topology in LRZ 9, potential reliability impacts resulting from each
12 resources, and other electric system needs, and (2) providing ELL and its evaluation
13 team with technical support in connection with its planning. ELL benefits from and
14 takes into consideration its robust experience in planning transmission facilities and
15 extensive library of prior facility studies.

16
17 Q28. WHAT STANDARDS AND GUIDELINES DID THE TRANSMISSION
18 PLANNING GROUP APPLY IN ANALYZING THE PROJECTS?

19 A. The Transmission Planning Group maintains a local transmission planning guideline
20 and criteria for transmission system planning in accordance with the NERC TPL-001-
21 5 reliability standard. This planning guideline and criteria are also applied when
22 studying the impacts of adding new generation resources onto the transmission system.

23

1 Q29. WHY WERE THESE STANDARDS AND GUIDELINES IMPORTANT TO YOUR
2 WORK IN CONNECTION WITH THE PROPOSED GENERATORS?

3 A. ELL's local transmission planning guidelines establish a baseline that ensures
4 compliance with NERC reliability standards. Compliance with these standards is
5 required by applicable laws and rules, per my understanding, but also helps ensure the
6 system is and continues to be reliable as loads, generation resources, and other
7 circumstances change over time. Compliance with NERC reliability standards is
8 necessary but, particularly from a transmission planning standpoint, is not always
9 sufficient to ensure electric system reliability. This is why utilities maintain local
10 transmission planning criteria to reflect the specifics of their own systems and why
11 utilities sometimes construct projects that, although not needed strictly for NERC
12 reliability standard compliance, are nonetheless needed to ensure reliable service to
13 their customers. A utility that planned only to meet NERC standards would fail over
14 time to deliver reliable service to its customers or other users of its transmission system.

15

16 Q30. WHAT RELIABILITY STANDARDS DID ELL CONSIDER IN CONNECTION
17 WITH ITS TRANSMISSION PLANNING FOR THE PROPOSED GENERATORS?

18 A. The following NERC reliability standards were the primary focus for consideration
19 when studying the impact to ELL's transmission system and identifying the projects
20 needed to reliably accommodate the Proposed Generators: (1) TPL-001 establishes
21 performance requirements for the transmission system in the long-term planning
22 horizon (up to 10 years into the future); and (2) FAC-002 establishes requirements

1 governing how to study the interconnection of new or materially modified transmission
2 facilities to the bulk electric system.

3

4 Q31. WHAT TRANSMISSION PLANNING ASSESSMENTS DID ELL UNDERTAKE
5 IN CONNECTION WITH THE PROPOSED GENERATORS?

6 A. The TET team performed steady-state, stability, deliverability, and short circuit
7 analysis to identify the transmission and generation projects needed to accommodate
8 the Proposed Generators to ensure that ELL maintains compliance with NERC
9 reliability standards and that reliable service is maintained for existing customers as the
10 resources are added to the grid.

11

12 Q32. HOW DID YOUR ASSESSMENTS COMPARE WITH THE ASSESSMENTS THAT
13 YOU HAVE PERFORMED ON OTHER NEW RESOURCE ADDITIONS?

14 A. The team followed our standard RFP study process which involved participating on the
15 TET to: evaluate any transmission-related impacts resulting from the proposals
16 submitted in response to the RFP, review the projects and costs associated with network
17 upgrades, and assess the reliability impact resulting from the proposed resources. The
18 TET's assessment was consistent with past RFP studies and with sound planning,
19 engineering, and economic principles.

20

1 Q33. WHAT DID YOUR ASSESSMENTS REVEAL ABOUT HOW THE PROPOSED
2 GENERATORS WOULD IMPACT THE TRANSMISSION SYSTEM IN
3 LOUISIANA?

4 A. As Mr. Plaisance discusses in greater detail in his Direct Testimony, ELL has identified
5 a need for additional generation capacity. The Proposed Generators are highly efficient
6 sources of power generation. The sites selected for the Proposed Generators are situated
7 in load pockets that have a high load concentration and are heavily dependent on local
8 resources. Our analysis of the transmission impacts from the addition of the new
9 resources led us to conclude that the Proposed Generators will: (1) make the
10 transmission system in the selected areas less dependent on importing power from
11 remote generating resources; (2) provide additional operational flexibility during
12 system restoration flowing from major storm events such as hurricanes; and (3) add
13 dynamic reactive power to the system.

14

15 Q34. HOW WILL THE PROPOSED GENERATORS MAKE THE TRANSMISSION
16 SYSTEM LESS DEPENDENT ON IMPORTING POWER FROM REMOTE
17 GENERATING RESOURCES, AND WHY IS THAT IMPORTANT?

18 A. Placing generation near load or within a load pocket reduces the need to rely on
19 imported power through the transmission system, which in turn reduces cost and
20 mitigates losses of energy on the transmission system. A load pocket generally refers
21 to an area of heavy load concentration that, due to a limited ability to import power into
22 the area, is dependent upon in-region generation to serve the area's load. Often, simply
23 expanding the transmission system to import more power into a load pocket, without

1 also adding generation, is not the most cost-effective method to increase a utility's load-
2 serving capability in the load pocket due to geographical and topographical constraints
3 that hinder the expansion of the transmission system.

4

5 Q35. HOW WILL THE PROJECTS IMPROVE OPERATING MARGINS AND
6 DECREASE DEPENDENCE ON LESS EFFICIENT RESOURCES WITHIN ELL'S
7 EXISTING LOAD POCKETS?

8 A. Both projects are planned to interconnect in a load pocket: WF6 will be within the
9 Amite South load pocket, and Westlake will be within the WOTAB load pocket.
10 Placing a resource within a load pocket generally reduces the dependence on imported
11 power and reduces line losses by serving the load locally. The alleviation of these
12 transmission constraints can also afford economic benefits to the extent the new
13 generation is more efficient than existing generation used to support transmission
14 reliability. Moreover, this consideration is particularly important here, where the two
15 load pockets at issue—Amite South and WOTAB—are served in part by aging
16 generation that has exceeded its original useful life and for which ELL is evaluating
17 options with respect to continued operations.

18

19 Q36. HOW WILL THE PROJECTS PROVIDE ADDITIONAL OPERATING
20 FLEXIBILITY?

21 A. Placing generation close to load has important reliability benefits during extreme
22 weather events, such as hurricanes and ice storms, and during restoration activities in
23 the aftermath of such events. Recent experience has affirmed that during a system

1 event such as a major hurricane, transmission lines can be damaged by the event and
2 can at times require weeks (or in a historically extreme event such as Hurricane Laura
3 in 2020) months to restore depending on the damage. When that occurs, loads that are
4 reliant on transmission imports can experience extended outages during the restoration
5 effort. Having generation near load centers can help ensure power is available in a
6 timely manner after a storm or other event without needing to rely exclusively on the
7 restoration of transmission lines to import power into an area.

8 The Proposed Generators will also provide operational flexibility during
9 emergency operating conditions arising from a combination of factors, such as the
10 recent load shed event that occurred in Amite South in May 2025. During that event,
11 a combination of factors including significant planned and forced outages on generation
12 within and bordering the Amite South load pocket and outages (including storm-driven
13 outages) on transmission facilities needed to import power into Amite South came
14 together and resulted in MISO declaring a Temporary Interconnection Reliability
15 Operating Limit and directing that 600 MW of load in metropolitan New Orleans, on
16 the northshore and southshore of Lake Pontchartrain, be shed to relieve constraints on
17 the grid. The presence of additional generation within the load pocket, along with
18 additional transmission to improve the import capability into the load pocket, serve to
19 mitigate the risk of future events similar to the May 2025 load shed event.

20
21 Q37. WHAT IS DYNAMIC REACTIVE POWER?

22 A. Reactive power is the portion of electricity that establishes and sustains the electric and
23 magnetic fields of electrical equipment. Reactive power supports voltage in a manner

1 analogous to pressure in a closed water system. Low pressure tends to make the system
2 work less efficiently. The ability of a power system to be able to produce or absorb
3 reactive power is crucial in allowing the grid to control and maintain an acceptable and
4 steady voltage profile at all the substations in the electric network. Large motors and
5 transformers, such as those used at industrial facilities, require significant reactive
6 power to operate and, as a result, industrial loads are typically large consumers of
7 reactive power. Reactive power shortages in an industrial region may inhibit industrial
8 customers from starting the electrical motors required to perform their processes or
9 might subject industrial loads to large voltage sags in the event of a fault in the grid.
10 The amount of demand for reactive power in the grid, therefore, must be balanced by
11 the ability to supply or generate reactive power or risk power quality issues and, in
12 extreme cases, a voltage collapse resulting in a power outage. Having ample sources
13 of local reactive power helps prevent against the types of supply/demand imbalances
14 in reactive power which can lead to a voltage collapse and power outage.

15

16 Q38. HOW WILL THE PROPOSED GENERATORS IMPACT ELL'S ABILITY TO
17 MANAGE AGAINST SUPPLY/DEMAND IMBALANCES IN REACTIVE
18 POWER?

19 A. The new CCCTs add dynamic reactive power capability to the system, in addition to
20 real power. This reactive power is especially important for significant industrial load
21 concentrations, like those present in the Amite South and WOTAB regions, that require
22 reactive power and whose needs for reactive power are more efficiently served by
23 generation proximate to those loads, as discussed above. Further, as quick-start and

1 fast ramping resources, the new CCCTs will add synchronous inertial response and
2 short-circuit capability to the system, both of which may be increasingly valuable for
3 the system to react to disturbance events while also accommodating expected industrial
4 growth.

5

6 Q39. COULD THE TRANSMISSION BENEFITS WHICH YOU DESCRIBED BE
7 ACHIEVED BY LOCATING ADDITIONAL CAPACITY ELSEWHERE ON THE
8 ENTERGY SYSTEM?

9 A. For the reasons set forth above in response to Questions 33 through 38 concerning
10 benefits for load pockets specifically, the benefits that I have described with respect to
11 Amite South and WOTAB can only be realized, in a similar manner, if the additional
12 capacity is sited within those load pockets.

13

14

VI. RIGHTS OF WAY

15 Q40. PLEASE DESCRIBE WHETHER RIGHTS OF WAY WILL BE ACQUIRED FOR
16 THE CONSTRUCTION OF THE TRANSMISSION-RELATED PROJECTS AND
17 WHETHER EXISTING RIGHTS OF WAY WILL BE UTILIZED.

18 A. Table 4 below specifies whether new rights of way will need to be acquired, whether
19 existing rights of way will be utilized, or both, for the construction of each of the
20 Proposed Generators' transmission-related projects.

1
2

Table 4
Rights of Way

Project	New Right of Way (Y/N)	Existing Right of Way (Y/N)
WF6	Y	Y
Westlake	N	Y

3

4 Q41. WHAT IS ELL'S PLAN FOR OBTAINING ANY NECESSARY RIGHTS OF WAY
5 FOR THE NEW TRANSMISSION LINES?

6 A. As needed, ELL will work proactively and constructively with impacted landowners to
7 reach mutually agreeable resolutions for obtaining the necessary rights-of-way for the
8 new transmission lines. In addition, and consistent with the Monitoring Plan applicable
9 to the Proposed Generators, ELL has established a structured framework for
10 identifying, tracking, and reporting any issues related to right-of-way acquisition as
11 part of its transmission development planning. The Monitoring Plan requires quarterly
12 updates on the status of transmission construction, including Right of Way acquisition
13 issues, permitting challenges, cost impacts, and any other factors affecting the timely
14 completion of transmission interconnection and network resource interconnection
15 services. This formal reporting process ensures that any impediments to securing
16 property rights are recognized early and addressed in coordination with project
17 scheduling and oversight. In the unlikely event that negotiations with landowners do
18 not result in an agreement, ELL would need to rely on expropriation procedures.

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VII. MISO PROCESS AND IMPACT

Q42. PLEASE DESCRIBE MISO’S ROLE AND HOW IT AFFECTS THE TRANSMISSION-RELATED PROJECTS FOR THE PROPOSED GENERATORS.

A. MISO is the Transmission Planner for the entire MISO region, which extends across all or part of fifteen states in the central United States, including most of Louisiana. As Transmission Planner, MISO administers two processes that are pertinent to the Proposed Generators: the transmission planning process and the generator interconnection process. New substations must be studied through the transmission planning process, and new generators must be studied through the generator interconnection process.

Q43. WHICH PROCESS DOES ELL PLAN TO PURSUE FOR THE PROPOSED GENERATORS?

A. ELL plans to pursue the generator interconnection process for the Proposed Generators.

Q44. PLEASE DESCRIBE THE MISO GENERATOR INTERCONNECTION STUDY OPTIONS AVAILABLE TO THE PROPOSED GENERATORS.

A. There are three MISO generator interconnection study options that were available for the Proposed Generators. The MISO generator interconnection process is a process governed by the MISO Tariff that provides a set of rules and procedures that a new generator looking to interconnect to the MISO administered transmission system must follow in order to secure the right to interconnect. As shown in Exhibit CJL-3, the traditional interconnection process, known as the Definitive Planning Phase (“DPP”),

1 is conducted in three phases over a period that has historically taken 355 days (although
2 in recent years the timeline has been much longer). Each phase consists of a series of
3 studies that assess whether the proposed new generator may interconnect to the
4 transmission system reliably and whether transmission upgrades are needed to reliably
5 accommodate the injections of energy from the proposed generator. In MISO, the
6 process is conducted in cycles in which all proposed new generators submitted within
7 that cycle are studied as a group. For the last several years, due in significant part to
8 the large volume of individual generators exploring areas on the grid at which it would
9 be advantageous to site new generation, the MISO DPP process has been plagued by
10 significant delays, including delays arising from restudies needed because of the
11 withdrawal of speculative projects.

12 A second study option, outside of the traditional interconnection process,
13 involves pursuing a replacement GIA which would generally involve the transfer of
14 existing transmission service rights from an existing generator interconnection to a new
15 generator interconnecting at the same node. Key advantages of the replacement process
16 are that it can help avoid the significant delays associated with the DPP process that I
17 noted above. It also mitigates substantially the risk of additional network upgrades
18 being required in connection with the addition of a new generation resource. Finally,
19 it also allows ELL customers to extend the period in which they can utilize and benefit
20 from the interconnection rights that were secured and maintained through the
21 development of transmission facilities that ELL customers paid for through their
22 electricity rates.

1 In August 2025, the Federal Energy Regulatory Commission (“FERC”)
2 accepted a filing by MISO creating a third generator interconnection study option
3 known as the ERAS. ERAS was developed in part in response to the delays associated
4 with the DPP process that I noted above and the need to add significant new generation
5 to the electric system in a relatively short period of time to maintain resource adequacy
6 and reliability as utilities work to serve large volumes of expected load growth. This
7 process created a limited set of fifty interconnection requests that would be studied by
8 MISO separately from the standard DPP. Per the rules and requirements of ERAS,
9 these requests must be related to resource adequacy needs in the MISO footprint, must
10 have an attestation from the load serving entity’s retail regulator that the project is
11 needed to serve resource adequacy needs, and must meet several other requirements
12 that are more restrictive than standard DPP requests. As shown in Exhibit CJL-4, the
13 ERAS process studies fifteen projects per three-month cycle, and, at the end of the
14 process, the projects receive an executed GIA.

15

16 Q45. HOW DO YOU COMMENCE THE MISO GENERATOR INTERCONNECTION
17 PROCESS?

18 A. As shown in Exhibit CJL-3, the traditional DPP process commences with the submittal
19 of generator interconnection requests by Generator Owners, which are also known as
20 Interconnection Customers. Next, once all necessary completeness milestones are met
21 for the entire DPP study cycle, MISO commences a Pre-Screen Analysis. The
22 completeness milestones involve MISO reviewing each application, determining
23 whether the Interconnection Customer’s evidence of site control is sufficient,

1 determining whether all the necessary information for the request has been submitted,
2 and confirming that queue entry payments have been received. The non-binding Pre-
3 Screen Analysis identifies potential thermal and voltage constraints for the entire DPP
4 study group. The Pre-Screen Analysis concludes with MISO communicating the
5 results to the Interconnection Customers prior to DPP Phase I kick-off.

6 For projects in the ERAS process, because there were only fifty interconnection
7 slots available, Interconnection Customers had an incentive to submit their requests as
8 soon as possible. MISO created a separate interconnection request portal for the ERAS
9 process but otherwise the process was similar to that described above for DPP requests.

10 The replacement generator process includes a more expedited set of analyses
11 and requires that the replacement generator request is submitted at least one year in
12 advance of the date on which the existing generator will cease operation.

13

14 Q46. HAS THE WESTLAKE PROJECT BEEN SUBMITTED TO MISO FOR STUDY?

15 A. Yes. ELL secured one of the fifty interconnection slots that were available within the
16 ERAS process for Westlake, with an expectation that the parties will be in a position
17 to execute a GIA by December 2026.

18

19 Q47. HAS THE WF6 PROJECT BEEN SUBMITTED TO MISO FOR STUDY?

20 A. No. As discussed above, and as also discussed by Company witness Nicholas D.
21 Pressler, ELL intends to use MISO's replacement generator process to secure NRIS for
22 WF6.

23

1 Q48. HOW ARE THE PROPOSED TRANSMISSION-RELATED PROJECTS
2 CLASSIFIED UNDER THE MISO TARIFF?

3 A. While MISO has not completed its review of the transmission line upgrades, ELL
4 expects the following classifications:

- 5 • Little Gypsy 115 kV switchyard expansion: Generator Interconnection Project
- 6 • Little Gypsy 230 kV switchyard expansion: Generator Interconnection Project
- 7 • WF6 to Little Gypsy 115 kV line: Generator Interconnection Project
- 8 • WF6 to Little Gypsy 230 kV line: Generator Interconnection Project
- 9 • Nelson 230 kV switchyard expansion: Generator Interconnection Project
- 10 • Westlake to Nelson 230 kV line: Generator Interconnection Project
- 11 • J1669 POI to Henning 138 kV line rebuild: Network Upgrade (NRIS)
- 12 • Big Cajun to Fancy Point 500 kV river crossing rebuild: Network Upgrade (NRIS)

13

14 Q49. WHEN WILL ELL SUBMIT THE PROPOSED GENERATORS TO THE DPP?

15 A. As previously explained above, ELL will not submit the WF6 and Westlake projects
16 into the traditional DPP process. Instead, Westlake will go through MISO ERAS study
17 process, and WF6 will utilize transmission service from existing ELL generation at the
18 Company's Little Gypsy site.

19

1 Q50. HOW LONG DO YOU ANTICIPATE THE MISO ERAS STUDY PROCESS WILL
2 TAKE FOR WESTLAKE?

3 A. Westlake is currently in Cycle 5 of MISO's ERAS study process. Per the MISO tariff,
4 the ERAS Cycle 5 has a target commencement of September 2026, so an executed GIA
5 can be reasonably expected by December 2026.
6

7 Q51. WHEN DO YOU EXPECT TO KNOW DEFINITELY WHAT NETWORK
8 UPGRADES WILL BE REQUIRED BY MISO FOR WESTLAKE TO SECURE
9 NRIS?

10 A. It is expected that ELL will know definitively what upgrades will be needed for
11 Westlake at the conclusion of MISO's ERAS Cycle 5 in the fourth quarter of 2026.
12

13 Q52. HOW LONG DO YOU ANTICIPATE THE MISO GENERATION REPLACEMENT
14 STUDY PROCESS TO TAKE FOR WF6?

15 A. The MISO generation replacement study process for WF6 is expected to have an
16 eleven-month lead time.
17

18 Q53. WHEN DO YOU EXPECT TO KNOW DEFINITELY WHETHER ANY
19 UPGRADES WILL BE NEEDED FOR WF6?

20 A. As noted, because ELL intends to use existing interconnection rights from Little Gypsy
21 Units 2 and 3, ELL does not anticipate needing any upgrades to secure NRIS for WF6.
22 ELL nevertheless expects it will know definitively whether any additional network
23 upgrades will be needed for WF6 at the conclusion of MISO's generation replacement

1 study process, which is expected to conclude approximately eleven months after ELL
2 makes the request to MISO. ELL expects to determine the exact timing of the
3 generation replacement request as it gains more clarity on the precise timing of the
4 deactivation of the resources being replaced.

5

6 Q54. WILL THE REQUIRED UPGRADES FROM THE ERAS STUDY BE DEFINITIVE
7 OR ARE THEY SUBJECT TO FURTHER CHANGE?

8 A. The required upgrades provided by MISO at the conclusion of the ERAS process
9 (including any required restudies) are final and will not be subject to further revision.
10 Definitive cost estimates for transmission upgrades associated with the generation
11 projects will be known at that time. That said, ELL has developed its own conclusions
12 with respect to anticipated network upgrades, as set forth above, and those conclusions
13 are based on extensive experience with previous facilities studies. ELL accordingly
14 believes that it has a reasonable projection of what upgrades will be required by MISO
15 in order to secure NRIS for Westlake.

16

17

VIII. CONCLUSION

18 Q55. PLEASE SUMMARIZE YOUR CONCLUSIONS FOR THE COMMISSION.

19 A. The main points of my direct testimony are:

20 • ELL conducted a thorough and robust evaluation of potential solutions for the
21 Proposed Generators in a manner consistent with sound planning, engineering, and
22 economic principles.

23 • WF6 and Westlake were determined to have transmission benefits in that they:

- 1 ◦ Reduce the need to rely on imported power for the Amith South and
- 2 WOTAB load pockets;
- 3 ◦ Improve operating margins and decrease dependence on less-efficient
- 4 resources (a particularly important consideration, given that the Amite
- 5 South and WOTAB load pockets are served, in part, by aging, legacy
- 6 generation);
- 7 ◦ Provide important reliability benefits during emergency events and during
- 8 restorations following storms and other events; and
- 9 ◦ Add dynamic reactive power capability to the system.

10

11 Q56. WHAT WOULD BE THE CONSEQUENCES TO THE PROPOSED GENERATORS
12 IF ELL IS UNABLE TO TIMELY SECURE THE REQUESTED RELIEF FOR THE
13 TRANSMISSION-RELATED PROJECTS?

14 A. The transmission-related projects listed above in Tables 1 and 2 are Generator Tie-Ins
15 needed to physically connect WF6 and Westlake to the electric system. Without timely
16 relief for these requests, the Proposed Generators will not be able to connect to the
17 system and address the Company's capacity and energy needs. Moreover, as to the
18 anticipated Interconnection Upgrades described in Table 3, the failure to timely obtain
19 the requested relief for those upgrades would jeopardize the Company's ability to
20 secure NRIS for Westlake, thus further jeopardizing the Company's ability to address
21 its capacity needs.

22

- 1 Q57. DOES THIS CONCLUDE YOUR TESTIMONY?
- 2 A. Yes, at this time.

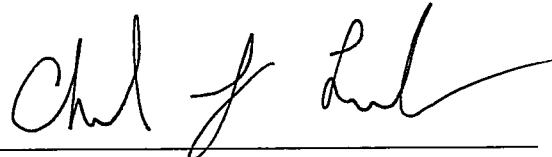
AFFIDAVIT

STATE OF MISSISSIPPI

COUNTY OF MADISON

NOW BEFORE ME, the undersigned authority, personally came and appeared, CHAD J. LADNER, who after being duly sworn by me, did depose and say:

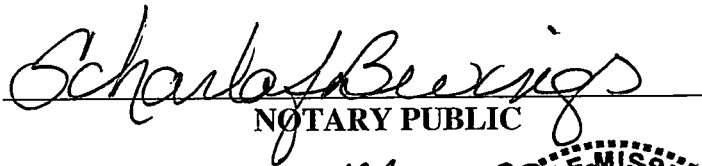
That the above and foregoing is his sworn testimony in this proceeding and that he knows the contents thereof, that the same are true as stated, except as to matters and things, if any, stated on information and belief, and that as to those matters and things, he verily believes them to be true.



CHAD J. LADNER

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 9th DAY OF FEBRUARY 2026



NOTARY PUBLIC

My commission expires: May 28, 2026

