

**BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION**

**ENTERGY LOUISIANA, LLC'S )  
NOTICE OF EXEMPTION )  
REGARDING THE AUDUBON )  
SUBSTATION AND RELATED )  
TRANSMISSION FACILITIES )  
CONSISTENT WITH LOUISIANA )  
PUBLIC SERVICE COMMISSION )  
GENERAL ORDER DATED )  
OCTOBER 10, 2013 )**

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

**AFFIDAVIT  
OF  
RYAN D. JONES**

**ON BEHALF OF**

**ENTERGY LOUISIANA, LLC**

**PUBLIC REDACTED VERSION**

**JANUARY 2024**

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**AFFIDAVIT OF RYAN D. JONES**

**SUPPORTING NOTICE OF EXEMPTION OF ENTERGY LOUISIANA, LLC**

**STATE OF LOUISIANA                    §**

**PARISH OF JEFFERSON                §**

Before me, the undersigned authority, on this day appeared RYAN D. JONES, who having been placed under oath by me, did depose as follows:

“My name is Ryan D. Jones. I am over the age of 18 years of age and a resident of the State of Louisiana. I am competent to make this Affidavit. Based upon my experience described below, I have personal knowledge of the matters addressed in this Affidavit, and my statements concerning these matters are true and correct.

I present this Affidavit before the Louisiana Public Service Commission (“LPSC” or the “Commission”) on behalf of Entergy Louisiana, LLC (“ELL” or the “Company”) in support of the Company’s Notice of Exemption in the above-styled docket.

**I. BACKGROUND**

I am employed by Entergy Louisiana, LLC (“ELL”) as Manager, Regulatory Affairs. My business address is 4809 Jefferson Highway, Jefferson, Louisiana 70121. I am presenting this affidavit to the Louisiana Public Service Commission (“LPSC” or the “Commission”) on behalf of ELL.

I hold a Bachelor of Science in Management degree with a major in Finance from Tulane University in New Orleans. I also hold a Master of Management in Energy from Tulane University. I began working for Entergy Services, LLC (“ESL”) in 2015 as a Financial

Analyst, a position in which I maintained the budget and components of the financial model and provided additional support for utility operations support groups within ESL. In 2018, I accepted a position in Louisiana Regulatory Affairs and have accepted roles of increasing responsibility within that group since that time. In my current capacity as Manager, Regulatory Affairs, I am responsible for providing regulatory support services to ELL and for coordinating various dockets and filings before the LPSC. I am also responsible for providing insight and guidance to various organizations across ELL and ESL on regulatory matters and compliance with Orders of the Commission.

## II. PURPOSE OF AFFIDAVIT

In the above-styled docket, the Company is providing notice that, consistent with the Commission's Transmission Siting Order,<sup>1</sup> the Company is undertaking a portfolio of transmission projects required to add a new 500/230 kilovolt ("kV") Substation in Ascension Parish, Louisiana and approximately 7.8 miles of new transmission line to connect the new substation to existing 230kV and 500kV transmission lines (the "Project," which is described in more detail below) for the primary purpose of accommodating a new customer's (the "Customer") clean energy complex<sup>2</sup> (the "Customer Complex") for which the Customer has executed a binding Electric Service Agreement ("ESA") with the Company.

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<sup>1</sup> See General Order No. R-26018 (October 10, 2013), 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, Docket No. R-26018 ("Siting Order").

<sup>2</sup> *Id.* at Section VIII(6).

1        This Affidavit provides certain factual information to support the applicability of the  
2        exemption established at Section VIII(6) of the Siting Order to the Project.<sup>3</sup> In particular, my  
3        Affidavit:

- 4        • describes why the Project qualifies for the exemption established under section  
5        VIII(6) of the Siting Order; specifically, my Affidavit (with reference to other  
6        affidavits submitted on behalf of ELL) explains that the transmission facilities that  
7        make up the Project are “[n]ew transmission point-of-delivery facilities, including  
8        radial lines, loop flow lines, switching stations, substations and any other  
9        transmission projects undertaken for the primary purpose of accommodating the  
10       needs of a new or expanding industrial load [*i.e.*, the Customer Complex] . . .  
11       located in Louisiana”; and
- 12       • describes the new revenue the Company expects to receive from serving the  
13       Customer Complex and recovery of the costs associated with the Project.

### 15       **III.    QUALIFICATION FOR EXEMPTION UNDER THE SITING ORDER**

16       The Transmission Siting Order, adopted in 2013, was the result of the LPSC  
17       rulemaking initiated in Docket No. R-26018. The Siting Order generally provides that any  
18       utility seeking to construct a transmission project meeting the definition of “Transmission  
19       Facility” must first obtain LPSC certification that the project serves the public convenience  
20       and necessity, unless it qualifies for certain enumerated exemptions. For example, Section

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<sup>3</sup>       The Commission Staff has proposed changes to the Siting Order, including modifications to the exemption at issue in this filing (Section VIII(6) of the Siting Order). Staff’s proposal remains pending before the Commission. *See* Initial Staff Report and Recommendation for a Revised Siting Order (September 1, 2023), *In re: Review and Possible Modification of the Commission’s General Order Dated October 10, 2013 Governing Transmission Certification and General Siting*, Docket No. R-36199.

VIII(6) of the Siting Order exempts from certification new transmission point-of-delivery facilities, including radial lines, loop flow lines, switching stations, substations, and any other transmission projects undertaken for the primary purpose of accommodating the needs of a new or expanding industrial load or set of industrial loads located in Louisiana. This affidavit, and those of the other affiants, supports the applicability of the exemption established at Section VIII(6) of the Siting Order to the Project. While the facts support that all components of the Project qualify for an exemption under Section VIII(6), certain individual components of the Project may also qualify under various other provisions of the Siting Order, including Sections VIII(1) (exempting new substations), VIII(5) (exempting projects needed to address violations of NERC standards), and VIII(7) (exempting projects that are in the nature of rebuilds, upgrades, or modernization or reconstruction of equipment to increase its capacity).

In their affidavits, Company affiants, Ms. Catherine Ward and Mr. Bradley Skok explain that the Project is necessary for the Company to be able to provide reliable electric service to the Customer Complex. The Project includes a new substation and several related transmission components designed to provide electric service to the Customer Complex. As such, the primary purpose of the Project is to accommodate the needs of the Customer's new industrial load located in Louisiana, and the Project therefore qualifies for exemption under Section VIII(6) of the Commission's Siting Order.

#### **IV. NEW REVENUE FROM SERVICE TO CUSTOMER COMPLEX AND RECOVERY OF PROJECT COSTS**

The Customer signed an ESA with ELL in December 2023. The ESA calls for ELL to supply up to [REDACTED] of electric service (including [REDACTED] of firm service

1 and [REDACTED] of standby service) to support the Customer Complex. The Customer has  
2 requested an initial in-service date of [REDACTED] to begin commissioning activities. The  
3 Customer will require initial service of [REDACTED] starting [REDACTED] and then continue  
4 construction and commissioning until [REDACTED] when the facility begins production. The  
5 ESA will become effective on [REDACTED]

6 [REDACTED].  
7 Additionally, the Customer executed a long lead Reimbursement Agreement ("RA")  
8 with ELL in July 2023 that [REDACTED]

9 [REDACTED]  
10 [REDACTED].  
11 Together, these agreements (the RA and the ESA) [REDACTED]

12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 The Company is not proposing any other specific recovery of the Project costs or  
23 revenue requirement outside of the normal course of ratemaking. [REDACTED]

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED] If  
4 no FRP is in effect at the time that the Project is placed in service, then it would be treated as  
5 a base rate item for purposes of cost recovery through a rate proceeding.

6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]

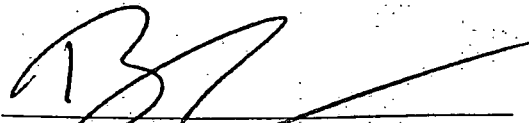
9 [REDACTED] The amount of the retail revenue requirement of  
10 the Project would [REDACTED] be offset by transmission wholesale revenues that the Company receives  
11 from those entities taking service on the Company's transmission system. Those revenues are  
12 collected from transmission customers who receive transmission service within the ELL  
13 Transmission Pricing Zone ("TPZ") pursuant to the Midcontinent Independent System  
14 Operator, Inc. ("MISO") Tariff and based on the combined revenue requirement of the  
15 Transmission Owners in the ELL TPZ.<sup>4</sup>

16 Further affiant sayeth not."  
17

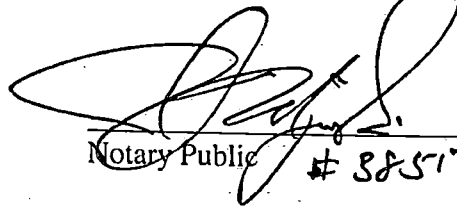
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<sup>4</sup> Certain load-serving entities within the ELL TPZ have LPSC-approved agreements with ELL that, in lieu of the MISO Tariff, dictate how payments for transmission service should be assessed.



  
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RYAN D. JONES

SWORN AND SUBSCRIBED TO before me, the undersigned authority, on this 23 day  
of January, 2024.

  
\_\_\_\_\_  
Notary Public # 38517

JON A. MAJEWSKI  
NOTARY PUBLIC, Jefferson Parish, LA  
My commission is for life.