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February 28, 2023

RECEIVED

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LA Public Service Commission

By Hand Delivery

Mr. Brandon Frey
Louisiana Public Service Commission
602 North Fifth Street
Baton Rouge, Louisiana 70802

Re: *Ex Parte*: Application of Entergy Louisiana, LLC for Approval of the 2022 Solar Portfolio, Expansion of the Geaux Green Option, Cost Recovery and Related Relief (LPSC Docket No. U-_____)

Dear Mr. Frey:

I have enclosed, on behalf of Entergy Louisiana, LLC ("ELL" or "Company"), the original and three copies of a Non-Confidential Public Version of the Company's Application for Approval of the 2022 Solar Portfolio, Expansion of the Geaux Green Option, Cost Recovery and Related Relief. This application is supported by the Direct Testimony and Exhibits of Laura K. Beauchamp, Elizabeth C. Ingram, and Phong D. Nguyen. Please retain the original and two copies for your files and return a date-stamped copy to our by-hand courier.

I have also enclosed five copies of the Confidential Version of the referenced filing, which is being provided under seal pursuant to the provisions of the LPSC General Order dated August 31, 1992, and Rules 12.1 and 26 of the Commission's Rules of Practice and Procedure. The confidential materials included in the filing consist of competitively sensitive market information or sensitive infrastructure information, the disclosure of which may create an artificial target for suppliers/vendors or create physical security risks. For this reason, this material is confidential and commercially sensitive. The disclosure of the information contained herein would subject not only the Company, but also its customers, to a substantial risk of harm. Accordingly, it is critical that this information remain confidential.

Please retain the appropriately marked Confidential Version for your files and return a date-stamped copy to our by-hand courier. Additional copies of the Confidential Version of this filing will be provided to the appropriate representatives of the Louisiana Public Service Commission Staff and made available to intervenors once a suitable Confidentiality Agreement has been executed by the parties.

If you have any questions, please do not hesitate to call me. Thank you for your courtesy and assistance with this matter.

Sincerely,

Harry M. Barton

HMB/lp
Enclosures

cc: LPSC Commissioners (*public version only via electronic mail*)

ROUTE TO ROUTE FF
DEPT. Bull DATE 2/28 DEPT. _____
DEPT. _____ DATE _____ DEPT. _____
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DEPT. _____ DATE _____ DEPT. _____

Paul

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

**EX PARTE: APPLICATION OF)
ENTERGY LOUISIANA, LLC)
FOR APPROVAL OF THE 2022 SOLAR)
PORTFOLIO, EXPANSION OF THE)
GEAUX GREEN OPTION, COST)
RECOVERY AND RELATED RELIEF)**

DOCKET NO. U-_____

**APPLICATION OF ENTERGY LOUISIANA, LLC FOR APPROVAL
OF THE 2022 SOLAR PORTFOLIO, EXPANSION OF THE
GEAUX GREEN OPTION, COST RECOVERY AND RELATED RELIEF**

NOW COMES Entergy Louisiana, LLC (“ELL” or the “Company”), through undersigned counsel, and respectfully submits to the Louisiana Public Service Commission (“LPSC” or “Commission”) this Application, which seeks certification of and approval for the addition of two new solar photovoltaic (“PV”) resources with a nameplate capacity of 224 megawatts (“MW”), collectively referred to as the “2022 Solar Portfolio,” or the “Portfolio,” to the Company’s generation portfolio. The Company is requesting a finding that the Portfolio is in the public interest, that the costs of investment in the Portfolio are deemed eligible for recovery through appropriate rate mechanisms, and related regulatory relief necessary to bring the resources comprising the Portfolio to fruition. The Company also requests that the resources comprising the Portfolio be deemed eligible for inclusion in the Company’s Geaux Green Option (“Rider GGO”). In support of these requests, the Company represents the following:

INTRODUCTION

I.

ELL is a limited liability company duly authorized and qualified to do business in the State of Louisiana, created and organized for the purposes, among others, of manufacturing, generating, transmitting, distributing, and selling electricity for power, lighting, heating, and other such uses.

II.

The 2022 Solar Portfolio is comprised of the Iberville Facility,¹ which was selected from the Company's 2021 Request for Proposals ("RFP") for Solar Photovoltaic Resources ("2021 Solar RFP") and the Sterlington Facility, a 49 MW resource the Company proposes to construct near the site of a deactivated generating resource. The 2022 Solar Portfolio will serve the public interest by providing benefits to ELL's customers and the State of Louisiana for numerous reasons explained in this Application and supporting testimony.

III.

The 2022 Solar Portfolio will allow the Company to continue to provide reliable electric service to its customers at the lowest reasonable cost. Additionally, the Portfolio will help meet the Company's long-term capacity needs while providing significant benefits (economic and otherwise) to ELL's customers.

IV.

Each of the resources comprising the 2022 Solar Portfolio will be constructed in Louisiana, which means that local economies will benefit from the jobs created during construction and the

¹ The Iberville Facility is the subject of a Power Purchase Agreement ("PPA") executed between ELL and Coastal Prairie, LLC. In that PPA the project is referred to as "Coastal Prairie;" however, to maintain consistency with the terminology used in the 2021 Solar RFP, it is referred to as the Iberville Facility or Iberville PPA throughout the Company's Application and in the testimonies filed in support thereof. Coastal Prairie, LLC is an indirect wholly-owned subsidiary of NextEra Energy Resources, LLC.

tax revenues generated as a result of their construction. Moreover, the location of the Iberville Facility within the Southeast Louisiana Planning Area (“SELPA”) will also support the reliability of the transmission system in the Amite South sub-region.

V.

The 2022 Solar Portfolio, when coupled with the recently approved Rider GGO,² will help ELL’s customers work toward meeting their environmental and sustainability goals. As Company witness Elizabeth C. Ingram describes in greater detail, a growing number of ELL’s commercial and industrial (“C&I”) customers have asked for assistance in aligning their electric energy consumption with such goals. As was demonstrated in the record of the Docket in which Rider GGO was approved, ELL and the Commission’s responsiveness to these customers’ desires in this regard will be important for continuing to make Louisiana an attractive location for existing, and potentially new, C&I customers.

VI.

Since its approval, Rider GGO has proven to be an extremely attractive offering for C&I customers with sustainability goals. As Ms. Ingram describes further, following Commission approval of Rider GGO, ELL provided a path for larger C&I customers to request reservations of the 365 MW of GGO subscriptions that were allocated to that group of customers. On the date that subscription reservations were opened, the 365 MW was fully reserved within minutes, and to date ELL’s C&I customers have expressed interest in enrolling in approximately 2,000 MW worth of Rider GGO subscriptions. Given this overwhelming interest, ELL is requesting that the

² Rider GGO is a voluntary offering that allows eligible customers to align some or all of their electricity requirements with renewable resources along with the Renewable Energy Certificates (“RECs”). The Commission approved Rider GGO for implementation and found that it serves the public interest in October 2022. *See*, Order Number U-36190 (October 14, 2022), In re: Application for Certification and Approval of the 2021 Solar Portfolio, Rider Geaux Green Option, Cost Recovery and Related Relief, Docket No. U-36190.

Commission approve the resources comprising 2022 Solar Portfolio as eligible to support Rider GGO in order to increase the number and size of Rider GGO subscriptions available for interested customers. ELL proposes that this expansion of Rider GGO be done in compliance with the terms under which the Commission approved Rider GGO in Order No. U-36190 and in a manner consistent with the Commission's approved allocations of costs, benefits, and the ratemaking treatment associated therewith.

VII.

The Application and supporting testimony present specific information on the resources comprising the 2022 Solar Portfolio and regulatory policy supporting the Company's requested relief. With this Application, the Company is submitting the Direct Testimonies of Laura K. Beauchamp, Elizabeth C. Ingram, and Phong D. Nguyen. The purpose of the testimony of each witness is as follows:

- Laura K. Beauchamp – Director, Resource Planning and Market Operations for ELL. Ms. Beauchamp describes ELL's rationale for issuing the 2021 Solar RFP, including the objectives that inform ELL's long-term resource planning process, and the reasons that the 2022 Solar Portfolio helps to meet these objectives. She also discusses the Company's plan to construct the Sterlington Facility. She explains the benefits that the 2022 Solar Portfolio is expected to provide to ELL's customers and the reasons that the Company asks that the Commission find, among other things, that the 2022 Solar Portfolio serves the public convenience and necessity, is in the public interest, and is therefore prudent.
- Elizabeth C. Ingram – Director, Regulatory Affairs for ELL. Ms. Ingram discusses the policy factors supporting a determination that approval of the Company's Application serves the public interest, which factors include compliance with all applicable Commission orders. Ms. Ingram also discusses the revenue requirement for the 2022 Solar

Portfolio and the Company's request that the costs be deemed eligible for recovery through the applicable mechanisms in place at the time that the Portfolio is placed into service. Ms. Ingram discusses the significant customer demand for enrollment in the Rider GGO and the Company's request that the 2022 Solar Portfolio be approved for inclusion in Rider GGO's resource portfolio to help satisfy this demand and assist ELL's customers in meeting their sustainability goals. Finally, Ms. Ingram discusses an additional option the Company is proposing for Rider GGO that will both benefit qualifying low-income customers and respond to the needs of larger commercial and industrial customers.

- Phong D. Nguyen – Director, Advanced Economic Planning for the System Planning and Operations organization. Mr. Nguyen describes the economic assessment of proposals received in the 2021 Solar RFP. He also discusses the viability, accounting, and deliverability assessments that were part of the overall evaluation of proposals received in the RFP. Mr. Nguyen also discusses the basis for the Company's selection of the Iberville Facility from the RFP. Finally, he discusses the net benefit analyses performed to evaluate the Sterlington Facility and the 2022 Solar Portfolio as a whole.

THE 2021 SOLAR RFP

VIII.

The 2021 Solar RFP is one component of the Action Plan set out in ELL's 2019 Integrated Resource Plan ("2019 IRP").³ Further, as described in ELL's most recent Draft 2023 IRP and demonstrated in Commission Docket U-36190, ELL is projected to need additional long-term generating capacity over the course of the planning horizon. In each of these assessments, solar

³ 2017 Integrated resource Planning ("IRP") Process for Entergy Louisiana, LLC Pursuant to the General Order No. R-30021, Dated April 20, 2012 (May 23, 2019), *Docket No. I-34694*.

resources were identified as an economic option to address long-term capacity and energy needs. The issuance of ELL's 2021 Solar Portfolio, and the selection of the Iberville Facility therefrom, furthers ELL's resource planning objectives of providing reliable electric service to its customers at the lowest reasonable cost and in a manner consistent with principles of prudent resources planning, which Ms. Beauchamp discusses in detail.

IX.

The 2021 Solar RFP was conducted in accordance with the process outlined in the Market-Based Mechanisms General Order (the "MBM Order"),⁴ including posting the draft 2021 Solar RFP for comment by market participants and Commission Staff; obtaining and responding to such comments; conducting a Bidders' and Technical Conference to present the draft 2021 Solar RFP and respond to questions from market participants; identifying clearly the resource needs and the products for which proposals were sought to meet those needs; engaging the services of an Independent Monitor ("IM") to oversee the design and conduct of the 2021 Solar RFP; ensuring that the IM had full access to all 2021 Solar RFP processes and evaluations and the opportunity to provide comment and direction regarding those matters; designing processes appropriately to safeguard confidential information, including confining the dissemination of information to only those persons engaged in the 2021 Solar RFP process and in accordance with practices approved by the IM; and conducting the 2021 Solar RFP in a manner that was fair and impartial to all bidders and resulted in selecting the lowest reasonable cost resources that could meet the supply needs of customers targeted in the 2021 Solar RFP. Also, as required by the MBM Order, the Commission Staff was informed of the development and implementation of the 2021 Solar RFP and resource

⁴ See, General Order (October 29, 2008), In re: Possible Suspension of, or Amendments to, the Commission's General Order dated November 3, 2006 (Market Based Mechanisms Order) to Make the Process more Efficient and to Consider Allowing the Use of On-Line Auctions for Competitive Procurement, Docket No. R-26172, Sub Docket C.

selection. The results of the 2021 RFP also demonstrate the competitiveness of the pricing associated with ELL's proposal to construct the Sterlington Facility and help to demonstrate that this Facility will also help to meet supply needs of customers at the lowest reasonable cost.

THE 2021 SOLAR PORTFOLIO

X.

As noted above, the 2021 Solar Portfolio is comprised of the Iberville Facility and the Sterlington Facility. Together, these resources have a total nameplate capacity of 224 MW. As Ms. Beauchamp describes in more detail, the specific attributes of each resource are as follows:

- Iberville: The Iberville Facility is a 175 MW_{AC} solar resource located in White Castle, Louisiana in Iberville Parish. ELL proposes to enter into a 20-year PPA with the developer of this facility. Under the PPA, ELL will purchase an expected 175 MW of must-take, unit-contingent, as-available energy, environmental attributes, and other electric products (voltage support or ancillary services) from the facility. The Iberville PPA, which is designated as Highly Sensitive Protected Materials ("HSPM"), is attached to Ms. Beauchamp's Direct Testimony as Exhibit LKB-3.
- Sterlington: The Sterlington Facility is a 49 MW_{AC} facility that will be constructed in Sterlington, Louisiana in Ouachita Parish. Construction of the Sterlington Facility is currently being developed in coordination with an EPC contractor. The project site has been secured through a Purchase Option Agreement that provides ELL a right to acquire the property prior to construction. A summary of the details of the Sterlington Facility is designated as HSPM and is attached to Ms. Beauchamp's Direct Testimony as Exhibit LKB-4.

XI.

The economic evaluation conducted for the 2021 Solar RFP indicated that the Iberville Facility was among the highest ranked PPA proposals and will provide significant economic net benefits to ELL's customers. The Sterlington Facility was also evaluated using assumptions and processes consistent with those utilized for the 2021 Solar RFP and, in addition to being competitive with the bids submitted into the 2021 Solar RFP, is also expected to provide significant

net economic benefits to ELL's customers. In total, the 2021 Solar Portfolio can provide \$86 million in net benefits to ELL's customers. Mr. Nguyen fully describes the analyses and assumptions used to derive the calculation of these benefits.

COMPLIANCE WITH APPLICABLE COMMISSION RULES AND ORDERS AND OTHER REGULATORY APPROVALS

XII.

For the reasons discussed herein and as explained in the Direct Testimonies of ELL's witnesses, the 2022 Solar Portfolio serves the public convenience and necessity and is in the public interest, and therefore prudent, and should be certified in accordance with the Commission's 1983 General Order.⁵ The 2022 Solar Portfolio will allow the Company to continue to fulfill its obligation to provide reliable electric service to its customers at the lowest reasonable cost. As Ms. Beauchamp explains, this is because the 2022 Solar Portfolio will help to meet the Company's long-term capacity needs while providing significant economic net benefits to ELL's customers. The 2022 Solar Portfolio, when coupled with Rider GGO, will also provide a means for assisting ELL's customers to meet their environmental sustainability goals and, as has been discussed herein, allow Louisiana to remain competitive in its ability to attract, or retain, large commercial and industrial operations. Finally, it should be noted that each of the resources comprising the 2022 Solar Portfolio will be constructed in Louisiana. This means that local economies will benefit from the jobs created during construction and the tax revenues generated as a result of their construction. Moreover, the location of the Iberville Facility within SELPA will also support reliability in the Amite South region, as Ms. Beauchamp explains. Ms. Ingram and Ms.

⁵ See, General Order (Corrected) (May 27, 2009), *In re: Possible Modifications to the September 30, 1983 General Order to Allow: (1) for More Expeditious Certifications of Limited-Term resource Procurements; and (2) an Exception for Annual and Seasonal Liquidated Damages Block Energy Purchases*, Docket No. R-30517.

Beauchamp also provide evidence that addresses the requirements of the 1983 General Order, including the total costs associated with the Portfolio, the agreements applicable to the Portfolio, and an overview of the expected timeline for completing the transactions associated with the Portfolio.

XIII.

The MBM Order augments the procedures of the 1983 General Order and generally requires a utility proposing to acquire or build new generating capacity to “employ a market-based mechanism” consisting of an RFP competitive solicitation process. For all the reasons mentioned herein, and as further discussed by Ms. Ingram and others in testimony, the 2021 Solar RFP was conducted in accordance with the MBM Order, and the selection of the Iberville Facility, was also consistent with the Order, as is the Company’s proposal to construct the Sterlington Facility.

XIV.

The Company is seeking approval to expand Rider GGO by including the resources comprising the 2022 Solar Portfolio within the resource portfolio supporting the Rider. The Company proposes to undertake this expansion, if approved, in accordance with the terms, allocations of costs and benefits, and prescribed rate treatment the Commission approved in Order No. U-36190. The Company is requesting that the Commission approve the modifications to the Rider necessary to accomplish the proposed expansion, as well as other modifications described by Ms. Ingram and contained in Exhibit ECI-3.

XV.

The Company is seeking specific approval of the terms, conditions, rights, remedies, and limitations set forth in the PPA for the Iberville Facility, and confirmation that ELL and Entergy Corporation shareholders will not be responsible, beyond the remedies specified in the agreement,

for any acts or omissions by the seller, its employees, or contractors of any tier for any incident arising out of the work performed by or for the seller under the PPA, absent imprudence on the part of ELL.

XVI.

The Company is asking the Commission to acknowledge that it may become necessary for the Company to seek rate relief if, during term of the PPA, the Company should experience adverse financial implications resulting from the PPA. These adverse financial implications could arise from debt imputation or the recognition of long-term liabilities from the application of lease accounting to the PPA. At this time, the Company is not asking the Commission to grant the Company rate relief to address any costs that the Company may incur as a result of the above-described debt imputation or lease accounting. The Company does, however, ask that the Commission recognize, in its order approving the PPA, that the Company is entitled to seek rate relief at the time such effects may arise, as determined by the Commission to address the potential adverse effects of debt imputation or lease accounting, and to commit that the Commission will determine the form of and provide such relief in a timely manner.

COST RECOVERY

XVII.

The Company requests that the costs associated with the 2022 Solar Portfolio be deemed eligible for recovery through the appropriate cost recovery mechanisms in place at the time the Iberville and Sterlington Facilities are placed into service. This recovery may occur through a combination of (i) the then-applicable Formula Rate Plan ("FRP"), and (ii) the Company's Fuel Adjustment Clause ("FAC"). As Ms. Ingram describes in more detail, the Company's current

Formula Rate Plan will have expired by the time the 2022 Solar Portfolio enters into service and it is not yet known whether a successor mechanism will exist or what the terms of that mechanism may prescribe in terms of cost recovery for generating resources. As such, in this filing, the Company is simply requesting that the revenue requirement associated with the Sterlington Facility and twenty-five percent (25%) of the costs of the Iberville Facility be deemed eligible for recovery through a future FRP, in accordance with the terms of that mechanism once known and if such a mechanism exists. The Company also requests that 75% of the costs of the Iberville Facility be deemed eligible for recovery through the FAC, as Ms. Ingram also describes.⁶ In the event that ELL does not have an FRP in place at the time that the 2022 Solar Portfolio is placed into service, the Company requests that the revenue requirement for the Sterlington Facility and 25% of the costs of the Iberville Facility be deferred and accrue interest until such time as those costs can be reflected in rates.

REQUEST FOR TIMELY TREATMENT

XVIII.

The Company is requesting that the Commission direct or establish a Procedural Schedule in accordance with the 120-day certification period set forth in the 1983 General Order.

⁶ As described more fully in her Direct Testimony, the Company is requesting this allocation of recovery of the costs of the Iberville Facility between the FAC and FRP in order to maintain consistency with the GGO Cost Allocation Ratio. *See*, Order Number U-36190 (October 14, 2022), *In re: Application for Certification and Approval of the 2021 Solar Portfolio, Rider Geaux Green option, Cost Recovery and Related Relief*, Docket No. U-36190.

REQUEST FOR NOTICE

XIX.

ELL requests that notices, correspondence, and other communications concerning this Application be directed to the following persons:

Lawrence J. Hand, Jr.
Elizabeth C. Ingram
4809 Jefferson Highway
Mail Unit L-JEF-357
Jefferson, Louisiana 70121
Telephone: (504) 840-2528
Facsimile: (504) 840-2681
lhanda@entergy.com
eingram@entergy.com

Harry M. Barton
Erin M. Murphy
Brett P. Fenasci
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Telephone: (504) 576-2984
Facsimile: (504) 576-5579
hbarton@entergy.com
emurph6@entergy.com
bfenasci@entergy.com

ELL requests that the foregoing persons be placed on the Official Service List for this proceeding, and respectfully requests that the Commission permit the designation of more than one person to be placed on the Official Service List for service in this proceeding.

REQUEST FOR CONFIDENTIAL TREATMENT

XX.

Portions of the Company's evidence supporting this Application contain information considered by the Company to be proprietary and confidential. Disclosure of certain of this information may expose the Company and its customers to an unreasonable risk of harm. Therefore, in light of the commercially sensitive nature of such information, the Company has submitted two versions of each of the affected documents, one marked "Non-Confidential Redacted Version" and the other marked "Confidential Version." In anticipation of the execution of a suitable confidentiality agreement in this docket, the Confidential Versions bear the

designation “Highly Sensitive Protected Materials” or words of similar import. Although the confidential information and documents included with this Application may be reviewed by appropriate representatives of the LPSC Staff and intervenors pursuant to the terms and conditions of a suitable confidentiality agreement once such an agreement has been executed in this Docket, this confidential information also is being provided pursuant to, and shall be exempt from public disclosure pursuant to, the Commission’s General Order dated August 31, 1992 and Rule 12.1 of the Rules of Practice and Procedure of the Commission.

PRAYER FOR RELIEF

XXI.

WHEREFORE, for the foregoing reasons, Entergy Louisiana, LLC respectfully requests that, after due and lawful proceedings are held, its Application be approved. In particular, the Company requests that the Commission:

1. find that the Sterlington Facility and the Iberville Facility serve the public convenience and necessity and are in the public interest, and are therefore prudent, in accordance with the Commission’s 1983 General Order;
2. find that the selection of the Iberville Facility and proposal to construct the Sterlington Facility are consistent with the terms of the Commission’s MBM Order, accepting the 2021 Solar RFP as an alternative market test for the Sterlington Facility and/or, in the alternative, granting any exemption to the MBM Order deemed necessary by the Commission;

3. find that, with respect to the resources comprising the 2022 Solar Portfolio, the Company has complied with, or is not in conflict with, the provisions of all applicable LPSC Orders, to the extent applicable;
4. find the Sterlington Facility and Iberville Facility are eligible for inclusion in the Geaux Green Option Rider (Rider GGO) resource portfolio;
5. approve the modifications to Rider GGO contained in Exhibit ECI-3;
6. find that, with respect to Rider GGO the Company has complied with, or is not in conflict with, the provisions of all applicable LPSC Orders, including the Commission's Tariff Filings General Order;
7. find that 75% of costs associated with the Iberville Facility, a portion (as determined by the GGO Cost Allocation Ratio approved in Order No. U-36190) of the subscription fees generated through Rider GGO, all MISO energy revenues for the 2022 Solar Portfolio, and the bill credits for Rider GGO are deemed eligible for inclusion in and recovery via the Company's FAC;
8. find that the estimated first year revenue requirement of the Sterlington Facility, 25% of the costs associated with the Iberville Facility, and a portion (as determined by the GGO Cost Allocation Ratio approved in Order No. U-36190) of the subscription fees generated through Rider GGO, are deemed eligible for recovery in accordance with the terms of the Company's FRP that is in place at the time the Iberville and Sterlington Facilities are placed into service; in the alternative, if ELL does not have an FRP in place at the time the Sterlington and Iberville Facilities are placed in service, grant the Company permission to defer the first year revenue requirement of the Sterlington Facility and 25% of the costs associated with the

Iberville Facility (net of Rider GGO revenues – allocated in accordance with the GGO Cost Allocation Ratio), and establish a regulatory asset, including carrying costs at the then-effective weighted average cost of capital, until those costs can be reflected in rates;

9. find that a 30-year depreciation period is appropriate for the Sterlington Facility;
10. find that the Company is entitled to seek rate relief from the Commission to address any adverse effects of debt imputation or lease accounting that result from the Iberville PPA at such a time as those effects arise;
11. approve the terms, conditions, rights, remedies, and limitations set forth in the Iberville PPA and confirm that ELL, its member entity, and Entergy Corporation shareholders shall not be responsible, beyond the remedies specified in the Iberville PPA for any acts or omissions by any seller, its employees, or its contractors of any tier in connection with seller's ownership or operation of the relevant facility, including, without limitation, seller's failure to deliver the contracted products under the Iberville PPA;
12. find that the confidential testimony, exhibits, and other materials referenced in this Application shall be exempt from public disclosure pursuant to the Commission's General Order dated August 31, 1992, and Rule 12.1 of the Rules of Practice and Procedure of the Louisiana Public Service Commission;
13. direct the procedural steps necessary to facilitate a Commission decision on the Company's Application consistent with the 120-day requirement in the Commission's 1983 General Order;
14. establish a fifteen-day period for interventions in this proceeding;

15. direct that notice of all matters in these proceedings be sent to Lawrence J. Hand, Jr., and Elizabeth Ingram, as well as to Harry M. Barton, Erin Murphy, and Brett Fenasci, as representatives of Entergy Louisiana, LLC; and
16. grant such other relief to which the Company shows itself to be entitled.

Respectfully submitted,

By: 

Harry M. Barton, La. Bar No. 29751
Erin M. Murphy, La. Bar No. 36601
Brett P. Fenasci, La. Bar No. 29858
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**ATTORNEYS FOR
ENTERGY LOUISIANA, LLC**