

**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

JEREMY HALLAND

ON BEHALF OF

ENTERGY LOUISIANA, LLC

2

FEBRUARY 2026

TABLE OF CONTENTS

	Page
I. INTRODUCTION AND BACKGROUND	1
II. SUMMARY OF TESTIMONY	3
III. ENVIRONMENTAL DUE DILIGENCE	5
IV. AIR QUALITY PERMITS	13
V. WATER QUALITY	16
VI. OTHER ENVIRONMENTAL PERMITTING PLANNING	18
A. WF6	18
B. WESTLAKE	20
VII. CONCLUSION	22

EXHIBIT LIST

Exhibit JH-1	List of Prior Testimony
Exhibit JH-2	List of Permits and Authorizations

I. INTRODUCTION AND BACKGROUND

Q1. PLEASE STATE YOUR NAME AND CURRENT BUSINESS ADDRESS.

A. My name is Jeremy Halland. My business address is 2107 Research Forest Drive, Suite 300, The Woodlands, Texas 77380. I am Manager of Environmental Project Services, including new capital projects, at Entergy Services, LLC (“ESL”).¹

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

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

Q3. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

A. I earned a Bachelor of Science degree in Meteorology from the University of Oklahoma in May 2005, and a Master of Science in Meteorology from Florida State University in July 2007. My professional experience prior to joining ESL includes approximately four years as a Project Consultant for Jim Clary and Associates, an environmental consulting firm; two years as a Senior Air Quality Specialist at Providence, an engineering and environmental consulting firm; five years as a Senior Environmental

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; and Entergy Texas, Inc.

1 Specialist at Luminant; three years as Director of Environmental Compliance at
2 Enchanted Rock; and two years as a Senior Compliance Specialist at Kinder Morgan.

3

4 Q4. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES.

5 A. I assumed my current position as Manager of Environmental Project Services at ESL
6 in November 2023. In this role, I oversee the environmental permitting for new power
7 generation, transmission, distribution, and substation facilities with an emphasis on
8 large capital projects. I track federal and state environmental regulatory developments
9 affecting electric utility generators and develop and communicate permitting
10 compliance plans. My career has included significant experience with air permitting
11 and compliance, along with other environmental program areas including natural
12 resources, surface water, solid waste, and hazardous waste issues.

13

14 Q5. HAVE YOU PREVIOUSLY TESTIFIED BEFORE A REGULATORY
15 COMMISSION?

16 A. Yes, including before the LPSC. Attached as Exhibit JH-1 is a list of my prior
17 testimony.

18

19 Q6. ARE YOU OFFERING ANY EXHIBITS WITH YOUR TESTIMONY?

20 A. Yes. I am offering Exhibits JH-1 and JH-2.

21

1 and local governments. The LDEQ will be primarily responsible for implementing the
2 various federal and state environmental laws, such as the Clean Air Act (“CAA”), the
3 Clean Water Act (“CWA”), the Resource Conservation and Recovery Act, and the
4 Louisiana Environmental Quality Act. The EPA will be responsible for oversight to
5 ensure that LDEQ properly implements federal law through federally enforceable state
6 implementation plans, regulations, and permits. The LDCE and USACE are
7 responsible for approving construction standards in navigable waterways relating to
8 navigation safety, fill, dredge, and preservation of jurisdictional wetlands and coastal
9 zone resources.

10
11 Q9. DO YOU OFFER ANY CONCLUSIONS IN SUPPORT OF THE PROPOSED
12 GENERATORS?

13 A. Yes. ELL will manage construction and operation of the Proposed Generators in
14 accordance with all applicable federal, state, and local regulations, rules, and standards
15 and has taken reasonable steps to protect the public welfare and health against adverse
16 environmental impacts. The Proposed Generators will meet all current environmental
17 regulations and were designed in such a way that they will be able to accommodate
18 future regulations, rules, and standards. ELL has developed a permitting plan for the
19 Proposed Generators and is working through the requirements needed to start
20 construction on the sites selected for the proposed CCCT units. The matrix includes
21 conservative review periods for the permit applications, and I do not anticipate that any
22 of the required permits will take longer than currently estimated. I also conclude that
23 the construction and operation of the Proposed Generators will not adversely impact

1 recreational and park areas, historical and aesthetic values, or the environmental
2 integrity of the surrounding areas.

3
4 **III. ENVIRONMENTAL DUE DILIGENCE**

5 Q10. PLEASE DESCRIBE THE GENERAL AREA IN WHICH WF6 IS PROPOSED TO
6 BE LOCATED.

7 A. If approved, WF6 will be sited on existing ELL-owned property adjacent to the
8 proposed Waterford 5 Power Station, the existing Waterford 1 and 2 Generating Plant,
9 and the Waterford 3 facility. The property is currently zoned industrial and is within
10 the industrial sector of St. Charles Parish.

11
12 Q11. PLEASE DESCRIBE THE TRANSMISSION INTERCONNECTION SCOPE FOR
13 WF6.

14 A. As Company witnesses Chad J. Ladner and Nicholas D. Pressler discuss in greater
15 detail, the Company intends to use the MISO Generator Replacement Process to utilize
16 existing Network Resource Interconnection Service (“NRIS”) rights from Little Gypsy
17 Units 2 and 3 to interconnect the output from the WF6 combustion turbine generator to
18 the Little Gypsy 230 kV substation and to interconnect the output from the WF6 steam
19 turbine generator to the Little Gypsy 115 kV substation. As Mr. Ladner and Mr.
20 Pressler discuss, the interconnection for WF6 includes building two new generator tie-
21 ins to span the Mississippi River to connect to the existing Little Gypsy substation.

1 Q12. PLEASE DESCRIBE THE GENERAL AREA IN WHICH WESTLAKE IS
2 PROPOSED TO BE LOCATED.

3 A. If approved, Westlake will be located on approximately 100 acres of existing ELL
4 property at the Nelson site in Westlake, Louisiana. The project site is on the western
5 side of the Nelson property and currently consists of natural vegetation and forested
6 areas.

7

8 Q13. PLEASE DESCRIBE THE GENERATOR TIE-INS FOR WESTLAKE.

9 A. Westlake will interconnect to the existing substation at the Nelson site. All routing will
10 be within the existing ELL property and will not require new servitudes to be obtained.
11 Mr. Ladner provides additional detail concerning the transmission interconnection for
12 Westlake.

13

14 Q14. PLEASE DESCRIBE THE DEVELOPMENT OF THE ENVIRONMENTAL DUE
15 DILIGENCE REPORTS FOR THE PROPOSED GENERATORS.

16 A. ELL conducted internal environmental assessments of each proposed site as part of its
17 due diligence. I will refer to these reports as environmental due diligence reports
18 (“EDDRs”) throughout the testimony to avoid confusion with any environmental
19 assessment the USACE may be required to prepare under the National Environmental
20 Policy Act to support its permitting review.

21

1 Q15. PLEASE SUMMARIZE THE OVERALL FINDINGS OF THE EDDRS.

2 A. The evaluation of the Proposed Generators' effects on environmental receptors
3 indicates that environmental consequences would vary in a range of negligible to
4 moderate prior to implementation of mitigation measures. The EDDRs evaluated a
5 variety of receptors and environmental consequences including climate and air quality,
6 geology and soils, natural hazards, water resources, wetlands, vegetation and wildlife
7 habitat, sensitive ecosystems, threatened and endangered species, cultural resources,
8 land use and infrastructure, noise, visual resources, and socioeconomic factors.

9 The EDDRs reflect that the Proposed Generators will have only a minimal
10 effect on recreational and park areas, historical and aesthetic values, and environmental
11 integrity of the surrounding area. With the implementation of mitigation measures, as
12 described in this testimony, the other potential environmental consequences of
13 constructing the Proposed Generators are considered to be offset.

14

15 Q16. DID THE EDDRS IDENTIFY POTENTIAL ENVIRONMENTAL EFFECTS
16 RELATED TO AIR QUALITY?

17 A. Yes. There will be short-term and long-term effects resulting from the construction of
18 the Proposed Generators. Short-term effects may result from dust and air emissions
19 and soil disturbance during the facility construction period and will be temporary. The
20 long-term effects on air quality are associated with emissions from operations.

21

1 Q17. HOW WILL ELL ADDRESS THE IMPACT OF THE PROPOSED GENERATORS
2 ON AIR QUALITY?

3 A. Minimization of dust emissions during construction will be addressed through best
4 management practices for construction such as water application to dust-prone areas.
5 As described in this testimony, while the Proposed Generators result in long-term air
6 emissions during operations, long-term adverse effects are reduced through the
7 application of Best Available Control Technology (“BACT”) to the emission sources,
8 including the use of combustion turbines with dry low-nitrogen oxides (“NO_x”)
9 burners, oxidation catalysts, selective catalytic reduction (“SCR”), low sulfur fuel
10 (pipeline quality natural gas), and air-cooled condensers.

11 The parishes in which WF6 and Westlake are proposed to be located—St.
12 Charles Parish and Calcasieu Parish, respectively—are designated
13 attainment/unclassifiable for all criteria pollutants. As described in my testimony,
14 under the federal New Source Review (“NSR”) program, WF6 and Westlake will be
15 major sources that require Prevention of Significant Deterioration (“PSD”) permitting
16 for the NSR-regulated pollutants, including greenhouse gases (“GHGs”).
17

18 Q18. WILL THE CONSTRUCTION OF THE PROPOSED GENERATORS TRIGGER
19 POTENTIAL ENVIRONMENTAL EFFECTS REGARDING THE SOIL IN THE
20 PROJECTS’ RESPECTIVE AREAS?

21 A. Yes. Preliminarily, it bears noting the current state of the two properties. WF6 is
22 located on existing ELL property which was previously being leased for agricultural
23 use; the Westlake site is located within native vegetation on ELL’s property.

1 Standard construction equipment will be used to prepare the sites for
2 construction. The use of this construction equipment will physically disturb underlying
3 soils, which could result in soil compaction, reducing the porosity and conductivity of
4 the soil. Such compaction may slightly increase the amount of surface runoff in the
5 immediate area during construction and/or operation of the facilities. Grading activities
6 may also destabilize surface soils, which could increase the potential for erosion,
7 sedimentation, and contamination of onsite and adjacent waterbodies.

8
9 Q19. HOW WILL ELL ADDRESS THE IMPACT OF THE CONSTRUCTION OF THE
10 PROPOSED GENERATORS UPON THE SOIL IN THE AREAS?

11 A. To mitigate the effects of construction equipment physically disturbing underlying
12 soils, the Proposed Generators will utilize crushed aggregate base to stabilize
13 temporary laydown areas and temporary construction roadways, and to
14 create/improve/widen the roadway to the facility sites to accommodate the hauling of
15 heavy equipment and construction traffic. The construction equipment may utilize
16 temporary matting to avoid impacts to wetland soils within the facility sites. No ground
17 disturbance is anticipated to occur outside the project sites and temporary laydown
18 areas.

19 ELL will utilize industry standard construction best management practices such
20 as silt fencing and erosion controls to stabilize soils and minimize potential erosion and
21 sedimentation into onsite and adjacent surface waters and other offsite waterbodies.
22 Prior to construction, a Stormwater Pollution Prevention Plan will be developed for

1 each site, and construction will be conducted in accordance with the terms of the LDEQ
2 Construction Stormwater General Permit to minimize potential soil impacts.

3

4 Q20. WHAT DO THE EDDRS REFLECT REGARDING FLOODPLAIN AND
5 WETLAND AREAS FOR THE WF6 PROJECT AREA?

6 A. The aquatic resources site delineation identified less than 0.5 acres of wetlands and
7 other waterbodies within the power block footprint. Additional site surveys were
8 conducted in December 2025 to evaluate the transmission structure and barge
9 unloading areas for potential jurisdictional waters, and identified approximately 1 acre
10 of wetlands that may be impacted depending on final design considerations. The WF6
11 site is not within a floodplain, and no floodplain permitting with St. Charles Parish will
12 be required.

13

14 Q21. WHAT DO THE EDDRS REFLECT REGARDING FLOODPLAIN AND
15 WETLAND AREAS FOR THE WESTLAKE PROJECT AREA?

16 A. ELL completed a wetland and waterbody delineation for the Westlake site in January
17 and October 2025. For construction of Westlake, approximately 0.76 acres of non-
18 wetland waters, 1.92 acres of PEM, 1.75 acres of PSS and 13.11 acres of PFO wetlands
19 were identified within the project area and will be either temporarily impacted or
20 permanently filled as part of the project.

21

1 Q22. WHAT STEPS WILL ELL TAKE DURING AND AFTER CONSTRUCTION OF
2 THE PROPOSED GENERATORS TO MITIGATE THE EFFECTS ON
3 WETLANDS?

4 A. Post-construction, areas of the two sites not permanently impacted by infrastructure
5 development will implement revegetation and/or soil stabilization that is consistent
6 with current industry practices. Natural revegetation, native landscaping, and/or
7 horticultural landscaping can be implemented to help restore denuded locations of the
8 site impacted by construction activities. Road or entryway boundary shoulders can
9 continue to be stabilized using a crushed aggregate base and natural revegetation to
10 minimize potential erosion and sedimentation into onsite and adjacent surface waters..
11 Laydown areas are expected to be maintained as crushed aggregate base or allowed to
12 revegetate naturally post construction.

13

14 Q23. WHAT DO THE EDDRS CONCLUDE WITH RESPECT TO PROTECTED
15 SPECIES?

16 A. For WF6, the Threatened and Endangered Species Habitat Assessment identified six
17 federally listed species with potential to occur in St. Charles Parish: the tricolored bat
18 (*Perimyotis subflavus*, proposed endangered), alligator snapping turtle (*Macrochelys*
19 *temminckii*, proposed threatened), monarch butterfly (*Danaus plexippus*, proposed
20 threatened), Pallid Sturgeon (*Scaphirhynchus albus*, endangered), and West Indian
21 Manatee (*Trichechus manatus*, threatened). The bald eagle (*Haliaeetus*
22 *leucocephalus*), protected under the Bald and Golden Eagle Protection Act, was also

1 noted as potentially present. No designated critical habitat occurs, and no signs or
2 presence of species were found within the project area.

3 For Westlake, the U.S. Fish and Wildlife Service IPaC system identified five
4 federally listed species with potential to occur in Calcasieu Parish: the tricolored bat
5 (*Perimyotis subflavus*, proposed endangered), alligator snapping turtle (*Macrochelys*
6 *temminckii*, proposed threatened), monarch butterfly (*Danaus plexippus*, proposed
7 threatened), red-cockaded woodpecker (*Dryobates borealis*, threatened), and
8 whooping crane (*Grus americana*, experimental non-essential population). The bald
9 eagle (*Haliaeetus leucocephalus*), protected under the Bald and Golden Eagle
10 Protection Act, was also noted as potentially present. No designated critical habitat
11 occurs within the project area.

12
13 Q24. WHAT STEPS WILL ELL UNDERTAKE TO MINIMIZE THE POTENTIAL
14 IMPACT UPON ANY PROTECTED SPECIES?

15 A. Three general habitat types were identified within the survey area: maintained
16 transmission rights-of-way, mixed upland pine and bottomland hardwood forest, and
17 palustrine wetland communities. Surveys found no direct evidence of listed species or
18 occupied habitat at either the WF6 or Westlake site. Limited suitable roosting habitat
19 for the tricolored bat was present in forested areas; however, tree clearing will occur
20 outside the active roosting and pupping period (May 1–July 15) to avoid potential
21 effects. No suitable habitat was identified for the alligator snapping turtle, monarch
22 butterfly, red-cockaded woodpecker, West Indian manatee, pallid sturgeon, or
23 whooping crane.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

Q25. WHAT DO THE EDDRS STATE REGARDING WHETHER THE PROJECTS WILL AFFECT LAND USE IN THE IMMEDIATE AREA?

A. The proposed projects are located on ELL-owned property in existing industrial areas. Therefore, the land use will align with other activities in the immediate area of the sites.

IV. AIR QUALITY PERMITS

Q26. WHAT AIR EMISSIONS PERMITS WILL BE REQUIRED TO CONSTRUCT AND OPERATE THE PROPOSED GENERATORS?

A. The Proposed Generators will each be a “major stationary source” under the CAA and, therefore, subject to multiple regulations governing air quality associated with emissions from their operation. In particular, they will need to comply with (i) National Ambient Air Quality Standards (“NAAQS”) and PSD rules; (ii) New Source Performance Standards (“NSPS”) for greenhouse gas emissions by new combustion turbines, stationary combustion turbines, and stationary compression ignition or reciprocating internal combustion engines; (iii) federal requirements associated with hazardous air pollutants; and (iv) other regulatory requirements associated with air emissions, including continuous monitoring, emissions market allowance obligations, and greenhouse gas emission regulations. For both WF6 and Westlake, ELL will obtain a combined air permit consisting of the PSD Air Permit Title V (Part 70) Operating Permit and an Acid Rain Permit encompassing each of the requirements listed above. These permits are issued by the LDEQ in consultation with the EPA.

1 Q27. WHAT STEPS HAS ELL TAKEN TO ENSURE THAT THE PROPOSED
2 GENERATORS WILL MEET THE NAAQS AND OTHER AIR QUALITY
3 REQUIREMENTS?

4 A. ELL designed the Proposed Generators to meet the BACT requirements, which is an
5 air pollution control standard mandated by the CAA and associated state regulations
6 for new major sources or significant modifications to major sources of air pollution.
7 The Proposed Generators will employ state-of-the-art emission reduction controls. The
8 units will include SCR and NO_x combustors to reduce NO_x emissions and an Oxidation
9 Catalyst for the control of carbon monoxide (“CO”) and volatile organic compound
10 (“VOC”) emissions. A more detailed statement of the controls selected by ELL is
11 contained in the BACT analysis included in the PSD pre-construction permit
12 applications that have been submitted to the LDEQ for WF6 and Westlake.

13

14 Q28. WHAT IS THE EPA’S PHASE 2 CO₂ EMISSION STANDARD?

15 A. Pursuant to Section 111 of the CAA, the EPA promulgated the NSPS under 40 CFR
16 Part 60 Subpart TTTTa that applies to fossil fuel-fired electric generating units,
17 including the Proposed Generators. The regulation is designed to ensure that the best
18 demonstrated emission control technologies are installed as new industrial
19 infrastructure for power generation is built or significantly upgraded, helping to reduce
20 greenhouse gas emissions moving forward. The efficiency-based standards applicable
21 to a particular fossil fuel-fired electric generating unit depend on the expected load,
22 whether the unit is a new build or proposed modification of an existing unit, and the
23 type of fossil fuel used as feedstock for the unit.

1

2 Q29. WHAT IS THE CURRENT STATUS OF PHASE 2 CO₂ EMISSION STANDARD?

3 A. This EPA rule imposes a Phase 2 CO₂ emission standard based on the application of
4 carbon capture and storage (“CCS”) for new baseload CCCTs beginning on January 1,
5 2032. The EPA rule is currently subject to a legal challenge by the State of Louisiana
6 and twenty-four other states, as well as a Proposed Rule from the EPA that could
7 significantly alter the current rule’s compliance obligations. As of now, however, the
8 rule remains in effect.

9

10 Q30. HOW WILL ELL RESPOND IF THE 2032 COMPLIANCE DATE HOLDS?

11 A. As Company witness Nicholas D. Pressler also explains, ELL’s project management
12 designed the Proposed Generators to enable them to accommodate a future CCS facility
13 onsite if needed to comply with the regulation as written. The Proposed Generators
14 will be designed to support CCS technology to capture CO₂ emissions prior to release
15 into the atmosphere, compress the CO₂ into a supercritical state for transport, and
16 transport the CO₂ via pipeline for offsite underground storage.

17

18 Q31. HOW FEASIBLE IS CCS TECHNOLOGY FOR THE PROPOSED GENERATORS?

19 A. Current CCS technology is available to support CCS in connection with these CCCTs,
20 although no project has yet implemented this technology on a natural gas-fired CCCT
21 in the United States. The technical capability is not an impediment to CCS, and the
22 site is being designed to accommodate future CCS as required under the current NSPS
23 TTTTa regulation for new combined cycle combustion turbines.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

V. WATER QUALITY

Q32. WHAT WATER QUALITY REGULATIONS WILL APPLY TO THE CONSTRUCTION AND OPERATION OF THE PROPOSED GENERATORS?

A. EPA has delegated to LDEQ the enforcement and permitting authority under the CAA, as well as certain portions of such authority under the CWA. All industrial facilities that discharge wastewater and some that discharge storm water into waters of the State of Louisiana must obtain a discharge permit under the Louisiana Pollutant Discharge Elimination System (“LPDES”). The LPDES permit is the state counterpart to the CWA’s National Pollutant Discharge Elimination System (“NPDES”) permit. These permits require treatment or management of wastewater and/or storm water prior to discharge to maintain designated water quality criteria. ELL will evaluate, prepare, and submit LPDES permit applications for the Proposed Generators to the LDEQ to the extent necessary.

Q33. WHAT OTHER WATER QUALITY REQUIREMENTS MAY BE APPLICABLE TO THE CONSTRUCTION AND OPERATION OF THE PROPOSED GENERATORS?

A. A construction storm water discharge permit from the LDEQ to authorize storm water discharges from the construction area during construction of the Proposed Generators will also need to be obtained.

1 Q34. WHAT OTHER POTENTIAL WATER QUALITY ISSUES COULD BE RAISED
2 WITH RESPECT TO THE PROPOSED GENERATORS?

3 A. Typical water quality effects for power projects include the use of surface or subsurface
4 water resources for process use and the discharge of treated wastewater, heated cooling
5 water, and storm water to receiving streams.
6

7 Q35. HOW WILL ELL ADDRESS THESE POTENTIAL WATER QUALITY EFFECTS?

8 A. The LPDES permitting process is predicated on the requirement that discharges from
9 a permitted facility comply with the state's water quality standards. An LPDES permit
10 cannot be issued if it would allow a facility to cause or contribute to violations of water
11 quality standards. The issuance of this permit, and ELL's continued compliance, will
12 minimize any water quality impacts. The Proposed Generators are being designed in
13 accordance with all water discharge regulatory requirements.
14

15 Q36. WILL THE PROPOSED GENERATORS CAUSE WATER SHORTAGES IN THE
16 COMMUNITIES IN WHICH THEY ARE SITED?

17 A. No. The Proposed Generators will utilize potable water from the nearest municipality.
18 Moreover, it bears noting that the need for water is further mitigated by the fact that
19 the Proposed Generators are designed to use air-cooled condensers for process cooling,
20 a technology that uses air instead of water as the cooling medium for the CCCT.
21

1 **VI. OTHER ENVIRONMENTAL PERMITTING PLANNING**

2 **A. WF6**

3 Q37. HAS ELL ANALYZED ANY OTHER ENVIRONMENTAL ISSUES WITH
4 RESPECT TO WF6 (E.G., HISTORICAL AND ARCHAEOLOGICAL SITES,
5 IMPACTS ON ENDANGERED SPECIES)?

6 A. Yes. The USACE is required to consider project impacts on historic properties and
7 other resources under section 106 of the National Historic Preservation Act (“NHPA”).
8 This review is in coordination with the Louisiana Division of Historic Preservation in
9 its capacity as the State Historic Preservation Office. In addition, USACE coordinates
10 with the U.S. Fish and Wildlife Service to conduct a Threatened and Endangered
11 Species review under the Endangered Species Act (“ESA”). ELL has completed its
12 site due diligence to support both the NHPA and ESA reviews.

13
14 Q38. ARE THERE ANY USACE PROJECTS THAT MIGHT AFFECT (OR BE
15 AFFECTED BY) WF6?

16 A. Yes, and this is the case because of the proximity of WF6 to the Mississippi River levee
17 and the need to extend transmission lines across the river to interconnect at the existing
18 Little Gypsy 230 kV and 115 kV substations. In particular, WF6 requires a Section
19 408 authorization (which pertain to projects that could have certain impacts on a
20 USACE project) and a Section 10 permit (which refers to a permit under Section 10 of
21 the Rivers and Harbors Act and which pertains to crossings over navigable waters) in
22 order to allow a new transmission line to cross the Mississippi River. In addition,
23 Section 408 authorization is required for activities within 1,500 feet of the Mississippi

1 River levee system. ELL will apply for a Section 408 authorization in connection with
2 activities inside the 1,500-foot buffer.

3

4 Q39. WHAT USACE WETLANDS PERMITTING MAY APPLY TO WF6?

5 A. WF6 requires issuance of a Section 404 Nationwide or Individual Permit from the
6 USACE prior to construction. ELL will submit a permit application for WF6 in the
7 near future. Wetland mitigation credits will be required to offset the permanently
8 impacted wetland areas.

9

10 Q40. WILL THE CONSTRUCTION OF WF6 UNREASONABLY IMPAIR VISIBILITY
11 OR VEGETATION?

12 A. ELL does not anticipate that the construction or operation of WF6 will cause or
13 contribute to the impairment of visibility, soils, vegetation, and/or other such secondary
14 environmental concerns. ELL will evaluate potential impacts from WF6 on visibility
15 and vegetation as part of its air dispersion modeling assessment that is submitted with
16 the air permit application.

17

18 Q41. WHAT IS THE PROXIMITY OF WF6 TO ANY NEARBY RESIDENTIAL AREAS?

19 A WF6 will be approximately 2,400 feet from the nearest residential area.

20

1 Q42. WILL THE CONSTRUCTION AND OPERATION OF WF6 CAUSE SIGNIFICANT
2 ENVIRONMENTAL IMPACTS ON ANY NEARBY RESIDENTIAL AREAS?

3 A No. Neither the construction nor the operation of the WF6 facility is anticipated to
4 significantly impact nearby residential areas based on existing conditions. Of particular
5 note, ELL has completed its air dispersion modeling reports and provided those reports
6 to the LDEQ, which show compliance with all ambient air quality standards.

7

8 **B. WESTLAKE**

9 Q43. HAS ELL ANALYZED ANY OTHER ENVIRONMENTAL ISSUES WITH
10 RESPECT TO WESTLAKE (*E.G.*, HISTORICAL AND ARCHAEOLOGICAL
11 SITES, IMPACTS ON ENDANGERED SPECIES)?

12 A. ELL has completed its site due diligence to support both the NHPA and ESA reviews.

13

14 Q44. ARE THERE ANY U.S. ARMY CORPS OF ENGINEERS PROJECTS THAT
15 MIGHT AFFECT (OR BE AFFECTED BY) WESTLAKE?

16 A. ELL is not aware of any USACE projects that would impact, or be impacted by,
17 Westlake.

18

19 Q45. WHAT USACE WETLANDS PERMITTING MAY APPLY TO WESTLAKE?

20 A. As with WF6, Westlake requires issuance of a Section 404 Individual Permit from the
21 USACE prior to construction. ELL submitted a permit application for Westlake in
22 November 2025. Wetland mitigation credits will be required to offset the permanently
23 impacted wetland areas.

1

2 Q46. WILL THE CONSTRUCTION OF WESTLAKE UNREASONABLY IMPAIR
3 VISIBILITY OR VEGETATION?

4 A. ELL does not anticipate that the construction or operation of Westlake will cause or
5 contribute to the impairment of visibility, soils, vegetation, and/or other such secondary
6 environmental concerns. ELL will evaluate potential impacts from the project on
7 visibility and vegetation as part of its air dispersion modeling assessment that is
8 submitted with the air permit application.

9

10 Q47. WHAT IS THE PROXIMITY OF WESTLAKE TO ANY NEARBY RESIDENTIAL
11 AREAS?

12 A Westlake will be approximately 1,200 feet from the nearest residential area. The
13 overall clearing for ancillary support equipment will be approximately 700 feet from
14 the nearest residential area.

15

16 Q48. WILL THE CONSTRUCTION AND OPERATION OF WESTLAKE CAUSE
17 SIGNIFICANT ENVIRONMENTAL IMPACTS ON ANY NEARBY
18 RESIDENTIAL AREAS?

19 A The only potential impact to nearby residential areas of any significance is the
20 possibility for incremental noise associated with Westlake's operations. ELL is
21 continuing to work on its studies and any potential mitigation strategies with respect to
22 any incremental increase in noise associated with Westlake. Moreover, as with WF6,

1 ELL has completed its air dispersion modeling reports and provided those reports to
2 the LDEQ, which show compliance with all ambient air quality standards.

3

4

VII. CONCLUSION

5 Q49. PLEASE SUMMARIZE YOUR TESTIMONY.

6 A. ELL has thoroughly investigated the impact of construction of the Proposed Generators
7 on community values as it relates to land use, natural resources, and environmental
8 integrity of the surrounding area. ELL will operate in accordance with all applicable
9 environmental regulatory permitting requirements imposed and administered by local,
10 state, and federal agencies during construction and commercial operation.

11

12 Q50. DOES THIS CONCLUDE YOUR TESTIMONY?

13 A. Yes, at this time.

AFFIDAVIT

STATE OF TEXAS

COUNTY OF MONTGOMERY

NOW BEFORE ME, the undersigned authority, personally came and appeared,
JEREMY HALLAND, 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.


JEREMY HALLAND

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 10th DAY OF FEBRUARY 2026



NOTARY PUBLIC

My commission expires: 05-14-2027

