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December 19, 2022

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LA Public Service Commission

Mr. Brandon Frey
 Louisiana Public Service Commission
 Galvez Building, 12th Floor
 602 North Fifth Street
 Baton Rouge, LA 70802

**Re: Re: *In Re:* Application of Entergy Louisiana, LLC for Approval of the
 Entergy Future Ready Resilience Plane (Phase I)
 (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 Entergy Future Ready Resilience Plan (Phase I), along with the Direct Testimony and Exhibits of Phillip R. May, Sean Meredith, Alyssa Maurice-Anderson, Charles W. Long, Jason D. De Stigter, Todd A. Shipman, and Jay A. Lewis. 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 our by-hand courier. The three additional confidential copies are for the Administrative Law Judge, Staff Attorney, and Research Attorney. 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.

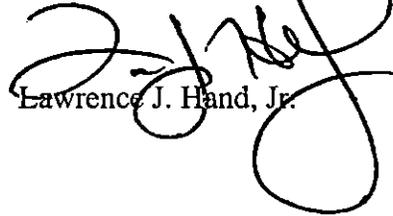
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Mr. Brandon Frey
December 19, 2022
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If you have any questions, please do not hesitate to call me. Thank you for your courtesy and assistance with this matter.

Respectfully submitted,



Lawrence J. Hand, Jr.

LJH/kl
Enclosures

cc: LPSC Commissioners (Public version only by email)
Phillip R. May
Mark D. Kleehammer

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

***IN RE: APPLICATION OF ENTERGY)
LOUISIANA, LLC FOR APPROVAL)
OF THE ENTERGY FUTURE READY) DOCKET NO. U- _____
RESILIENCE PLAN (PHASE I))***

**APPLICATION OF ENTERGY LOUISIANA, LLC FOR
APPROVAL OF THE ENTERGY FUTURE READY RESILIENCE PLAN (PHASE I)**

Pursuant to the Rules of Practice and Procedure of the Louisiana Public Service Commission (“LPSC” or the “Commission”), Entergy Louisiana, LLC (“ELL” or the “Company”) respectfully submits its Application for Approval of the Entergy Future Ready Resilience Plan (Phase I) (the “Application”).

In particular, with this Application, ELL requests that the Commission approve, and issue a public interest finding regarding, the Entergy Future Ready Resilience Plan (the “Resilience Plan”),¹ which is the Company’s proposed course of action to improve the resilience of its electric system through accelerated infrastructure hardening and vegetation management.² As further described herein, the relief sought by the Company in this Application, as supported by the accompanying witness testimony and exhibits thereto, is necessary and essential to foster a more resilient and reliable system that can better withstand extreme events, avoid or mitigate customer outages from such events, and facilitate faster restoration of service after such events.

¹ Company witness Jay Lewis discusses the specific Commission orders that may be relevant to the Commission’s consideration of the Company’s request in this proceeding.

² Alternatively, the Company requests that the Commission determine the level of resilience investment that the Commission believes serves the public interest.

I. OVERVIEW OF RELIEF SOUGHT BY THE APPLICATION

As discussed by Company witness Phillip R. May and others, ELL's Application addresses directly the significant risks faced by communities in the Gulf Coast region and the Company's plan to improve its electric system to help customers meet the challenges and opportunities of tomorrow. In particular, following Hurricane Ida, and in the light of the back-to-back years of historically severe weather affecting the areas served by the Company and the other Entergy Operating Companies ("EOCs"),³ including both major hurricanes and severe winter storms, the EOCs consulted their own internal subject matter experts and stakeholders, evaluated the practices of other utilities across the country, and undertook a holistic analysis of the opportunities available for creating a more resilient system. As that process evolved, the Company engaged an outside industry consultant, 1898 & Co., to assist with identifying potential hardening projects and estimating the costs and benefits of those projects. The result of those comprehensive and customer focused efforts – which have been aimed at understanding the risks faced and identifying cost-effective and achievable projects to build a more resilient electric system – is the Company's Resilience Plan. As discussed in the witness testimony supporting the Application, the Resilience Plan is reasonably expected to reduce the cost of restoring the electric grid after major storms as well as reduce the number and duration of outages associated with those events. The implementation of the Resilience Plan will thus result in a substantially improved risk profile for the ELL grid, and that improvement is vital to the communities served by the Company and, in turn, to the economy of Louisiana.

The Company is proposing to implement the Resilience Plan over the 10-year period from 2024 to 2033. In this docket, the Company seeks specific approval of Phase I of the

³ The five EOCs include Entergy Arkansas, LLC; ELL; Entergy Mississippi, LLC; Entergy New Orleans, LLC; and Entergy Texas, Inc.

Resilience Plan, which includes approximately \$5.0 billion in projects proposed to be implemented in the first five years (2024 to 2028) (“Phase I”).

The Company also is seeking approval in its Application of a new rider for ELL, the Resilience Plan Cost Recovery Rider (the “Resilience Plan Rider” or “Rider”), to permit timely recovery of the Resilience Plan’s revenue requirement as ELL completes the plan’s resilience improvements and customers begin receiving the benefits of those improvements. Undertaking the level and pace of spending in the proposed Resilience Plan and recovering the resulting costs via existing ratemaking mechanisms would place ELL’s financial condition at great risk and expose ELL to adverse action from the credit rating agencies and, in turn, its customers to higher costs. The proposed Rider would improve ELL’s cash flow and place ELL in a much better position to execute the Resilience Plan and maintain ELL’s financial condition for the benefit of customers.

Finally, the Company’s Application requests certain accounting and ratemaking treatments related to the Resilience Plan and approval of the Company’s proposed monitoring plan for the resilience investments.

II. THE COMPANY

ELL is a limited liability company duly authorized and qualified to do and doing business in the State of Louisiana, created and organized for the purposes, among others, of generating, transmitting, distributing, and selling electricity for power, lighting, heating, and other such uses; and ELL is engaged in the business thereof in fifty-eight (58) of the sixty-four (64) parishes of the State of Louisiana. ELL provides electric service to approximately 1.1 million customers.

A significant portion of ELL’s service area in Louisiana is comprised of communities that are regularly exposed to extreme weather and flooding, and, as such, ELL has been working to make its system more resilient since the significant storms that impacted Louisiana in the early

2000s. The experience with Hurricane Ida in 2021, as well as the challenges of the record setting 2020 Atlantic hurricane season, demonstrate the necessity of those improvements. In the intervening years, ELL, like the overall electric utility industry in the United States, has invested considerable capital to replace and upgrade aging infrastructure. In particular, ELL has modernized its power plants, adding both cleaner and more efficient energy sources in order to provide its customers with reliable, safe, and low-cost energy. ELL has also invested significantly in its transmission grid to expand for growth and to comply with federal reliability requirements. And, for its distribution system, ELL has implemented grid modernization and system-hardening improvements. In particular, grid modernization is being enabled by new technology and developed in response to increasing customer expectations for reliability enhancements that require a more modern, responsive, and resilient grid to minimize the frequency and duration of outages.

III. THE RESILIENCE PLAN

Although the Company has successfully invested in resilience for years, the increasing threat of extreme weather events and the transition to a more electrified economy have necessitated a review of the timeline on which the Company must continue to make those investments to position our communities to be ready for future weather events. Because major storm events are occurring more frequently and with more intensity, it is very likely that the Company will incur costs, one way or another, to improve the resilience of the electric system. That is, either it will incur these costs as part of a comprehensive, accelerated plan to improve resilience, or it will incur these and additional costs in the aftermath of a major storm or weather event (1) without achieving the same level of resilience and (2) in the face of obstacles and challenges that make it difficult to perform work as efficiently and with the level of management oversight and coordination that is possible if the work is performed during blue sky conditions.

Therefore, in line with input received from stakeholders and as the next step in the Company's ongoing efforts to provide customers with safe, reliable, affordable, and sustainable service, the Company has developed a proposed course of action specifically designed to improve overall electric system resilience through accelerated infrastructure hardening and vegetation management. The projects and the associated investment proposed in the Company's Resilience Plan represent investment that goes beyond what the Company had already planned in its capital budgets prior to Hurricane Ida. Furthermore, these investments do not fall into the same category as the Company's day-to-day reliability programs. Instead, these projects represent a careful, studied approach to enable the Company to accelerate investment, where appropriate, to address the frequency and intensity of storms that pose an increasing threat to the electric system.

Specifically, the Resilience Plan has four interconnected components:

- *First*, the Company proposes to complete approximately 9,600 identified distribution and transmission hardening projects, which will harden more than 269,000 structures over more than 11,000 line miles over the course of the 10-year period from 2024 to 2033 (the "Comprehensive Hardening Plan") at a cost of approximately \$9 billion (nominal).⁴ Phase I of the Resilience Plan includes the first five years of the Comprehensive Hardening Plan and is estimated at \$4.6 billion.

⁴ The specific projects contained in the Comprehensive Hardening Plan are attached to the testimony of Company witness Sean Meredith as Highly Sensitive Protected Materials ("HSPM") Exhibit SM-2. Although the Company's proposed plan sets forth the Company's best efforts to identify the scope and timing of the selected projects, the precise work performed (as well as the timing of when that work will be performed) will be subject to continual refinement as the Company implements its Resilience Plan.

- *Second*, the Company proposes to construct 44 dead-end structures for the Company's 500 kV transmission lines, which form the high voltage backbone of the transmission system. This will improve the resilience of these lines by helping prevent and/or limit cascading damage to transmission structures. The additional cost for these dead-end structure projects is included in Phase I of the Resilience Plan and is estimated to be \$88 million.
- *Third*, the Company is proposing a number of projects aimed specifically at increasing the resilience of the Company's telecommunications systems, which play an integral part in the Company's efforts to respond to and recover from disruptions caused by major weather events. The projects included in Phase I of the Resilience Plan are estimated to cost approximately \$100 million (approximately \$97.2 million in capital spending and \$2.8 million in incremental operation and maintenance costs).
- *Fourth*, the Company is proposing resilience-based enhancements to its current vegetation management programs to accelerate trim cycles and to implement additional program elements. These enhancements on the Company's distribution and transmission systems will cost approximately \$172 million in Phase I of the Resilience Plan.

In addition, while not presently a part of the Resilience Plan, the Company has identified a number of non-wire alternatives ("NWAs"), or microgrids, that are able to provide a local source of power that can swiftly restore power to a substation, to the feeders that are connected to a substation, or to certain critical loads in the Company's distribution system. Specifically, the Company has identified ten NWAs across the state for consideration, which NWAs are possible

alternatives to certain transmission hardening projects identified in the Comprehensive Hardening Plan. While these NWAs would not prevent damage during a weather event, they are expected to enable the electric system to restore electric service rapidly when damages and outages do occur.

IV. COST RECOVERY AND REQUESTED ACCOUNTING AND RATEMAKING TREATMENTS

Absent the sort of commitment to and substantial investment in resilience measures included in the Resilience Plan, the Gulf Coast will be insufficiently prepared to address the future risks posed by extreme weather events, which are becoming more frequent, severe, unpredictable, and costly, and are disproportionately impacting the Gulf Coast region. But the level of investment contemplated in the Resilience Plan is substantial, and undertaking the proposed Resilience Plan with cost recovery via the currently existing ELL ratemaking mechanisms would compromise ELL's credit metrics and cash flow and thus expose ELL to adverse action from the credit rating agencies and its customers to higher costs. Therefore, ELL is proposing that the revenue requirement associated with the Resilience Plan be recovered through a new contemporaneous recovery mechanism – the Resilience Plan Rider – the specifics of which are discussed by Company witness Alyssa Maurice-Anderson in her testimony. In short, the proposed Rider would accomplish contemporaneous recovery of Resilience Plan costs through a forward-looking rate that would also include a true-up after a prudence review.

In addition, the Company also intends to request a waiver from the Federal Energy Regulatory Commission (“FERC”) to allow ELL to capitalize conductor handling costs incurred through the Resilience Plan, which treatment would benefit customers by lowering the Resilience Plan's immediate bill effects. ELL requests that the Commission express support or non-opposition to the contemplated FERC waiver request.

The Company also requests authorization to create a regulatory asset for the remaining net book value associated with assets that must be retired and replaced as part of the Resilience Plan. ELL would include the regulatory asset in rate base and amortize such retired plant costs at a rate consistent with the associated depreciation expense currently reflected in rates. With this approved ratemaking treatment, customers would not see an incremental increase in rates associated with ELL's recovery of assets prudently retired in connection with the Resilience Plan.

V. CUSTOMER BENEFITS

The Company expects that the investment contemplated in the Resilience Plan will produce significant customer benefits by, among other things, (1) lowering future post-storm restoration costs and (2) decreasing the number of customers impacted and the duration of the overall outage after major weather events. Specifically, if implemented, the Company's Comprehensive Hardening Plan, which is a large component of the Resilience Plan, is reasonably projected to produce a reduction in storm restoration costs of approximately 50 percent over the next fifty years. Moreover, the projects identified in the Comprehensive Hardening Plan are reasonably projected to produce a decrease in the projected customer minutes interrupted after a major storm (*i.e.*, shortening the period during which customers are without electricity) by approximately 55 percent over the next fifty years. The Company's proposed vegetation management enhancements included in the Resilience Plan also complement the accelerated storm hardening of transmission and distribution assets by helping to decrease the number of times that the Company's storm-hardened assets will be tested by vegetation during and after a major storm. These enhancements therefore are likewise expected to increase overall system resilience and reduce the number and duration of outages following a major storm.

A third anticipated benefit of implementing the Company's Resilience Plan is that blue sky resilience work can be more carefully planned, executed, and overseen as compared to reactive, post-storm restoration work where the Company is working as quickly and safely as possible to restore power, often in highly unattractive conditions and with tens of thousands of contract workers laboring simultaneously across a vast area impacted by a major storm.

For all of these reasons, the extensive hardening and resilience work included in the Resilience Plan will benefit not only the Company, the Company's customers, and the communities that the Company serves, but also customers of other Louisiana utilities served by the Company's transmission system in terms of fewer and shorter transmission outages as a result of storms and other major weather events.

VI. PROJECT MANAGEMENT AND CONTRACTING APPROACH

Given the magnitude of the Resilience Plan and the Company's existing organizational framework for construction and project management, the Company plans to work with qualified contractors ("Alliance Partners") that will be retained in addition to the Company's management team. Specifically, the Company plans to use a competitive bidding process among the identified Alliance Partners to select contractors to perform various aspects of the work and, if needed, the Company will qualify additional partners to add capacity and execution capabilities.

The Alliance Partners will be heavily relied upon for project execution and support; however, these Alliance Partners will not be utilized exclusively to execute the Resilience Plan, as the Company also plans to leverage existing contract partners and strategies. Additionally, the Company will maintain appropriate project controls in the areas of project safety, cost, and schedule. The Company will also employ the necessary administrative and technical resources to ensure that project design, quality, and material deliverables are achieved in accordance with the Company's specifications.

The Company is using Alliance Partners because the Company has determined that this approach is the best method for controlling costs and to consistently and reliably execute the large portfolio of projects contained in the Resilience Plan. As discussed by Company witness Mr. Meredith, after considering a number of different contracting strategies, including an “EPC” model, baseload contractors, and strategic sourcing, the alliance model emerged as the preferred contracting strategy for the Resilience Plan. As the Company executes the Resilience Plan, the Company will continue to evaluate the best contracting structure with Alliance Partners to cost effectively execute the plan.

VII. MONITORING PLAN

To keep the Commission informed on the progress and costs of the Resilience Plan, the Company is proposing to file progress reports every six months beginning August 15, 2024. As discussed by Mr. Meredith in his testimony, the reports generally will provide information regarding the preceding two quarters and will address subjects such as project completion status, projects schedule, material business issues, and additional matters intended to keep the Commission informed on the progress of the Resilience Plan. For example, the report filed on August 15, 2024, will discuss projects completed and developments in the execution of the plan for the period of January 1, 2024, through June 30, 2024; and the report filed on February 15, 2025, will discuss projects completed and developments in the execution of the plan for the period of July 1, 2024, through December 31, 2024. Near the end of Phase I, the Company will evaluate the impact of its efforts and make a recommendation about completing the portfolio of resilience projects in Phase II of the Resilience Plan.⁵

⁵ Phase II of the Resilience Plan is projected to include approximately \$4.6 billion in infrastructure resilience and storm hardening projects.

VIII. SUMMARY OF WITNESSES SUPPORTING THE APPLICATION

Attached to this Application are the testimonies of seven witnesses of the Company:

- Phillip R. May – President and Chief Executive Officer of ELL. Mr. May provides an overview of the Company’s Application as well as the Resilience Plan, including why the Company has developed that plan. He also describes the Company’s historical investment in its generation, transmission, distribution systems; the Company’s current and future plans to continue to modernize and harden its infrastructure for the benefit of its customers; and the significant and emerging circumstances supporting the necessity for accelerating the pace of certain hardening investment as contemplated in the Resilience Plan. He also introduces the Company’s other witnesses in this proceeding.
- Sean Meredith – Vice President, System Resilience. Mr. Meredith presents ELL’s Resilience Plan and provides details regarding the proposed projects under that plan. He also summarizes the estimated costs and benefits of implementing the plan, provides support for the conclusion that the investments included in the Resilience Plan are in the public interest and should be made, and summarizes the Company’s proposed monitoring plan.
- Alyssa Maurice-Anderson – Director, Regulatory Filings and Policy, for ESL. Ms. Maurice-Anderson’s testimony supports the Company’s request in its Application in this proceeding seeking approval of the Resilience Plan Rider to permit more timely recovery of the Resilience Plan’s revenue requirement as ELL completes the plan’s resilience improvements and customers begin receiving the benefits of those improvements. Ms. Maurice-Anderson also explains that the need for the Resilience Plan is supported by ELL’s expectation that it will have limited securitization capacity to finance future storm-

related restoration costs in the near term and that financing future restoration costs would likely occur at a less favorable cost to customers. Her testimony also supports the requested ratemaking treatment related to transmission and distribution assets that must be retired and replaced with new assets pursuant to the Resilience Plan and discusses an accounting waiver that ELL intends to request at the FERC, which will mitigate the near term bill effect on customers.

- Charles W. Long – Vice President of Power Delivery Operations for ESL. Mr. Long discusses the Power Delivery Organization that is responsible for planning, operating, and maintaining ELL’s transmission and distribution systems, as well as the Capital Projects Organization that designs and constructs ELL’s transmission and distribution systems. These two organizations will work with ELL to execute the Comprehensive Hardening Plan and bring resilience benefits to ELL and its customers. He also discusses the ongoing process of the Company’s reliability work on its distribution and transmission systems and provides an overview of those systems and operations. He then discusses the Company’s proposed changes to vegetation management programs and spending. Finally, he discusses the need for the Comprehensive Hardening Plan and the benefits that a comprehensive resilience effort can provide.
- Jason D. De Stigter – Director, 1898 & Co. Mr. De Stigter summarizes the results and methodology used to develop the Comprehensive Hardening Plan, including a description of how the assessment was performed and why it was performed in that way. He also describes the major elements of the Storm Resilience Model, which include a Major Storms Event Database, Storm Impact Model, Resilience Benefit Module, and Investment Optimization & Project Prioritization. He also reviews historical major storm

events that have impacted ELL's service area, describes the datasets used in the Storm Impact Model and how they were used to model system impacts due to storms events, and explains how to understand the resilience benefit results. Finally, he describes the calculations and results of the Storm Resilience Model.

- Todd A. Shipman – Principal, Utility Credit Consultancy LLC. Mr. Shipman explains what credit ratings are, the importance of utility credit ratings to regulators, and the analytical framework used for determining utility credit ratings. He also provides information regarding the overall utility industry's financial outlook from a ratings perspective. He then summarizes ELL's current credit ratings and outlook, and, in that context, he opines on how Moody's Investor Service and S&P Global Ratings may react to ELL's proposed Resilience Plan and Resilience Plan Rider.
- Jay A. Lewis – Principal, ASD@Work, LLC. Mr. Lewis discusses a number of Commission orders that may be implicated by the Company's request regarding the Resilience Plan and provides context for how the Company's proposal may be considered. Additionally, he discusses the public interest standard that has been historically used at the LPSC and how that standard should be applied in the context of an accelerated resilience program like the Resilience Plan that has both traditional benefits and nontraditional benefits. He further discusses the periodic reporting required by the Business Combination order and the proposed monitoring plan for the resilience investments. He then summarizes the regulatory requests being made by ELL.

IX. SERVICE OF NOTICE AND PLEADINGS

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

Mark D. Kleehammer
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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.

X. REQUEST FOR CONFIDENTIAL TREATMENT

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 the 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.

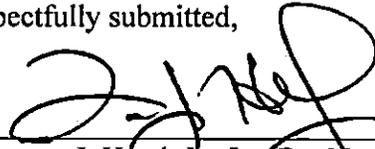
XI. PRAYER FOR RELIEF

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. Approve Phase I of the Resilience Plan as prudent and in the public interest subject to an ongoing obligation of ELL to prudently manage the Resilience Plan;
2. Deem the prudently incurred costs under the Resilience Plan to be eligible for cost recovery via the rate mechanisms proposed by the Company;
3. Approve the Resilience Plan Cost Recovery Rider to permit timely recovery of the Resilience Plan's revenue requirement and to provide for true-up reporting, prudence review and dispute resolution procedures;
4. Approve the creation of a regulatory asset for addressing recovery of (and on, if applicable) the remaining net book value of assets that are replaced through the Resilience Plan, at the level currently reflected in ELL's rates;
5. Approve the Company's proposed monitoring plan;
6. Acknowledge that ELL will be requesting Federal Energy Regulatory Commission approval to capitalize certain conductor handling expenses that would otherwise be treated as expenses, and express support or non-opposition to the contemplated FERC waiver request;
7. Publish notice of this proceeding in the Commission's Official Bulletin and establish a twenty-five (25)-day period for interventions in this proceeding;
8. Provide for appropriate protection for any confidential information to be produced in this proceeding;

9. Direct that notice of all matters in these proceedings be sent to Mark D. Kleehammer, Lawrence J. Hand, Jr., and Brett P. Fenašci as representatives of Entergy Louisiana, LLC; and
10. Grant all other relief that the law and the nature of the case may permit or require.

Respectfully submitted,



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**ATTORNEYS FOR
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