



**ALLIANCE FOR
AFFORDABLE
ENERGY**

August 10, 2026

Via Hand-Delivery

Krys Abel
Records and Recording Division
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 N. 5th St.
Baton Rouge, LA 70802

In re: Louisiana Public Service Commission, ex parte. Rulemaking to Revise the
Commission's Rules of Practice and Procedure (**Docket No. R-36241**).

Dear Krys,

Enclosed are the Second Comments in Response to Staff's Notice of Proposed Rules for Part 2 on behalf of the Alliance for Affordable Energy in the matter referenced above. Please file this motion in the record in accordance with the Commission's hand-delivery filing procedures. Three (3) copies will be submitted. Thank you for your attention to this matter.

Respectfully submitted,

Alaina DiLaura

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Alliance for Affordable Energy

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**IN RE: RULEMAKING TO REVISE)
THE COMMISSION’S RULES OF)
PRACTICE AND PROCEDURE)**

DOCKET NO. R-36241

**THE ALLIANCE FOR AFFORDABLE ENERGY’S COMMENTS AND PROPOSED
REVISIONS TO STAFF’S REDLINE PROPOSAL**

On May 22, 2026 Staff for the Louisiana Public Service Commission (“LPSC”) filed a Notice of Proposed Rules for Part 2 – “Parties” of the Commission’s Rules of Practice and Procedure (“Notice”). On June 22, 2026 The Alliance for Affordable Energy filed comments in response to these proposed changes. On July 27, 2026, Staff issued a redline to their initial proposed rule, and requested comments in advance of an expected Commission action in September 2026. Alliance for Affordable Energy (“AAE”) submits the following comments in response to Staff’s proposed changes to the Commission’s Rules.

Among the values that serve our mission to make home energy both affordable and environmentally responsible, good governance and equitable processes are top priorities. The Alliance agrees with the Commission that transparency with the public is a worthy and critical goal, and has no general objection to strengthening the Louisiana Public Service Commission’s disclosure requirements. To be clear, however, the Alliance is firmly opposed to the information gleaned from disclosures being wielded against organizations who have legitimate interests in the state. Whether founded in Louisiana, as the Alliance was 40 years ago, or incorporated in another state, the right to meaningful participation and representation in Commission proceedings must not be threatened or undermined. As there is nothing in these draft rules that

indicate that the information disclosed will cause prejudice, or disallowance of standing and intervention if parties comply, the Alliance understands that if the Commission approves this language, the impact to intervenors is administrative.

Alliance for Affordable Energy supports Staff's redline proposal, and recommends one only change. In particular, the Alliance appreciates Staff's solutions to make compliance more clearcut, and the removal of an affidavit. While the additional steps associated with the new rule do add administrative barriers, including for individuals who may want to represent themselves, *pro se*, the cost of an affidavit must not limit public participation.

Staff's redline states, "For any Intervenor that is a publicly traded company, submission of a disclosure statement identifying any parent corporation and shareholder owning 10% or more of its outstanding stock is deemed sufficient." The Alliance proposes that number be adjusted to 5%. A 5% ownership stake in a public utility still represents meaningful ownership and warrants disclosure.

The Alliance appreciates the opportunity to respond to the proposed revisions to Part 2 of the Commission's Rules of Practice and Procedure, and thinks the revisions advance the Commission's goal of increasing transparency without imposing unreasonable risk to legitimate and full participation in Commission proceedings.

Certificate of Service

I hereby certify that I have, this 10th day of August 2026, served the required number of copies of the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

Alaina DiLaura

Alaina DiLaura
Alliance for Affordable Energy