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LA PUBLIC SERVICE COMM  
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July 9, 2025

**VIA HAND DELIVERY**

Ms. Kris Abel  
Records Supervisor  
Records Division  
Information Technology Department  
Louisiana Public Service Commission  
602 North Fifth Street  
Galvez Building, 12<sup>th</sup> Floor  
Baton Rouge, Louisiana 70802-5312

***Re: Docket No. U-37394, South Louisiana Electric Cooperative Association,  
ex parte. In re: Petition for approval of abandonment of electric facilities  
located in Terrebonne and Lafourche Parishes pursuant to Commission  
General Order dated July 9, 2008 (R-30301).***

Dear Ms. Abel:

Enclosed for filing in the above-referenced matter are the Rebuttal Testimonies of Jason Guy, Thomas Boudreaux, Timothy J. Allen, Scotti Henry, and Steven Portero on behalf of South Louisiana Electric Cooperative Association. Please file the enclosed original into the record of the above-referenced docket, and provide one of the enclosed copies to the Administrative Hearings Division and one to the Legal Division. If you have any questions regarding this filing or need any additional information, please feel free to contact me at the telephone number listed above.

Sincerely,

H. Barlow Holley

Hand

**BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION**

**SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION, EX PARTE**

**DOCKET NO. U-37394**

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*In re: Petition for approval of abandonment of electric facilities located in Terrebonne and Lafourche Parishes pursuant to Commission General Order dated July 9, 2008 (R-30301).*

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**REBUTTAL TESTIMONY**

**of**

**Mr. Jason Guy**

**on behalf of**

**SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION**

**July 2025**

1   **INTRODUCTION**

2   Q.    PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.

3   A.    My name is Jason Guy. My business address is 1501 Religious Street, New Orleans,  
4       Louisiana 70130. I am currently a Program Manager for Royal Engineering, which is  
5       providing consulting services to South Louisiana Electric Cooperative Association  
6       ("SLECA" or "Cooperative") related to the Lake Lines Electrical Utility Permanent Repair  
7       Project with the Federal Emergency Management Agency ("FEMA").

8   Q.    ON WHOSE BEHALF ARE YOU FILING THIS REBUTTAL TESTIMONY?

9   A.    I am filing this Rebuttal Testimony on behalf of the Cooperative.

10  Q.    HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN THIS PROCEEDING?

11  A.    Yes, I submitted Direct Testimony in support of SLECA's Petition for Approval of  
12       Abandonment filed on September 25, 2024 ("Petition"). In my Direct Testimony, I focused  
13       on my role in assisting SLECA with the submission of documentation to and coordination  
14       with FEMA for reimbursement of storm recovery costs, including detailed assessments of  
15       the damage to the Lakes Lines' electric infrastructure and the estimated costs associated  
16       with rebuilding the Lake Lines, and my role in planning potential environmental  
17       permitting, environmental mitigation, and procurement of additional utility servitudes. My  
18       Direct Testimony also contains my professional background and qualifications, which I  
19       adopt and incorporate herein by reference. Terms defined in my Direct Testimony have the  
20       same meaning in this Rebuttal Testimony. Additionally, I adopt my pre-filed Direct  
21       Testimony in full as if it were copied herein.

22  Q.    WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

1 A. The purpose of my rebuttal testimony is to respond to direct and cross-answering testimony  
2 from intervenors and the Louisiana Public Service Commission (“Commission”) Staff  
3 (“Staff”). In responding, I will primarily address the increasing estimated cost to rebuild  
4 the Lakes Lines and the inefficiency and inequity of a segmented cost analysis.

5  
6 **GROWING COST OF REBUILDING THE LAKES LINES**

7 Q. SINCE YOU FILED DIRECT TESTIMONY IN THIS MATTER, HAS THE  
8 ESTIMATED COST TO RECONSTRUCT THE LAKE LINES CHANGED?

9 A. Yes, the total cost estimate and, therefore, SLECA’s estimated 10% cost share obligation  
10 continue to increase. As mentioned in my Direct Testimony, the Lake Lines rebuild was  
11 designated as an at-cost project, and, due to various factors affecting costs, the high-end  
12 estimate of SLECA’s cost share obligation currently stands at \$38 million to rebuild the  
13 Lake Lines. (*See* SLECA Exhibit No. 3-1.2 attached to SLECA’s Responses to Staff’s  
14 Third Set of Data Requests, attached hereto as Exhibit “A” *in globo*.) Using these estimates,  
15 Lake Lines customers would pay approximately \$1,580 per meter per month for seven  
16 years just to pay for the rate base component of costs to rebuild this infrastructure.

17 Q. COULD THIS COST ESTIMATE INCREASE EVEN FURTHER?

18 A. Yes, due to the same factors, estimated costs could increase even more as time goes on.  
19

20 **INEFFICIENCY AND INEQUITY OF A SEGMENTED COST ANALYSIS AND**  
21 **PIECEMEAL RECONSTRUCTION**

22 Q. IN THE TESTIMONY OF THOMAS BROADY IN SUPPORT OF THE STAFF  
23 RECOMMENDATION, MR. BROADY STATED THAT HIS “RECOMMENDATION

1 WOULD BE THAT THE COMMISSION NOT GRANT THE ABANDONMENT UNTIL  
2 SLECA HAS PERFORMED A FULL FINANCIAL ANALYSIS ON THE COSTS  
3 ASSOCIATED WITH REPLACING INDIVIDUAL GROUPINGS OF ASSETS IN THE  
4 LAKE DE CADE, GRAND PASS, LAKE FIELDS, AND FOUR POINT AREAS.”  
5 SINCE STAFF FILED ITS REPORT AND RECOMMENDATION, DID SLECA  
6 PERFORM SUCH A SEGMENTED ANALYSIS?

7 A. Yes, SLECA performed an estimated segmented analysis and provided the same to Staff  
8 on two occasions, including as an attachment to Exhibit “A” *in globo*.

9 Q. BASED ON YOUR FINDINGS FROM THAT SEGMENTED ANALYSIS, HOW DO  
10 YOU RESPOND TO INTERVENOR TESTIMONY THAT “AREAS WERE NEVER  
11 CONSIDERED SEPARATELY, BUT AS A WHOLE RESTORATION PROJECT FOR  
12 ALL AREAS AFFECTED” AND THAT PARTICULAR LINES WERE “NEVER  
13 CONSIDERED FOR ISOLATED RESTORATION...[THAT WOULD HAVE BEEN]  
14 MUCH EASIER TO RESTORE”? (Direct Testimony of Sara Boudreaux, pdf page 5.)

15 A. I reject a segmented cost analysis and proposals for piecemeal reconstruction of the Lake  
16 Lines, because they run contrary to the fact that the Lake Lines terrain is relatively similar  
17 and would likely result in even higher per-meter costs. First, the Lake Lines have  
18 historically been treated as a single, integrated project, including in connection with FEMA  
19 funding applications and prior cost recovery efforts, because they share a similar geography  
20 marked by remote marshland and bayous, which present logistical challenges. Second,  
21 attempting to segment the project would introduce additional financial and regulatory risk,  
22 as higher-cost segments could drive inequitable rate disparities and further destabilize cost  
23 recovery, and any benefit from economies of scale and production costs would be lost.

1 Segregating the Lake Lines into four separate projects not only ignores the facts on the  
2 ground, but also results in higher costs.

3  
4 **LACK OF FUNDING ALTERNATIVES**

5 Q. HAS SLECA CONTINUED ENGAGING WITH FEMA TO OBTAIN FUNDING FOR  
6 THE LAKE LINES PROJECT?

7 A. Yes, the Cooperative is still in discussions with FEMA over SLECA's application for  
8 funding for rebuilding the Lake Lines, but no funding has been secured to date, and  
9 FEMA's Environmental and Historic Preservation review remains incomplete.

10 Q. DO OTHER VIABLE FUNDING OPTIONS EXIST TO PAY FOR REBUILDING THE  
11 LAKE LINES?

12 A. No, none of which I am aware. SLECA has looked exhaustively at trying to find funding  
13 for reconstructing the Lake Lines. SLECA's efforts included meeting with the Louisiana  
14 Office of Community Development ("LOCD") to secure Community Development Block  
15 Grant Funding for the cost share participation; however, due to the number of storms and  
16 total cost to the state, no permanent work project cost shares for 2020 and 2021 storms  
17 were granted cost share participation by LOCD.

18  
19 **SUPPLEMENTAL EVIDENCE FROM SLECA'S DISCOVERY RESPONSES**

20 Q. HAVE SLECA'S RESPONSES TO STAFF'S THIRD SET OF DATA REQUESTS  
21 CLARIFIED VARIOUS ISSUES RAISED IN TESTIMONY IN THIS PROCEEDING?

22 A. Yes, they have. For the sake of brevity, I have attached those responses to this Rebuttal  
23 Testimony as Exhibit "A" *in globo*, and I endorse the same as true and complete.

1   **CONCLUSION**

2   Q.    BASED ON YOUR COST ANALYSES AND FAMILIARITY WITH SLECA'S  
3        UNSUCCESSFUL ATTEMPTS TO OBTAIN FUNDING FOR THE LAKE LINES  
4        PROJECT, DO YOU SUPPORT SLECA'S PETITION?

5   A.    Yes, I do.

6

7   Q.    DOES THIS CONCLUDE YOUR TESTIMONY?

8   A.    Yes, it does.

**BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION**

**SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION, EX PARTE**

**DOCKET NO. U-37394**

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*In re: Petition for approval of abandonment of electric facilities located in Terrebonne and Lafourche Parishes pursuant to Commission General Order dated July 9, 2008 (R-30301).*

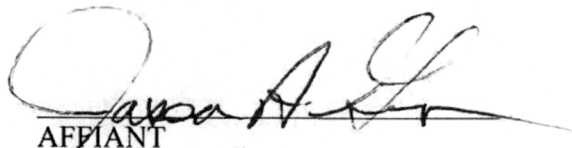
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**AFFIDAVIT**

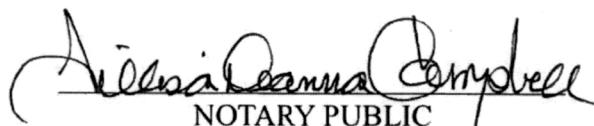
Alabama  
STATE OF ~~LOUISIANA~~  
PARISH OF Baldwin

BEFORE ME, the undersigned notary public, duly qualified and commissioned in and for the State and Parish aforesaid, personally came and appeared Jason Guy ("Affiant"), a consultant for SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION, who, after being duly sworn, did depose and say that Affiant has reviewed the foregoing Rebuttal Testimony and that the said testimony is true and accurate to the best of Affiant's knowledge, information, and belief.

FURTHER AFFIANT SAYETH NAUGHT.

  
AFFIANT

SWORN TO AND SUBSCRIBED before me this 7th day of July, 2025.

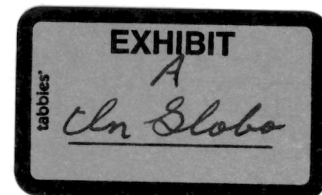
  
NOTARY PUBLIC

Printed Name: Tisha Deanna Campbell

Bar Roll/Notary No.: W/A  
My Commission Expires 03/24/2029

My commission expires: \_\_\_\_\_





BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION

SOUTH LOUISIANA ELECTRIC  
COOPERATIVE ASSOCIATION,  
EX PARTE

DOCKET NO. U-37394

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*In re: Petition for approval of abandonment of electric facilities located in Terrebonne and Lafourche Parishes pursuant to Commission General Order dated July 9, 2008 (R-30301).*

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**SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION'S  
RESPONSES TO STAFF'S THIRD SET OF DATA REQUESTS**

South Louisiana Electric Cooperative Association ("SLECA" or "Cooperative") hereby answers the Third Set of Data Requests propounded by the Louisiana Public Service Commission Staff ("Staff") with the following Objections and Responses.

**GENERAL OBJECTIONS**

The Cooperative objects to Staff's data requests to the extent that the data requests seek information beyond that which is permitted by the Rules of Practices and Procedures of the Louisiana Public Service Commission ("Commission") and/or the Louisiana Code of Civil Procedure. The Cooperative further objects to the extent that any data request seeks information that is confidential or protected by the attorney-client privilege, the work product privilege, the attorney work product privilege, or any other privilege recognized by applicable law. Furthermore, the Cooperative objects to all data requests that are vague, overly broad, unclear, and/or not limited in time. The Cooperative reserves the right to amend and supplement its responses.

**NOTES AND COMMENTS**

Please note that the data request responses and/or exhibits labeled "**CONFIDENTIAL**" are of a confidential and/or proprietary nature. Therefore, the Cooperative submits these responses confidentially and under seal in accordance with Rule 12.1 of the Commission's Rules of Practices and Procedures. The narrative portions highlighted indicate confidential information. If there are any questions regarding confidentiality, please contact undersigned counsel.

These responses are being supplied electronically. No hard copies will be served.

**INTRODUCTORY STATEMENT**

SLECA respectfully submits the following responses to Staff Third Set of Data Requests concerning the proposed reconstruction of the Lake Lines. SLECA maintains that the proposed reconstruction is contrary to the public interest and inconsistent with the Cooperative's statutory and regulatory obligations to provide safe, reliable, and affordable electric service in a fair and non-discriminatory manner to its members.

The current, estimated \$38 million cost to SLECA (high end cost estimation, see attached SLECA Exhibit No. 3-1.2) of rebuilding the Lake Lines, solely to serve approximately 282 recreational camp meters, would impose an inequitable and unsustainable financial burden on the Cooperative's approximately 21,000 members. Such an outcome would directly violate core regulatory principles of cost causation, rate equity, and financial prudence. The Board of Directors, duly elected to represent the interests of the entire membership, has determined that shifting this disproportionate cost onto the membership would undermine long-term rate stability and the financial integrity of the Cooperative.

As set forth in the responses below (in addition to SLECA's other filings in this docket, along with SLECA's responses to other numerous data requests), SLECA has thoroughly examined available funding options, historical precedents, potential FEMA reimbursement potential, and member cost participation and has found that reconstruction presents unacceptable financial and operational risks. Considering these factors and consistent with the Cooperative's duties and obligations to serve the broader member interest, SLECA respectfully submits that the decision not to reconstruct the Lake Lines is the most prudent, equitable, and legally sound course of action.

### **RESPONSES TO STAFF'S THIRD SET OF DATA REQUESTS**

Staff 3-1. Has SLECA performed any analysis that segregates the costs associated with the rebuild of each of the four areas included in the Lake Lines? If so, please provide that information and any calculations utilized in the analysis.

#### **SLECA RESPONSE TO DATA REQUEST STAFF 3-1:**

There is no legal requirement or precedent to segment utility assets for funding or cost analysis purposes in abandonment proceedings. Historically, the Lake Lines have always been treated as a single, integrated project, including in connection with FEMA funding applications and prior cost recovery efforts. Moreover, the Lake Lines are similar in nature and geography.

Nevertheless, in the spirit of cooperation, SLECA has put together what it believes to be an estimated segmented analysis. Please note that all figures are approximations as no formal segmented project cost has been submitted to FEMA. Additionally, as noted throughout the filings in this proceeding, the cost of the reconstruction of the Lake Lines continues to increase.

Historical data following Hurricane Andrew indicates that approximately 200 Lake Line meters paid \$29.50/month for seven years, totaling \$495,600 for reconstruction (See SLECA Exhibit No. 3-1.1, an article believed to be published by *The Courier Bayou State* on January 3, 1993). Current estimates (high end estimate) indicate that the full cost of rebuilding the Lake Lines would equate to approximately \$1,580/month per meter over seven (7) years (See SLECA Exhibit No. 3-1.2).

Attempting to segment the project would introduce additional financial and regulatory risk, as higher-cost segments could drive inequitable rate disparities and further destabilize cost recovery. Further, any benefit from economies of scale and production costs would be lost. The Board of Directors, elected to represent SLECA's 21,000 members, has determined that reconstructing the Lake Lines remains financially untenable and contrary to the public interest.

Staff 3-2. Has SLECA performed any cost of service analysis or conducted a review of options to modify existing tariffs to determine what rate options exist, or could exist, to limit a subsidization of the entire cost of the Lake Lines rebuild across SLECA's full membership? If so, please provide a narrative detailing those efforts.

**SLECA RESPONSE TO DATA REQUEST STAFF 3-2:**

SLECA has considered potential rate design options, including modified tariffs to allocate reconstruction costs more equitably to the members of the Lake Lines. However, the estimated \$38 million (high end cost) rebuild cost to SLECA, affecting roughly 282 meters, presents significant challenges that no tariff structure can adequately mitigate without causing undue financial hardship or inequity.

For example, a dedicated Lake Lines-only tariff could be implemented to isolate costs to affected members only. Preliminary modeling shows this would require approximately \$1,580 per Lake Lines meter per month over seven years (high end costs utilized), excluding financing/interest costs, future operation and maintenance expenses, and potential cost escalations. Such rates are prohibitively high and not sustainable for the members served. Additionally, the financial risk of member attrition would cause these rates to escalate further for remaining customers, undermining stability.

Alternatively, spreading costs across the entire membership to reduce individual charges would require substantial cross-subsidization, contradicting cost causation principles and creating inequitable burdens on members who do not benefit from the Lake Lines. The Cooperative's Board of Directors, elected to protect the interests of all members, has determined that imposing either model would be financially unsound and contrary to the public interest.

Given current estimates and membership considerations, reconstruction under any available rate design scenario is not a viable option.

Staff 3-3. As part of SLECA's restoration and rebuild after Hurricane Ida, has SLECA performed or is it working to perform any repairs to facilities that are substantially similar to the facilities that make up the Lake Lines? If so please provide a narrative with supporting

documents if available, and further indicate if any of these repairs were approved for funding by FEMA's CRC.

**SLECA RESPONSE TO DATA REQUEST STAFF 3-3:**

No. As stated in SLECA Response to Staff 1-11 (incorporated herein by reference), emergency system-wide repairs, including at Persimmon Pass, totaled approximately \$91 million over 1,550 miles of distribution line, with partial FEMA reimbursement. The Lake Lines, however, are fundamentally different in both scale and cost. Their unique scope makes them ineligible for comparable treatment, and rebuilding them would pose an unacceptable financial risk to SLECA's members. The Board, elected by the membership, determined such a project is not in the public interest.

Staff 3-4. Has SLECA continued its efforts to obtain funding from FEMA to assist in the rebuild of the Lake Lines during the pendency of this abandonment docket? If so please provide a narrative outlining what efforts SLECA has made.

**SLECA RESPONSE TO DATA REQUEST STAFF 3-4:**

Yes. SLECA continues pursuing FEMA funding, with \$11.5 million in validated removal and reconstruction-related costs (including but not limited to engineering fees, and other costs, such as costs for surveying, geotechnical analysis, inspection services, project management, and grants management activities). That said, FEMA's Environmental and Historic Preservation review remains unresolved and incomplete, with no funding secured. SLECA is currently providing FEMA the required Environmental Analysis and Cultural Resource survey. Given this uncertainty and the overall financial risk, which has been very much detailed throughout SLECA's filings in this matter, the member-elected Board concluded that proceeding with reconstruction is not in the public interest, not in the best interest of SLECA, and not in the best interest of SLECA's entire membership.

Staff 3-5. Has SLECA polled or in any way sought feedback from the members affected by this Application to determine a willingness or ability to contribute to the restoration costs of the Lake Lines?

**SLECA RESPONSE TO DATA REQUEST STAFF 3-5:**

No. At an estimated \$38 million for SLECA's portion of the rebuild effort (high end cost estimation), or \$1,580/month per Lake Lines meter for seven years, the cost is prohibitively high. The Board determined it is unreasonable to expect affected members to shoulder this burden, and defaults would risk shifting costs onto the broader

membership. The decision not to reconstruct the Lake Line protects cooperative-wide financial stability and equity.

Staff 3-6. Has SLECA polled or in any way sought feedback from the entire membership to determine its willingness or ability to contribute to the restoration costs of the Lake Lines?

**SLECA RESPONSE TO DATA REQUEST STAFF 3-6:**

No. As addressed in SLECA Response to Data Request Staff 3-5 and in the Direct Testimony of Matthew Peters (page 14, lines 15–25), the \$38 million cost would impose an unsustainable burden on SLECA’s entire membership. The Board, accountable to SLECA’s approximate 21,000 members, voted not to reconstruct the Lake Line to preserve rate stability and uphold financial fairness in the public interest. That decision is in the best interests of the Cooperative and the Cooperative’s entire membership.

For the reasons detailed herein, and in accordance with its statutory and regulatory obligations, SLECA firmly maintains that the decision not to reconstruct the Lake Line is in the best interest of the Cooperative’s members and the public at large. Proceeding with reconstruction would impose disproportionate and unsustainable financial burdens, jeopardizing rate stability, financial integrity, and equitable service across the membership. The Board of Directors, acting in its fiduciary capacity and consistent with the public interest standard, has therefore correctly determined that not reconstructing the Lake Line represents the most prudent and responsible course of action.

Respectfully submitted,

**MARIONNEAUX KANTROW, LLC**



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Kyle C. Marionneaux (Bar Roll No. 25785)  
Kara B. Kantrow (Bar Roll No. 31042)  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 11<sup>th</sup> day of June, 2025, served copies of the public version of the foregoing responses upon all other parties to this proceeding by electronic mail and a copy of the confidential version upon Commission Staff by electronic mail.



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KARA B. KANTROW

# BAYOU

## state

\* Sunday, Jan. 3, 1993

CALENDAR 2B, EDITORIAL 6B

## SLECA looking for someone to bill for repairs

By TED GRIGGS  
The Courier

The 250 camp owners on Lake De Cade and Grand Pass will probably have to pay the \$472,000 it will cost SLECA to replace the power lines and poles knocked out by Hurricane Andrew, state and cooperative officials have said.

The payments would be spread out over seven years and work out to about \$35 more per month than the camp owners are now paying, said Lawrence "Tubby" St. Blanc, an aide to state Public Service Commissioner Kathleen Blanco.

"The question is whether the camp owners are willing to pay or whether all the (South Louisiana Electric Cooperative Association) members want to subsidize the cost," St. Blanc said.

Most members probably won't, St. Blanc said.

Camp owners are being given the chance to decide whether they want to pay, St. Blanc said. The Public Service Commission made SLECA send ballots to the camp owners, asking them if they are willing to pay the higher bills.

The camp owners have until Jan. 15 to return their ballots to SLECA. If most camp owners favor the proposal, SLECA will seek Public Service Commission approval.

SLECA invited all of the camp owners to a Board of Directors' meeting Dec. 21, Manager Mike Guidry said. About 70 of the 82 or so camp owners who voted at the meeting said they were willing to pay the additional charges.

About 12 voted against the proposal, Guidry said. The results of the ballots mailed to the other camp owners have not yet been tallied.

Some camp owners have said they feel they were not really given a choice in the matter. They say the cooperative presented the choice as either having electricity or going without; given those two choices, most people chose electricity.

The cost to install poles and lines is much higher in the remote areas on Lake De Cade and Grand Pass where power lines to camps were knocked out by Hurricane Andrew.

Those camp owners say the cooperative had other choices, such as spreading the payments over a longer period of time or having all the members pay a little more money per month.

Guidry said Lake De Cade-Grand Pass, in southwestern Terrebonne Parish, is primarily a recreational area. SLECA's board and management felt

it would be unfair to the rest of the cooperative's members to make them pay for something that would benefit a small group of people, almost none of whom are permanent residents.

A survey of the camp owners showed about 80 percent or 200 plan to rebuild, Guidry said. The estimated increases are based on 200 customers, so the final costs could be lower.

Camp owners' current minimum charge for electricity is \$19 per month, Guidry said. SLECA has been losing money on the camps for years and plans to increase the minimum charge to about \$24.50. By doing so, the cooperative can break even.

The remaining \$29.50 of the increase will help pay SLECA's portion of the repair costs.

SLECA has taken bids on the repair project, Guidry said. The co-op received two bids, the lowest of which was \$1.89 million.

The Federal Emergency Management Agency is paying for 75 percent of the repairs, Guidry said. SLECA has to come up with the remaining 25 percent.

The cost to install poles and lines is much higher in the remote areas, which can't be reached by land, Guidry said. The poles have to be flown in by helicopter and special equipment must be used to install the lines.

St. Blanc said SLECA's board has the authority to make the decision, but the Public Service Commission made the co-op poll the camp owners.

If the camp owners vote against the proposal, the issue might go before the whole membership, St. Blanc said. The problem with that would be the amount of time necessary to get the full membership to vote.

SLECA has until Feb. 1 to award the contract, Guidry said. If SLECA has to take more bids for the work, the price will probably increase.

Approximate Segmented Cost Analysis  
Lake Line Cost Share Represents 10% of Estimated Project Cost plus \$23M for ENV Fees  
Representing the High End (HE) of the estimated Env Fees

SLECA Project #666650									
Cost Analysis by "Group"									
Information									
Ref No.	Grouping	Total Project Cost		# of Meters	Cost Share		Total Project Cost		SLECA Responsible Cost Share
		Total Cost	Unit Cost		Quantity	Units	Unit Cost	Total Cost	
1	Lake Decade	\$97,617,746.00	\$23,952,254.72		157	Meters	\$621,769.08	\$97,617,746.00	\$152,562.13
2	Grand Pass	\$34,094,566.00	\$8,365,709.75		38	Meters	\$897,225.42	\$34,094,566.00	\$220,150.26
3	Lake Fields	\$23,039,531.00	\$5,653,159.78		77	Meters	\$299,214.69	\$23,039,531.00	\$73,417.66
4	Four Point Island	\$3,467,480.00	\$850,808.05		10	Meters	\$346,748.00	\$3,467,480.00	\$85,080.81
Total Value		\$158,219,323.00	\$38,821,932.30					\$158,219,323.00	\$38,821,932.30

Cost per Lake Line Member by Group (of Cost Share)			
Lake Decade	\$152,562.13	Member Reimbursement over 7 year period (Cost Share per Camp Meter per Month	
Grand Pass	\$220,150.26		
Lake Fields	\$73,417.66		
Four Point Island	\$85,080.81		
Average Cost per Meter per Month over 7 year period		\$1,580.98	

Cost per SLECA Member if Subsidized by Group (of Cost Share)	
Lake Decade	\$ 1,140.58
Grand Pass	\$ 398.37
Lake Fields	\$ 269.20
Four Point Island	\$ 40.51

Summary Total Cost for All Camp Meters	
SLECA Cost	\$38,821,932.30
Camp Lump Sum per Meter (282 Meters)	\$137,666.43
84 Month Payment Value per Month	\$1,638.89
Cost for All SLECA Members (21,000)- Lump Sum	\$1,848.66
84 Month Payment Value per Month for All Members	\$22.01

Approximate Segmented Cost Analysis  
Lake Line Cost Share Represents 10% of Estimated Project Cost plus \$11.5M for ENV Fees  
Representing the Low End (LE) of the estimated Env Fees

SLECA Project #666650									
Cost Analysis by "Group"									
Information									
Ref No.	Grouping	Total Project Cost		Cost Share		# of Meters		Total Project Cost	
		Total Cost		Total Cost		Quantity	Units	Unit Cost	Total Cost
1	Lake Decade	\$97,617,746.00		\$16,857,014.66		157	Meters	\$621,769.08	\$97,617,746.00
2	Grand Pass	\$34,094,566.00		\$5,887,583.17		38	Meters	\$897,225.42	\$34,094,566.00
3	Lake Fields	\$23,039,531.00		\$3,979,556.44		77	Meters	\$299,214.69	\$23,039,531.00
4	Four Point Island	\$3,467,480.00		\$598,778.03		10	Meters	\$346,748.00	\$3,467,480.00
Total Value		\$158,219,323.00		\$27,321,932.30				\$158,219,323.00	\$27,321,932.30

Cost per Lake Line Member by Group (of Cost Share)

Line Segment	Total Cost per Meter
Lake Decade	\$107,369.52
Grand Pass	\$154,936.40
Lake Fields	\$51,669.56
Four Point Island	\$59,877.80

Member Reimbursement over 7 year period (Cost Share per Camp Meter per Month (84 Months)

Lake Decade	\$1,278.21
Grand Pass	\$1,844.48
Lake Fields	\$615.11
Four Point Island	\$712.83

Cost per SLECA Member if Subsidized by Group (of Cost Share 121,000 Meters

Lake Decade	\$ 802.71
Grand Pass	\$ 280.36
Lake Fields	\$ 189.46
Four Point Island	\$ 28.51

Summary Total Cost for All Camp Meters

SLECA Cost	\$27,321,932.30
Camp Lump Sum per Meter (282 Meters)	\$96,886.28
84 Month Payment Value per Month	\$1,153.41
Cost for All SLECA Members (21,000)- Lump Sum	\$1,301.04
84 Month Payment Value per Month for All Members	\$15.49

**BEFORE THE**  
**LOUISIANA PUBLIC SERVICE COMMISSION**  
**SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION, EX PARTE**  
**DOCKET NO. U-37394**

---

*In re: Petition for approval of abandonment of electric facilities located in Terrebonne and Lafourche Parishes pursuant to Commission General Order dated July 9, 2008 (R-30301).*

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**REBUTTAL TESTIMONY**  
**OF**  
**THOMAS BOUDREAUX**  
**ON BEHALF OF**  
**SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION**

**JULY 2025**

## **TABLE OF CONTENTS**

- I. INTRODUCTION AND SUMMARY OF DIRECT TESTIMONY**
- II. POSITION ON SLECA’S PETITION AND REBUTTAL**
- III. CONCLUSION**

**I. INTRODUCTION AND BACKGROUND**

Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. My name is Thomas Boudreaux. I reside at 1606 Bull Run Road, Schriever, Louisiana 70395. In addition to this being my residential address, it is the mailing address of my businesses, Norris & Boudreaux Contractors, LLC and Thomas Boudreaux Farms, LLC.

Q. ON WHOSE BEHALF ARE YOU FILING THIS REBUTTAL TESTIMONY?

A. I am submitting this rebuttal testimony, as I did with my direct testimony, on my own behalf, as a member of SLECA and as a business owner, in support of SLECA's Petition in this proceeding.

**II. POSITION ON SLECA'S PETITION AND REBUTTAL**

Q. WHAT POSITION DID YOU TAKE IN YOUR DIRECT TESTIMONY?

A. In my direct testimony, I testified that between my residence and businesses, I have what I believe to be a total of 21 meters with SLECA, all of which will be subject to additional significant charges, in my understanding, if the electric lines at issue in this matter are reconstructed at the cost of all of the SLECA members. Considering my advance budgeting and strategic planning for my businesses, my planning would be greatly impacted by a decision to reconstruct the electric lines for these services, solely to support the part time, recreational use of camps by other members. Considering this, I took the position that the LPSC should support the business decision made by SLECA's Board of Directors to abandon this service and protect the many member accounts who would have to support the costs of this rebuild without receiving any benefit.

1 Q. HAVE YOU REVIEWED THE INTERVENOR TESTIMONIES AND DID ANY OF  
2 THESE CAUSE YOU TO CHANGE YOUR VIEWS ON THE MATTER?

3 A. I have reviewed the testimonies filed by the intervenors, and I remain firm in my position  
4 that other members should not support the rebuild of these electric lines. I also believe  
5 strongly that other members should not pay millions of dollars to fund any of the  
6 intervenor's proposed solutions, including purchasing camps, paying for any loss of value,  
7 paying for camp improvements made, or paying to install solar panels. Other members  
8 should not be made to pay for any of this.

9  
10 **III. CONCLUSION**

11 Q. WHAT IS YOUR REQUEST TO THE LPSC?

12 A. I ask that the LPSC grant SLECA's Petition for Abandonment and allow SLECA to  
13 abandon the service to these camps.

14 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

15 A. Yes, it does.

**BEFORE THE**  
**LOUISIANA PUBLIC SERVICE COMMISSION**

**SOUTH LOUISIANA ELECTRIC COOPERATIVE  
ASSOCIATION**

**DOCKET NO. U-37394**

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*In re: Petition for Approval of Abandonment of electric facilities located in Terrebonne and  
Lafourche Parishes pursuant to Commission General Order  
dated July 9, 2008 (R-30301)*

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**AFFIDAVIT OF WITNESS**

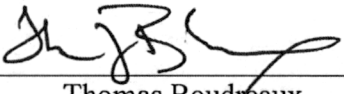
I, Thomas Boudreaux, being duly sworn, depose

that the Rebuttal Testimony in the

above referenced matter on behalf of

South Louisiana Electric Cooperative Association

is true and correct to the best of my knowledge, information, and belief.

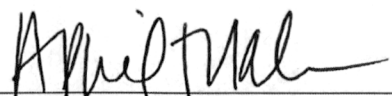
  
\_\_\_\_\_  
Thomas Boudreaux

Subscribed and sworn before

me, Notary Public, this

8<sup>th</sup> day of

July, 2025.

 (Signature)

April Trahan (Printed Name)

La. Bar Roll No./Notary No. 38919

My commission expires at death



**BEFORE THE**  
**LOUISIANA PUBLIC SERVICE COMMISSION**  
**SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION, EX PARTE**  
**DOCKET NO. U-37394**

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*In re: Petition for approval of abandonment of electric facilities located in Terrebonne and Lafourche Parishes pursuant to Commission General Order dated July 9, 2008 (R-30301).*

---

**REBUTTAL TESTIMONY**  
**OF**  
**TIMOTHY J. ALLEN**  
**ON BEHALF OF**  
**SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION**

**JULY 2025**

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- I. INTRODUCTION AND SUMMARY OF DIRECT TESTIMONY**
- II. POSITION ON SLECA’S PETITION AND REBUTTAL**
- III. CONCLUSION**

**I. INTRODUCTION AND SUMMARY OF DIRECT TESTIMONY**

Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. My name is Timothy J. Allen. I work for Apache Louisiana Minerals LLC (“ALM”) at the business address of 1913 La Terre Ct., Houma, Louisiana 70363. The mailing address Post Office Box 206, Houma, LA 70361-0206. ALM is a subsidiary of Apache Corporation, which is headquartered in Houston.

Q. ON WHOSE BEHALF ARE YOU FILING THIS REBUTTAL TESTIMONY?

A. I submitted my direct testimony in my capacity as a Professional Land Surveyor and the General Manager of ALM, overseeing the surface of land owned by Apache, including land located in Terrebonne Parish within SLECA’s service area. I am providing this rebuttal testimony in the same capacity in support of SLECA’s Petition in this matter.

**II. POSITION ON SLECA’S PETITION AND REBUTTAL**

Q. WHAT POSITION DID YOU TAKE IN YOUR DIRECT TESTIMONY?

A. I testified in my direct testimony that ALM will be detrimentally affected for several reasons if the Lake Line infrastructure is rebuilt by SLECA. First, ALM’s properties in the area, which are substantial, are impacted each time the electric lines at issue have been knocked out by hurricanes or tropical storms due to the equipment that must be used for restoration in this marshland. Second, it is my understanding that any rebuild of the electric lines would be effectively hardened from the previous electric lines under FEMA requirements, and I have advised SLECA that ALM does not support a reconstruction that is more intrusive to ALM’s properties than what has previously existed. Third, ALM has

1 a reduced number of campsite property leases, or meters, on its properties that would  
2 support the rebuild and benefit from it. Fourth, I have advised SLECA that ALM would  
3 NOT grant new servitudes for an electric line rebuild and that projected costs of the rebuild  
4 should include the cost of expropriation of land rights from ALM if a rebuild will be  
5 pursued. Also, I added in my direct testimony that ALM has a camp that was formerly  
6 serviced by SLECA and is now serviced by a generator. This works great and is a great  
7 alternative for other impacted camp owners and lessors.

8  
9 Q. HAVE YOU REVIEWED THE INTERVENOR TESTIMONIES AND DID ANY OF  
10 THE CAUSE YOU TO CHANGE YOUR VIEWS ON THE MATTER?

11 A. I have reviewed the intervenor testimonies and believe that none of them adequately  
12 address ALM's concerns and positions. I stand by my direct testimony and oppose any of  
13 the expensive options that the intervenors would like the other members to be responsible  
14 for.

15  
16 **III. CONCLUSION**

17 Q. WHAT IS YOUR REQUEST TO THE LPSC?

18 A. I ask that the LPSC grant SLECA's Petition for Abandonment and allow SLECA to  
19 abandon the service to these camps.

20 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

21 A. Yes, it does.

**BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION**

**SOUTH LOUISIANA ELECTRIC COOPERATIVE  
ASSOCIATION**

**DOCKET NO. U-37394**

---

*In re: Petition for Approval of Abandonment of electric facilities located in Terrebonne and  
Lafourche Parishes pursuant to Commission General Order  
dated July 9, 2008 (R-30301)*

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**AFFIDAVIT OF WITNESS**

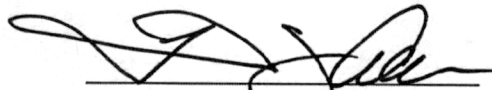
I, Timothy J. Allen, being duly sworn, depose

that the Rebuttal Testimony in the

above referenced matter on behalf of

South Louisiana Electric Cooperative Association

is true and correct to the best of my knowledge, information, and belief.

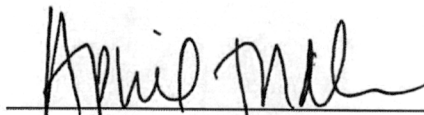
  
\_\_\_\_\_  
Timothy J. Allen

Subscribed and sworn before

me, Notary Public, this

8<sup>th</sup> day of

July, 2025.

 (Signature)

April Trahan (Printed Name)

La. Bar Roll No./Notary No. 38919

My commission expires at death



**BEFORE THE**  
**LOUISIANA PUBLIC SERVICE COMMISSION**  
**SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION, EX PARTE**  
**DOCKET NO. U-37394**

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*In re: Petition for approval of abandonment of electric facilities located in Terrebonne and Lafourche Parishes pursuant to Commission General Order dated July 9, 2008 (R-30301).*

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**REBUTTAL TESTIMONY**  
**OF**  
**SCOTTI HENRY**  
**ON BEHALF OF**  
**SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION**

**JULY 2025**

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- I. INTRODUCTION AND SUMMARY OF DIRECT TESTIMONY**
- II. POSITION ON SLECA’S PETITION AND REBUTTAL**
- III. CONCLUSION**

**I. INTRODUCTION AND SUMMARY OF DIRECT TESTIMONY**

Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. My name is Scotti Henry. My address is 110 Spence Court, Houma, Louisiana 70360.

Q. ON WHOSE BEHALF ARE YOU FILING THIS REBUTTAL TESTIMONY?

A. I am filing this rebuttal testimony on my own behalf, in support of SLECA's Petition in this matter.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS MATTER AND, IF SO, IN WHAT CAPACITY?

A. Yes, I did submit Direct Testimony in support of SLECA's Petition for Approval of Abandonment filed on September 25, 2024 ("Petition"). I submitted testimony as a SLECA member.

**II. POSITION ON SLECA'S PETITION AND REBUTTAL**

Q. WHAT POSITION DID YOU TAKE IN YOUR DIRECT TESTIMONY?

A. In my Direct Testimony, I supported SLECA's request due to the fact that I was concerned about the cost of the reconstruction of the electric lines to these camps, since these costs would be distributed to the entire membership, including me, for the benefit of a few members in support of their hobbies. I also testified that I have used a generator for many years at my houseboat/camp, and it works great. This would be a much more economical option for the camp owners here, and it would not burden the rest of the membership.

Q. HAVE YOU REVIEWED THE INTERVENOR TESTIMONIES AND DID ANY OF THE CAUSE YOU TO CHANGE YOUR VIEWS ON THE MATTER?

1 A. Yes, I have reviewed the intervenor testimonies, and I stand by my initial position. The  
2 camp owners want either the electric lines to be rebuilt at a significant cost to all members,  
3 or they want SLECA to pay them large sums of money for claimed losses of value or some  
4 other reimbursement measure. I do not believe that any of the proposed options are  
5 appropriate to be due from all of SLECA's member ratepayers. When these camp owners  
6 built these camps and made improvements in these coastal areas, these activities, and the  
7 expenses that went with them, were done with the risk that provided electric service might  
8 not be forever. All ratepayers of SLECA, who had no input in these decisions, cannot be  
9 expected to be responsible for these costs.

10  
11 **III. CONCLUSION**

12 Q. WHAT IS YOUR REQUEST TO THE LPSC?

13 A. I ask that the LPSC grant SLECA's Petition for Abandonment and allow SLECA to  
14 abandon the service to these camps.

15 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

16 A. Yes, it does.

**BEFORE THE**  
**LOUISIANA PUBLIC SERVICE COMMISSION**

**SOUTH LOUISIANA ELECTRIC COOPERATIVE  
ASSOCIATION**

**DOCKET NO. U-37394**

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**AFFIDAVIT OF WITNESS**

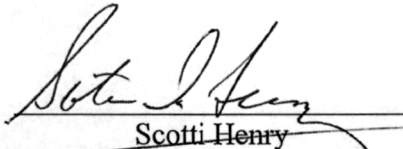
I, Scotti Henry, being duly sworn, depose

that the Rebuttal Testimony in the

above referenced matter on behalf of

South Louisiana Electric Cooperative Association

is true and correct to the best of my knowledge, information, and belief.

  
Scotti Henry

Subscribed and sworn before

me, Notary Public, this

9<sup>th</sup> day of

July, 2025.

 (Signature)

April Trahan (Printed Name)

La. Bar Roll No./Notary No. 38919

My commission expires at death



**BEFORE THE**  
**LOUISIANA PUBLIC SERVICE COMMISSION**  
**SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION, EX PARTE**  
**DOCKET NO. U-37394**

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*In re: Petition for approval of abandonment of electric facilities located in Terrebonne and Lafourche Parishes pursuant to Commission General Order dated July 9, 2008 (R-30301).*

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**REBUTTAL TESTIMONY**  
**OF**  
**STEVEN PORTERO**  
**ON BEHALF OF**  
**SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION**

**JULY 2025**

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- I. INTRODUCTION AND SUMMARY OF DIRECT TESTIMONY**
- II. POSITION ON SLECA’S PETITION AND REBUTTAL**
- III. CONCLUSION**

**I. INTRODUCTION AND SUMMARY OF DIRECT TESTIMONY**

Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. My name is Steven Portero. My address is 206 Cindy Lane, Gray, Louisiana 70359.

Q. ON WHOSE BEHALF ARE YOU FILING THIS REBUTTAL TESTIMONY?

A. I am filing rebuttal testimony on my own behalf, in support of SLECA's Petition in this matter.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS MATTER AND, IF SO, IN WHAT CAPACITY?

A. Yes, I did submit Direct Testimony in support of SLECA's Petition for Approval of Abandonment filed on September 25, 2024 ("Petition"). I submitted testimony as a SLECA member.

**II. POSITION ON SLECA'S PETITION AND REBUTTAL**

Q. WHAT POSITION DID YOU TAKE IN YOUR DIRECT TESTIMONY?

A. I testified that I am against the reconstruction of these electric lines for this service, particularly because these are camps, not primary residences, and I do not believe that the entire membership should be making significant payments for these camps, which in my understanding represents just slightly over 1% of the SLECA meters. I testified that the members of SLECA elected the Board of Directors, and the Board's decision to abandon these electric lines and services should control.

Q. HAVE YOU REVIEWED THE INTERVENOR TESTIMONIES AND DID ANY OF THE CAUSE YOU TO CHANGE YOUR VIEWS ON THE MATTER?

1 A. Yes, I have reviewed the testimonies filed by the intervenors and nothing stated in those  
2 testimonies changes any of my views. Whether the members have to pay to reconstruct  
3 the electric lines to these camps or pay some other amount as requested by the camp  
4 owners, it is still too much for the other members to have to pay for these camps that are  
5 used part time. The Board made the correct decision here.

6  
7 **III. CONCLUSION**

8 Q. WHAT IS YOUR REQUEST TO THE LPSC?

9 A. I ask that the LPSC grant SLECA's Petition for Abandonment and allow SLECA to  
10 abandon the service to these camps.

11 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

12 A. Yes, it does.

BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION

**SOUTH LOUISIANA ELECTRIC COOPERATIVE  
ASSOCIATION**

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Lafourche Parishes pursuant to Commission General Order  
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---

AFFIDAVIT OF WITNESS

I, Steven Portero, being duly sworn, depose

that the Rebuttal Testimony in the

above referenced matter on behalf of

South Louisiana Electric Cooperative Association

is true and correct to the best of my knowledge, information, and belief.

  
Steven Portero

Subscribed and sworn before

me, Notary Public, this

9th day of

July, 2025.

April Trahan (Signature)

April Trahan (Printed Name)

La. Bar Roll No./Notary No. 38919

My commission expires at death



**CERTIFICATE OF SERVICE**

I hereby certify that I have this 9<sup>th</sup> day of July, 2025, served copies of the foregoing pleading upon all other known parties of this proceeding by electronic mail or by regular United States mail, postage prepaid and properly addressed.

  
H. BARLOW HOLLEY