



Southern Renewable Energy Association

11610 Pleasant Ridge Rd., Suite 103 #176, Little Rock, AR 72223

November 12th, 2024

Louisiana Public Service Commission – 12th Floor
Records and Recording Division
Kris Abel
602 North Fifth Street
Baton Rouge, Louisiana 70802

CC: MV/LE
LA PUBLIC SERVICE COMM
NOV 13 2024 AM 11:46

Re: LPSC Docket No. 37425, Entergy Louisiana, LLC Application for Approval of Generation and Transmission Resources in Connection with Service to Single Customer for a Project in North Louisiana

Dear Mr. Abel:

Please find enclosed an original and two (2) copies of the Southern Renewable Energy Association's Notice of Intervention and Request for Inclusion on Service List in LPSC Docket No. 37425. Please contact me if you have any questions. Thank you for your assistance with this matter.

Respectfully submitted,

Whit C

Whit Cox
Regulatory Director
Southern Renewable Energy Association
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Little Rock, AR 72223
whit@southernrenewable.org
(501) 701-0874

Enclosures

cc: All parties of record in this docket (*via e-mail*)

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

IN RE: APPLICATION OF ENTERGY)	
LOUISIANA, LLC FOR APPROVAL OF)	
GENERATION AND TRANSMISSION)	
RESOURCES IN CONNECTION)	DOCKET NO. U-37425
WITH SERVICE TO A SINGLE)	
CUSTOMER FOR A PROJECT IN)	
NORTH LOUISIANA)	

SOUTHERN RENEWABLE ENERGY ASSOCIATION'S
NOTICE OF INTERVENTION
AND REQUEST FOR INCLUSION ON SERVICE LIST

COMES NOW, the Southern Renewable Energy Association (“SREA”), and hereby files this *Notice of Intervention and Request for Inclusion on Service List* (“Notice”) in the above-referenced docket pursuant to Rule 10 of the Louisiana Public Service Commission (“Commission”) Rules of Practice and Procedure. In support hereof, SREA respectfully states as follows:

1.

On October 30, 2024, Entergy Louisiana, LLC (“ELL”) filed its Application for Approval of Generation and Transmission Resources Proposed in Connection with Service to a Significant Customer Project in North Louisiana, Including Proposed Rider, and Request for Timely Treatment (“Application”) with the Commission, seeking among other things, 2,262 MW of new gas-fired generation,¹ “1,500 megawatts (“MW”) of designated solar and/or solar and storage (“hybrid”) resources,”² and “a new 500 kV transmission line.”³ On November 8, 2024, the

¹ ELL Application at p. 12.

² ELL Application at p. 5.

³ ELL Application at p. 3.

Commission published Official Bulletin # 1336, establishing the docket number for ELL's Application and a 10-day deadline for intervention.⁴ SREA objects to this shortened intervention period, for which ELL provides no good cause in its Application. Further, as of the date of SREA's filing, ELL's Application has not yet been published on the Commission's website in the applicable docket.⁵ Nonetheless, SREA notes that its Notice is timely even under this shortened period for intervention.

2.

Rule 10 of the LPSC's Rule of Practice and procedure provides that any party actually in interest may appear in any proceeding before the LPSC. Rule 10 provides also that "[u]nless otherwise provided by law...every trade organization shall be permitted to appear in any proceeding whether as a formal intervenor or otherwise, and present any relevant and proper testimony and evidence bearing upon the issues involved in the particular proceeding."

3.

SREA is a regional trade association that works to promote the responsible development and use of utility-scale wind energy, energy storage, solar energy, and transmission solutions throughout the South. SREA members have a vital interest in the proceeding because they develop renewable energy and transmission facilities, and ELL's Application indicates that the Application includes "1,500 megawatts ("MW") of designated solar and/or solar and storage ("hybrid") resources"⁶ and "a new 500 kV transmission line."⁷ SREA also has an interest in ensuring that its members are given a fair opportunity to compete for ELL generation and transmission projects in

⁴ LPSC Bulletin Report. ("Notice of intervention or protest shall be filed within 10-days of the date of this bulletin.").

⁵ Only ELL's cover letter was published with the filing on Oct. 30th, but not the full Application.
<https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=4y5xTw%2f15do%3d>.

⁶ ELL Application at p. 5.

⁷ ELL Application at p. 3 (requesting "a new 500 kV transmission line extending from a substation near Sarepta, Louisiana to a substation near Mt. Olive, Louisiana.")

Louisiana, including through a request for proposal (“RFP”) competitive solicitation process. However, ELL’s Application indicates that it is seeking an exemption from the Commission’s Market Based Mechanism (“MBM”) Order, asserting that a secret “Customer’s urgent need for electric service and the speed with which ELL needed to act to secure the [secret] Customer’s commitment to Louisiana...supports a finding that good cause excuses compliance with the MBM order.”⁸ SREA therefore has concerns that ELL’s request for an exemption from the Commission’s MBM Order and corresponding decision to forego an RFP competitive solicitation process will unfairly limit competition and is thus contrary to the interests of its members, who may potentially be able to provide ELL’s customers with renewable energy alternatives at lower prices than ELL’s proposed projects. Thus, for the reasons outlined above, the Commission’s actions in this docket will affect the interests of SREA’s members. As a result, SREA has substantial interests in the outcome of this proceeding and desires to intervene in order to advance and protect those interests.

4.

SREA respectfully requests that it be granted leave to intervene and participate fully as a party in these proceedings, including the right to present testimony and exhibits, cross-examine witnesses, and file briefs. SREA has participated in prior Commission proceedings, including Docket No. U-36697. SREA has also participated in commission proceedings in other states that have resulted in settlements where public utilities have agreed to conduct expedited RFPs for renewable generation resources after initially making similar claims that urgency provided justification to circumvent competitive procurement rules, such as Georgia Power Company’s

⁸ ELL Application at p. 22.

2023 IRP Update.⁹ Our expertise regarding utility-scale wind energy, energy storage, solar energy, transmission, utility resource planning, and expedited competitive procurement processes will be valuable in this proceeding.

5.

SREA requests that the following persons be included on the service list in this docket and that all communications regarding this docket be directed to them:

Simon Mahan
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WHEREFORE, SREA respectfully requests that the Commission admit it as a full party of record in these proceedings with all right attendant thereto.

Respectfully submitted this 12th day of November, 2024.



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⁹ See Georgia Public Service Commission Docket No. 55378, Doc. # 218484, Order Adopting Stipulated Agreement at pp. 8-9, 19, April 26, 2024, available at <https://psc.ga.gov/search/facts-document/?documentId=218484>. (“As discussed more below, other customer benefits in the Stipulation include, but are not limited to...requiring an RFP for 500 MW of the originally proposed 1,000 MW of Battery Energy Storage Systems (“BESS”) additions...”).

CERTIFICATE OF SERVICE

I hereby certify that I have served all parties with the foregoing document by electronic mail on this 12th day of November, 2024.

Whit C

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