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CC: JG/JB

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July 8, 2025

VIA HAND DELIVERY

Ms. Kris Abel Records Supervisor Records Division Information Technology Department Louisiana Public Service Commission 602 North Fifth Street Galvez Building, 12th 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 is a Motion to Upset Procedural Schedule and for Status Conference. 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. Thank you and kindest regards.

Sincerely,

H. Barlow Holley

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).

MOTION TO UPSET PROCEDURAL SCHEDULE AND FOR STATUS CONFERENCE

NOW BEFORE the Louisiana Public Service Commission ("Commission"), through undersigned counsel, comes South Louisiana Electric Cooperative Association ("SLECA" or "Cooperative"), who respectfully submits this Motion to Upset Procedural Schedule and for Status Conference ("Motion") and moves, out of an abundance of caution and without opposition from Commission Staff, that the Tribunal upset the procedural schedule established in the above-captioned matter and hold a status conference in this proceeding to establish a new procedural schedule. In support of this Motion, SLECA represents as follows:

1.

On December 10, 2024, the Tribunal issued a Report of Status Conference that established a procedural schedule for this docket. The procedural schedule set a deadline of July 18, 2025, for all discovery, subject to a 15-day turnaround agreed by the parties of record in this matter.

2.

On July 7, 2025, SLECA received responses to data requests from three intervenors indicating that each of the intervenors intended to call one or more non-party witnesses at the hearing in this proceeding, including an unnamed corporate representative of Soggy Bottom Power, LLC to testify about the removal of Lake Lines infrastructure. SLECA was made aware of

these witnesses with 11 days left for conducting discovery, as provided in the procedural schedule governing this docket.

3.

The delayed notice of intervenors' intent to call these witnesses at hearing and SLECA's inability to propound further discovery upon the intervenors and/or witnesses in accordance with the procedural schedule would prejudice SLECA's rebuttal case and deprive the Cooperative and other parties of a meaningful opportunity to cross-examine evidence fully and prepare adequately for the hearing in this matter. Under these circumstances, SLECA represents that the procedural schedule in this matter should be upset and that the Tribunal should hold a status conference to establish a new procedural schedule to accommodate further discovery on these (and perhaps other, yet unknown) witnesses.

4.

SLECA avers that upsetting the procedural schedule established in this matter and holding another status conference would not cause any harm or prejudice to any known party in interest.

5.

Counsel for SLECA has contacted counsel for Commission Staff, and the latter has indicated that Commission Staff has no opposition to this Motion. This Motion is, therefore, unopposed by Commission Staff.

WHEREFORE, SLECA respectfully moves that the Tribunal:

- 1. Grant this Motion;
- 2. Issue a ruling upsetting the procedural schedule established in this matter; and
- 3. Issue notice of a status conference to be held to establish a new procedural schedule

in this matter.

Respectfully submitted,

MARIONNEAUX KANTROW, LLC

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CERTIFICATE OF SERVICE

I hereby certify that I have this 8th 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