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LA PUBLIC SERVICE COMM
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July 10, 2025

Ms. Krys Abel
Records Supervisor
Records Division
Louisiana Public Service Commission
602 North 5th St., 12th Floor
Baton Rouge, LA 70802

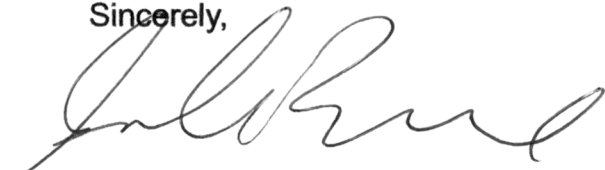
Re: LPSC Docket No. U-37394 South Louisiana Electric Cooperative

Dear Ms. Abel:

On behalf of Sara A. Boudreaux, ex parte, please find enclosed filing in the above-referenced docket the following documents:

- Memorandum in Opposition to SLECA's Motion in Limine

Sincerely,

A handwritten signature in black ink, appearing to read 'Sara Boudreaux', written over a horizontal line.

Sara A. Boudreaux

Hand

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

SARA A. BOUDREAUX, EX PARTE

DOCKET NO. U-37394

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

Sara A. Boudreaux's Memorandum in Opposition to SLECA's Motion to Limine

MAY IT PLEASE THE TRIBUNAL:

Sara A. Boudreaux respectfully submits this Opposition to SLECA's Motion to Limine. I am a school teacher, a layperson, and have been working diligently to participate in this complex procedural process. I study, read all documents submitted, and call the LPSC regularly to ensure that I am following procedural guidelines for submission of documents, all in good faith.

I have been active and answered each set of Data Requests within the timeline set forth to the best of my ability. I have done the same with my testimony. SLECA's Data Requests have been laborious. These questions are multifaceted and require much research and documents that laypersons may not have or may not know how to obtain.

I have repeatedly clarified, and revised my documents to abide by policies and procedures. By SLECA requesting my information be dismissed due to (1) Irrelevant and Speculative Evidence, (2) Evidence Outside of the Scope of Pleadings, and (3) Evidence Not Filed in the Record of this Proceeding, I am being silenced.

I have requested SLECA prove the extent of damage to Lake Fields, answered SLECA's questions regarding safety, have requested from them directly a bifurcation, and continued the discussion of why two parishes with distinctly differently electrification restoration requirements were lumped together for abandonment. I have been met with objections only to now be dismissed because SLECA states that they are asking for an Abandonment and the subject of how we got to abandonment is irrelevant and can no longer be discussed here. It is unfair to dismiss the damage that was caused to now warrant the abandonment SLECA is applying for.

I. Fairness

While this matter concerns the Cooperative's Petition, specifically SLECA's request for the Commission's approval not to reconstruct the Lake Lines, which is a total of 282 respective properties, it is imperative to remember the process of how SLECA's decisions got them to the point that they feel that abandonment is the only option left. To leave out the timeframe, communications, and relevant evidence on how we got to this abandonment is unfair to the stakeholders regarding this docket.

Intervenors reference their anticipated gains and losses tied to SLECA's action regarding the Lake Lines due to SLECA's request for this information.¹ SLECA is asking intervenors to provide information, only to now dismiss the information claiming it is irrelevant and speculative or outside the scope of pleadings.

SLECA has the advantage of trained attorneys with credentials and experience with the LPSC procedural processes. Most intervenors do not have that advantage. I, as one of those intervenors involved in this docket, do not have the advantage of a lawyer on retainer at this time or legal training and/or credentials, yet, I continue to work hard to comply, follow procedures, and be an active public participant in this very complex procedure to be met with communication by SLECA that my responses are incomplete or evasive, and are now at the risk of potentially being dismissed.

SLECA's final letter dated 8/21/2024 to campowners stated:

"The Louisiana Public Service Commission (LPSC) has a formal process for utilities regarding the abandonment of facilities that SLECA must adhere to; therefore, pursuant to LPSC General Order R-30301, SLECA intends to file a Petition for Abandonment with the Commission. This process will involve meetings, public hearings, etc. As a regulated utility, these public hearings give the members yet another avenue to voice your opinion to our regulators regarding the abandonment of the lake lines."

SLECA stated these hearings would give members another avenue to voice opinions and are now seeking to exclude opinions, answers, and facts that do not fit into the narrow narrative that SLECA has created about abandonment only and seek to silence all other factors outside this narrow scope.

Through the Discovery phase and pre-trial phase, more information and evidence has been revealed. To dismiss this evidence is contrary to the purpose of what the Discovery phase

¹ See First Set of Data Requests to Intervenors Propounded by SLECA: SLECA 1-6, 1-7, 1-8, 1-9, 1-10, 1-11, 1-13, 1-14, 1-15, 1-16, 1-17, 1-18, 1-19, 1-20, 1-21, 1-22, 1-23, 1-24, 1-25, 1-26, 1-27, and 1-28. See also SLECA's Second Set of Data Requests to Sara A. Boudreaux: SLECA 2-15, 2-16, 2-17, 2-18, 2-19, 2-25, 2-28, 2-29, 2-30, 2-31, 2-32, 2-33, 2-34, and 2-35.

is intended to do. As new evidence is revealed, it becomes more relevant to the outcome and therefore broadens and not limits the scope of this preceding.

The subject of how we got to this point needs to be addressed and included in this proceeding. Did SLECA have the authority to remove entire public utility infrastructure without the approval of a governing body since they are a public service provider and fall under the public service protocols. SLECA claims there are millions of dollars of damage and to dismiss the damage, what the damage actually is, and the cause of the damage would be unfair to this preceding.

II. Argument

Regarding alleged (1) Irrelevant and Speculative Evidence: SLECA claims in its Motion in Limine that the Commission's responsibility is forward-looking. It would be unfair not to consider what happened before SLECA's Petition for Abandonment. It would dismiss evidence that led up to SLECA's decision to apply for something that could potentially set precedent in this state. SLECA also has sent me a total of 67 questions that I have answered within the timeline and procedures of this matter to the best of my ability. To dismiss my answers to questions SLECA asked is limiting my voice in this matter.

Regarding alleged (2) Evidence Outside of the Scope of Pleadings: Having provided detailed answers with evidence to all 67 Data Requests made to me by SLECA and providing my testimony, it is still relevant to discuss that SLECA's removal of the Lake Fields lines caused the damage they are now petitioning to abandon. I fail to see how this information is outside the Scope of Pleadings in this docket.

Feelings, emotions, and sentiments are part of the story here and are based on facts that should not be ignored, nor summarily dismissed. To dismiss my testimony or parts of my story because emotions, feelings and sentiments are mixed within the facts, is not outside the Scope of Pleadings. Facts can easily be separated and I have no doubt that the Commission, Commission Staff, and the judge will uphold the separation of the two, and look at the facts only since those facts are relevant to this preceding.

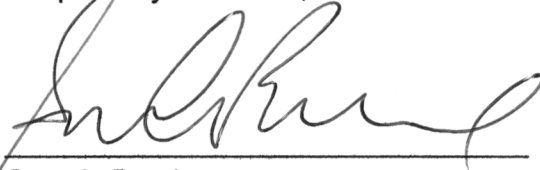
Regarding alleged (3) Evidence Not Filed in the Record of this Proceeding: I am a full-time teacher and mother to three children and we all went through online teaching/learning, virtual lessons, and the issuance of Chromebooks and the Google platform. Due to these facts I consider myself technologically up to date. In contrast, there are over 60 intervenors and many of these intervenors are retired or elderly. Many other intervenors do not have careers that have the advantage of training in computer programs, extensive email knowledge, and/or regular use

of a computer at all. The sheer amount of emails can be very overwhelming added to that the deadlines, procedural expectations, and the amount of information laypersons are required to know, find, and provide evidence for. For example, on June 25, 2025, SLECA's counsel sent 19 emails within a 90 minute period. My personal set of data requests that day was a total of 37 with some having multiple questions embedded, many of which asked for documents and this all required an affidavit once completed. These documents can seem very overwhelming and intimidating.

III. Conclusion

For the foregoing reasons and Louisiana Code of Evidence Article 403, Sara A. Boudreaux requests that the Tribunal grant my Opposition to SLECA's Motion in Limine. Such an order will ensure that the Commission is providing a thorough but efficient regulatory process that is fair, open, and encourages public participation granted by Article IV, Section 21 of the Louisiana Constitution of 1974.²

Respectfully submitted,

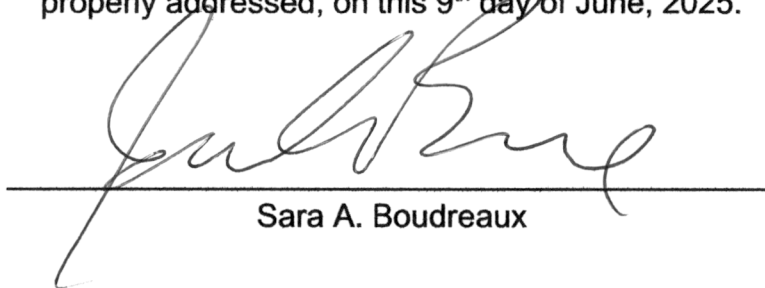


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² ABOUT THE LOUISIANA PUBLIC SERVICE COMMISSION, <https://www.lpsc.louisiana.gov/About> (last visited July 9, 2025).

CERTIFICATE OF SERVICE

I hereby certify that I have served copies of the foregoing data requests upon all parties to this proceeding by electronic mail or by regular United States mail, postage prepaid and properly addressed, on this 9th day of June, 2025.



Sara A. Boudreaux