



Southern Renewable Energy Association

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

CC: MV/LE

May 9th, 2025

Via Fax to (225) 342-0877

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

Re: LPSC Docket No. U-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 Ms. Abel:

Please find enclosed the **Cross Answering Testimony of John D. Wilson on behalf of the Southern Renewable Energy Association** in LPSC Docket No. U-37425.

SREA will follow up this fax filing with the original and two (2) hard copies of the document, along with the fax transmission fee within five days pursuant to the Commission's Rules. Please contact me if you have any questions. Thank you for your assistance with this matter.

Respectfully submitted,

Whit Cox
Regulatory Director
Southern Renewable Energy Association
11610 Pleasant Ridge Road, Suite 103 # 176
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(501) 701-0874

Enclosures

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



Southern Renewable Energy Association

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

CERTIFICATE OF SERVICE

I hereby certify that I have served all parties of record with the foregoing document by electronic mail on this 9th day of May, 2025.

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BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

Application of Entergy Louisiana,)
LLC for Approval of)
Generation and Transmission)
Resources in Connection with Service)
To Single Customer for a Project)
In North Louisiana)

Docket Number U-37425

CROSS-ANSWERING TESTIMONY OF

JOHN D. WILSON

ON BEHALF OF THE

SOUTHERN RENEWABLE ENERGY ASSOCIATION

Grid Strategies, LLC

MAY 9, 2025

Southern Renewable Energy Association
Cross-Answering Testimony of John D. Wilson
LPSC Docket No. U-37425

TABLE OF CONTENTS

I. Introduction 3
II. Answer to LEUG: Compliance with Tariff Rules..... 3
III. Answer to Sierra Club: Grid-Enhancing Technologies 8
IV. Additional Evidence from Entergy: Expedited Certification Process 9
V. Summary of Conclusions and Recommendations10

TABLE OF EXHIBITS

Exhibit JDW-3 *ELL's Responses to SREA's Data Requests (4-1 and 4-3)*

Southern Renewable Energy Association
Cross-Answer Testimony of John D. Wilson
LPSC Docket No. U-37425

1 **I. Introduction**

2 **Q: What is the purpose of your cross-answer testimony?**

3 A: My cross-answer testimony responds to recommendations from the Louisiana Energy Users
4 Group ("LEUG") and the Sierra Club. Specifically, I address LEUG's contention that Entergy
5 Louisiana, LLC's ("ELL") application does not comply with the Louisiana Public Service
6 Commission's ("Commission") Tariff Rules.¹ Additionally, I address the Sierra Club's
7 findings and recommendations regarding Grid-Enhancing Technologies.

8 I also provide a brief update to my direct testimony regarding ELL's exclusion of wind
9 from its expedited certification process proposal based on additional discovery filed by ELL.

10 **II. Answer to LEUG: Compliance with Tariff Rules**

11 **Q: Please summarize Witness Dauphinais' testimony regarding Entergy's non-**
12 **compliance with the Tariff Rules.**

13 A: On behalf of LEUG, Witness Dauphinais testifies that the proposed Corporate Sustainability
14 Rider ("CSR") violates the Tariff Rules and that ELL should not be authorized to implement
15 it.²

16 Witness Dauphinais' concerns are that the proposed CSR (i) violates the Commission's
17 Tariff Rules, (ii) potentially allows Meta "access to renewable power via Geaux Zero ("GZ")
18 Group 3 in advance of addressing renewable power needs of customers already on the

¹ Docket No. R-34738, LPSC ex parte. *In re: Proceeding to Establish Rules Regarding Electric Utility Tariff Filings and Related Review, Including Site Specific Rate Filings*, General Order (July 1, 2019)("Tariff Rules"). The Tariff Rules have been filed as Exhibit JRD-7.

² Dauphinais Direct at 4-6, 25-30.

Southern Renewable Energy Association
Cross-Answer Testimony of John D. Wilson
LPSC Docket No. U-37425

1 waiting lists for GZ Groups 1 and 2,”³ and (iii) potentially allows Meta “a direct path to
2 renewable power supply without providing a similar path to other industrial customers.”⁴
3 Witness Dauphinais asserts that providing Meta with “a level of market access to renewable
4 power that is not currently given to other industrial customers ... is unduly discriminatory
5 to other industrial customers.”⁵

6 **Q: What is your response to Witness Dauphinais’ finding?**

7 A: I disagree with some aspects of his findings, but agree that ELL’s proposal violates the Tariff
8 Rules. I will begin with his second concern.

9 It seems plain to me that, whatever its merits, ELL is not proposing to give Meta
10 advance access ahead of customers already on the waiting lists. To begin with, I sympathize
11 *greatly* with Witness Dauphinais’ evident frustration with ELL’s responses to multiple
12 rounds of discovery seeking clarity on the relationship between the renewable energy
13 procured for Geaux Zero and for Meta.

14 For example, SREA asked ELL whether it interprets the 3 GW Order to “allow some of
15 the resources procured under the 3 GW Order to apply towards the 1,500 MW incremental
16 commitment and if so, whether the CSR contemplates using those resources to meet the
17 1,500 MW incremental commitment.”⁶ ELL objected to this question and simply referred to
18 prefiled testimony. I find it puzzling why, when presented with multiple opportunities to
19 clarify what is evidently somewhat confusing testimony, ELL has chosen instead to leave
20 parties without a clear answer.

³ Dauphinais Direct at 4.

⁴ Dauphinais Direct at 5.

⁵ Dauphinais Direct at 33.

⁶ ELL Response to SREA Data Request (“DR”) 4-1(g).

Southern Renewable Energy Association
Cross-Answer Testimony of John D. Wilson
LPSC Docket No. U-37425

1 Nonetheless, it appears that ELL's intent is to procure CSR resources outside of the 3
2 GW order. While it would have been helpful for ELL to clearly state this in a discovery
3 response to LEUG or SREA, it seems to me that ELL Witness May testifies that the two paths
4 proposed for acquiring CSR resources are either (1) a modestly-amended variation on the
5 process approved in the 3 GW Order or (2) the Unsolicited Offer process.⁷

6 It appears to me that the correct understanding of the proposed CSR is that it provides
7 paths for acquiring additional resources, beyond those approved in the 3 GW Order. Those
8 resources would include system energy and renewable energy credit ("REC") attributes, with
9 the REC attributes paid for by Meta. It does not seem to me that the proposal puts Meta in
10 line ahead of other customers on the Geaux Zero waiting list because Meta is being served
11 in another process.

12 This understanding directly answers Witness Dauphinais' third point where we are in
13 agreement. ELL has provided Meta with an exclusive path to renewable energy development
14 that is not yet available to other large customers.

15 Back to the first point: Witness Dauphinais argues that the CSR exists outside of the
16 ELL Electric Tariff and that this is illegal.⁸ It seems to me that his third point supports this
17 finding but the second one does not. Witness Dauphinais also points to "a charge that meets
18 the definition of Rate and the CSR clearly being a Rate Rider," but does not appear to explain
19 what charge he is referring to or how said charge meets the definition of Rate.⁹

⁷ May Direct at 33, lines 3-10.

⁸ Dauphinais Direct at 29 (asserting that "the CSR would exist outside of the ELL Electric Tariff, which under the Tariff Rules is the "all-encompassing document" that sets forth the rules and responsibilities by which ELL provides electric service to customers and which must be approved by the Commission.").

⁹ Dauphinais Direct at 29.

Southern Renewable Energy Association
Cross-Answer Testimony of John D. Wilson
LPSC Docket No. U-37425

1 Presumably, Witness Dauphinais is referring to prospective charges for RECs.
2 Whether such charges meet the definition of Rate is a question that the Commission should
3 resolve.

4 **Q: Are there any other ways in which you believe Entergy's proposal violates the**
5 **Tariff Rules?**

6 A: Yes. As discussed in my Direct Testimony,¹⁰ the proposed ESA fixes the average demand
7 amount by contract. Rider Schedule LLHFPS-L, Section IV.D, states:

8 The Average Demand shall be the greater of a) seventy (70) MW or b) the average
9 Maximum Demand during the 12 billing Months preceding application of this
10 schedule or, for Customers who have not yet established a billing history, the
11 amount established per Contract.

12 The proposed ESA fixes the average demand for Meta permanently, and not just until it has
13 established 12 months of billing history.

14 The use of a contract-specified average demand departs from the Tariff Rules, as
15 follows:

16 • The definition of demand is "The rate at which electric Energy is delivered to or by a
17 system ... over any designated period of time." The Tariff Rules allow for "Rate
18 Schedules and Rate Riders [to use] varying definitions of Demand as necessary for
19 billing purposes." The ESA is neither a Rate Schedule nor a Rate Rider, and thus the
20 varying of the definition of demand violates the Tariff Rules."¹¹

¹⁰ Wilson Direct at 26:13 to 27:10.

¹¹ Tariff Rules, Section 101, Definition 3.

Southern Renewable Energy Association
Cross-Answer Testimony of John D. Wilson
LPSC Docket No. U-37425

- 1 • As noted by Witness Dauphinais, the definition of the Tariff is that it is the “all-
2 encompassing document” that “contains rules” that address rates.¹²

3 As Witness Dauphinais notes, ELL has not proposed the ESA as “a Site Specific
4 Contract under the Tariff Rules to ensure individual arrangements between a customer and
5 the utility are in the public interest.”¹³ As the Tariff Rules make not provision for customer-
6 specific ESAs to modify the terms and definitions found in the Tariff Rules, ELL’s proposed
7 fixed average demand level violates the Tariff Rules.

8 **Q: What is your recommendation?**

9 A: The findings discussed above further support my recommendation that the Commission
10 deny ELL’s requested approval of new gas-fired generation. In addition to not complying
11 with the 2024 MBM Order, I agree with and further substantiate Witness Dauphinais’
12 finding that ELL’s proposal violates the Tariff Rules.

13 If, however, the Commission grants ELL exemptions from its applicable rules and
14 orders, then I agree with Witness Dauphinais’ recommendation¹⁴ that ELL also offer the
15 same terms included in the CSR to other similarly-situated customers. Existing and other
16 new large load customers should also have the opportunity to participate in the acquisition
17 of additional renewable energy and storage resources using the same processes and
18 commitments from ELL as are proposed to benefit Meta.

19 For clarity, if the Commission grants those same exemptions, I do not agree with
20 Witness Dauphinais’ recommendation as to delaying Meta’s renewable resource fulfillment

¹² Dauphinais Direct at 26; Tariff Rules, Section 101, Definition 11.

¹³ Dauphinais Direct at 30, lines 1-7.

¹⁴ Dauphinais Direct at 30, lines 14-17.

Southern Renewable Energy Association
Cross-Answer Testimony of John D. Wilson
LPSC Docket No. U-37425

1 or denying what he alleges is discriminatory market access.¹⁵ Instead, any discriminatory
2 aspects of ELL's proposal should be resolved by requiring ELL to offer the same terms
3 included in the CSR to other similarly-situated customers.

4 **III. Answer to Sierra Club: Grid-Enhancing Technologies**

5 **Q: Please summarize Sierra Club Witness Glick's testimony related to grid**
6 **enhancing technologies.**

7 A: Witness Glick finds that ELL has not adequately evaluated grid enhancing technologies
8 ("GETs") or other alternative technologies to reduce system costs.¹⁶ Witness Glick
9 recommends that the Commission direct ELL to study and file "a report that evaluates the
10 role of GETs in allowing it to serve Customer load, and the rest of ratepayers, in a more
11 economic manner."¹⁷

12 Witness Glick further states:

13 GETs are not intended to displace the need for new generation to serve large and
14 concentrated data center load, but rather to ensure that ratepayers are getting
15 the most of out the existing technology and infrastructure on the grid.¹⁸

16 **Q: What is the potential role of GETs in the proposed application?**

17 A: While GETs cannot cure the fundamental problems with the application discussed in my
18 Direct Testimony and elaborated on above, if the Commission grants ELL exemptions from
19 its applicable rules and orders, then deployment of GETs is likely to mitigate costs and
20 expedite deployment of renewable energy resources pursuant to the proposed CSR.

¹⁵ Dauphinais Direct at 33, lines 1-11.

¹⁶ Glick Direct at 7, lines 25-28.

¹⁷ Glick Direct at 9, lines 13-15.

¹⁸ Glick Direct at 43, lines 13-15.

Southern Renewable Energy Association
Cross-Answer Testimony of John D. Wilson
LPSC Docket No. U-37425

1 **Q: Do you agree with Witness Glick's recommendation?**

2 A: Yes, but I would elaborate that the Commission should ensure that the scope of the GETs
3 study is not limited to serving Meta, but rather all customers. Therefore, the Commission
4 should require that the study be filed as part of ELL's 2025 Integrated Resource Plan ("IRP")
5 in addition to any compliance filings for this proceeding.

6 I understand that ELL's 2025 IRP filing deadline is in or around October of this year,
7 so it may not be possible for ELL to file such a report concurrently with its initial IRP filing.
8 The Commission should require that it be filed no later than nine months following its order
9 in this proceeding.¹⁹

10 **IV. Additional Evidence from Entergy: Expedited Certification Process**

11 **Q: If the Commission approves the expedited certification process proposed by**
12 **Entergy, should it amend that process to include wind energy resources?**

13 A: Yes. In my Direct Testimony, I explained how ELL has not sufficiently justified its decision
14 to exclude wind energy resources from the expedited 1,500 MW procurement that it
15 proposes for solar and hybrid battery resources. Subsequent to filing my direct testimony,
16 ELL has provided an additional discovery response clarifying its reasons for this exclusion,
17 as follows:

¹⁹ Ideally, ELL would concur with this recommendation and proceed to initiate such a study if it is not already engaged in such analysis.

Southern Renewable Energy Association
Cross-Answer Testimony of John D. Wilson
LPSC Docket No. U-37425

1 Assuming the question is inquiring as to why wind resources contemplated by
2 the CSR are not proposed to be included in an expedited procurement and
3 certification process, the request for expedited procurement and certification
4 identified in the Direct Testimony of Elizabeth Ingram is structured to be
5 consistent with the 3 GW Order, and the processes approved in the 3 GW Order
6 were limited to solar and hybrid resources.²⁰

7 In fact, the request included in Witness Ingram's testimony does not propose a process
8 that is identical to the 3 GW Order, but rather includes "some limited deviations."²¹ ELL has
9 simply not provided any satisfactory rationale for excluding wind resources from the
10 process. ELL's selectivity in identifying where the 3 GW Order can and cannot be deviated
11 from is simply further evidence of ELL's inadequate consideration of wind resources.

12 ELL's attitude can only discourage developers from investing in developing cost-
13 effective opportunities. This is ultimately not just to the detriment of those developers'
14 business prospects, but also denies ELL's customers the opportunity to obtain service at the
15 lowest reasonable cost by excluding potential low-cost wind resources from consideration
16 for procurement by ELL.

17 **V. Summary of Conclusions and Recommendations**

18 **Q: Please summarize your cross-answering recommendations to the Commission**
19 **on behalf of SREA.**

20 **A:** As explained above, based on my review of the direct testimony of other intervenors, I
21 recommend that the Commission grant the following relief in addition to the
22 recommendations set forth in my Direct Testimony filed on April 12th, 2025. The
23 Commission should:

²⁰ ELL Response to SREA DR 4-3(b).

²¹ Ingram Direct at 9-10 and Table 1.

Southern Renewable Energy Association
Cross-Answer Testimony of John D. Wilson
LPSC Docket No. U-37425

1 1. Find that the proposed ESA's inclusion of a fixed annual demand is inconsistent with
2 the definition of demand in the Tariff Rules and therefore the ESA cannot be
3 approved.

4 If the Commission finds good cause to grant exemptions from its applicable rules and orders,
5 the Commission's regulatory approval should:

6 2. Clarify whether prospective charges for RECs in the CSR meet the definition of Rate,
7 and the corresponding implications of that, including the implications with respect to
8 the Tariff Rules;

9 3. Resolve any discriminatory aspects of ELL's proposal pursuant to the Tariff Rules by
10 requiring ELL to offer the same terms included in the CSR to other similarly-situated
11 customers;²²

12 4. Direct ELL to study and file a report in this docket and in its IRP docket that evaluates
13 the role of GETs in allowing it to serve Meta, and the rest of ratepayers, in a more
14 economic manner, no later than nine months following the Commission's final order
15 in this proceeding; and

16 5. Find that ELL has not met its burden of proof for excluding wind resources from its
17 proposed procurement process for the 1,500 MW of solar and/or hybrid storage
18 resources set forth in the CSR.

19 **Q: Do you still support the recommendations set forth in your Direct Testimony**
20 **filed this docket on April 12th, 2025?**

21 A: Yes. My review of the Direct Testimony filed by the other intervenors and the Commission
22 Staff in the proceeding on April 12th, 2025, has not changed the recommendations set forth

²² If the Commission approves ELL's Application.

Southern Renewable Energy Association
Cross-Answer Testimony of John D. Wilson
LPSC Docket No. U-37425

1 my Direct Testimony, except to cause me to support the additional recommendations
2 outlined herein. Therefore, I still recommend that the Commission should deny ELL's
3 requested approval of the 2,262 MW of new gas-fired generation as system resources
4 because ELL's application does not comply with applicable Commission rules and orders,
5 restricting the access of third-party developers to opportunities to serve the public interest
6 by providing service at the lowest reasonable cost to ELL's customers.

7 Alternatively, if the Commission finds good cause to grant exemptions from its
8 applicable rules and orders, the Commission should include, at a minimum, the following
9 conditions prior to approving ELL's Application:

- 10 1. Require ELL to solicit and procure, and the Customer to commit to paying for, at least
11 enough clean and renewable energy to match or "offset" 100% of the gas megawatt-
12 hours required to serve the Customer's data centers' electricity usage;
- 13 2. Require ELL to issue RFPs that are open to all sources of clean and renewable energy,
14 including solar, battery, wind, and hybrid resources; and
- 15 3. Specify the timeframe for procurement of incremental renewable resources to allow
16 developers, including SREA members, to plan accordingly.

17 **Q: Does this conclude your testimony?**

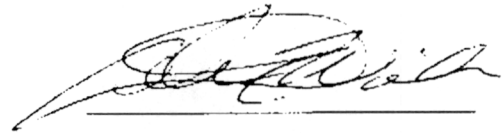
18 **A:** Yes.

Southern Renewable Energy Association
Cross-Answer Testimony of John D. Wilson
LPSC Docket No. U-37425

AFFIDAVIT**STATE OF** Kentucky**COUNTY OF** Fayette

NOW BEFORE ME, the undersigned authority, personally came and appeared,
John D. Wilson, who after being duly sworn by me, did depose and say:

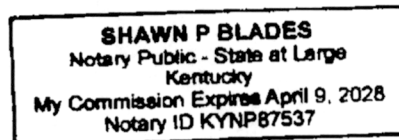
That the above and foregoing is his sworn testimony in this proceeding and that he
knows the contents thereof, that the same are true as stated, except as to matter and things,
if any, stated on information and belief, and that as to those matters and things, he verily
believes them to be true.



John D. Wilson

SWORN AND SUBSCRIBED BEFORE ME**THIS** 1 **DAY OF MAY 2025**

My commission expires: April 9, 2028
Shawn P. Blades, Notary



BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

Application of Entergy Louisiana,)
LLC for Approval of)
Generation and Transmission) Docket Number U-37425
Resources in Connection with Service)
To Single Customer for a Project)
In North Louisiana)

CROSS-ANSWERING EXHIBIT **JDW-3**

OF

JOHN D. WILSON

ON BEHALF OF THE

SOUTHERN RENEWABLE ENERGY ASSOCIATION

Grid Strategies, LLC

MAY 9, 2025

Exhibit JDW-3

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37425

Response of: Entergy Louisiana, LLC
to the Third Set of Data Requests
of Requesting Party: Southern Renewable
Energy Association

Question No.: SREA 4-1

Part No.:

Addendum:

Question:

Reference the Direct Testimony of Phillip R. May, pp. 5, 7, 33; Elizabeth C. Ingram, pp. 7-12; and Laura K. Beauchamp, pp. 6, 62.

- a. Please provide a list of the specific commitments “that provide a path to offset or ‘clean’ approximately sixty percent (60%) of the gas megawatt-hours from the Planned Generators by 2031”² along with ELL’s best estimate of the amount that each commitment contributes towards that 60% total, expressed in both megawatt-hours and as a percentage, and including key assumptions such as capacity and capacity factor for each commitment.
- b. Please explain whether a solar facility of X MW would be considered to contribute the same amount towards that 60% total as a hybrid facility of the same X MW. In other words, are charge cycle losses considered when determining the contribution of a hybrid facility towards the 60% total?
- c. Please explain why the commitment is expressed as a percentage of the “gas megawatt- hours from the Planned Generators” rather than as a percentage of the annual energy requirement of the Customer’s facility.
- d. Please state how much energy ELL understands or estimates will be required by the Customer’s facility at full load.
- e. Please reconcile the statement referenced in part (a) of this data request with the statement that “21% of the carbon emissions from the new CCCTs will be offset by the Customer’s solar and/or hybrid commitments.”³ Please include any available supporting calculations in a workbook.
- f. Please confirm that the “1,500 MW of incremental solar and/or hybrid resources” will be procured through a process that is additional to the “3 GW Order” and that the resulting resources will be fully additional to (and “in excess of”) those authorized by prior Commission orders.⁴
- g. With reference to Section 19 of the 3 GW Order stating, “the addition of resources to the Rider GZ resource portfolio, including resources that result

U-37425

LC648

Question No.: SREA 4-1

Exhibit JDW-3

in a Rider GZ resource portfolio that exceeds 2,000 MW.” Please explain whether ELL interprets this language to

- a. allow some of the resources procured under the 3 GW Order to apply towards the 1,500 MW incremental commitment and
- b. if so, whether the CSR contemplates using those resources to meet the 1,500 MW incremental commitment.
- h. Does ELL understand the “expedited certification process from the 3 GW Order” to be available to procure resources in addition to those specifically authorized in the 3 GW Order?

Response:

- a. See the Corporate Sustainability Rider (“CSR”), Attorney’s Eyes Only HSPM Exhibit ECI-2. The CSR speaks for itself and is the best evidence of its contents.
- b. Charge cycle losses would be accounted for in assessing a hybrid resource.
- c. The Company objects to this request as it misstates, misconstrues or misunderstands the testimony. As noted in the Direct Testimony of Phillip May, “commitments from the Customer [] provide a path to offset or “clean” approximately sixty percent (60%) of the gas megawatt-hours from the Planned Generators by 2031.” Subject to and without waiving this objection, the Company responds as follows: See the response to subpart a.
- d. See Attorney’s Eyes Only Exhibit RDJ-2, Revenue Calculations tab Row 21.
- e. See the Company’s response to Staff 1-10.
- f. The Company objects on the basis that this request is vague and ambiguous. The Company further objects to this request as an improper Request for Admission in contravention of Rule 63 of the Commission’s Rules of Practice and Procedure. Subject to and without waiving these objections, the Company responds as follows: See the Direct Testimony of Laura Beauchamp at pages 62-63
- g. See the Company’s response to subpart f.
- h. The Company objects to this request as vague and ambiguous.

² May Direct, p. 5.

Exhibit JDW-3

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37425

Response of: Entergy Louisiana, LLC
to the Third Set of Data Requests
of Requesting Party: Southern Renewable
Energy Association

Question No.: SREA 4-3

Part No.:

Addendum:

Question:

With reference to the Direct Testimony of Elizabeth C. Ingram, p. 9, Table 1, stating, "Limited to Solar Photovoltaic ("PV") resources ..."

- a. Please confirm that this statement refers to language in HSPM Exhibit ECI-2, p. 2, stating, [REDACTED] If not fully confirmed, please explain in full.
 - b. Please explain why wind resources are excluded from this process and what changes to the process would be necessary to include wind resources in this process.
-

Response:

- a. The Company objects to subparts (a) as it constitutes requests for admission in contravention to Rule 63 of the Commission's Rules of Practice and Procedure. Subject to and without waiving this objection, the quoted language from Table 1 is in the column "Restriction Detail in 3 GW Order" and refers to LPSC Order No. U-36697 and not the Corporate Sustainability Rider ("CSR").
- b. The Company objects to this request as vague and ambiguous. Subject to and without waiving this objection, the Company responds as follows: Assuming the question is inquiring as to why wind resources contemplated by the CSR are not proposed to be included in an expedited procurement and certification process, the request for expedited procurement and certification identified in the Direct Testimony of Elizabeth Ingram is structured to be consistent with the 3 GW Order, and the processes approved in the 3 GW Order were limited to solar and hybrid resources.

U-37425

LC653

Recipient Information

To: Kris Abel
Company: Louisiana Public Service Commission
Fax #: 12253420877

fax

Sender Information

From: Whit Cox
Company: Southern Renewable Energy Association
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Sent on: Friday, May 9 2025 at 3:50 PM EDT