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July 3, 2025

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Via Facsimile 225-342-0877 and FedEx Overnight Delivery

Ms. Krys Abel
Business Technology Supervisor
Louisiana Public Service Commission
Galvez Building, 12th Floor, 602 North Fifth Street
Baton Rouge, Louisiana 70802

LOUISIANA PUBLIC SERVICE COMMISSION

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

Dear Ms. Abel:

Enclosed please find an original and three copies of the **Non-Party Meta Platforms, Inc.'s Motion for Leave to File Reply to the Alliance for Affordable Energy and Union of Concerned Scientists' Memorandum in Opposition to Meta Platforms, Inc.'s Motion for Immediate Review of Interlocutory Ruling**. A check for \$25.00 is also enclosed to cover the fax filing fee. Please retain the original and two copies for your file and return a stamped copy to me in the enclosed, self-addressed envelope.

Very truly yours,

Weston Adams, III

WA: kkh
Enclosure

cc: Official Service List U-37425 (via electronic mail)

BEFORE THE LOUISIANA PUBLIC SERVICE COMMISSION

RECEIVED BY FAX

ENTERGY LOUISIANA LLC, ex parte

JUL 03 2025

**IN RE: APPLICATION FOR
APPROVAL OF GENERATION AND
TRANSMISSION RESOURCES IN
CONNECTION WITH SERVICE TO
A SINGLE CUSTOMER FOR A
PROJECT IN NORTH LOUISIANA**

DOCKET NO. ~~LOUISIANA~~ PUBLIC SERVICE COMMISSION

**NON-PARTY META PLATFORMS, INC.'S MOTION FOR LEAVE TO FILE REPLY TO
THE ALLIANCE FOR AFFORDABLE ENERGY AND UNION OF CONCERNED
SCIENTISTS' MEMORANDUM IN OPPOSITION TO META PLATFORMS, INC.'S
MOTION FOR IMMEDIATE REVIEW OF INTERLOCUTORY RULING**

NOW BEFORE THE COMMISSION, through its undersigned counsel, comes Meta Platforms, Inc. (“Meta”), a non-party to the above-captioned Proceeding appearing in a limited capacity, which respectfully moves for the Tribunal to grant Meta leave to reply to Intervenor Alliance for Affordable Energy and Intervenor Union of Concerned Scientists’ (together, the “NPOs”) Memorandum in Opposition to Meta Platform’s Motion for Immediate Review of Interlocutory Order. In support of this motion, Meta states the following:

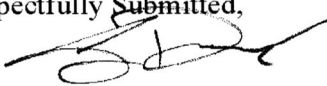
1. On June 18, 2025, the NPOs filed a Motion for Subpoena for the Production of Documents requesting the Tribunal issue a Subpoena to Meta.
2. On June 18, 2025, the Tribunal granted the NPOs Motion and issued a Subpoena requesting Meta produce the requested information by June 27, 2025.
3. On June 27, 2025, Meta filed a Motion to Quash the Subpoena, Motion for Immediate Review of Interlocutory Ruling, and a Motion for Stay Pending Immediate Review of Interlocutory Ruling.
4. On June 27, 2025, the Tribunal granted Meta's Motion for Stay Pending Immediate Review of Interlocutory Ruling.

5. On July 1, 2025, the Tribunal issued a Notice of Oral Argument regarding Meta's Motion to Quash Subpoena and Motion for Immediate Review of Interlocutory Ruling, instructing Meta, the NPOs, and interested Parties in the Proceeding to appear before the Tribunal for oral argument on July 7, 2025 at 10:00am.
6. On July 2, 2025, the NPOs filed a Memorandum in Opposition to Meta's Motion to Quash Subpoena and a Memorandum in Opposition to Motion for Immediate Review of Interlocutory Ruling.
7. Meta now seeks leave to file a reply to the NPOs' Memorandum in Opposition to Meta's Motion for Immediate Review of Interlocutory Order to dispute the NPOs' interpretation of the LPSC Rules, reiterate the risk of irreparable harm, call further attention to the unreasonable delay of the NPOs' Subpoena discussed in the Opposition, and highlight the apparent deficiency in the NPOs' service of the subpoena on Meta.

WHEREFORE, for the reasons set forth in this Motion and the accompanying Memorandum, Meta respectfully requests that the Tribunal grant Meta leave to file a reply to the NPOs' Memorandum in Opposition to Meta's Motion for Immediate Review of Interlocutory Order.

Respectfully Submitted,

BY:


Weston Adams, III (*pro hac vice* pending)
Craig Dillard (La. Bar No. 29150)
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BEFORE THE LOUISIANA PUBLIC SERVICE COMMISSION**ENTERGY LOUISIANA LLC, ex parte****IN RE: APPLICATION FOR
APPROVAL OF GENERATION AND
TRANSMISSION RESOURCES IN
CONNECTION WITH SERVICE TO
A SINGLE CUSTOMER FOR A
PROJECT IN NORTH LOUISIANA****DOCKET NO. U-37425****NON-PARTY META PLATFORMS, INC.'S REPLY IN SUPPORT OF
MOTION FOR IMMEDIATE REVIEW OF INTERLOCUTORY RULING****I. The LPSC Rules of Practice and Procedure Apply to Administrative Law Judges.**

The NPOs argue without any support that Rule 40 of the LPSC Rules of Practice and Procedure is “inapplicable to proceedings before an Administrative Law Judge [ALJ].”¹ Instead, they argue that Rule 55(c) alone governs the ALJ’s subpoena power. Given the Administrative Hearings Division exists “[t]o assist the Commission in fulfilling its adjudicatory functions,”² it strains credulity to conclude an ALJ is exempt from a separate Rule that provides detailed guidelines for a squarely adjudicatory function like issuing subpoenas.

Seeming unsatisfied with this first argument, the NPOs then note the Preamble to Part XI of the Rules of Practice and Procedure prevails in the event of a conflict between Part XI and other LPSC Rules or previous Orders.³ The NPOs conclude that Rule 40 and Rule 55(c) are in conflict, and therefore Rule 40 is inapplicable “once a proceeding is delegated to the Administrative Hearings Division.”⁴

¹ Opp’n at 5.

² LPSC Rules of Practice and Procedure, Part XI, Preamble.

³ Opp’n at 5 (quoting LPSC Rules of Practice and Procedure, Part XI, Preamble). The existence of this statement within the Preamble necessarily implies the other LPSC Rules remain in force for the Administrative Hearings Division.

⁴ *Id.* at 5.

Given the LPSC Rules “shall be liberally construed, with a view towards the purpose for which they are adopted[.]”⁵ it is unlikely the function of Rule 55(c) is to nullify the entirety of Rule 40 and grant the ALJ broader subpoena power than the Commission itself. Instead, a liberal construction of both Rules would require the ALJ to consult with the Secretary of the Commission upon receipt of a motion for issuance of a subpoena. Once the Secretary of the Commission determines the “matter sought is relevant material and necessary and that the production of such books, papers, accounts or documents will not result in unnecessary harassment, imposition, or undue inconvenience or expense to the party to be required to produce the same[.]”⁶ the ALJ may then issue the subpoena and exercise its adjudicatory function.

II. Meta Had No Opportunity to Allege the Information was Trade Secret or Confidential Because the Motion for Issuance of a Subpoena was Granted the Same Day the NPOs Requested it.

The NPOs state that an individual or entity required to produce documents under a subpoena “must affirmatively allege that the information is of a trade secret or confidential nature in order to get a hearing” under LPSC Rule 40. Here, Meta had no opportunity to “affirmatively allege” the information sought was trade secret or confidential because the Tribunal issued a Ruling on the Subpoena *the same day* the NPOs filed their Motion for Issuance of a Subpoena.

Even if the Tribunal waited a few days to issue its Ruling, Meta would still have no way to affirmatively allege the information is confidential or trade secret because it is not a party to the Proceeding. Meta was not served with the Motion and only learned of the Subpoena after receiving the Tribunal’s Ruling. Its decision to file a Motion to Quash, the Motion for Immediate Review of Interlocutory Ruling, and the accompanying Motion for Stay were the only tools it possessed to allege the confidential and trade secret nature of the information requested.

⁵ LPSC Rules of Practice and Procedure, Rule 1.

⁶ *Id.*, Rule 40(B).

Assuming the construction of the Rule set forth by the NPOs is correct, any subpoena issued by the Tribunal to a non-party that is later found to seek trade secret or confidential information is a violation of the Rule because the hearing and determination will always follow issuance of the subpoena. This produces an absurd outcome as the Tribunal essentially must stay and walk back its own violation each time a non-party alleges the information sought is trade secret or confidential. A proper construction of Rule 40(B) would therefore require that the Tribunal afford the non-party targeted with the subpoena notice of the motion, an opportunity to respond and assert the information is confidential or trade secret, and a hearing *before* the subpoena is issued.

III. The Risk of Irreparable Harm to Meta's Economic Position from Disclosure of Meta's Confidential and Trade Secret Information Warrants Immediate Review.

Setting aside the NPOs frequent criticisms⁷ of Meta's proposed project in Louisiana and the resulting concerns with sharing confidential business information and trade secret data with non-lawyer, non-expert consultant arms of these organizations, the issuance of this Subpoena will create a precedent that could severely harm Meta's economic position. Irreparable injury or harm occurs when confidential and proprietary information and trade secrets are misused or disclosed to others improperly.⁸

⁷ See, e.g., Arbaje, Paul, Union of Concerned Scientists, "Entergy Doesn't Want Louisianans to Know How Expensive this Gas Project Could Be" (May 29, 2025), <https://blog.ucs.org/paul-arbaje/entergy-doesnt-want-louisianans-to-know-how-expensive-this-gas-project-could-be/> (last accessed July 2, 2025); Union of Concerned Scientists, "Entergy's Plan for Fossil Fuel-Powered Data Center a Bad Deal for Louisianans, Expert Testimony Says," (April 14, 2025), <https://www.ucs.org/about/news/entergy-gas-plant-data-center-proposal-bad-louisianans> (last accessed July 2, 2025); Union of Concerned Scientists, "Motion Filed to Defend Louisiana Ratepayers Against Entergy's Attempt to Circumvent Commission Policy", <https://test.ucsaction.org/about/news/motion-filed-defend-louisiana-ratepayers> (last accessed July 2, 2025); Alliance for Affordable Energy, "Motion Filed to Bring Transparency to Meta's Fossil Fuel Powered Data Center Plans in Louisiana," <https://www.all4energy.org/watchdog/motion-to-bring-transparency-to-metas-fossil-fuel-powered-data-center-plans/> (last accessed July 2, 2025); Alliance for Affordable Energy, "Tell Regulators: Don't Let Big Tech Put Our Grid & Wallets at Risk" (May 30, 2025), <https://www.all4energy.org/take-action/tell-lpsc-dont-let-meta-put-our-wallets-at-risk/> (last accessed July 2, 2025).

⁸ See, e.g., *Union Nat. Life Ins. Co. v. Tillman*, 143 F. Supp. 2d 638, 645 (N.D. Miss. 2000) ("[L]oss of sales, disclosure of its confidential information and loss of its competitive advantage constitute irreparable harm.")

As discussed in Meta's original Motion, the extremely competitive nature of the AI industry and its exponential growth instill significant economic value in Meta's information regarding its data center processes, procedures, and power procurement strategy. By granting this Subpoena, the Tribunal will create a precedent that parties in other utility proceedings (including the NPOs) can now showcase as reason to demand confidential information from Meta in other current and future proceedings related to energy procurement for AI and data center projects. This broader dissemination of otherwise confidential and trade secret material creates a much higher risk of this information reaching the public despite a confidentiality designation. This heightened risk in the current proceeding and future proceedings warrant a finding of "irreparable injury" if this Subpoena is not quashed or withdrawn.

IV. The NPOs Have Not Shown Good Cause to Issue the Subpoena Because the Requested Information is Not Necessary to Adjudicate the Proceeding.

The NPOs claim the operative standard for their current Subpoena request is "relevance."⁹ This is not the correct standard to evaluate a subpoena issued for the production of documents under LPSC Rules and is not the correct standard to evaluate a subpoena issued to a non-party under Louisiana law.

Under LPSC Rule 40, subpoenas "for the production of books, papers, accounts or documents at a hearing in a pending proceeding" that are brought upon the written motion of a party require the requesting party show "there is *good cause* for issuance" of the subpoena.¹⁰ Further, "[n]o such subpoena shall be issued unless the Secretary of the Commission shall determine that the matter sought is *relevant* material *and necessary*" and production of the books,

⁹ Opp'n at 10 (citing Rule 63 of the LPSC Rules of Practice and Procedure and La.Code Civ.P. art 1422).

¹⁰ LPSC Rules of Practice and Procedure, Rule 40(A) (emphasis added).

papers, accounts or documents “will not result in *unnecessary harassment, imposition, or undue inconvenience or expense* to the party to be required to produce the same.”¹¹

Louisiana courts similarly require a showing of “both good cause and relevancy” before issuing a subpoena on a non-party,¹² and have found that failure to show a document was “necessary” to the proceeding resulted in a failure to show good cause.¹³

For example, in *St. Bernard Port, Harbor & Terminal District v. Violet Dock Port, Inc., L.L.C.*, two non-parties appealed the trial court’s denial of a motion to quash a subpoena ordering production of the non-parties’ records related to the valuation of a former minority membership interest in a port subject to expropriation.¹⁴ The appellate court reversed the denial and found the respondent had not shown good cause to compel production of the valuation records.¹⁵ In its discussion of the failure to show good cause, the appellate court emphasized the non-parties’ valuation records were not necessary because the respondent “obtained its own expert appraisals” regarding the value of the expropriated property to prepare for the valuation trial and the requested records were therefore “not necessary to establish the value” of the property.¹⁶

Similarly, the documents sought in the NPOs’ subpoena are not necessary for disposition of this proceeding because the NPOs and other Intervenors have obtained their own expert opinions and used the available information in the docket and from other sources to draw conclusions regarding Meta’s job creation, load need for the data center, and sustainability goals.

For example, the NPOs’ subpoena request asks for:

¹¹ *Id.* Rule 40(B).

¹² See Motion at 10; see also *Hendricks v. Wells Fargo Ins.*, 2021-0109 (La. App. 4 Cir. 10/27/21), 366 So. 3d 376, 379, *writ denied*, 2021-01916 (La. 3/15/22), 333 So. 3d; *St. Bernard Port, Harbor & Terminal Dist. v. Violet Dock Port, Inc., L.L.C.*, 2014-0286 (La. App. 4 Cir. 8/27/14), 147 So. 3d 1266, 1270, *writ denied*, 2014-2019 (La. 10/31/14), 152 So. 3d 160.

¹³ *St. Bernard Port*, 147 So. 3d at 1270.

¹⁴ *Id.* at 1267.

¹⁵ *Id.* at 1269–70.

¹⁶ *Id.* at 1270.

- Analyses, data, reports, calculations, and/or evidence which substantiate the amount of electricity load the Richland data center will need.¹⁷
- Analyses, data, reports, calculations, and/or evidence providing the Richland data center's high load factor and expected load variability over time; including daily, weekly and monthly load variability.¹⁸

The NPOs' own expert Nicholas Miller has already opined in detail about the “[r]isks associated with dynamic behavior of the Customer load” and “risks of the load increase announced in mid-February.”¹⁹ Elsewhere, he has provided conclusions such as “data centers, like the one the Customer is planning to build, are extremely dynamic – i.e., the load fluctuates significantly over extremely short periods of time.”²⁰ Other experts in the docket have provided similar conclusions regarding the feasibility of renewable alternatives, the Corporate Sustainability Rider, and sustainability goals using their expertise, available discovery, and outside research.²¹

Like the respondents in *St. Bernard Port*, the Intervenor in this docket have employed their own experts to draw inferences and conclusions regarding the proposed data center and generation needs. The Intervenor has ample means to produce information that refutes or substantiates the assertions ELL provides regarding anticipated job growth, load needs, and sustainability goals without the need for obtaining non-party Meta's proprietary and confidential business information.

As stated in Meta's Motion, the Commission's task is to determine whether ELL has successfully met its burden to prove the need of the generation requested.²² The Commission will

¹⁷ Motion at 2.

¹⁸ *Id.*

¹⁹ Direct Testimony of Nicholas Miller, Sections B and C, pp. 17–29.

²⁰ *Id.* at p. 20:5–7

²¹ See, e.g., Direct Testimony of John D. Wilson (concluding the Commission should order ELL to initiate a renewable energy procurement to supply data center needs); Direct Testimony of James R. Dauphinais (concluding the negotiations that led to the Corporate Sustainability Rider are inappropriate and requesting ELL afford the same path to renewables it offered to Meta to other customers).

²² Motion at 10.

consider ELL's evidence and testimony alongside the evidence and testimony provided by the experts for Staff and other Intervenors to determine if ELL has ultimately shown a need for the requested generation. A last-minute subpoena to seek Meta's proprietary and highly confidential business information concerning is not "necessary" to adjudicate this hearing, as experts for Intervenors, Staff, and ELL alike have had ample opportunity to develop their own analyses, data, reports, calculations, and/or evidence that undercut or otherwise support Meta's conclusions regarding job creation, load needs, and sustainability goals.

V. The NPOs Minimize and Ignore Their Unreasonable Failure to Timely File the Subpoena.

The NPOs contend that Meta is not subject to the discovery deadlines in the Scheduling Order because it is a non-party to the Proceeding and, assuming the deadlines applied, it should be afforded seven days to respond like Applicant Entergy Louisiana, LLC ("ELL"). Meta alluded to the Scheduling Order as a frame of reference for the time considered reasonable for production of discovery in this Proceeding. The NPOs do not explain why Meta, as a non-party, should be held to the discovery response deadline afforded to the Applicant and main Party to this proceeding.

These arguments ultimately distract from the fact the NPOs waited nearly three months to request this Subpoena despite instruction from the Tribunal and the LPSC staff to pursue it as an alternative discovery vehicle as early as March 25, 2025. In their Opposition, the NPOs first attribute their untimeliness to the need for "due diligence" when seeking a subpoena from a non-party.²³ Considering the NPOs fully briefed (and were denied) a Peremptory Exception for Mandatory Joinder predicated on their own assertion that the Tribunal lacked jurisdiction to subpoena a non-party, then sought (and were refused) interlocutory review from the Commission

²³ Opp'n at 8.

under the same premise, Meta is unsure what further “due diligence” the NPOs could uncover before trying out the Subpoena route posed by the Tribunal and Staff in March 2025.

The NPOs state they “honestly interpreted the law governing subpoenas as not allowing the Commission to issue a subpoena against Meta” and were therefore “entitled to get this issue finally resolved, even to the extent of asking the Commission itself to rule on the issue.”²⁴ Meta has learned recently the Commission declined to take up the NPOs’ Rule 57 Motion on May 19, 2025,²⁵ in part because the Staff noted the NPOs failed to exhaust alternative remedies for discovery.²⁶ Nonetheless, the NPOs waited another month to ultimately request the Subpoena.

The NPOs also claim they “waited until after ELL filed the Company’s Rebuttal Testimony [on May 30, 2025] to see if ELL had addressed the issues regarding job numbers, required load, and Meta’s sustainability goals.”²⁷ The NPOs claim that only once it “became clear that ELL was incapable of addressing these issues” did they pursue the Subpoena.²⁸ This assertion does not explain why the NPOs waited another *18 days* to file the Subpoena after ELL filed Rebuttal Testimony. Further, if the NPOs were only willing to accept that ELL could not provide the requested information after the receipt of Rebuttal Testimony, it is not clear why they chose to forego a Motion to Compel against ELL as the Tribunal and Staff recommended in March 2025 (or sought to even join Meta in the first place).

The NPOs reasoning in their Opposition only highlights their unreasonable delay in filing the Subpoena. They were informed repeatedly they should exhaust the Subpoena route given the ambiguity in the LPSC rules yet failed to take any action until nine days before the close of

²⁴ *Id.*

²⁵ LPSC B&E Open Session Transcript (May 19, 2025), at p. 145:1-6.

²⁶ *Id.* at p. 144:10-23.

²⁷ Opp’n at 8.

²⁸ *Id.*

discovery. This sort of delay is unreasonable, unduly burdensome, and should not be rewarded with the issuance of the requested eleventh-hour Subpoena.

VI. Improper Service and Overbroad Discovery Requests Justify a Finding of Oppression.

a. An Order to Produce all “Analyses, Data, Reports, Calculations, and/or Evidence” on Six Separate Topics in Three Days is Oppressive.

The NPOs attempt to distinguish *Whitt v. McBride* and claim the Subpoena was not oppressive because it did not request a “compilation of information.”²⁹ Although the NPOs did not request a “compilation” of information verbatim, they requested “analyses, data, reports, calculations, and/or evidence” on six different topics alongside all communications regarding the Corporate Sustainability Rider. This overbroad request for information results in a parallel exercise that requires Meta to review documents and extract the relevant “analyses, data, reports, calculations, and/or evidence” to satisfy the Subpoena’s requests for information in an unreasonably short timeframe. This creates the exact burden a party faces if tasked with producing a “compilation.” The NPOs argument does not sufficiently compare the facts in *Whitt* to the nature of its own requests and therefore falls short.

b. Service on Meta was Insufficient.

The NPOs allege the short timeframe to respond to the Subpoena was due to Meta’s resident agent, Corporation Service Commission (CSC), failing to “get the subpoena to Meta in a timely fashion.” Opp’n at 6. The NPOs fail to note that CSC did not even receive the certified mail notice until June 24, 2025.

It is also not clear whether this certified mailing even constitutes proper service on Meta. “All notices of which personal service may be required by statute” may be made by either the

²⁹ Opp’n at 9 (quoting *Whitt v. McBride*, 94-896 (La. App. 3 Cir. 3/1/95), 651 So. 2d 427, 428).

“sheriff of the parish of the party served, or by a duly authorized employee or official of the Commission, who shall make a return thereon.”³⁰

Under Louisiana statute, “a subpoena shall be served and a return thereon made in the same manner and with the same effect as a service of and return on a citation.”³¹ “Service of citation or other process on a domestic or *foreign corporation* is made by *personal service* on any one of its agents for service of process.”³² Only if “the corporation has failed to designate an agent for service of process, if there is no registered agent by reason of death, resignation, or removal, or if the person attempting to make service certifies that he is unable, after due diligence, to serve the designated agent” may the party seeking service utilize “service of process under the provisions of R.S. 13:3204 [e.g., certified mail], if the corporation is subject to the provisions of R.S. 13:3201.”³³

Although service of a “pleading or order” that sets a “court date” may be served through “registered or certified mail,” subpoenas are governed by the means of service of a *citation* and not “pleadings or orders.”³⁴ Further, while *reissuance* of a subpoena may be served by certified mail, this may only occur after “a subpoena that has been personally served is ordered reissued due to continuance or passage of the trial or hearing”³⁵

Here, Meta’s agent was mailed the subpoena via certified mail and nothing more. Given Meta is a foreign corporation, the Code of Civil Procedure requires service of a subpoena *by personal service* on Meta’s registered agent in accordance with the procedures for service of a citation. Service by

³⁰ LPSC Rules of Practice and Procedure, Rule 22.

³¹ La.Code Civ.P. art. 1355(A).

³² *Id.* art. 1261(A) (emphasis added).

³³ *Id.* art. 1261(3). *See also* La.R.S. 13:3201 (authorizing personal jurisdiction over a nonresident); 13:3204(A) (“In a suit under R.S. 13:3201, a certified copy of the citation . . . shall be sent by counsel for the plaintiff . . . to the defendant by registered or certified mail, or actually delivered to the defendant by commercial courier, when the person to be served is located outside of this state or by an individual designated by the court in which the suit is filed, or by one authorized by the law of the place where the service is made to serve the process of any of its courts of general, limited, or small claims jurisdiction.”)

³⁴ La.Code Civ.P. art. 1313(C).

³⁵ *Id.* art. 1355.1.

certified mail is not applicable to the present Subpoena, and the NPOs appear to have failed to properly serve Meta.

VII. CONCLUSION

WHEREFORE, for the reasons set forth in this Reply, Meta respectfully requests the Tribunal quash the NPOs' Subpoena for production of documents.

Respectfully Submitted,

BY:



Weston Adams, III (*pro hac vice* pending)
Craig Dillard (La. Bar No. 29150)
Brandon A. Prince (*pro hac vice* forthcoming)
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Suite 2100
Houston, TX 77002

Attorneys for Non-Party Meta Platforms, Inc.

CERTIFICATE OF SERVICE
LPSC Docket No. U-37425

I hereby certify that I have certified copies of the foregoing pleading upon all other known parties of this proceeding, by electronic mail and/or overnight delivery.

Houston, Texas, ~~this~~ 3rd day of July, 2025.



Craig Dillard