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July 3, 2025

VIA HAND DELIVERY

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

Re: LPSC 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 docket, please find Rebuttal Testimony in support of South Louisiana Electric Cooperative Association from Mr. Matthew Peters.

If any additional information is needed, please feel free to contact me. Thank you and with kindest regards,

Sincerely,

A handwritten signature in black ink, appearing to be 'Kara B. Kantrow', written over a horizontal line.

Kara B. Kantrow

Enclosure: as stated
cc: Service List (via email)

**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).

REBUTTAL TESTIMONY

of

Mr. Matthew Peters

on behalf of

SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION

July 3, 2025

1 **INTRODUCTION**

2 Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.

3 A. My name is Matthew Peters. I am the General Manager of South Louisiana Electric
4 Cooperative Association (“SLECA” or the “Cooperative”). My business address is 2028
5 Coteau Road, Houma, Louisiana 70364.

6 Q. ON WHOSE BEHALF ARE YOU FILING THIS REBUTTAL TESTIMONY?

7 A. I am filing this Rebuttal Testimony on behalf of the Cooperative.

8 Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN THIS PROCEEDING?

9 A. Yes, I submitted Direct Testimony in support of SLECA’s Petition for Approval of
10 Abandonment filed on September 25, 2024 (“Petition”). My professional background and
11 qualifications are contained in that testimony and are adopted and incorporated herein by
12 reference. Terms defined in that testimony have the same meaning in this Rebuttal
13 Testimony. Additionally, I adopt my Direct Testimony in full as if it were copied herein.

14 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

15 A. My Rebuttal Testimony responds to testimony from intervenors and the Louisiana Public
16 Service Commission (“LPSC” or “Commission”) Staff (“Staff”). I reaffirm SLECA’s
17 decision not to reconstruct the Lake Lines because that decision was the result of a
18 responsible, deliberate, and fact-driven process. I also demonstrate that, while some
19 intervenors have expressed understandable frustration and hardship, their individual
20 expectations cannot override SLECA’s statutory and fiduciary duties to its entire
21 membership. The cost to rebuild the Lake Lines would devastate our rate base and violate
22 core regulatory principles. I further demonstrate that the decision to forego reconstruction

1 is not only reasonable, but also necessary to protect the public interest and to avoid unjust,
2 unreasonable, and discriminatory rate impacts.

3
4 **RESPONSE TO INTERVENOR TESTIMONY**

5 Q. SEVERAL INTERVENORS CLAIM THAT SLECA PROMISED TO REBUILD THE
6 LAKE LINES. IS THIS ACCURATE?

7 A. No. SLECA never guaranteed the restoration of power to areas previously served by the
8 Lake Lines. SLECA communicated with members in good faith during the uncertain period
9 following Hurricane Ida. Our letters consistently emphasized our intent to *evaluate*
10 restoration, not to guarantee it. The July 13, 2022 letter explicitly stated that we “have
11 every intention” of rebuilding the lines “at this time,” but it was not a commitment. It
12 reflected our position at that moment. As facts changed, costs increased, FEMA delays
13 mounted, and environmental permitting grew uncertain, we reassessed. That reassessment
14 led to the only responsible conclusion: rebuilding the Lake Lines would be unjustified and
15 fiscally reckless.

16 Q. INTERVENORS CITE PERSONAL INVESTMENTS AND FINANCIAL LOSSES.
17 DOES THIS CREATE A DUTY FOR SLECA TO REBUILD?

18 A. SLECA sympathizes with these challenges and understands the disappointment, but the
19 Cooperative cannot guarantee investment outcomes for any member, and utility regulation
20 is not a safety net for private investment decisions. SLECA has over 21,000 members. The
21 Lake Lines served just 282 meters for mostly seasonal camps. As Steve Richard candidly
22 stated in his direct testimony, “Many camps have been abandoned for lack of power.”
23 Reconstructing the Lake Lines for tens of millions of dollars would force our full

1 membership, most of whom are working families, to subsidize remote, recreational
2 infrastructure.

3 Q. WHAT ABOUT CLAIMS OF INAPPROPRIATE INFRASTRUCTURE REMOVAL
4 AFTER HURRICANE IDA?

5 A. SLECA acted to remove hazardous, storm-damaged infrastructure in compliance with
6 public safety and engineering standards. As stated by the Cooperative's engineer, it would
7 have been imprudent to reuse any of the infrastructure that remained from Hurricane Ida.
8 (See SLECA Response to Guidroz Family's First Set of Requests for Production of
9 Documents No. 1-9, attached hereto as Exhibit "A" *in globo*.)¹ Intervenor testimony
10 regarding the removal of the Lake Lines does not have any bearing on whether the Lake
11 Lines are reconstructed. Intervenor Sara A. Boudreaux specifically testifies to the purpose
12 of her testimony as follows: "My primary reason against abandonment is due to the lack of
13 clarity and transparency on infrastructure removal." This issue is outside the scope of the
14 Petition and this proceeding.

15 Q. SHOULD SLECA COMPENSATE CAMP OWNERS OR BUY THEIR PROPERTY?

16 A. No. As far as I know, these proposals are well outside the Commission's jurisdiction. The
17 question here is narrow: whether SLECA's decision under General Order No. R-30301 is
18 justified. It is. Broader financial claims must be addressed, if at all, in other forums.

19
20 **RESPONSE TO MAY 9, 2025 STAFF REPORT AND RECOMMENDATION;**
21 **ADDITIONAL EVIDENCE AND DEVELOPMENTS**
22

23 Q. IN GENERAL, WHAT IS STAFF'S POSITION ON SLECA'S PETITION?

¹ A copy of SLECA's narrative response entitled "SELCA's Responses to Guidroz Family's First Set of Requests For Production of Documents" in addition to the exhibit associated with the response are attached.

1 A. It appears that Staff is generally supportive of the Petition and that SLECA has met the
2 procedural requirements outlined in the General Order. Staff emphasized that it would be
3 “untenable” to raise systemwide rates \$3.00-\$5.00 per month for 30 years to serve a tiny
4 number of seasonal camps.² Nevertheless, Staff ultimately recommended that the
5 Commission not grant the Petition until SLECA performed a segmented financial
6 breakdown for reconstruction of the four Lake Line sections.³

7 Q. HAVE CIRCUMSTANCES CHANGED OR BEEN CLARIFIED SINCE STAFF FILED
8 ITS REPORT AND RECOMMENDATION?

9 A. Yes. Since Staff filed its Report and Recommendation, SLECA filed detailed responses to
10 the Staff’s Third Set of Data Requests, which focused on a financial segmented approach,
11 a request which, as mentioned above, stems from Staff’s conclusion in its Report and
12 Recommendation requesting a segmented financial breakdown.⁴

13 Q. WHY DID SLECA CONDUCT A SEGMENTED COST ANALYSIS, AND WHAT
14 WERE THE RESULTS?

15 A. Although not required by the Commission’s General Order, SLECA conducted a
16 segmented financial analysis in response to Staff’s request in the Staff Report and
17 Recommendation as well as Staff’s Third Set of Data Requests to SLECA.⁵ We broke the
18 Lake Lines into four groups: Lake Decade, Grand Pass, Lake Fields, and Four Point Island.
19 All four groups are similar in geography and will require similar equipment for repair,

² Staff Report and Recommendation, p. 12.

³ Testimony of Thomas Broady in Support of the Staff Recommendation, p. 9, ll. 1-4.

⁴ See Staff Report and Recommendation, p. 12: “However, without fully understanding or knowing the costs associated with each group of individual assets within the Lake Line project, Staff cannot say that it would be in the public interest to abandon all of the assets in their entirety.”

⁵ Staff does not appear to disagree with any of SLECA’s findings; however, before agreeing with SLECA, Staff states that “SLECA should provide an analysis and determination” of the Lake Lines in a “piecemeal” fashion “rather than in whole.” (Staff Report and Recommendation”), p. 12.

1 operation, and maintenance. The results of the segmented analysis only highlighted the
2 diseconomies of scale and lack of revenue base. This analysis reinforces SLECA's core
3 conclusion: that no portion of the Lake Lines can be prudently rebuilt under current or
4 foreseeable conditions. *See* Exhibit "B" *in globo* attached hereto, which is a copy of
5 SLECA's Responses to Staff's Third Set of Data Requests to SLECA.

6 Q. HOW DOES THE SEGMENTED ANALYSIS SUPPORT SLECA'S PETITION?

7 A. The segmented analysis eliminates any doubt. It affirms that SLECA's decision not to
8 reconstruct was not only appropriate, but also unavoidable. There is no lower-cost, self-
9 sustaining cluster of camps, and any effort to cherry-pick parts of the system would still
10 impose prohibitively high costs on either the affected camp owners or the Cooperative's
11 full membership. No regulatory principle allows such a result. In addition, a segmented
12 approach ignores efficiencies of scale as well as opportunities for certain funding options.

13 Q. DID ANY INTERVENOR CONCEDE THAT REBUILDING IS UNJUSTIFIED?

14 A. Yes. Intervenor witness Christopher M. Guidroz in his Cross-Answering Testimony
15 admitted that the reconstruction of affected distribution facilities would not be justified
16 (page 2, lines 21-24). This admission further confirms the reasonableness of SLECA's
17 position. Even those opposing abandonment were ultimately unable to justify
18 reconstruction when pressed under oath. It reinforces the clear reality that rebuilding cannot
19 be defended under regulatory scrutiny.

20
21 **ECONOMIC AND EQUITY CONSIDERATIONS**

22 Q. PLEASE SUMMARIZE WHY REBUILDING THE LAKE LINES IS NOT IN THE
23 PUBLIC INTEREST.

1 A. The numbers speak for themselves. Rebuilding would cost anywhere between \$27.3 to
2 \$38.9 million. Divided among 282 meters, the cost per meter is astronomical. If socialized,
3 every member would pay between \$16.00 and \$22.00 extra per month for the next seven
4 years just to restore power to a few seasonal camps. For reference, SLECA's current rate
5 for 1,000 kilowatt-hours (kWh) is \$131.98.⁶ On the high side, this would equate to an
6 approximate 16% increase on a 1,000-kWh bill. Such a proposition would violate every
7 principle of utility fairness: cost causation, rate parity, and prudent investment.

8 Q. DO THE LAKE LINE CAMPS PRESENT UNIQUE LOGISTICAL AND
9 OPERATIONAL CHALLENGES?

10 A. Yes. The Lake Lines are only accessible by boat. Maintenance requires specialized
11 amphibious equipment. Even routine outages would require mobilization of marine fleets,
12 equipment that SLECA does not own, thereby driving up labor and operation and
13 maintenance costs. The terrain has also changed significantly over the years due to coastal
14 erosion and subsidence. This is not a typical line replacement; it is a high-risk, high-cost,
15 low-revenue capital project. No prudent operator, under regulatory scrutiny, would
16 undertake such a project absent a compelling public interest, which is plainly lacking here.
17 In fact, Intervenor Steve Richard testified that, "[m]any camps have been abandoned for
18 lack of power," a fact that not only compounds the financial burden on SLECA's
19 membership, but also highlights the fact that there is no guarantee that Lake Lines members
20 will actually remain members to share in the exorbitant costs if SLECA is forced to
21 reconstruct the Lake Lines.

⁶ See Exhibit "C," attached hereto, the LPSC Jurisdictional Residential Electrical Rate Comparison for 1,000 kWh, which is published on the LPSC's website as of the date of the filing of this Rebuttal Testimony.

1

2 **REGULATORY DUTY TO ENTIRE MEMBERSHIP**

3 Q. HOW DOES SLECA'S DECISION NOT TO RECONSTRUCT THE LAKE LINES
4 COMPORT WITH SLECA'S DUTY TO ITS MEMBERSHIP?

5 A. As a member-owned cooperative, our duty is to every member, not just a vocal few. We
6 must deliver safe, reliable, and affordable service and protect the financial integrity of our
7 system and cooperative. Rebuilding the Lake Lines would violate that duty. This decision
8 was not easy, but it was right. It reflects a cooperative acting with care, foresight, and
9 fairness toward all its members.

10

11 **CONCLUSION**

12 Q. WHAT IS YOUR REQUEST TO THE COMMISSION?

13 A. I respectfully urge the Commission to approve SLECA's Petition. The record is clear.
14 Reconstruction would be economically unsound, environmentally uncertain, and unjust to
15 our members. SLECA's decision protects the public interest, affirms utility fairness, and
16 ensures that ratepayer dollars are spent wisely, fairly, and equitably.

17 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

18 A. Yes, it does.

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).*

AFFIDAVIT

STATE OF LOUISIANA
PARISH OF Terrebonne

BEFORE ME, the undersigned notary public, duly qualified and commissioned in and for the State and Parish aforesaid, personally came and appeared Matthew Peters ("Affiant"), General Manager of SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION, who, after being duly sworn, did depose and say Affiant has reviewed the foregoing Rebuttal Testimony and that the said testimony is true and accurate to the best of Affiant's knowledge, information, and belief.

FURTHER AFFIANT SAYETH NAUGHT.

Matt Peters
AFFIANT

SWORN TO AND SUBSCRIBED before me this 3rd day of July, 2025.

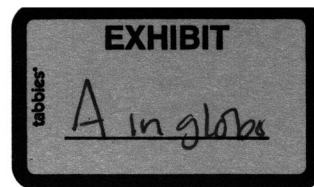
April Trahan
NOTARY PUBLIC

Printed Name: April Trahan

Bar Roll/Notary No.: 38919

My commission expires: At death.





BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

**SOUTH LOUISIANA ELECTRIC COOPERATIVE
ASSOCIATION**

DOCKET NO. U -37394

In re: Petition for Approval of Proposed Abandonment

**SLECA'S RESPONSES TO GUIDROZ FAMILY'S
FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

TO: Christopher M. Guidroz, Mark J. Guidroz and Action Charters, LLC ("Guidroz Family")
Through their attorneys of record:
Christopher M. Guidroz
SIMON, PERAGINE, SMITH & REDFEARN, LLP
1100 Poydras Street
30th Floor, Energy Centre
New Orleans, Louisiana 70163
chrisg@spsr-law.com; cguidroz@gmail.com

SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION (hereinafter referred to as "**SLECA**" or the "**Cooperative**") responds to discovery propounded by Christopher M. Guidroz, Mark J. Guidroz and Action Charters, LLC (hereinafter referred to as "**Guidroz**" or the "**Guidroz Family**") with the Objections and Answers that follow.

GENERAL OBJECTIONS

SLECA objects to Guidroz's discovery requests to the extent that the requests seek information beyond that which is permitted by the Rules of Practices and Procedures of the Louisiana Public Service Commission and/or the Louisiana Code of Civil Procedure. SLECA further objects to the extent any discovery request seeks information that is confidential, protected by the attorney-client privilege, the work product privilege, the attorney work product privilege or any other privilege recognized by applicable law. Furthermore, SLECA objects to any and all requests that are vague, overly broad, unclear, and/or not limited in time. SLECA reserves the right to supplement its responses.

NOTES AND COMMENTS

Please note that while the narrative responses to the data requests are not confidential, some of the exhibits and attachments referenced within these responses could contain confidential and/or proprietary information. If confidential, please note that SLECA submits these confidential exhibits and attachments under seal in accordance with Rule 12.1 of the Rules of Practices and Procedures of the Louisiana Public Service Commission.

Should any party wish to review the confidential exhibits and attachments, they will need to sign and return a Confidentiality Agreement to undersigned counsel. Upon receipt of the executed Confidentiality Agreement, SLECA will provide access to the confidential information.

These responses are being supplied electronically. No hard copies will be served.

REQUEST NO. 1:

Identify and produce all documents which support the statement in paragraph 8 of your petition that “as of today the total estimated expected cost to replace the Lake Line is \$105,194,712.00.”

SLECA RESPONSE TO GUIDROZ REQUEST NO. 1:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. SLECA further objects to this Request to the extent it seeks information protected by the attorney-client privilege, work product doctrine, or any other applicable privilege or protection. Subject to and without waiver of these objections, please see SLECA’s Response to LPSC Staff Request 1-9, which is incorporated herein by reference, *in extenso*, along with the documents produced in response thereto.

GUIDROZ REQUEST NO. 2:

Identify and produce all documents which support the statement in paragraph 8 of your petition “SLECA has diligently worked with FEMA regarding reimbursement related to the Lake Line rebuild.”

SLECA RESPONSE TO GUIDROZ REQUEST NO. 2:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. SLECA further objects to this Request to the extent it seeks information protected by the attorney-client privilege, work product doctrine, or any other applicable privilege or protection. Finally, SLECA objects to this request as impermissibly vague. It fails to identify with any sort of specificity what documents are being requested.

Subject to and without waiver of objections, please see SLECA’s Response to LPSC Staff Request 1-10, which is incorporated herein by reference, *in extenso*.

GUIDROZ REQUEST NO. 3:

Identify and produce all documents which support the statement in paragraph 8t of your petition “environmental permitting environmental mitigation and/or additional associated procurement of Right-of-Ways is estimated to cost an additional \$5 million.”

SLECA RESPONSE TO GUIDROZ REQUEST NO. 3:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of these objections, please see SLECA’s Responses to LPSC Staff Requests 1-12 and 2-7(b), which is incorporated herein by reference, *in extenso*, along with the attached corresponding document.

GUIDROZ REQUEST NO. 4:

Identify and produce all documents which support the statement in paragraph 8 of your petition “interest associated with the revolving line of credit required to pay for all services in the interim between costs incurred and reimbursement of FEMA eligible funding.”

SLECA RESPONSE TO GUIDROZ REQUEST NO. 4:

SLECA objects to this Request as vague and ambiguous. The Request selectively identifies language within SLECA’s petition and, as worded, does not reasonably identify the documents sought. The sentence referenced states, in its entirety:

At a minimum, using the \$105,194,712.00 estimated rebuild cost, SLECA’s entire membership (not just those members that receive service off the Lake Line) will be responsible for the payment of approximately \$10,500,000.00.

Environmental permitting, environmental mitigation, and/or additional associated procurement of Rights-of-Ways is estimated to cost an additional \$5,000,000.00, plus interest associated with the revolving line of credit required to pay for all services in the interim period between costs incurred and reimbursement of FEMA eligible funding. (See petition at ¶ 8, emphasis in original).

SLECA further objects to this Request as overly broad, unduly burdensome, and objects to the extent this Request seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. SLECA further objects to the extent this request seeks information protected by the work product privilege, or to the extent this request seeks information equally available to the requesting party.

Subject to and without waiver of these objections, SLECA is responsible for interest costs incurred from the Lake Line replacement in accordance with the Stafford Act and applicable law.

GUIDROZ REQUEST NO. 5:

Identify and produce all documents which support the statement in paragraph 8 of your petition “the labor cost (contractors) alone for the replacement of lines and poles after thunderstorms cost the Cooperative approximately \$311,000 in 2019 and \$142,000 in 2020.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 5:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of these objections, please see attached documents. These documents are being produced CONFIDENTIALLY under seal pursuant to Rule 12.1 of the Commission Rules of Practice and Procedure.

GUIDROZ REQUEST NO. 6:

Identify and produce all documents which support the statement in paragraph 11 of your petition “During the last five years, due to corrosion, harsh environmental surroundings storms and strong winds there have been more weekly repairs needed to the Lake Line and its infrastructure.”

SLECA RESPONSE TO GUIDROZ REQUEST NO. 6:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Responding to this Request as worded would require an extensive search and compilation of documents related to repairs to the Lake Lines, which is not feasible or proportional to the needs of this proceeding.

To identify responsive documents, SLECA would need to individually access each of the accounts associated with the Lake Lines, identify repair requests and submissions made over the last five years, and then manually pull the relevant documents on an individual basis. This process is extremely time-consuming and burdensome, and it falls outside the scope of SLECA's petition to not rebuild the Lake Lines.

Moreover, SLECA does not maintain responsive documents in a centralized or easily accessible manner. Any responsive documents are contained within individual account records, making the identification and compilation of responsive documents a monumental task that would require a disproportionate amount of time and resources relative to the needs of this proceeding.

Due to the overly broad and burdensome nature of this Request, SLECA is not producing documents relating to the Lake Lines repairs at this time. However, SLECA is willing to meet and confer to discuss the feasibility of producing a narrower set of responsive documents that are relevant and proportional to the needs of this proceeding, if such documents can be reasonably identified and compiled.

GUIDROZ REQUEST NO. 7:

Identify and produce minutes of all meetings of the Board of Directors of SLECA and any recording of proceedings from and after August 29, 2021 to October 1, 2024.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 7:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of these objections, please see attached documents that are being produced CONFIDENTIALLY under seal pursuant to Rule 12.1 of the Commission Rules of Practice and Procedure.

GUIDROZ REQUEST NO. 8:

Identify and produce all engineering reports, estimates, economic analysis, or other documents referring or relating in any way to the Lake Lines that were presented to the SLECA board in connection with its decision to seek abandonment of the Lake Lines.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 8:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of these objections, a Special Board meeting was held on May 17, 2024, during which all discussions and presentations of documentation related to the Lake Lines were conducted in executive session, as reflected in the board minutes. The motion regarding the Lake Lines was made as described in the board minutes. Subsequently, at the August 5, 2024 Board Meeting, the Board approved the motion for the abandonment letters to be sent to the affected members.

SLECA is producing the following documents related to this Request: (1) SLECA Board Meeting Minutes, May 17, 2024; and (2) SLECA Board Meeting Minutes, August 5, 2024. These documents are being produced CONFIDENTIALLY under seal pursuant to Rule 12.1 of the Commission Rules of Practice and Procedure.

SLECA asserts that any documents referring or relating to the Lake Lines that were presented to the SLECA board in connection with its decision to seek abandonment of the Lake Lines during the executive session are protected by the attorney-client privilege and/or work product doctrine and will not be produced.

GUIDROZ REQUEST NO. 9:

Identify and produce all engineering reports, estimates, economic analyses, correspondence, emails, memoranda, letters, or other documents referring or relating to the Lake Lines on or after August 29, 2021.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 9:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. SLECA further objects to this request as impermissibly vague, as there is no defined limitation on what “relates to” the Lake Lines. Responding to this Request as worded would require an extensive search and compilation of documents “related to” the Lake Lines, which is simply not feasible, nor proportional to the needs of this proceeding.

Subject to and without waiver of these objections, SLECA refers to all other documents produced in response to all other requests propounded in this proceeding. SLECA also produces the attached statement from its engineer in specific response to this Request. Due to the overly broad and burdensome nature of this Request, SLECA is not producing all documents relating to the Lake Lines with this request. However, SLECA is willing to meet and confer to discuss the production of a narrower set of responsive documents that are relevant and proportional to the needs of this proceeding.

GUIDROZ REQUEST NO. 10:

Identify and produce all documents referring or relating in any manner whatsoever to contact with FEMA, any of its representatives, any consultants, or other parties referring or relating in any way to the Lake Lines.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 10:

SLECA incorporates its objections and response to Guidroz Request No. 2 as if set forth herein *in extenso*.

GUIDROZ REQUEST NO. 11:

Identify and produce all documents evidencing any consideration of alternative methods of providing electrical services to the 282 meters affected by your proposed abandonment of the Lake Lines.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 11:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of these objections, SLECA states that as a distribution cooperative, its primary function is to distribute the power it purchases from its wholesale power provider to its members. SLECA does not generate its own power or actively consider alternative methods of power provision, as such considerations fall outside the scope of its role as a distribution cooperative. Consequently, SLECA possesses no documents responsive to this request.

GUIDROZ REQUEST NO. 12:

Identify and produce all documents evidencing any directors and officers liability insurance for the directors and/or officers of SLECA for the period August 1, 2021 through October 1, 2024.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 12:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Neither SLECA nor its directors or officers are defendants, nor subject to any claim for damages by virtue of this proceeding. Consequently, SLECA declines to produce documents responsive to this Request.

GUIDROZ REQUEST NO. 13:

Identify and produce a complete list of all addresses to which you sent the letters attached as exhibits to your petition.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 13:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. SLECA further objects to this Request to the extent it seeks confidential and proprietary information, including individual customer information, which SLECA is legally obligated to protect.

Subject to and without waiver of these objections, SLECA states that it sent letters, substantially similar to the form letters attached as exhibits to the petition, to the affected members whose meters are subject to the proposed abandonment of the Lake Lines. However, SLECA will not produce a list of the specific addresses to which these letters were sent, as this information is confidential and protected by law.

GUIDROZ REQUEST NO. 14:

Identify and produce all documents evidencing actual expenditures by SLECA for any transactions relating to the Lake Lines on and after August 29, 2021.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 14:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Due to the overly broad and burdensome nature of this Request, SLECA is not producing all documents evidencing actual expenditures by SLECA related to the Lake Lines on or after August 29, 2021. However, subject to and without waiver of these objections, and in the spirit of cooperation, please see attached document that is being produced CONFIDENTIALLY pursuant to Rule 12.1 of the Rules of Practice and Procedure. Please also see the documents previously produced by SLECA in response to Staff Data Request 1-9 and 2-7(a).

GUIDROZ REQUEST NO. 15:

Identify and produce all documents, invoices, statements, or other charges, or any contracts relating to the removal of the infrastructure of the Lake Lines on and after August 29, 2001.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 15:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. The timeframe requested is overly broad and unreasonable as is the scope of the documents requested.

Subject to and without waiver of these objections please see the documents produced in SLECA's Response to LPSC Staff DR 1-9 evidencing the approximately \$11 million spent thus far for removal of the Lake Lines following Hurricane Ida. Please also see the document produced in response to Guidroz Request No. 14 above.

Due to the overly broad and burdensome nature of this Request, SLECA is not producing all documents relating to the removal of the infrastructure of the Lake Lines with this request. However, SLECA is willing to meet and confer to discuss the production of a narrower set of responsive documents that are relevant and proportional to the needs of this proceeding. SLECA maintains that identifying and producing each individual document that could potentially be responsive to this request is not reasonable or proportional to the needs of this proceeding.

GUIDROZ REQUEST NO. 16:

Identify and produce any statement reflecting actual Kilowatt hours used by and sums billed to account 4153405902, meter 90406447 on a monthly basis for each month from August 1, 2016 through September 1, 2021.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 16:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor

reasonably calculated to lead to the discovery of admissible evidence. SLECA further objects to this Request to the extent it seeks confidential and proprietary information, including individual customer information, which SLECA is legally obligated to protect.

Subject to and without waiver of these objections, please see attached spreadsheet reflecting the actual kW hours used by and sums billed to former account 4153405902 (current account number 105745-001), meter 90406447 on a monthly basis for the number of years available to SLECA. SLECA is producing this document CONFIDENTIALLY under seal pursuant to Rule 12.1 of the LPSC Rules of Practice and Procedure.

GUIDROZ REQUEST NO. 17:

Identify and produce all documents showing any financial reserves established on the books and records of SLECA on or after September 1, 2021 on a cash, governmental accounting, or accrual basis for repair and replacement of the Lake Lines under FASB5 or any other accounting rule or principal.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 17:

SLECA objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information that is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiver of these objections, as a not-for-profit electrical cooperative, SLECA does not maintain financial cash reserves. Accordingly, SLECA has no responsive documents in its possession, custody, or control to produce in response to this Request.

GUIDROZ REQUEST NO. 18:

Produce a copy of the audit of SLECA's consolidated financial statements for the period ended December 31, 2023.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 18:

SLECA objects to this request on the grounds that the information sought is not relevant to this proceeding, is not reasonably calculated to lead to the discovery of admissible evidence and, as such, is overly burdensome, vexatious, and excessive. Subject to and without waiver of objections, please see attached 2023 financial statements, which are being produced CONFIDENTIALLY pursuant to Rule 12.1 of the Rules of Practice and Procedure.

GUIDROZ REQUEST NO. 19:

Produce a copy of the audit of SLECA's consolidated financial statements for the period ended December 31, 2024.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 19:

SLECA objects to this request on the grounds that the information sought is not relevant to this proceeding, is not reasonably calculated to lead to the discovery of admissible evidence and, as such, is overly burdensome, vexatious, and excessive. Subject to and without waiver of objections, please see attached 2024 financial statements, which are being produced CONFIDENTIALLY pursuant to Rule 12.1 of the Rules of Practice and Procedure.

GUIDROZ REQUEST NO. 20:

Identify and produce all documents submitted to the Public Service Commission from and after September 1, 2021.

SLECA RESPONSE TO GUIDROZ REQUEST NO. 20:

SLECA objects to this request on the grounds that it is overly broad, vague, ambiguous, and unduly burdensome. The request, as written, would require SLECA to produce an extensive array of documents submitted to the Public Service Commission over a period of more than four and a half years, many of which may not be relevant to the specific issues raised in this proceeding.

Moreover, the vast majority of the filings made by SLECA with the Commission are publicly available through the Commission's website and other official channels. As such, the requesting party has equal access to these documents and can obtain them independently.

Given the broad scope of the request and the fact that most of the responsive documents are already in the public domain, SLECA asserts that the burden of identifying, collecting, and producing all documents submitted to the Commission since September 1, 2021, would be disproportionate to the potential relevance and usefulness of the information sought.

Furthermore, SLECA does not maintain a comprehensive index or record of all the information it has provided to the Commission since 2021, making it impractical and unreasonably burdensome to attempt to recreate or compile such a list.

In light of these considerations, SLECA respectfully declines to provide a substantive response to this request. However, SLECA remains willing to engage in good-faith discussions with the requesting party to identify and provide specific, relevant documents that are not otherwise publicly available, subject to reasonable limitations on scope and burden.

Respectfully Submitted,

MARIONNEAUX KANTROW, LLC

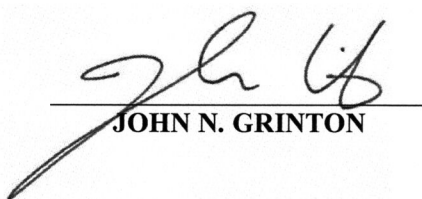


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Counsel for the Cooperative

CERTIFICATE OF SERVICE

I hereby certify that I have on this 2nd day of May 2025, served copies of the foregoing pleading upon all known parties to this proceeding by email as listed on the LPSC service list in Docket No. U-37394.



JOHN N. GRINTON

Statement Regarding Potential Damage to Existing Wood Poles

Sleca Lake Lines


October 21, 2024

The existing Sleca Lake Lines distribution structures were damaged during Hurricane Ida because of the extreme wind forces. Many structures failed structurally, and many ended up leaning over. Those distribution structures were constructed utilizing a wood pole and timber pile combination.

Hurricane winds are extreme, gusty, and changing in direction. This results in a continual flexing of the wood pole. The flexing likely contributed to weakening of the wood pole fibers and an overall reduction in pole strength. Additionally, due to the soft nature of the soil at the surface, the below-grade portion of timber piles would also have been subjected to that continual flexing. Pile damage likely occurred below the ground level.

The actual amount of remaining pole and pile strength is unknown. As such, it would have been imprudent, and would have been recommended not to reuse any of the remaining wood-pole structures.

W. Brook Samuel, PE
Vice-President
BHA, Inc.



October 21, 2024



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).

**SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION'S
RESPONSES TO STAFF'S THIRD SET OF DATA REQUESTS**

South Louisiana Electric Cooperative Association ("SLECA" or "Cooperative") hereby answers the Third Set of Data Requests propounded by the Louisiana Public Service Commission Staff ("Staff") with the following Objections and Responses.

GENERAL OBJECTIONS

The Cooperative objects to Staff's data requests to the extent that the data requests seek information beyond that which is permitted by the Rules of Practices and Procedures of the Louisiana Public Service Commission ("Commission") and/or the Louisiana Code of Civil Procedure. The Cooperative further objects to the extent that any data request seeks information that is confidential or protected by the attorney-client privilege, the work product privilege, the attorney work product privilege, or any other privilege recognized by applicable law. Furthermore, the Cooperative objects to all data requests that are vague, overly broad, unclear, and/or not limited in time. The Cooperative reserves the right to amend and supplement its responses.

NOTES AND COMMENTS

Please note that the data request responses and/or exhibits labeled "CONFIDENTIAL" are of a confidential and/or proprietary nature. Therefore, the Cooperative submits these responses confidentially and under seal in accordance with Rule 12.1 of the Commission's Rules of Practices and Procedures. The narrative portions highlighted indicate confidential information. If there are any questions regarding confidentiality, please contact undersigned counsel.

These responses are being supplied electronically. No hard copies will be served.

INTRODUCTORY STATEMENT

SLECA respectfully submits the following responses to Staff Third Set of Data Requests concerning the proposed reconstruction of the Lake Lines. SLECA maintains that the proposed reconstruction is contrary to the public interest and inconsistent with the Cooperative's statutory and regulatory obligations to provide safe, reliable, and affordable electric service in a fair and non-discriminatory manner to its members.

The current, estimated \$38 million cost to SLECA (high end cost estimation, see attached SLECA Exhibit No. 3-1.2) of rebuilding the Lake Lines, solely to serve approximately 282 recreational camp meters, would impose an inequitable and unsustainable financial burden on the Cooperative's approximately 21,000 members. Such an outcome would directly violate core regulatory principles of cost causation, rate equity, and financial prudence. The Board of Directors, duly elected to represent the interests of the entire membership, has determined that shifting this disproportionate cost onto the membership would undermine long-term rate stability and the financial integrity of the Cooperative.

As set forth in the responses below (in addition to SLECA's other filings in this docket, along with SLECA's responses to other numerous data requests), SLECA has thoroughly examined available funding options, historical precedents, potential FEMA reimbursement potential, and member cost participation and has found that reconstruction presents unacceptable financial and operational risks. Considering these factors and consistent with the Cooperative's duties and obligations to serve the broader member interest, SLECA respectfully submits that the decision not to reconstruct the Lake Lines is the most prudent, equitable, and legally sound course of action.

RESPONSES TO STAFF'S THIRD SET OF DATA REQUESTS

Staff 3-1. Has SLECA performed any analysis that segregates the costs associated with the rebuild of each of the four areas included in the Lake Lines? If so, please provide that information and any calculations utilized in the analysis.

SLECA RESPONSE TO DATA REQUEST STAFF 3-1:

There is no legal requirement or precedent to segment utility assets for funding or cost analysis purposes in abandonment proceedings. Historically, the Lake Lines have always been treated as a single, integrated project, including in connection with FEMA funding applications and prior cost recovery efforts. Moreover, the Lake Lines are similar in nature and geography.

Nevertheless, in the spirit of cooperation, SLECA has put together what it believes to be an estimated segmented analysis. Please note that all figures are approximations as no formal segmented project cost has been submitted to FEMA. Additionally, as noted throughout the filings in this proceeding, the cost of the reconstruction of the Lake Lines continues to increase.

Historical data following Hurricane Andrew indicates that approximately 200 Lake Line meters paid \$29.50/month for seven years, totaling \$495,600 for reconstruction (See SLECA Exhibit No. 3-1.1, an article believed to be published by *The Courier Bayou State* on January 3, 1993). Current estimates (high end estimate) indicate that the full cost of rebuilding the Lake Lines would equate to approximately \$1,580/month per meter over seven (7) years (See SLECA Exhibit No. 3-1.2).

Attempting to segment the project would introduce additional financial and regulatory risk, as higher-cost segments could drive inequitable rate disparities and further destabilize cost recovery. Further, any benefit from economies of scale and production costs would be lost. The Board of Directors, elected to represent SLECA's 21,000 members, has determined that reconstructing the Lake Lines remains financially untenable and contrary to the public interest.

Staff 3-2. Has SLECA performed any cost of service analysis or conducted a review of options to modify existing tariffs to determine what rate options exist, or could exist, to limit a subsidization of the entire cost of the Lake Lines rebuild across SLECA's full membership? If so, please provide a narrative detailing those efforts.

SLECA RESPONSE TO DATA REQUEST STAFF 3-2:

SLECA has considered potential rate design options, including modified tariffs to allocate reconstruction costs more equitably to the members of the Lake Lines. However, the estimated \$38 million (high end cost) rebuild cost to SLECA, affecting roughly 282 meters, presents significant challenges that no tariff structure can adequately mitigate without causing undue financial hardship or inequity.

For example, a dedicated Lake Lines-only tariff could be implemented to isolate costs to affected members only. Preliminary modeling shows this would require approximately \$1,580 per Lake Lines meter per month over seven years (high end costs utilized), excluding financing/interest costs, future operation and maintenance expenses, and potential cost escalations. Such rates are prohibitively high and not sustainable for the members served. Additionally, the financial risk of member attrition would cause these rates to escalate further for remaining customers, undermining stability.

Alternatively, spreading costs across the entire membership to reduce individual charges would require substantial cross-subsidization, contradicting cost causation principles and creating inequitable burdens on members who do not benefit from the Lake Lines. The Cooperative's Board of Directors, elected to protect the interests of all members, has determined that imposing either model would be financially unsound and contrary to the public interest.

Given current estimates and membership considerations, reconstruction under any available rate design scenario is not a viable option.

Staff 3-3. As part of SLECA's restoration and rebuild after Hurricane Ida, has SLECA performed or is it working to perform any repairs to facilities that are substantially similar to the facilities that make up the Lake Lines? If so please provide a narrative with supporting

documents if available, and further indicate if any of these repairs were approved for funding by FEMA's CRC.

SLECA RESPONSE TO DATA REQUEST STAFF 3-3:

No. As stated in SLECA Response to Staff 1-11 (incorporated herein by reference), emergency system-wide repairs, including at Persimmon Pass, totaled approximately \$91 million over 1,550 miles of distribution line, with partial FEMA reimbursement. The Lake Lines, however, are fundamentally different in both scale and cost. Their unique scope makes them ineligible for comparable treatment, and rebuilding them would pose an unacceptable financial risk to SLECA's members. The Board, elected by the membership, determined such a project is not in the public interest.

Staff 3-4. Has SLECA continued its efforts to obtain funding from FEMA to assist in the rebuild of the Lake Lines during the pendency of this abandonment docket? If so please provide a narrative outlining what efforts SLECA has made.

SLECA RESPONSE TO DATA REQUEST STAFF 3-4:

Yes. SLECA continues pursuing FEMA funding, with \$11.5 million in validated removal and reconstruction-related costs (including but not limited to engineering fees, and other costs, such as costs for surveying, geotechnical analysis, inspection services, project management, and grants management activities). That said, FEMA's Environmental and Historic Preservation review remains unresolved and incomplete, with no funding secured. SLECA is currently providing FEMA the required Environmental Analysis and Cultural Resource survey. Given this uncertainty and the overall financial risk, which has been very much detailed throughout SLECA's filings in this matter, the member-elected Board concluded that proceeding with reconstruction is not in the public interest, not in the best interest of SLECA, and not in the best interest of SLECA's entire membership.

Staff 3-5. Has SLECA polled or in any way sought feedback from the members affected by this Application to determine a willingness or ability to contribute to the restoration costs of the Lake Lines?

SLECA RESPONSE TO DATA REQUEST STAFF 3-5:

No. At an estimated \$38 million for SLECA's portion of the rebuild effort (high end cost estimation), or \$1,580/month per Lake Lines meter for seven years, the cost is prohibitively high. The Board determined it is unreasonable to expect affected members to shoulder this burden, and defaults would risk shifting costs onto the broader

membership. The decision not to reconstruct the Lake Line protects cooperative-wide financial stability and equity.

Staff 3-6. Has SLECA polled or in any way sought feedback from the entire membership to determine its willingness or ability to contribute to the restoration costs of the Lake Lines?

SLECA RESPONSE TO DATA REQUEST STAFF 3-6:

No. As addressed in SLECA Response to Data Request Staff 3-5 and in the Direct Testimony of Matthew Peters (page 14, lines 15–25), the \$38 million cost would impose an unsustainable burden on SLECA's entire membership. The Board, accountable to SLECA's approximate 21,000 members, voted not to reconstruct the Lake Line to preserve rate stability and uphold financial fairness in the public interest. That decision is in the best interests of the Cooperative and the Cooperative's entire membership.

For the reasons detailed herein, and in accordance with its statutory and regulatory obligations, SLECA firmly maintains that the decision not to reconstruct the Lake Line is in the best interest of the Cooperative's members and the public at large. Proceeding with reconstruction would impose disproportionate and unsustainable financial burdens, jeopardizing rate stability, financial integrity, and equitable service across the membership. The Board of Directors, acting in its fiduciary capacity and consistent with the public interest standard, has therefore correctly determined that not reconstructing the Lake Line represents the most prudent and responsible course of action.

Respectfully submitted,

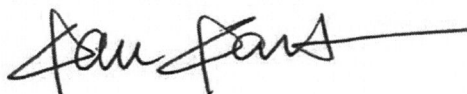
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CERTIFICATE OF SERVICE

I hereby certify that I have on this 11th day of June, 2025, served copies of the public version of the foregoing responses upon all other parties to this proceeding by electronic mail and a copy of the confidential version upon Commission Staff by electronic mail.



KARA B. KANTROW

BAYOU

state

* Sunday, Jan. 3, 1993

CALENDAR 2B, EDITORIAL 6B

SLECA looking for someone to bill for repairs

By TED GRIGGS
The Courier

The 250 camp owners on Lake De Cade and Grand Pass will probably have to pay the \$472,000 it will cost SLECA to replace the power lines and poles knocked out by Hurricane Andrew, state and cooperative officials have said.

The payments would be spread out over seven years and work out to about \$35 more per month than the camp owners are now paying, said Lawrence "Tubby" St. Blanc, an aide to state Public Service Commissioner Kathleen Blanco.

"The question is whether the camp owners are willing to pay or whether all the (South Louisiana Electric Cooperative Association) members want to subsidize the cost," St. Blanc said.

Most members probably won't, St. Blanc said.

Camp owners are being given the chance to decide whether they want to pay, St. Blanc said. The Public Service Commission made SLECA send ballots to the camp owners, asking them if they are willing to pay the higher bills.

The camp owners have until Jan. 15 to return their ballots to SLECA. If most camp owners favor the proposal, SLECA will seek Public Service Commission approval.

SLECA invited all of the camp owners to a Board of Directors' meeting Dec. 21, Manager Mike Guidry said. About 70 of the 82 or so camp owners who voted at the meeting said they were willing to pay the additional charges.

About 12 voted against the proposal, Guidry said. The results of the ballots mailed to the other camp owners have not yet been tallied.

Some camp owners have said they feel they were not really given a choice in the matter. They say the cooperative presented the choice as either having electricity or going without; given those two choices, most people chose electricity.

The cost to install poles and lines is much higher in the remote areas on Lake De Cade and Grand Pass where power lines to camps were knocked out by Hurricane Andrew.

Those camp owners say the cooperative had other choices, such as spreading the payments over a longer period of time or having all the members pay a little more money per month.

Guidry said Lake De Cade-Grand Pass, in southwestern Terrebonne Parish, is primarily a recreational area. SLECA's board and management felt

it would be unfair to the rest of the cooperative's members to make them pay for something that would benefit a small group of people, almost none of whom are permanent residents.

A survey of the camp owners showed about 80 percent or 200 plan to rebuild, Guidry said. The estimated increases are based on 200 customers, so the final costs could be lower.

Camp owners' current minimum charge for electricity is \$19 per month, Guidry said. SLECA has been losing money on the camps for years and plans to increase the minimum charge to about \$24.50. By doing so, the cooperative can break even.

The remaining \$29.50 of the increase will help pay SLECA's portion of the repair costs.

SLECA has taken bids on the repair project, Guidry said. The co-op received two bids, the lowest of which was \$1.89 million.

The Federal Emergency Management Agency is paying for 75 percent of the repairs, Guidry said. SLECA has to come up with the remaining 25 percent.

The cost to install poles and lines is much higher in the remote areas, which can't be reached by land, Guidry said. The poles have to be flown in by helicopter and special equipment must be used to install the lines.

St. Blanc said SLECA's board has the authority to make the decision, but the Public Service Commission made the co-op poll the camp owners.

If the camp owners vote against the proposal, the issue might go before the whole membership, St. Blanc said. The problem with that would be the amount of time necessary to get the full membership to vote.

SLECA has until Feb. 1 to award the contract, Guidry said. If SLECA has to take more bids for the work, the price will probably increase.

Approximate Segmented Cost Analysis
Lake Line Cost Share Represents 10% of Estimated Project Cost plus \$23M for ENV Fees
Representing the High End (HE) of the estimated Env Fees

SLECA Project #666650									
Cost Analysis by "Group"									
Information		# of Meters		Cost Share		Total Project Cost		SLECA Responsible Cost Share	
Ref No.	Grouping	Quantity	Units	Total Cost	Unit Cost	Total Cost	Unit Cost	Total Cost	Unit Cost
1	Lake Decade	157	Meters	\$23,952,254.72	\$152,562.13	\$97,617,746.00	\$621,769.08	\$23,952,254.72	\$152,562.13
2	Grand Pass	38	Meters	\$8,365,709.75	\$220,150.26	\$34,094,566.00	\$897,225.42	\$8,365,709.75	\$220,150.26
3	Lake Fields	77	Meters	\$5,653,159.78	\$73,417.66	\$23,039,531.00	\$299,214.69	\$5,653,159.78	\$73,417.66
4	Four Point Island	10	Meters	\$850,808.05	\$85,080.81	\$3,467,480.00	\$346,748.00	\$850,808.05	\$85,080.81
Total Value				\$158,219,323.00		\$158,219,323.00		\$158,219,323.00	

SLECA Cost Share = \$ 38,821,932.30
Total # of Meters 282
Lake Line Project Cost = \$158,219,323.00

Cost per Lake Line Member by Group (of Cost Share)

Lake Decade	\$152,562.13
Grand Pass	\$220,150.26
Lake Fields	\$73,417.66
Four Point Island	\$85,080.81

Member Reimbursement over 7 year period (Cost Share per Camp Meter per Month)

Lake Decade	\$1,815.22
Grand Pass	\$2,620.84
Lake Fields	\$874.02
Four Point Island	\$1,012.87

Average Cost per Meter per Month over 7 year period \$1,580.98

Cost per SLECA Member (Subsidized by Group (of Cost Share))

Lake Decade	\$ 1,140.58
Grand Pass	\$ 398.37
Lake Fields	\$ 269.20
Four Point Island	\$ 40.51

Summary Total Cost for All Camp Meters

SLECA Cost	\$38,821,932.30
Camp Lump Sum per Meter (282 Meters)	\$137,666.43
84 Month Payment Value per Month	\$1,638.89
Cost for All SLECA Members (21,000) - Lump Sum	\$1,848.66
84 Month Payment Value per Month for All Members	\$22.01

Approximate Segmented Cost Analysis
Lake Line Cost Share Represents 10% of Estimated Project Cost plus \$11.5M for ENV Fees
Representing the Low End (LE) of the estimated Env Fees

SLECA Project #666650									
Cost Analysis by "Group"									
Information									
Ref No.	Grouping	Total Project Cost		Cost Share		# of Meters		Total Project Cost	
		Total Cost	Unit Cost	Total Cost	Unit Cost	Quantity	Units	Unit Cost	Total Cost
1	Lake Decade	\$97,617,746.00	\$16,857,014.66	\$16,857,014.66	\$16,857,014.66	157	Meters	\$97,617,746.00	\$16,857,014.66
2	Grand Pass	\$34,094,566.00	\$5,887,583.17	\$5,887,583.17	\$5,887,583.17	38	Meters	\$34,094,566.00	\$5,887,583.17
3	Lake Fields	\$23,039,531.00	\$346,748.00	\$346,748.00	\$346,748.00	77	Meters	\$23,039,531.00	\$346,748.00
4	Four Point Island	\$3,467,480.00	\$598,778.03	\$598,778.03	\$598,778.03	10	Meters	\$3,467,480.00	\$598,778.03
Total Value		\$158,219,323.00	\$27,321,932.30	\$27,321,932.30	\$27,321,932.30			\$158,219,323.00	\$27,321,932.30

Cost per Lake Line Member by Group (of Cost Share)

Line Item	Total Cost per Meter
Lake Decade	\$107,369.52
Grand Pass	\$154,936.40
Lake Fields	\$51,669.56
Four Point Island	\$59,877.80

Member Reimbursement over 7 year period (of Cost Share per Camp Meter per Month (84 Months)

Line Item	Member Reimbursement over 7 year period (of Cost Share per Camp Meter per Month (84 Months)
Lake Decade	\$1,278.21
Grand Pass	\$1,844.48
Lake Fields	\$615.11
Four Point Island	\$712.83

Cost per SLECA Member if Subsidized by Group (of Cost Share 21,000 Meters)

Line Item	Cost per SLECA Member if Subsidized by Group (of Cost Share 21,000 Meters)
Lake Decade	\$802.71
Grand Pass	\$280.36
Lake Fields	\$189.46
Four Point Island	\$28.51

Summary Total Cost for All Camp Meters

SLECA Cost	\$27,321,932.30
Camp Lump Sum per Meter (282 Meters)	\$96,886.28
84 Month Payment Value per Month	\$1,153.41
Cost for All SLECA Members (21,000) - Lump Sum	\$1,301.04
84 Month Payment Value per Month for All Members	\$15.49

LPSC Jurisdictional Residential Electric Rate Comparison for 1,000 Kwh for June 2025, Previous Month, and Same Month Last Year

