

Louisiana Public Service Commission



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May 13, 2021

BRANDON M. FREY
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KATHRYN H. BOWMAN
Executive Counsel

JOHNNY E. SNELGROVE, JR
Deputy Undersecretary

VIA E-MAIL ONLY

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Critical Technologies Consulting, LLC
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R. Lane Sisung
United Professionals Company
201 St. Charles, Ave., Ste. 4240
New Orleans, Louisiana 70170-1048
lane@sisung.com

Re: Request for updated proposals in response to LPSC RFP 21-10.

Dear Messrs. Hill and Sisung:

On behalf of the Louisiana Public Service Commission ("LPSC" or "Commission"), LPSC RFP 21-10¹ was issued on April 15, 2021 seeking an outside consultant to assist Staff in an upcoming review of SWEPCO's application for certification of the Trinity Solar Project. LPSC RFP 21-10 provided an overview of the application and the anticipated scope of representation. Based on conversations with SWEPCO, consideration of advance metering infrastructure ("AMI") associated with the Trinity Solar Project was specifically excluded from the scope of representation. However, on May 11, 2021, SWEPCO filed an amended application with the Commission seeking certification of a limited Pilot Program to install 82 AMI meters in connection with the Trinity Solar Project pursuant to the Commission's General Order dated September 22, 2009 (Docket No. R-29213 consolidated with Docket No. R-29213 Subdocket A) ("AMS/DR General Order"). In the alternative, SWEPCO sought an exemption from the AMS/DR General Order. (See Attached).

¹ LPSC RFP 21-10, seeking an outside consultant for Docket No. U-35936, Southwestern Electric Power Company, ex parte. In re: Application for Certification of the Trinity Solar Project.

As you are both aware, LPSC RFP 21-10 was scheduled to be considered by the Commission at the upcoming May Business and Executive Session. Given Commission consideration did not occur prior to SWEPCO amending its application, this letter requests updated proposals from your respective firms to include review and consideration of SWEPCO's amended application. Such proposals shall include fees and costs associated with not only the scope of representation contained in LPSC RFP 21-10, but also the additional scope of representation contained herein.

Scope of Representation

Along with the scope of representation provided for in LPSC RFP 21-10, you will be assisting Staff in reviewing SWEPCO's amended application to not only ensure compliance with all applicable Commission Orders, but also to make a recommendation as whether SWEPCO's proposal related to AMI of the Trinity Solar Project is in the public interest and whether SWEPCO should be granted an exemption from the AMS/DR General Order. Further, while SWEPCO indicates it does not seek cost recovery for the AMI component in this proceeding, that is not a determination for SWEPCO to make, but a determination to be made during this proceeding in conjunction with whether SWEPCO's AMI component should be certified.

In assisting Staff, you will perform the same scope of representation provided for in LPSC RFP 21-10 to the amended application, including, but not necessarily limited to reviewing the application, any direct testimony of witnesses and associated exhibits; draft data requests; and review responses thereto. Additionally, the AMS/DR General Order sets forth several guidelines for the Commission in determining whether an AMS is in the public interest, including a cost-benefit analysis and you should familiarize yourself with the order and its requirements - including whether the order contemplates any exemptions - as well as other relevant Commission Orders.

Additional Minimum Requirements

In addition to the Minimum Requirements provided for in LPSC RFP 21-10, you should also have knowledge of:

- 1) Appropriate accounting standards and practices for electric utilities, especially investor-owned utilities;
- 2) The Commission's Rules and Orders pertaining to acquisitions and capital outlays; and
- 3) The Commission's Rules and Orders pertaining to outage management and service reliability.

Please note, you are still bound by LPSC RFP 21-10, in addition to the new requirements contained herein.

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If you are still interested in assisting Staff in the review and certification of SWEPCO's Trinity Solar Project, please electronically provide an updated proposal on or before **June 2, 2021 by close of business** to me, at kathryn.bowman@la.gov. Consideration of LPSC RFP 21-10 will no longer occur at the Commission's May Business and Executive Session; instead, it is anticipated that the Commission will consider the updated proposals at the Commission's June Business and Executive Session, which is currently scheduled for June 16, 2021. Should you have any questions regarding this request, please feel free to contact me.

Regards,

A handwritten signature in blue ink, appearing to read 'K. Bowman', with a long horizontal flourish extending to the right.

Kathryn H. Bowman
Executive Counsel

/h

cc: Brandon M. Frey, Executive Secretary
Justin Bello, Staff Attorney