
**RFP 23-01 Docket U-36625, Entergy
Louisiana, LLC, ex parte. In re: Application
for Approval of the Entergy Future Ready
Resilience Plan (Phase I)**

FEBRUARY 3, 2023

Prepared for:

Kimberley N. O'Brian

Kathryn H. Bowman

Louisiana Public Service Commission

602 North Fifth Street (Galvez Building) (70802)

P.O Box 91154

Baton Rouge, Louisiana 70821-9154

Phone: (225) 342-9888

Fax: (225) 342-5610

Prepared by:

Larkin & Associates PLLC

15728 Farmington Road

Livonia, MI 48154

(734) 522-3420



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I. INTRODUCTION

The Louisiana Public Service Commission ("Commission" or "LPSC"), in accordance with the requirements of the LPSC General Order dated November 10, 2014 ("Contract Order"), is seeking proposals from outside consultants to assist the Commission Staff in the review of Entergy Louisiana, LLC's ("ELL" or "Company") request for approval, and issuance of a public interest finding, of the Entergy Future Ready Resilience Plan ("Plan"), including approval of a new rider, the Resilience Plan Cost Recovery Rider, to permit timely recovery of the Resilience Plan's revenue requirement. Staff requests the assistance of an outside consultant to work closely with in house Legal, Utilities, and Auditing Divisions and an outside engineering consultant in this review.

Larkin & Associates, PLLC ("Larkin"), are pleased to submit this proposal to the LPSC to perform the desired review.

On December 19, 2022, ELL filed its request, which was docketed as Docket No. U-36625, and published in the Commission's Bulletin dated December 22, 2022 for a twenty-five day intervention period. As of this RFP, the Louisiana Energy User's Group ("LEUG") is the only party that has filed for intervention.

ELL's request seeks approval, and issuance of a public interest finding, of the Company's Resilience Plan, as well as approval of a new Rider. Per the Company's application, this Plan is to "improve the resilience of its electric system through accelerated infrastructure hardening and vegetation management,"¹ which is "necessary and essential to foster a more resilient and reliable system that can better withstand extreme events, avoid or mitigate customer outages from such events, and facilitate faster restoration of service after such events."²

Further, ELL indicates approval of the new Rider is to "permit timely recovery of the Resilience Plan's revenue requirement as ELL completes the plan's resilience improvements and customers begin receiving the benefits of those improvements."³ The

Company goes on to explain that "undertaking the level and pace of spending in the proposed Resilience Plan and recovering the resulting costs via existing ratemaking mechanisms would place ELL's financial condition at great risk and expose ELL to adverse action from the credit rate agencies and, in turn, its customers to higher costs."⁴

Per the application, ELL is proposing to implement the Resilience Plan over a 10-year period, with Phase I consisting of \$5 billion in projects over the first five years (2024 to 2028).

The Company filed the testimony of the following seven witnesses in support of its application: Phillip R. May, Sean Meredith, Alyssa Maurice-Anderson, Charles W. Long, Jason D. De Stigter, Todd A. Shipman, and Jay A. Lewis.

In preparing this proposal, Larkin has reviewed ELL's Application and the accompanying witness testimony and exhibits, paying particular attention to the request for the Rider included in the pre-filed direct testimony of Sean Meredith.

ELL's Application addresses risks faced by communities in the Gulf Coast region and the plan to improve its electric system to help customers meet the challenges and opportunities of tomorrow. In particular, following Hurricane Ida, and in the light of the back-to-back years of historically severe weather affecting the areas served by ELL and the other Entergy Operating Companies ("EOCs") including both major hurricanes and severe winter storms, the EOCs consulted their own internal subject matter experts and stakeholders, evaluated the practices of other utilities across the country, and undertook a holistic analysis of the opportunities available for creating a more resilient electric grid. As that process evolved, the Company engaged an outside industry consultant, 1898 & Co., to assist with identifying potential hardening projects and estimating the costs and of those projects. The result of those comprehensive and customer focused efforts which have been aimed at understanding the risks faced and identifying cost-effective and achievable projects to build a more resilient electric system is the Resilience Plan. The ELL witness testimony discusses how the proposed Resilience Plan is expected to reduce the cost of restoring the electric grid after major storms as well as to reduce the number and duration of outages associated with those events. ELL indicates that implementation

of the Resilience Plan would result in a substantially improved risk for the ELL grid. ELL indicates that such grid improvements are vital to the communities served by the Company and, in turn, to the economy of Louisiana.

ELL proposes to implement the Resilience Plan over the 10-year period from 2024 to 2033. In this docket, the Company seeks approval of Phase I of the system is the Resilience Plan.

The Company also is seeking approval in its Application of a new rider for ELL, the Resilience Plan Cost Recovery Rider (the “RPCRR” or “Rider”). ELL claims that the RPCRR would permit timely of the Resilience revenue requirement as ELL completes the recovery resilience improvements and customers begin receiving the benefits of those improvements. ELL asserts that undertaking the level and pace of spending in the proposed Resilience Plan and recovering the resulting costs via existing ratemaking mechanisms would place ELL’s financial condition at risk and would subject ELL to adverse action from credit rating agencies and, in turn, could expose ELL’s ratepayers to higher costs for electric utility service. ELL asserts that the proposed Rider would improve cash and would place ELL in a much better position to execute the Resilience Plan and to maintain its financial condition.

Finally, ELL’s Application requests certain accounting and ratemaking treatments related to the Resilience Plan and approval of the proposed monitoring plan for the resilience investments.

The work on Phase 1 to be undertaken involves a review of ELL’s proposed Rider mechanism and the accounting and ratemaking treatments that ELL has proposed related to monitoring the resilience plan related spending. Larkin has extensive experience in reviewing utility accounting and ratemaking, including the design a monitoring of riders and special spending programs, such as spending by utilities to improve electric grid resiliency by replacing failure-prone circuits, undergrounding distribution feeders, hardening poles and transmission and distribution infrastructure and utility vegetation management and tree trimming to avoid outages caused by tree limbs making contact with or taking down power lines. We understand that a prudence review of ELL’s proposed

resiliency spending will be undertaken by a qualified engineering firm under another Commission RFP. The focus of the current Phase 1 review by Larkin on this project would be on ELL's regulatory accounting for costs that are included in the Rider and in the design of the Rider itself, including consideration of customer safeguards related to ELL's proposed resiliency cost recovery.

Larkin proposes to assist the Commission's in-house Staff (Legal, Utilities, and Auditing Divisions) and an outside engineering consultant in reviewing ELL's request and providing a recommendation to the Commission.

II. SCOPE OF REPRESENTATION

The independent consultant retained by the Commission shall assist the Commission's Legal, Utilities, and Audit Divisions by reviewing the application (including the direct testimony of seven witnesses, any supporting documentation, and associated cost models); drafting data requests and reviewing responses thereto; potentially participating in informal meetings with Staff and ELL, Staff and Intervenors, or Staff, ELL, and Intervenors; assisting in drafting a recommendation(s), including testimony, to the Commission regarding ELL's request on implementing the Rider for cost recovery of the Resilience Plan; reviewing and responding to any rebuttal testimony; assisting in preparing any necessary direct and cross-answering testimony; assisting in trial preparation, including cross-examination of witnesses and drafting pleadings and motions related thereto; and reviewing and analyzing potential stipulation terms.

Additionally, the consultant shall be available to participate in meetings, conference calls, status conferences, hearings, and other conferences with the Commission and its Staff, as well as attending any Business and Executive ("B&E") Sessions that Staff deems necessary. The scope of work provided herein shall continue through the conclusion of the docket, including Commission consideration of the request at B&E Sessions.

III. PERIOD OF REPRESENTATION

The estimated time period estimated to complete the Scope of Representation is approximately 12 months. This is merely an estimate and the Commission makes no representations as to the accuracy of the Period of Representation. In developing our proposal we used the following estimated timeline:

Proposals Due	Friday, February 3, 2023
Project Start	Tuesday, February 28, 2023
Project duration	Wednesday, February 28, 2024
	Estimated 12 months

IV. MINIMUM REQUIREMENTS

Larkin has extensive experience in analyzing the operations, books and records and capital and operating budgets of electric utility companies, particularly investor-owned utilities, for the purpose of setting just and reasonable rates, including, but not limited to, calculation of rate base, rates of return, capital structure, formula rates, cost recovery via riders, and all related studies and calculations and prior cost recovery filings with the LPSC. Larkin has extensive experience testifying before and advising utility regulatory commissions and is qualified to provide expert assistance with respect to the following:

Larkin meets the following minimum requirements in addition to those provided in this Commission's Contract Order dated November 10, 2014. The RFP states: "Consideration will be given to factors which indicate degrees of competence such as the amount of practical experience in the field of public utility practice, similar practice before this or other regulatory agencies, and knowledge of Louisiana ratemaking standards and regulatory law." As described herein, Larkin has extensive experience before other state public utility commissions, as well as 46 years of practical experience in the field of public utility regulation.

Larkin is qualified and prepared to draft and render expert testimony and be cross-examined with respect to all of the issues addressed in this RFP and which are likely to arise in the proceeding and be qualified and prepared to render testimony at a hearing and/or a B&E regarding the same.

(1) Larkin has a detailed understanding of the major functional areas of a regulated investor-owned electric utility;

(2) Larkin has experience with appropriate accounting standards and practices for electric public utilities, public utility accounting, and generally accepted auditing standards;

(3) Larkin has an understanding of FERC approved cost-of-service cost methodologies for electric utilities and will gain an understanding of LPSC cost-of-service cost methodologies during its work on this project;

(4) Larkin has knowledge of the basic components and requirements of ELL's Formula Rate Plan, including cost of capital, capital structure, cost of debt, cost of equity, and rates of return, and will review ELL's currently approved riders;

(5) Larkin has experience with the cost allocation methodologies for the allocation of investments and expenses among affiliates, including the relationship of the holding company to its subsidiary operating companies, the transfer of investment and costs between operating companies, and the provision of services among affiliates; and

(6) Larkin has experience with utility cost recovery mechanisms (including ratepayer safeguard features that can be incorporated into such mechanisms), cost allocation among customer classes and rate design.

We understand that in the event the Larkin is chosen to perform this work, the Commission and its Staff shall have the right to determine how the tasks will be carried out.

We believe that this proposal demonstrates that Larkin has the qualifications and experience necessary to meet the requirements of this RFP and the Commission's Contract Order.

V. DELIVERABLE PRODUCTS

Invoicing

As required by the Contract Order, all bills will be rendered monthly and shall specifically identify and describe all work performed, the person performing such work, the time and charge for such work, and shall additionally show the total amount billed to date and the authorized original estimate. Bills will be rendered in strict accordance with the Commission's guidelines. Expenses shall also be separately disclosed with proof of such expenses attached.

Expenses, where applicable, shall be reimbursed at state authorized rates as specified in the Travel Policies and Procedures Memorandum issued by the State of Louisiana, Division of Administration in effect at the time such expenses are incurred ("Allowable Expenses"). Any expenses that exceed the Allowable Expenses shall be borne by the contract employee and shall not be reimbursed by either the Commission, or the correspondent utility, unless otherwise specified by the Commission.

Interim Progress Reporting

At the midpoint of the project activities, Larkin will submit a status report to the Staff indicating progress. Larkin anticipates the interim report will be provided after responses to initial sets of discovery requests have been reviewed.

Other progress reporting will occur as needed throughout the project.

Production of Documents

Upon the request of the Commission or its Staff, Larkin will immediately produce any document or information obtained or produced within the scope review.

VI. APPROACH TO THE ASSIGNMENT/WORK PLAN

Larkin believes that the best approach for accomplishing the objectives of the audit is a combination of document review, interviews/virtual meetings (possibly supplemented with site-visits/meeting), and analysis. A description of each follows:

- Document Review: Larkin will review all documents detailing the ELL's resiliency planning activities. This would include not only the Application and the testimony of ELL's seven witnesses, but also policy and procedures manuals, transmission and distribution system performance, vegetation management information, system hardening project prioritization and vendor contracts, agreements between ELL and affiliates, contract correspondence files, performance records, strategic plans, strategic studies, special studies and recent internal and external audits.
- Interviews: Interviews would be conducted with the personnel involved in transmission and distribution system planning, plant and operating expense accounting, budgeting, outage response, storm restoration, regulatory and ratemaking, and ELL and affiliate staff in support departments, e.g., internal auditing, administration, legal, as well as the outside consultants that ELL employed related to its Resiliency Plan and the design of the Rider.

If needed, the team may also elect to interview one or more vendors or suppliers to key ELL resiliency projects. Vendor interviews, provided that the identity of the vendor is kept confidential, can yield useful information regarding how a utility is perceived in the marketplace. The team would solicit input from the Commission staff as to the desirability of such interviews.

- Performance: The analysis of performance will include evaluating the Company's performance in a number of areas including storm restoration, reliability measurements, construction costs, identification of circuits prone to fail and prioritization of maintenance and capital spending, accounting procedures for plant and maintenance costs, and how ELL prioritizes projects related to reliability and resiliency. ELL's performance will be measured against its own stated guidelines and, in some areas, against the performance of other regional utilities. Both quantitative and qualitative comparisons will be made. Types of performance measures could include vegetation management plans and backlogs, reliability measures, storm restoration costs and timeline, depreciation rates and distribution system replacement rates. In addition, ELL's accounting details will be reviewed, with a focus on costs that would be recovered in the Rider.
- Financial Verifications: Larkin will verify that ELL has the procedures in place to insure accurate booking of its transmission and distribution plant costs and the cost

of maintenance and for accounting for the cost of resiliency projects that would be recoverable through ELL's proposed Future Ready Resiliency Plan ("FRRP") Rider. ELL's accounting and budgeting documentation for each type of cost proposed by the Company for the FRRR will be reviewed.

Larkin plans to include the LPSC staff in all aspects of the audit, as desired. All meetings, interviews, and site visits will be scheduled to allow staff to participate. Staff will be copied on all correspondence. To the extent significant problems, delays in receiving requested information, or other issues are encountered, the team will discuss said problems and issues with the LPSC Staff.

The work plan for this engagement is provided below in outline form. The key areas of inquiry are incorporated into the work plan. Following the initial document review and interviews, the work plan may be modified.

Task 1: Initial Document Review

Task 2: Initial Interviews

Task 3: Review of the Resilience Plan and Cost Projections

Task 4: Review of the Resilience Tariff

Task 5: Follow-Up Interviews (if needed)

Task 6: Preparation of Reports or Testimony

6.1 Draft Report or Testimony

- Scope and Objectives of the Review
- Standards Used in Conducting the Review
- Findings
- Specific Recommendations

6.2 Final Report

Task 7: Review of Responses to Recommendations

As needed: Testimony, Hearings and Post Hearing Assistance (as Required) and Assistance at B&E Sessions.

The next section reflects these tasks over the anticipated 12-month project schedule.

VII. PROPOSED SCHEDULE – BY TASK

Larkin intends to “start running” upon contract award. To that end, Larkin will prepare an initial data request immediately upon contract award, will accept information as it is available, and will start assembling information from data that is in the public domain.

The tasks are scheduled, per the timeline provided in the Request for Proposal. This is an approximate schedule based upon Larkin’s prior audit experience. The actual schedule may vary based upon data availability, scheduling issues, and the determination of different audit priorities once the audit has started.

Below is a chart showing professional hours allocated to the project tasks:

Entergy Louisiana Future Read Resilience Plan, RFP 23-01, Docket No. U-36625														
Estimated Timeline by Month, from:		2/27/2023	4/1/2023	5/1/2023	6/1/2023	7/1/2023	8/1/2023	9/1/2023	10/1/2023	11/1/2023	December 2023	January 2023	February 2023	TOTAL
To:		3/31/2023	4/30/2023	5/31/2023	6/30/2023	7/31/2023	8/31/2023	9/30/2023	10/31/2023	11/30/2023	Draft Rpt	Final Rpt	Respond	
Task	Description													
1	Document Review and Review of Discovery Responses		20	20	20	16	12	12	8	8				116
2	Initial Interviews		8	8										16
3	Review of the Resilience Plan and Cost Projections	16	12	12	12	12	12	12	12	12				112
4	Review of the Resilience Tariff	8	12	8	8	8	8	4	4	4				64
5	Follow-Up Interviews (if needed)				8	4	4	4	2	2				24
6	Report Preparation													
	Draft Report			8			8	8	8	8	32			72
	Final Report											16		16
7	Review of Responses to Recommendations												16	16
	Total Hours	24	52	56	48	40	44	40	34	34	32	16	16	436
Larkin Hours Detail														
	Hugh Larkin, Jr., CPA													0
	Ralph Smith, CPA*	12	20	20	20	20	20	20	12	16	12	6	6	184
	Helmuth Schultz, III, CPA													0
	Mark Dady, CPA*	8	16	16	12	12	16	12	12	8	12	4	4	132
	John Delever, CPA													0
	Christina Miller													0
	Megan Granston*	4	8	12	8	4	4	4	6	6	4	4	2	66
	Dawn Bisdorf*		8	8	8	4	4	4	4	4	4	2	4	54
	Word Processing/Secretarial													0
	TOTAL LARKIN HOURS	24	52	56	48	40	44	40	34	34	32	16	16	436

VIII. CONFLICTS OF INTEREST

Statement Concerning No Conflicts for Work on This Project

Neither Larkin, nor its employees, has a financial interest in, litigation or any other relationship with Entergy Louisiana, its affiliates, or with any other Louisiana utilities. Larkin does not have any present or ongoing contracts or agreements with Entergy Louisiana or any other Louisiana utilities or their affiliates.

Other Larkin Louisiana Contracts

Over thirteen years ago, Mr. Smith testified in a Louisiana court proceeding involving the City of Lafayette, Louisiana involving a condemnation by Lafayette of a portion of the Entergy Louisiana distribution system within the Lafayette municipal boundaries. Larkin was also briefly engaged by AARP for a preliminary evaluation of rate filings by Entergy including an increase involving the Algiers district in a rate proceeding before the City of New Orleans; however, after the preliminary evaluation, that engagement was not pursued. Larkin does not have any current contracts with any Louisiana utilities and is not currently involved in any cases before the LPSC.

FERC Proceedings Involving Entergy Affiliates

In prior years, Mr. Larkin has testified on behalf of the Mississippi Public Service Commission in a series of cases before FERC involving interpretations of the Entergy (and previously the Middle South Utilities) system agreement.

Mr. Smith testified in two proceedings before the FERC on behalf of the Mississippi and Arkansas Public Service Commissions concerning System Energy Resources income tax issues and Grand Gulf lease renewables in which the interests of the MPSC and APSC were aligned with those of the LPSC.

IX. LARKIN QUALIFICATIONS

Information about the corporate and personnel capabilities of Larkin is provided in this section.

Background on Larkin

Larkin & Associates, PLLC is a firm of certified public accounts and regulatory consultants, with offices at 15728 Farmington Road, Livonia, Michigan 48154. The firm is organized as a professional limited liability company (PLLC). Larkin & Associates has no branch or affiliate offices.

In April 1970, the certified public accounting firm of Larkin, Chapski & Co., was formed by former employees of Peat, Marwick, Mitchell & Co., a “big eight” accounting and auditing concern. In addition to the auditing, accounting and tax work typical of CPA firms, Larkin, Chapski & Co, specialized in the area of utility regulation. In September 1982, the firm was reorganized into Larkin & Associates, a certified public accounting and consulting firm with Hugh Larkin, Jr., as senior partner. As such, Mr. Larkin has ultimate responsibility for all regulatory consulting work performed by the firm. Larkin performs a variety of auditing and accounting services, but concentrates in the area of utility regulation and ratemaking. The firm has performed regulatory consulting services for numerous clients. Section V of this proposal provides summaries of some of Larkin's past work completed on various electric utility regulatory consulting engagements.

Larkin performs independent regulatory consulting primarily for public service/utility commission staffs and consumer interest groups (public counsels, public advocates, consumer counsels, attorneys general, etc.). Larkin has had extensive experience in the utility regulatory field as expert witnesses in over 800 regulatory proceedings, including numerous electric, gas, telephone and water and sewer utilities.

Larkin & Associates professional staff assigned to this project would bring to this engagement over 120 years cumulative business, public accounting and utility related experience. Our personnel are familiar with issues affecting electric utility regulation, including regulatory accounting, ratemaking, transmission, distribution and generation issues, auditing techniques and cost verification, and design and review of cost recovery mechanisms. In performing our work for the Commission and Staff on this project, we will draw on knowledge gained through comparable studies performed in other utility regulatory projects.

Larkin Professional Personnel Qualifications

Larkin currently employs eight professional staff members with over 100 years cumulative business public accounting and regulatory experience. Of these, five are CPAs (Larkin, Smith, Schultz, Dady, and Defever). The firm employs three senior consultants (Larkin, Smith, and Schultz), all of whom are CPAs with extensive experience in testifying before utility regulatory commission and reviewing utility costs and cost recovery mechanisms. The Larkin professional staff also includes four regulatory analysts (Dady, Defever, Miller, and Megan Cranston), and a research associate (Dawn Bisdorf), as well as two office administrators (Brooke Cranston and Sophia Spiegel). When not performing on-site documentation reviews and interviews, Larkin professionals will be stationed at our office in Livonia, Michigan and can be reached at (734) 522-3420, or via fax or email.

Hugh Larkin Jr. is a certified public accountant, founder, and senior partner of Larkin & Associates. He is thoroughly versed in independent auditing, as well as the design and review of accounting systems and the presentation of data for management and financial reporting. Mr. Larkin is licensed in the states of Michigan and Florida. For over 47 years, Mr. Larkin has concentrated in the field of public utility regulation. He has served as project leader for numerous financial and compliance audits and regulatory consulting engagements, and has testified as an expert witness on issues dealing with public utility management and regulation in over 300 proceedings. His testimony has been sponsored by public utility/service commission staffs, state attorneys general, groups of municipalities, a district attorney, people's counsel, public counsel, and other such entities. Jurisdictions in which Mr. Larkin has presented expert testimony include: Alabama, Alaska, Arizona, California, Connecticut, Delaware, Florida, Georgia, Hawaii, Idaho,

Illinois, Indiana, Kentucky, Kansas, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nevada, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, South Dakota, Texas, Vermont, Utah, Washington, Wisconsin, West Virginia, FERC and Canada. Mr. Larkin is not expected to work on this project but may provide advice to the project team, on an as-needed basis.

Ralph C. Smith's professional credentials include being a Certified Financial Planner™, a certified rate of return analyst, a licensed certified public accountant, and attorney. He functions as project manager on consulting projects involving utility regulation, regulatory policy and ratemaking and utility management. His involvement in public utility regulation has included project management and in-depth analyses of numerous issues involving electric, gas, telephone, and water and sewer utilities. Mr. Smith has performed work in the field of utility regulation on behalf of public service commission staffs, state attorneys general, municipalities, and consumer groups concerning regulatory matters before regulatory agencies in Alabama, Alaska, Arizona, Arkansas, Barbados, California, Connecticut, Delaware, Florida, Georgia, Hawaii, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, New Jersey, New Mexico, New York, Nevada, North Carolina, North Dakota, Ohio, Oregon, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, Washington D.C., West Virginia, Canada, Federal Energy Regulatory Commission, and various state and federal courts of law. He has presented expert testimony in regulatory hearings on behalf of utility commission staffs and intervenors on numerous occasions. Mr. Smith has extensive experience with regulatory projects and would be the Project Manager for this engagement.

Helmuth W. Schultz, CPA, is a senior regulatory analyst. Mr. Schultz has supervised many projects and presented testimony on numerous occasions. Mr. Schultz has been responsible for much of the auditing work done by the firm as well as being an expert witness in numerous utility rate cases and regulatory proceedings. Mr. Schultz has evaluated numerous issues affecting regulated public utilities including fuel and purchased power expenses, rate base, sales, O&M expenses, taxes of all types, and management controls over operations and expenses, and compliance with Commission orders and

policies and procedures. Mr. Schultz has performed work in the field of utility regulation on behalf of public service commission staffs, state attorneys general, municipalities, and consumer groups concerning regulatory matters before regulatory agencies in Alaska, Arizona, California, Connecticut, Delaware, Florida, Georgia, Kentucky, Kansas, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, New Jersey, New York, Nevada, North Dakota, Ohio, Pennsylvania, Rhode Island, Texas, Utah, and Vermont. Mr. Schultz is not expected to work on this project, but he may provide assistance to the project team on an as-needed, as-available basis.

Mark Dady, CPA, is a regulatory analyst. As a certified public accountant with Larkin & Associates, duties include the analysis of utility regulatory issues, researching accounting and regulatory developments, preparing computer models and spreadsheets, assisting on financial audits, preparation of bids and proposals, and writing testimony. Mr. Dady co-sponsored expert testimony presented by Larkin in California and co-sponsored with Mr. Smith the Larkin financial portions of several fuel audits of Ohio utilities, which Larkin performed as a subcontractor to Energy Ventures Analysis. Jurisdictions in which Mr. Dady has participated in the analysis of regulatory filings include Alaska, Arizona, California, Connecticut, Illinois, Indiana, Ohio, Pennsylvania, Vermont, Virginia, and West Virginia. Mr. Dady has extensive experience analyzing regulatory issues and accounting for Ohio utilities (in several fuel cases where Larkin has functioned as a subcontractor to EVA and has been responsible for the financial and accounting review). He would participate in this engagement by reviewing accounting information, conducting on-site interviews (with Mr. Smith), and writing the report.

John Defever, CPA, is a regulatory analyst with Larkin. Mr. Defever participates in regulatory engagements by reviewing and organizing information, and assisting with the preparation of testimony, briefs, schedules, exhibits, reports. Mr. Defever also performs research relating to regulatory, accounting, and financial issues. Mr. Defever is not expected to work on this project.

Tina Miller is a regulatory analyst with over 21 years of regulatory experience. Ms. Miller participates in regulatory engagements by reviewing and organizing information, and assisting with the preparation of testimony, briefs, schedules, exhibits, reports. Ms. Miller

also performs research relating to regulatory, accounting, and financial issues. Ms. Miller is not expected to work on this project.

Megan Cranston is a regulatory analyst with Larkin. Ms. Cranston has a masters degree from the University of Michigan, Dearborn. As a regulatory analyst, she prepares discovery requests, produces spreadsheets and models, assists with the review and analysis of regulatory filings, performs regulatory and accounting research, and helps prepare testimony and exhibits. Ms. Cranston will perform similar duties on this case.

Dawn Bisdorf is a research associate. She will assist on the project by preparing analyses under the direction of the senior professionals, locating testimony and orders online, performing research, preparing and editing schedules and testimony, and keeping files and workpapers organized.

The Project Manager and Senior Consultants assigned to this project are senior professionals who all have substantial experience with rate setting and testifying before utility regulatory agencies. All of the Larkin senior professionals and two of the regulatory analysts assigned to this project are CPAs. The work of the regulatory analysts will be adequately supervised by the Senior Consultants.

Resumes containing additional details of the experience, work history, and education of each of the Larkin professionals who will be performing work on this case, along with references, were recently provided to the LPSC as part of the process of getting Larkin on the LPSC's qualified bidders list.

Larkin Financial Responsibility

Larkin does not have any outstanding liens or claims against its business. Larkin is financially capable of performing all work required. The firm is financially solvent and foresees no financial problems whatsoever affecting the ability to perform the work required. Banking references will be provided if necessary.

Larkin Computer Capability

Larkin can receive and transfer data/reports electronically and can participate in video conferencing meetings (via Zoom, TEAMS, etc.).

Contact Within Firm

In the event additional information is desired, please contact Mr. Ralph Smith at the following address and telephone number:

Ralph Smith, CPA
Larkin & Associates, PLLC
15728 Farmington Road
Livonia, MI 48154
(734) 522-3420 – Office Phone
(313) 590-7023 - Mobile
(734) 522-1410 – Fax
RSmithLA@aol.com

Representative Assignments for Larkin

References for Larkin & Associates for specific projects that demonstrate our capabilities to perform the work described herein are:

Florida Power & Light Company and Gulf Power Company, Docket No. 20200092-EI, review of Storm Protection Plan Cost Recovery Clause (testimony was submitted for this case)

Completion Date: 2020
Project Manager: Ralph Smith
Key Participants: Ralph Smith, Mark Dady, Dawn Bisdorf

The following individual may be contacted as a reference:

Contact Name: Patricia Christensen, Charles Rehwinkel
Organization: Florida Office of Public Counsel
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
Telephone No.: (850) 488-9330

Florida Power & Light Company, Docket No. 20200071-EI, review of 2020-2029 Storm Protection Plan

Completion Date: 2020
Project Manager: Ralph Smith

Key Participants: Ralph Smith, Mark Dady, Megan Cranston, Dawn Bisdorf

The following individual may be contacted as a reference:

Contact Name: Patricia Christensen, Charles Rehwinkel
Organization: Florida Office of Public Counsel
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
Telephone No.: (850) 488-9330

Gulf Power Company, Docket No. 20200070-EI, review of 2020-2029 Storm Protection Plan

Completion Date: 2020
Project Manager: Ralph Smith
Key Participants: Ralph Smith, Mark Dady, Megan Cranston, Dawn Bisdorf

The following individual may be contacted as a reference:

Contact Name: Patricia Christensen, Charles Rehwinkel
Organization: Florida Office of Public Counsel
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
Telephone No.: (850) 488-9330

Georgia Power Company, Docket No. 44280, general rate case and review of annual surveillance reports

Completion Date: 2022
Project Manager: Ralph Smith
Key Participants: Ralph Smith, Mark Dady, Megan Cranston, Dawn Bisdorf

The following individual may be contacted as a reference:

Contact Name: Robert Trokey
Organization: Georgia Public Service Commission
Public Interest Advocacy Staff
244 Washington Street, SW
Atlanta, GA 30334-9052
Telephone No.: (404) 656-4549

Virginia Electric and Power Company, Case No. PUR-2021-00058

Completion Date: 2021
Project Manager: Ralph Smith
Key Participants: Ralph Smith, Mark Dady, Megan Cranston, Dawn Bisdorf

The following individual may be contacted as a reference:

Contact Name: Meade Browder (804) 786-7373
C. Mitch Burton (804) 371-0343
Organization: Office of the Attorney General
202 North 9th Street
Richmond, VA 23219

Florida Power & Light Company, Docket No. 20210015-EI

Completion Date: 2021
Project Manager: Ralph Smith
Key Participants: Ralph Smith, Megan Cranston, Dawn Bisdorf

The following individual may be contacted as a reference:

Contact Name: Patricia Christensen
Charles Rehwinkel
Organization: Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., Rm 812
Tallahassee, FL 32399-1400
Telephone No.: (850) 488-9330

Georgia Power Company, Docket No. 42516

Completion Date: 2019
Project Manager: Ralph Smith
Key Participants: Ralph Smith, Mark Dady, Dawn Bisdorf

The following individual may be contacted as a reference:

Contact Name: Rob Trokey, Tom Newsome, Tom Bond
Organization: Georgia Public Service Commission
Public Interest Advocacy Staff
244 Washington Street, SW
Atlanta, GA 30334-9052

Telephone No.: (404) 656-0994

Arizona Public Service Company's Application for a Rate Increase, Docket No. E-01345A-19-0236

Completion Date: Ongoing
Project Manager: Ralph Smith
Key Participants: Ralph Smith, Mark Dady, Megan Cranston, Dawn Bisdorf

The following individuals may be contacted as a reference:

Contact Name: Maureen Scott (602) 542-6022
Ranelle Paladino (602) 364-0347
Organization: Arizona Corporation Commission – Utilities Division
Address: 1200 W. Washington
Phoenix, AZ 85007

Arizona Public Service Company's Application for a Rate Increase, Docket No. E-01345A-16-0036

Completion Date: 2018
Project Manager: Ralph Smith
Key Participants: Ralph Smith, Mark Dady, Dawn Bisdorf, Megan Cranston

The following individuals may be contacted as a reference:

Contact Name: Maureen Scott (602) 542-6022
Barbara Keene (602) 542-0853
Organization: Arizona Corporation Commission – Utilities Division
Address: 1200 W. Washington
Phoenix, AZ 85007

Appalachian Power Company, Case No. 14-1152-E-42T

Completion Date: 2014
Project Manager: Ralph Smith
Key Participants: Ralph Smith, Dawn Bisdorf

The following individual may be contacted as a reference:

Contact Name: Robert Williams
Organization: Consumer Advocate Division
Division of Consumer Counsel
900 East Main Street
Richmond, VA 23219
Telephone No.: (304) 558-0526

Appalachian Power Company, Case No. PUE-2014-00026

Completion Date: 2014
Project Manager: Ralph Smith
Key Participants: Ralph Smith, Dawn Bisdorf

The following individual may be contacted as a reference:

Contact Name: Meade Browder
Organization: Virginia Office of the Attorney General
Division of Consumer Counsel
900 East Main Street
Richmond, VA 23219
Telephone No.: (804) 786-2071

Georgia Power Company, Docket No. 36989, general rate case and review of annual surveillance reports

Completion Date: 2014
Project Manager: Ralph Smith
Key Participants: Ralph Smith, Mark Dady, Dawn Bisdorf

The following individual may be contacted as a reference:

Contact Name: Sheree Kernizan, Rob Trokey
Organization: Georgia Public Service Commission
Public Interest Advocacy Staff
244 Washington Street, SW
Atlanta, GA 30334-9052
Telephone No.: (404) 656-0994

Virginia Electric and Power Company, Case No. PUE-2013-00020

Completion Date: 2013
Project Manager: Ralph Smith
Key Participants: Ralph Smith, Dawn Bisdorf

The following individual may be contacted as a reference:

Contact Name: Meade Browder
Organization: Virginia Office of the Attorney General
900 East Main Street
Richmond, VA 23219

Telephone No.: (804) 786-2071

Arizona Public Service Company's Application for a Rate Increase, Docket No. E-01345A-11-0224

Completion Date: 2012
Project Manager: Ralph Smith
Key Participants: Ralph Smith, Dawn Bisdorf

The following individuals may be contacted as a reference:

Contact Name: Maureen Scott (602) 542-6022
Organization: Arizona Corporation Commission – Utilities Division
Address: 1200 W. Washington
Phoenix, AZ 85007

Larkin Offices

The office of Larkin & Associates and all of its operating equipment and facilities is located in Livonia, Michigan. Larkin & Associates has no offices, facilities or equipment in Louisiana.

X. ESTIMATE OF COSTS

Quotation of Charges

The hourly rates for each person and personnel class are listed in the table below:

Professional	Title	Rate
Hugh Larkin, Jr., CPA	Senior Partner	\$ 225
Ralph Smith, CPA*	Project Manager/Sr. Reg Analyst	\$ 225
Helmuth Schultz, III, CPA	Senior Regulatory Analyst	\$ 225
Mark Dady, CPA*	Regulatory Analyst II	\$ 175
John Defever, CPA	Regulatory Analyst II	\$ 175
Christina Miller	Regulatory Analyst	\$ 95
Megan Cranston*	Regulatory Analyst	\$ 95
Dawn Bisdorf*	Research Associate	\$ 75
Brooke Cranston / Sophie Spiegel	Administration	\$ 25
*Anticipated to work on project. Others may work on project on an as-needed, as-available basis		

The labor costs are based upon the above rates and hours assumed to be performed by each team member. Estimated labor costs are provided by task although they are not intended to be a cap on each task. The effort per task will be a function of what is required once the initial interviews and initial discovery and documentation review is complete. As noted above, the total labor costs represent a ceiling. The cost proposed is \$74,820 for labor costs and \$2,500 for travel and out-of-pocket expenses, for a total not-to-exceed price of \$77,320, as shown in detail on the following page.

Entergy Louisiana Future Read Resilience Plan, RFP 23-01, Docket No. U-36625													
Estimated Timeline by Month, from: 2/27/2023 4/1/2023 To: 3/31/2023 4/30/2023 5/31/2023 6/30/2023 7/31/2023 8/31/2023 9/30/2023 10/31/2023 11/30/2023 12/31/2023													
	3/31/2023	4/30/2023	5/31/2023	6/30/2023	7/31/2023	8/31/2023	9/30/2023	10/31/2023	11/30/2023	December 2023	January 2023	February 2023	TOTAL
										Draft Rpt	Final Rpt	Respond	
Larkin Hours Detail													
Hugh Larkin, Jr., CPA			20	20	20	20	20	20	16	12	6	6	184
Ralph Smith, CPA*	12												0
Helmuth Schultz, III, CPA													0
Mark Dady, CPA*	8	16	16	12	12	16	12	12	8	12	4	4	132
John Defever, CPA													0
Christina Miller													0
Megan Cranston*	4	8	12	8	4	4	4	6	6	4	4	2	66
Dawn Bisdorf		8	8	8	4	4	4	4	4	4	2	4	54
Word Processing/Secretarial													0
TOTAL LARKIN HOURS	24	52	56	48	40	44	40	34	34	32	16	16	436
LARKIN PROFESSIONAL FEES DETAIL													
Hugh Larkin, Jr., CPA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Ralph Smith, CPA*	\$ 2,700	\$ 4,500	\$ 4,500	\$ 4,500	\$ 4,500	\$ 4,500	\$ 4,500	\$ 2,700	\$ 3,600	\$ 2,700	\$ 1,350	\$ 1,350	\$ 41,400
Helmuth Schultz, III, CPA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Mark Dady, CPA*	\$ 1,400	\$ 2,800	\$ 2,800	\$ 2,100	\$ 2,100	\$ 2,800	\$ 2,100	\$ 2,100	\$ 1,400	\$ 2,100	\$ 700	\$ 700	\$ 23,100
John Defever, CPA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Christina Miller	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Megan Cranston*	\$ 380	\$ 760	\$ 1,140	\$ 760	\$ 380	\$ 380	\$ 380	\$ 570	\$ 570	\$ 380	\$ 380	\$ 190	\$ 6,270
Dawn Bisdorf	\$ -	\$ 600	\$ 600	\$ 600	\$ 300	\$ 300	\$ 300	\$ 300	\$ 300	\$ 300	\$ 150	\$ 300	\$ 4,050
Administration	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
TOTAL LARKIN PROFESSIONAL FEES	\$ 4,480	\$ 8,660	\$ 9,040	\$ 7,960	\$ 7,280	\$ 7,980	\$ 7,280	\$ 5,670	\$ 5,870	\$ 5,480	\$ 2,580	\$ 2,540	\$ 74,820
Estimated Travel Cost, 1 Trip by 2 Professionals													\$ 2,500
TOTAL ESTIMATES FEES AND TRAVEL COST													\$ 77,320
**Anticipated to work on project; others may work on project on an as-needed, as-available basis													