



RESPONSE TO LOUISIANA PUBLIC SERVICE COMMISSION

REQUEST FOR PROPOSALS 25-06

FOR

OUTSIDE CONSULTANT

IN

DOCKET NO. X-37602, LOUISIANA PUBLIC SERVICE COMMISSION,
EX PARTE. IN RE: AUDIT OF PURCHASE GAS ADJUSTMENT FILINGS
FOR CENTERPOINT ENERGY ARKLA FOR THE PERIOD OF JANUARY
2023 THROUGH MARCH 31, 2025;

DOCKET NO. X-37604, LOUISIANA PUBLIC SERVICE COMMISSION,
EX PARTE. IN RE: AUDIT OF PURCHASE GAS ADJUSTMENT FILINGS
FOR CENTERPOINT ENERGY ENTEX FOR THE PERIOD OF JANUARY
2023 THROUGH MARCH 31, 2025; AND,

DOCKET NO. X-37603, LOUISIANA PUBLIC SERVICE COMMISSION,
EX PARTE. IN RE: AUDIT OF PURCHASE GAS ADJUSTMENT FILINGS
FOR THE NATURAL GAS DIVISION OF ENTERGY LOUISIANA, LLC
FOR THE PERIOD OF JANUARY 2023 THROUGH JUNE 30, 2025.

SUBMITTAL DATE:

July 30, 2025

PREPARED AND SUBMITTED BY:

UNITED PROFESSIONALS COMPANY, LLC
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Appendix A: Resumes of UPC Professionals Assigned to RFP 25-06

Executive Summary

United Professionals Company, LLC (“UPC”) is pleased to submit its response to the Louisiana Public Service Commission’s (“LPSC” or “Commission”) Request for Proposals for Outside Consultants 25-06. We hope to have the opportunity to assist Commission Staff (“Staff”) in its completion of three separate Purchase Gas Adjustment (“PGA”) audits for CenterPoint Energy Arkla (“Arkla”), CenterPoint Energy Entex (“Entex”), and the natural gas division of Entergy Louisiana, LLC (“ELL”) (collectively, “Utilities”).

Pursuant to Commission General Order dated March 24, 1999 (“PGA Order”), Staff issued Notices of Proceeding commencing the final PGA audits on Arkla, Entex, and ELL’s purchase gas adjustment filings. The audit period for Arkla and Entex is January 1, 2023 through March 31, 2025, and the period for ELL is January 1, 2023 through June 30, 2025 (“Audit Period”). These Audit Periods cover the final purchase gas adjustment filings for Arkla, Entex, and ELL as all three entities have been purchased by Delta North Louisiana Gas Company, LLC and Delta South Louisiana Gas Company, LLC, with the closing for Arkla and Entex occurring on April 1, 2025 and on June 30, 2025 for ELL.

UPC has a team of regulatory, utility finance, and economics professionals and consultants, the members of which were specifically selected for their ability to serve the needs of the LPSC. As a Louisiana firm, we take great pride in any and all work that we do that benefits the people of our state, and we believe these Dockets provide just such an opportunity. Our team of professionals and consultants consists of individuals with tremendous qualifications. These professionals have a vast amount of experience assisting Staff in dockets involving ratemaking, utility accounting standards and adjustments, cost-of-service and cost allocation methodologies, determination of rate base, cost of capital, and riders, Formula Rate Plan reviews, resource planning, monitoring of utility-led RFPs pursuant to the Commission’s Market Based Mechanisms (“MBM”) Order, audits of Fuel Adjustment Clauses (“FAC”) and PGAs, and other regulatory issues.

UPC has knowledge and experience with each Utilities’ business operations and financial structures. UPC has previously assisted Staff with its PGA audits of Arkla (Docket No. X-36647), Entex (Docket No. X-36648), and the natural gas division of ELL (Docket No. X-36646).

UPC appreciates from the Commission’s RFP that the scope of representation would involve the review and analysis of each Utilities’ fuel purchases and usage; the draft, review, and analysis of discovery and associated responses for each PGA audit and Audit Period; a review of accompanying workpapers and each Utilities’ financial data; a review of historical data involving prior PGA audits for the Utilities; identifying any irregularities detected in the monthly filings; preparing three separate audit reports and direct testimony (as necessary), which shall include a written or executive summary identifying any costs included in the audits found to be in violation of the PGA Order; preparing three recommendations as to the appropriate methodology to provide for recovery of any irregularities (as necessary); participating in meetings (formal and informal) and conference calls with the Commission, Staff, and/or the parties (as deemed necessary by Staff); and, assisting in the preparation of briefing materials for Staff and Commissioners. While the scope of representation does not contemplate a contested hearing(s), UPC is prepared to defend each audit report by assisting in responding to discovery on each of Staff’s audit reports; participating in meetings and conference calls regarding Staff’s audit report; and appearing before the Commission at B&Es where any of these matters will be discussed. UPC understands that the scope of representation shall continue through the conclusion of each docket, including Commission consideration at a B&E or B&Es, and that Staff will ultimately determine how tasks will be carried out, including the setting of internal deadlines if necessary to ensure all work is completed timely.

Based on UPC’s above-described review of the solicitation, scope, and related filings, UPC proposes a total budget for the Commission’s consideration for all three PGA audits not to exceed \$51,000, including \$50,000 in professional fees and \$1,000 in expenses. UPC’s proposed not to exceed budget covers the scopes of

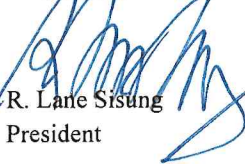
representation to complete all three PGA audits solicited by the RFP. Additionally, and per the terms of the RFP, should any audit report be contested and a procedural schedule need to be established for a contested hearing, UPC reserves the right to submit a proposed budget for the contested hearing at that time.

UPC's LPSC discounted hourly rates for this proposal range from \$60 to \$303 annually adjusted by CPI. UPC will only submit expenses as allowed by Commission rules.

UPC will only charge for work performed and such work will be monitored by the LPSC Staff. If less time is expended than was used to estimate the "not to exceed" budget, then the total fees charged will be lower, as the Commission will only be billed for the actual work performed and expenses incurred on these Dockets. However, if more time is expended on the proposed scope than was budgeted, UPC is capped at its proposed "not to exceed" budget amount.

Our professionals are excited about the opportunity to serve the Commission as an Outside Consultant in these Dockets. UPC's local presence offers the LPSC the benefits of geographic proximity and a wealth of institutional knowledge. The multifaceted financial qualifications and experience offered by UPC's staff of regulatory and utilities finance experts and consultants best position us to provide the Commission with the most extensive and comprehensive service. For more information on our knowledge and experience, please contact the client references that we have provided.

Very truly yours,



R. Lane Sisung
President



A. QUALIFICATIONS AND EXPERIENCE

1. The Sisung Group

UPC is a member of the New Orleans, Louisiana-based Sisung Group, which is comprised of related Company that provide investment banking, asset management, venture capital and business consulting and development services to corporations, individuals, institutions and governmental agencies.

- **United Professionals Company (“UPC”)** offers financial consulting, transaction structuring, business development, real estate development, and revenue and cash flow development services to clients operating in the public, private and non-profit sectors. UPC specializes in the areas of public utility financial and accounting analysis, mergers and acquisitions consulting, healthcare revenue maximization, public infrastructure and facilities development, energy efficiency and project management services.
- **Sisung Securities Corporation (“SSC”)** is a full-service investment banking firm that offers a range of services, including equity and fixed income underwritings, financial advisory services and securities brokerage services in addition to other related financial services. Clients served include public, corporate, retail and institutional entities. SSC is registered with the Securities and Exchange Commission (SEC) and is a member of the Financial Industry Regulatory Authority (FINRA), the Municipal Securities Rulemaking Board (MSRB) and the Securities Investor Protection Corporation (SIPC).
- **Sisung Investment Management Services (“SIMS”)** provides investment advisory services to corporate and public institutions, as well as to high net worth individuals. SIMS is an investment advisor registered with the Securities and Exchange Commission (SEC).
- **Sisung Capital** provides alternative financing products to small and medium-sized businesses, thus positively impacting economic development in the communities in which it invests. Sisung Capital invests capital and resources in companies in need of funding for growth and profitability. As a licensed Louisiana Capital Company (“CAPCO”) and Business and Industrial Development Corporation (“BIDCO”), Sisung Capital has primarily focused its investments in Louisiana. By leveraging State tax credit incentive programs, Sisung Capital has assisted start-up and expanding Louisiana businesses in raising and investing over \$25 million dollars in communities throughout Louisiana. Sisung Capital has worked with Company operating in a wide variety of industries including: telecommunications, print manufacturing, construction, weatherization services, oil & gas, healthcare, media and government services sectors.





Unlike most financial firms which focus solely on financial matters, UPC and its affiliated Sisung Group companies have extensive experience in a broad range of financially related areas involving state and local governments

As demonstrated by the above, our professionals are highly experienced in multifaceted areas, including financial analysis, program design, government relations, legislative advocacy, policy initiatives, financing transactions, and legal and regulatory budgeting, planning, and administration.

More information on The Sisung Group is also available at www.sisung.com.

2. United Professionals Company

UPC, which operates the Sisung Group's non-regulated financial advisory and consulting activities, provides clients operating in the public, private and non-profit sectors with a broad range of services from its Louisiana based offices. These services include, but are not limited to financial analysis, transaction structuring, business plan development, real estate development, and revenue maximization. UPC's public sector clients include state governments, parish and county governments, cities, towns, state utility regulatory authorities, school districts, hospitals, levee districts, housing authorities, universities, port authorities, law enforcement districts, charter schools and more.





UPC has extensive experience in a broad range of financially-related areas involving state and local government throughout Louisiana. UPC's dedicated and accomplished staff includes individuals with backgrounds as diversified as:

- Investment Bankers
- Securities Traders
- Financial Analysts
- Attorneys
- Certified Public Accountants
- Regulatory Economists
- Published Authors
- MBAs

Our professionals are highly educated, experienced, and published in multidisciplinary areas including:

- Financial Analysis
- Asset Acquisitions
- Program Design
- Program Management
- Policy Initiatives
- Government Relations
- Legislative Advocacy
- Financing Transactions
- Regulatory Budgeting, Planning, and Administration

Successfully utilizing the strengths, talents and expertise of our seasoned professionals, we are able to provide customized, quality service to our clients. Our professionals have represented local, state and federal issuing authorities, cities, parish and county governments, hospital districts, 501(c)(3) corporations, state agencies, state governments and commissions, and corporations.

As a specialty branch of these financial advisory and consulting services, UPC has built a team of regulatory and utility finance and economics professionals, the members of which were specifically selected for their ability to serve the needs of the LPSC. Members of the UPC team have an extensive experience analyzing the operations, books, and records of 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/rate stabilization plans. We have detailed knowledge and experience regarding Louisiana regulatory law and ratemaking principles. UPC's team of consultants all have direct experience with LPSC policies, rulemakings and jurisdictional issues, applicable Commission and federal regulations, as well as the following:

1. Detailed understanding of electric and natural gas utility regulation;



2. Detailed understanding of the major functional areas of a regulated utility;
3. Analyzing the operations, books, and records of utilities;
4. Appropriate accounting standards and practices for electric and natural gas utilities, public utility accounting, and generally accepted auditing standards;
5. Appropriate adjustments to be made to the utility's accounting records, including appropriate fuel adjustments to be made by a utility pursuant to the Commission's PGA Order;
6. Specific adjustments allowed by the Commission to be flowed through a utility's PGA;
7. LPSC Rules and Orders pertaining to the RFP process and acquisition of power supply resources;
8. LPSC's Market-Based Mechanism ("MBM") Order and its 1983 General Order, as amended;
9. LPSC's Minimum Capacity Obligation ("MCO") Order (Commission General Order dated July 16, 2024 in Docket No. R-36263);
10. LPSC General Order dated November 6, 1997 in Docket No. U-21497 regarding fuel cost recovery;
11. LPSC General Order dated March 24, 1999 ("PGA Order");
12. LPSC rules on affiliate transactions and cost recovery mechanisms for power supply resources;
13. Cost allocation methodologies for the allocation of investment and expenses between 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 between affiliates;
14. Principles associated with resource acquisitions and the competitive process, including but not limited to analyzing utility resource needs and whether the considered resource(s) is able to meet those needs (including but not limited to renewable and/or solar resources);
15. Public interest criteria for approval of resources and purchase power contracts;
16. Whether or not a resource will provide reliable service at the lowest reasonable cost;
17. The determination and calculation of the appropriate rate base of a utility plant investment dedicated to providing service;
18. Resource planning methods to improve the efficiency of a utility's power supply operations and whether the utility is making use of any such methods;
19. LPSC and FERC approved cost-of service cost methodologies for utilities;
20. Cost-of-service and cost allocation methodologies and mechanisms supporting the revenue requirements among classes of customers;
21. Rate design;



22. Practice of setting just and reasonable rates, including, but not limited to, the calculation of rate base, rates of return, capital structure, formula rates, cost recovery via riders;
23. Just and reasonable costs and prudent investments associated with providing safe, reliable, and quality service as recommended by NARUC;
24. Depreciation and taxation;
25. Familiarity with prior cost recovery filings with the LPSC;
26. MISO tariffs, rules and planning processes, generally, and specifically related to resource adequacy planning processes and use of Zonal Resource Credits (“ZRCs”), specifically Local Resource Zone (“LRZ”) 9, but not necessarily limited to LRZ 9.

UPC’s team of regulatory and utility finance and economics professionals is well qualified to provide the services that the LPSC has requested in Request for Proposal 25-06. Our organization has an extensive amount of practical experience in the field of public utility practice that includes similar practice before the LPSC and other regulatory agencies, and a vast knowledge of Louisiana ratemaking standards and regulatory law. All members of our team are experienced in participating in cases involving public utility regulation, or other regulatory issues on administrative and judicial levels, including the presentation of direct testimony or report and recommendations, assistance in developing cross examination of adverse witnesses, and the analysis of comments and exceptions to proposed recommendations. Our team of professionals has significant experience in the presentation of recommendations involving public utility regulation and other regulatory issues on administrative and judicial levels. Our professionals have practiced before, and acted as expert witnesses in complex cases before, regulatory agencies such as the LPSC, Securities and Exchange Commission (“SEC”), the Federal Energy Regulatory Commission (“FERC”), and the Financial Industry Regulatory Authority (“FINRA”). The attorneys who work in-house for UPC have been published on topics covering a wide range of law.

Collectively, the UPC professionals possess a full understanding and ability to assist Commission Staff in reviewing the issues related to these Dockets. Indeed, the combination of our team members’ educational backgrounds, achievements, specific expertise, and prior experience serving the Commission best positions us to provide the LPSC and Staff with the most extensive and comprehensive consulting services available to it on these Dockets.

The resumes of some of our highly qualified professionals who could be assigned to assist the Commission in this matter are detailed in *Appendix A*. UPC reserves the ability to supplement its team, if necessary, in order to provide the Commission with the very best service on these Dockets.

Some of the United Professionals Company’s unique accomplishments include:



- Serving the Commission on *Docket No. U-33983 In Re: Docket No. U-33983 Review of Entergy Louisiana, LLC's Motion for Extension of gas Rate Stabilization Plan* by assisting the Commission's Legal Staff by conducting a review of Entergy Louisiana, LLC's Motion for Extension of Gas Rate Stabilization Plan, and assisting with the review of Annual Evaluation Reports for each of the three proposed test years.
- Serving the LPSC on Commission on *Docket No. U-34434, Atmos Energy Corporation, ex parte. In re: 2016 Rate Stabilization Clause filing for Louisiana Gas Rate Division*, by assisting Staff in reviewing Atmos's Gas Rate Stabilization Clause Filing for the Trans Louisiana Rate Division.
- Serving the LPSC on Commission on *Docket No. U-34343, Atmos Energy Corporation, ex parte. In re: 2016 Rate Stabilization Clause filing for Trans Louisiana Gas Rate Division*, by assisting Staff in reviewing Atmos's Gas Rate Stabilization Clause Filing for the Trans Louisiana Rate Division.
- Serving the Commission on *Docket No. U-33925, Atmos Energy Corporation, ex parte. In re: 2015 Rate Stabilization Clause filing for Trans Louisiana Gas Rate Division*, by assisting Staff in reviewing Atmos's Gas Rate Stabilization Clause Filing for the Trans Louisiana Rate Division.
- Serving as an independent technical consultant in *Docket No. I-33013, Southwestern Electric Power Company, ex parte. In re: 2013 Integrated Resource Planning process for SWEPCO pursuant to General Order dated April 20, 2012*, by assisting the LPSC in reviewing and evaluating the Company's integrated resource plan filings, including comprehensive sets of potential resource options, supply-side, demand-side and economic transmission resource options, to determine a base or "reference resource" plan that offers the most economic and reliable combination of resources satisfying the forecasted load requirements.
- Serving as an independent technical consultant in *Docket No. I-34715, In re: Request to Initiate the Integrated Resource Plan process pursuant to the General Order dated April 20, 2012*.
- Serving the Commission through assisting Commission Staff in participating in and monitoring the Southwestern Power Pool related matters.
- Serving as an independent technical consultant in *Docket No. U-34619, In re: Application of Southwestern Electric Power Company (SWEPCO) for Expedited Certification and Approval of the Acquisition of Certain Renewable Resources and the Construction of a Generation Tie Pursuant to the 1983 and/or 1994 General Orders*.
- Serving the Commission in *Docket No. U-35324, Application of Southwestern Electric Power Company (SWEPCO) for Certification and Approval of the Acquisition of Certain Renewable Resources and the Construction of a Generation Tie Pursuant to the 1983 and/or 1994 General Orders*.



- Serving the LPSC on Commission on LPSC Docket No. *U-33434 Joint Application of Cleco Power, LLC and Cleco Partners L.P. for: (i) Authorization of the Change of Ownership and Control of Cleco Power LLC and (ii) Expedited Treatment*
- Serving the LPSC on Commission on LPSC Docket No. *U-33848 Cleco Power LLC Formula Rate Plan June 2015 Monitoring Report*
- Serving the LPSC on Commission on LPSC Docket No. *U-34289 Cleco Power LLC Formula Rate Plan – June 2016 Monitoring Report and pursuant to U-32507 Prudence Review of Cleco’s Installation of MATS Emissions Control Equipment at Dolet hills Power Station, Rodemacher Power Station Unit No. 2, and Madison Unit No. 3*
- Serving the LPSC on Commission on LPSC Docket No. *U-34617 Application of Cleco Power LLC requesting Commission consideration of a Proposed Physical Bilateral Hedge Program, pursuant to General Order R-32975*
- Serving the LPSC on Commission on LPSC Docket No. *U-34974 In Re: Application of Cleco Corporate Holdings LLC and Cleco Power LLC for (i) Authorizations, Waivers, and Regulatory Interpretations of Certain Provisions of LPSC Order No. U-33434-A; (i) Authorization for Cleco Corporate Holdings, LLC to Pledge its Ownership Interest in Cleco Power LLC; and (iii) Expedited Treatment*
- Serving the LPSC on Commission on LPSC Docket No. *U-35049 Cleco Power LLC, LPSC Docket U-35049, In Re: June 2018 Monitoring Report - Application of Cleco Power LLC for: (i) Authorization to Implement Rate Reductions resulting from the Tax Cuts and Jobs Act of 2017; (ii) Authorization to Modify Certain Tariffs in connection with such Rate Reductions; (iii) Authorization to Implement Residential Base Revenue Decoupling; and (iv) Expedited Treatment*
- Serving the LPSC on Commission on LPSC Docket No. *U-34687 Cleco Power LLC Formula Rate Plan- June 2017 Monitoring Report*
- Serving the LPSC on Commission on LPSC Docket No. *U-32631 Application of Cleco Power LLC for: (i) public interest finding in favor of the transfer of functional control of certain transmission assets to the Midwest Independent Transmission System Operator, Inc.*
- Serving the LPSC on Commission on LPSC Docket No. *U-34501 Cleco Power LLC, ex parte. Application Regarding the Costs and Benefits of Continued Participation in the Midcontinent Independent Systems Operator, Inc. Regional Transmission Organization*
- Serving the LPSC on Commission on FERC Docket No. *EC18-63 Joint Application for Order Authorizing Disposition of Jurisdictional Facilities Under Section 203 of the Federal Power Act of the Cleco and NRG Applicants*
- Serving the LPSC on Commission on FERC Docket No. *ER17-1368 Cleco Power, LLC System Support Resource (“SSR”) Payment for Teche Power Station Unit 3*



- Serving as an independent technical consultant in *Docket U-33244 Entergy Louisiana, LLC and Entergy Gulf States Louisiana, LLC, ex parte, In re: Submission of Business Combination Study regarding potential business*
- Serving the Commission as an independent outside consultant on *Docket No. U-33605 Joint Application of Entergy Gulf States Louisiana, L.L.C. and Entergy Louisiana, LLC. for Certification of the Louisiana Economic Transmission Project in Accordance with Louisiana Public Service Commission General Order dated October 10, 2013 in Docket No. R-26018*
- Serving the Commission as an independent outside consultant on *Docket No. U-33645 Application of Entergy Gulf States Louisiana, L.L.C. for Certification of the Lake Charles Transmission Project in Accordance with Louisiana Public Service Commission General Order dated October 10, 2013 in Docket No. R-26018.*
- Providing written and live testimony before the Commission to address and advise the Commission regarding the securitization bonds issued by Entergy Louisiana Investment Recovery Funding I, L.L.C., the designated special purpose entity created by ELL for recovery of the costs related to the Little Gypsy 3 repowering project, and the Commission's issuance of a financing order issued under Louisiana's 2010 enabling legislation, as codified in LA. R.S. 45:1251-1216 (“Entergy Little Gypsy Securitization Docket”)
- Acting as outside consultant to the Commission in reviewing issues related to the evaluation of the proposed transfer of transmission assets in *Docket No. U-32538- Entergy Louisiana, LLC, Entergy Gulf States Louisiana, LLC, Mid South TransCo LLC, Transmission Company Louisiana I, LLC, Transmission Company Louisiana II, LLC, ITC Holdings Corp. and ITC Midsouth LLC, ex parte. In re: Joint Application for Approval of Change of Ownership of Electric Transmission Business, for Certain Cost-Recovery Adjustments, and for Related Relief and the related dockets before the Federal Energy Regulatory*
- Acting as outside consultants to the Commission in reviewing issues related to the evaluation of *Docket No. 32707- Entergy Gulf States, LLC, In re: Application for Authority to Change Rates, Approval of Formula Rate Plan and for Related Relief* and *Docket No. 32708- Entergy Louisiana, LLC, In re: Application for Authority to Change Rates, Approval of Formula Rate Plan and for Related Relief*
- Performing financial analysis and rendering testimony on the proposed issuance and securitization of storm recovery bonds, under La. R.S. 45:1331-1328, for permanent rate-financed recovery of system restoration costs related to Hurricanes Isaac and the replenishment of storm reserve escrow accounts in *Docket No. U-32764 Energy Gulf States Louisiana LLC and Energy Louisiana LLC, ex parte. In re: Joint Application for Recovery in Rates of Costs Related to Hurricane Isaac, Determination of Appropriate Storm Reserve Escrow Amounts and Related Relief*
- Serving as an independent outside consultant to the Commission in *Docket No. U-34289, Cleco Power LLC, ex parte. In re: Formula Rate Plan-June 2016 Monitoring Report*



- Serving as an independent outside consultant to the Commission in *Docket No. U-33848, Cleco Power LLC, ex parte. In re: Formula Rate Plan-June 2015 Monitoring Report*
- Serving as an independent outside consultant to the Commission in *Docket No. U-33434, Joint Application of Cleco Power, LLC and Cleco Partners, L.P. for: (I) Authorization for the Change of Ownership and Control of Cleco Power, LLC and (II) Expedited Treatment*
- Serving the Commission as an independent outside consultant on *Docket No. U-33510 Entergy Gulf States Louisiana, LLC's Upcoming Filing Regarding Acquisition of two power blocks located at Union Power Station*
- Serving the Commission through assisting Commission Staff in participating in and monitoring the Midcontinent Independent System Operator, Inc., Organization of MISO States, and Entergy Regional State Committee related matters
- Serving as an Outside Technical Consultant in *Docket No. R-26968-LPSC, ex parte, In re: Review of the General Order Dated March 12, 1999*
- Serving the Commission on *Docket No. R-32975-LPSC, ex parte, In re: Examination of long-term natural gas hedging proposals, by assisting in: determining whether it is in the public interest for LPSC-jurisdictional investor owned utilities to accept long-term (five, seven, ten and fifteen year), fixed-price hedging proposals for natural gas supply contracts, and if so, determining and/or developing an appropriate methodology for expedited, streamlined Commission approval of such contracts*
- Serving as an independent outside consultant to the Commission in *Docket No. U-33848, Cleco Power LLC, ex parte. In re: Formula Rate Plan-June 2015 Monitoring Report*
- Serving as an independent outside consultant to the Commission in *Docket No. U-33434, Joint Application of Cleco Power, LLC and Cleco Partners, L.P. for: (I) Authorization for the Change of Ownership and Control of Cleco Power, LLC and (II) Expedited Treatment*
- Serving the Commission on *Docket No. U-33974 Entergy Gulf States Utilities, L.L.C. ex parte. In re: 2015 Rate Stabilization Plan Filing, by assisting Staff in reviewing EGSL's Gas Rate Stabilization Plan Filing*
- Serving the Commission on *Docket No. R-32138-Wastewater Treatment Systems & Operations, LLC, ex parte. in relation to the request for an increase in water and wastewater rates by assisting in reviewing, documenting and verifying the upgrades that Wastewater Treatment Systems & Operations, LLC has stated it has made in filings in the above-captioned docket*
- Developing and implementing innovative strategies to assist healthcare providers, local governments, and the Louisiana Department of Health ("LDH") to finance services through utilization of unused Medicaid Upper Payment Limit Caps ("UPLs"), Certified Public Expenditures ("CPEs"), Intergovernmental Transfers ("IGTs") and Public Private Partnerships ("PPPs")





- Design and administrative management of a statewide financing and construction program for the Louisiana Community and Technical College System (“LCTCS”) including budgeting, accounting, financial advisory services for bond issues, construction fund investment management, board presentations, and other administrative services

As demonstrated by the above, our professionals are highly experienced in multifaceted areas, including financial analysis, program design, government relations, legislative advocacy, policy initiatives, financing transactions, and legal and regulatory budgeting, planning, and administration.





Response to Louisiana Public Service Commission Request for Proposals for an Outside Consultant

Provided below is a list of five (5) references who can speak on behalf of the United Professionals Company's abilities, integrity, and professional reputation in acting as financial advisor to a private or governmental entity.

Client	Lead Contact	Telephone
Louisiana Senate	John Alario Retried Senate President	(504) 289-7428
Louisiana Community and Technical College System	Dr. Monty Sullivan President	(225) 922-2800
West Jefferson Medical Center (Jefferson Parish Hospital Service District No. 1)	Nancy Cassagne Retired CEO	(504) 715-6093
Terrebonne General Health System	Diane Yeates COO	(985) 873-4640
Louisiana Public Service Commission	Eve Kahao Gonzalez Former Secretary	(225) 505-6161



B. PLAN OF ACTION

We are fully prepared to assist the Commission's in-house Staff in its review of the Utilities' PGAs. The Commission's RFP estimates that the time anticipated to complete the Scope of Representation is approximately 18 months.

Following its review of the Commission's RFP and the contemplated Scope of Representation, UPC has tailored a Plan of Action that includes (but is not limited to) the following actions:

- Review and analysis of each Utilities' fuel purchases and usage;
- Draft, review, and analysis of discovery and associated responses for each PGA audit and Audit Period;
- Review and analysis of accompanying workpapers and each Utilities' financial data;
- Review and analysis of historical data involving prior PGA audits for each utility;
- Identification of any irregularities detected in each utility's monthly filings;
- Preparation of three separate audit reports and accompanying direct testimony (as deemed necessary) to include a written or executive summary identifying any costs included in the audits found to be in violation of the Commission's PGA Order;
- Preparation of recommendations for each Utility as to the appropriate methodology to provide for recovery of any irregularities (as necessary);
- Participation in any meetings and/or conference calls (formal or informal) with the Commission, Staff, and/or the parties;
- Assisting in the preparation of briefing materials for Staff and Commissioners;
- Defending each audit report by assisting in responding to discovery on each of Staff's audit reports; and,
- Appearing at any B&Es where any applicable matters will be discussed.

UPC fully understands that, if chosen, the Commission and its Staff shall have the right to determine how all tasks will be carried out, including the setting of internal deadlines if necessary to ensure all work is completed timely. UPC further understands that the Scope of Representation shall continue through the conclusion of each docket, including Commission consideration at a B&E or B&Es.

If selected, our team of professionals would make ourselves available to participate in informal conference calls, meetings and conferences with the Commission and its Staff, and attend any Business and Executive Sessions that the Staff deems necessary through the conclusion of each Docket and a final Commission vote.



1. Methodology

The methodology that UPC proposes to utilize in serving the LPSC in these Dockets leverage our team's in-depth understanding of Commission and state of Louisiana law and regulatory precedent, the regulatory process, and our team of specially-selected professionals' prior experience serving the LPSC on related issues.

2. Approach

If UPC is selected as the Commission's Outside Consultant, our team would actively work to ensure that the Commission and Staff are provided with any and all resources necessary to complete the scope of representation. The UPC approach uses a collaborative, standardized methodology that ensures efficiency, effectiveness, and proper controls. As such, detailed below is an outline of UPC's proposed approach for assisting the Commission Staff in the review and analysis of the Utilities' PGAs. UPC fully understands, however, that if chosen, the Commission and its Staff shall determine how the tasks will be carried out.

3. Workload Management and Distribution

UPC's staff utilizes a collaborative and fluid team approach. R. Lane Sisung will serve as the primary contact to the LPSC. Mr. Sisung and the team will remain in constant contact with Commissioners, Commission Staff, and intervening parties regarding any and all material matters so as to provide seamless coverage for the LPSC. Together, we will work with Commissioners, Commission Staff and intervening parties to assess needs, determine deliverables and timelines, coordinate our firm's resources, and schedule meetings with the LPSC and other parties to provide analysis and advice.

Mr. Sisung will draw upon our individual team members' expertise as needed for understanding and edification on individual issues. By assigning the proper specialist to individual issues as they arise, with Mr. Sisung acting as program administrator, we will be able to effectively meet LPSC's needs. All of this resource coordination will take place seamlessly.

We anticipate a close working relationship with the Commissioners and Commission Staff. All LPSC personnel will have Mr. Sisung and the rest of his team's contact information. Commissioners, Commission Staff, and parties will be encouraged to reach out to Mr. Sisung with any questions or concerns. We believe that our process ensures that the work products and deliverables will exceed the quality standards that the LPSC expects from the Outside Consultant awarded this contract. UPC fully understands, however, that if chosen, the Commission and its Staff shall determine how the tasks will be carried out.



C. COST PROPOSAL

UPC is pleased to submit the following cost proposal to the Commission for consideration.

Based on UPC's above-described review of the solicitation, scope, and related filings, UPC proposes a total budget for the Commission's consideration for all three PGA audits not to exceed \$51,000, including \$50,000 in professional fees and \$1,000 in expenses. UPC's proposed not to exceed budget covers the scopes of representation to complete all three PGA audits solicited by the RFP. Additionally, and per the terms of the RFP, should any audit report be contested and a procedural schedule need to be established for a contested hearing, UPC reserves the right to submit a proposed budget for the contested hearing at that time.

UPC proposes to use its LPSC discounted rates for this engagement which range from \$60 to \$303 and are adjusted annually for CPI as provided below.

These costs reflect our estimate of the travel and lodging costs of experts over the period of representation. Expenses would also be separately disclosed with proof of such expenses attached. UPC would request reimbursement for only those travel-related expenses that are actually incurred. Expenses, where applicable, would be billed in accordance with 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 would be borne by UPC, unless otherwise specified by the Commission

UPC will only charge for the work performed and such work will be monitored by the LPSC Staff. If less time is expended than was used to estimate the "not to exceed" budget, then the total fees charged will be lower, as the Commission will only be billed for the actual work performed and expenses incurred on these Dockets. However, if more time is expended on the proposed scope than was budgeted, UPC is capped at its proposed "not to exceed" budget amount.

As the solicitation and scope of work contemplate a multi-year engagement, effective January 1, 2026, and annually thereafter (no later than January 31st) during the pendency of the proceedings in these Dockets, as applicable, UPC will adjust its standard and discounted hourly rates for each service provider charged for in these Dockets by the previous twelve month average of the Consumer Price Index for All Urban Consumers—South Region (CPI-U), as available. Such rate changes will become effective for billing periods representing work performed starting January 1st through the remainder of the calendar year (i.e., bills rendered February through January). UPC will only adjust its hourly billing rates by CPI-U once per calendar year and will include such calculations on its February delivered bills for January hourly services. UPC will only adjust its hourly billing rates under circumstances where applying the previous twelve month average of





CPI-U would result in an increase in its hourly rates. Further, UPC reserves the right to increase a particular consultant's hourly rate based on an individual professional's promotion, provided that no such increase would raise a rate above the \$303 highest rate proposed after any annual CPI-U adjustments. **Notwithstanding anything to the contrary, the total not to exceed labor budget proposed by UPC in these proceedings will not be adjusted and will remain \$50,000 in not to exceed professional fees for the Commission's consideration of the Utilities' PGAs as contemplated by the RFP.**

UPC understands that Staff would be able to request, and UPC would be required to provide, billing information at any time upon Staff's Request. Staff, working with UPC, would review all of the bills submitted for payment, including but not limited to conformity with the planning sessions and any amendments. UPC further understands that the Commission shall have the discretion to impose additional safeguards upon the potential bidders at the time such bids are put up for vote, and that it shall have the right to either accept such additional safeguards, or reject them and withdraw their bid. Further, at any time after UPC is selected and hired, the Staff and UPC may agree to further safeguards.

If selected, UPC bills would be rendered in strict accordance with the Commission's guidelines. UPC would only charge for actual hours of work performed and costs incurred. All UPC bills would be rendered monthly, and specifically identify and describe all work performed, the person performing such work, the time and charge for such work, and show the total amount billed to date and the authorized original estimate, in accordance with the Commission's August 4, 2004 General Order.





D. CONFLICTS OF INTEREST

United Professionals Company, LLC does not possess any conflicts of interest that would impair its ability to serve the Commission for the purposes of this RFP.





E. OTHER CURRENT REPRESENTATIONS

Below are outlined a list of other matters in which we currently represent the Commission:

1. UPC presently serves the Commission through assisting Commission Staff in participating in and monitoring the Midcontinent Independent System Operator, Inc., Organization of MISO States, and Entergy Regional State Committee related matters.
2. UPC also presently serves the Commission through assisting Commission Staff in participating in and monitoring the Southwest Power Pool.

LPSC Docket No. R-36263	LPSC Docket No. U-36822	LPSC Docket No. X-36647
LPSC Docket No. R-35462	LPSC Docket No. U-36959	LPSC Docket No. X-36648
LPSC Docket No. R-35135	LPSC Docket No. U-36682	LPSC Docket No. X-36720
LPSC Docket No. R-35136	LPSC Docket No. U-37112	LPSC Docket No. X-37003
LPSC Docket No. R-34407	LPSC Docket No. U-36625	FERC Docket No. ER18-1247
LPSC Docket No. R-34758	LPSC Docket No. U-36697	FERC Docket No. ER21-915
LPSC Docket No. U-34354	LPSC Docket No. U-37062	FERC Docket Nos. ER17-2219, EL 17-93, EL17-41, EL 18-142, EL 18-204
LPSC Docket No. U-34735	LPSC Docket No. U-36923	FERC Docket No. EL 18-152
LPSC Docket No. U-33434	LPSC Docket No. U-35324	FERC Docket No. ER21-117
LPSC Docket No. U-34794	LPSC Docket No. U-37067	FERC Docket No. ER21-748
LPSC Docket No. U-35807	LPSC Docket No. U-37122	FEEC Docket No. ER23-816
LPSC Docket No. U-35806	LPSC Docket No. U-37131	FERC Docket No. ER18-1182
LPSC Docket No. U-33244	LPSC Docket No. U-37143	FERC Docket No. ER21-142
LPSC Docket No. U-36092	LPSC Docket No. U-37155	FERC Docket No. ER21-129
LPSC Docket No. U-36381	LPSC Docket No. X-37323	FERC Docket No. EL23-11
LPSC Docket No. U-36103	LPSC Docket No. U-37225	FERC Docket No. ER21-530
LPSC Docket No. U-36105	LPSC Docket No. U-37425	FERC Docket No. ER22-958
LPSC Docket No. U-36502	LPSC Docket No. U-37441	FERC Docket No. EL21-24
LPSC Docket No. U-36174	LPSC Docket No. U-37467	FERC Docket No. EL21-46
LPSC Docket No. U-36301	LPSC Docket No. S-37113	FERC Docket No. RM18-9
LPSC Docket No. U-36383	LPSC Docket No. X-35071	FERC Docket No. RM21-14
LPSC Docket No. U-34332	LPSC Docket No. X-35981	FERC Docket No. RM21-17
LPSC Docket No. U-33782	LPSC Docket No. X-36125	FERC Docket No. RM22-5
LPSC Docket No. U-34475	LPSC Docket No. X-36645	FERC Docket No. ER22-736
LPSC Docket No. U-35987	LPSC Docket No. X-36646	FERC Docket No. ER22-24





F. CONCLUSION

UPC appreciates this opportunity to respond to the Commission's RFP to serve as an Outside Consultant to assist Staff in the review and analysis of the filings and issues in these Dockets. As detailed in the sections above, UPC and its affiliated Sisung Group companies are multifaceted and have extensive experience in a broad range of financially-related areas involving state and local governments. Because we are a Louisiana firm, all of whose employees are Louisiana residents, we take great pride in any and all work that we do that benefits the people of our state, and we believe this project provides just such an opportunity.

UPC has built a team of regulatory and utility finance and economics professionals and consultants, the members of which were specifically selected for their ability to serve the needs of the LPSC in these Dockets. Together, our team of professionals and consultants has a vast amount of specific knowledge and experience, which will allow us to work closely with the Commission and its Staff as an Outside Consultant on these Dockets. The multifaceted financial qualifications and experience offered by UPC's staff of regulatory and utilities finance experts and consultants, combined with our in-depth understanding of Louisiana laws, regulations and local issues, best position us to provide the Commission with the most extensive and comprehensive service.

Our professionals have a distinctive style that encourages personal service, excellence and integrity. We believe that the combination of our professionals' experience, our local Louisiana presence, our national expertise, and our proven track record of nearly thirty years of exceptional quality and integrity in our dealings offers the Commission an excellent choice for an Outside Consultant to assist it in these Dockets.





Response to Louisiana Public Service Commission Request for Proposals for an Outside Consultant

Appendix A: Resumes of Sisung Professionals Assigned to RFP 25-06





ROBERT LANE SISUNG

Mr. Sisung earned a Bachelor of Science degree in Accounting from Louisiana State University. After graduation, he sat for and passed the Certified Public Accountant exam and subsequently attended Loyola University Law School where he earned a Juris Doctorate. After law school, Mr. Sisung earned an LL.M. in Tax Law from the University of Florida. Mr. Sisung is a fully licensed General Securities Representative, a licensed insurance agent in the state of Louisiana, and a member of the Louisiana State Bar.

Mr. Sisung has over two decades of experience in financial, real estate and investment transactions. His most recent projects include successful development and implementation of the Healthcare Finance Consulting and Financial Litigation Services/Regulatory Consulting business lines for the Sisung Group, where he specializes in providing consulting to regulators of utilities. The Sisung Group's work in these endeavors has produced hundreds of millions of dollars for the firms' clients and the state.

The Financial Litigation Services/Regulatory Consulting business line has primarily supported governmental entities in cases before tribunals. Mr. Sisung manages an array of regulatory and financial experts in coordinating a cohesive approach to providing expert witness services for complicated financial and regulatory matters. Mr. Sisung himself also provides expert testimony and assist in the creation of settlements and orders of judgment. His personal involvement in the representation of the LPSC has helped to provided critical and effective safeguarding of LPSC-jurisdictional rate payers.

Mr. Sisung's previous endeavors include the successful creation, development and implementation of the corporate finance and mergers and acquisitions operations of Sisung Securities Corporation; the creation and operations of Sisung Capital that include raising and investing millions of dollars in venture capital funds in Louisiana; the creation and operation of the Sisung Film Finance Division; and the growth and management of over \$1 billion dollars in assets under management in Sisung Investment Management Services. Mr. Sisung also manages and directs all Sisung Group real estate, project management, and business development projects including multi-facility capital infrastructure projects. Mr. Sisung sits on the investment committee for Sisung Investment Management Services, LLC and also serves as in-house counsel for the five companies that comprise the Sisung Group.

Mr. Sisung serves as the primary point of contact for the LPSC, and he will be responsible for coordinating and managing all of our firm's resources, including the direct provision of consulting and litigation services.





JONATHAN BOURG

Mr. Bourg holds a Bachelor of Science in Mechanical Engineering from Louisiana State University and a Juris Doctor, with honors, from Loyola University New Orleans College of Law. He is a member of the Louisiana State Bar Association.

Mr. Bourg has over a decade of experience in the regulated utility industry having formerly worked for Entergy Corporation in various regulatory roles including transmission policy, regulatory affairs, finance, and resource planning. His prior experience covers a wide array of utility-related matters, including generation resource and transmission certifications, regional transmission organization participation, tariff interpretation, and general regulatory policy. He also has an extensive background in regulated utility ratemaking, and he has provided testimony before the Louisiana Public Service Commission in numerous proceedings.

Prior to attending law school, Mr. Bourg served as a mechanical engineer at a 1750 MW power station located in the metro New Orleans area. During his time there, he was responsible for the engineering oversight of all rotating equipment, and he managed the successful overhaul of two 750 MW turbines.

Mr. Bourg also has former litigation experience, having practiced law for over six years. His litigation experience includes both trial and appellate work in a variety of complex commercial litigation matters, including electric utility certifications, nation-wide toxic tort litigation, insurance coverage disputes, and ad valorem tax valuations.

Mr. Bourg brings his years of diverse regulated utility, engineering, and litigation experience to the table in offering a wide breadth of knowledge and expertise in his role as Vice President, Regulatory Policy at UPC.

Mr. Bourg will serve the LPSC in these Dockets by providing consulting services on an as needed basis.





JAKE CHAPMAN

John A. “Jake” Chapman holds a Master of Business Administration degree with a concentration in Finance and a Bachelor of Accountancy degree, both from the Joseph A. Butt, S.J., College of Business at Loyola University New Orleans.

As Vice President of Special Projects, Mr. Chapman is a member of the UPC team that provides regulatory consulting, litigation services, and expert testimony services to regulators of utilities.

Mr. Chapman is further charged with overseeing the expansion of venture capital projects through the group’s venture capital firm, Sisung Capital, a licensed Louisiana Capital Company (CAPCO) and Business and Industrial Development Corporation (BIDCO) primarily focusing on investments in Louisiana. Mr. Chapman also assists in the operations and development of Sisung’s capital markets, asset management, and program management groups.

Mr. Chapman is a registered investment advisory representative (Series 65), investment banking representative (Series 79), has passed his FINRA Securities Industry Essentials exam, and maintains an active Louisiana Contractor’s License for Commercial Building Construction. Additionally, Mr. Chapman regularly attends continuing professional education and has completed courses sponsored by the National Association of Regulatory Utility Commissioners Regulatory Training Initiative and the Center for Public Utilities at New Mexico State University.

Prior to joining The Sisung Group in December of 2012, Mr. Chapman worked for over five years with a large regional grocery conglomerate in various store-level customer service management positions before becoming a district operations trainer, providing store support to newly hired associates across the New Orleans and Baton Rouge areas.

Mr. Chapman is an active volunteer with Alpha Kappa Psi, the world’s oldest, largest, and most prestigious professional business fraternity, overseeing and advising collegiate chapters across the gulf south. Additionally, Mr. Chapman serves as a Mentor for the Young Entrepreneur Academy at Southeastern Louisiana University, as well as an Executive Mentor within the College of Business at Loyola University New Orleans.

Mr. Chapman will serve the LPSC in these Dockets by providing consulting services on an as needed basis.



**J. THOMAS MCGUCKIN, PH.D.**

Dr. McGuckin holds a Bachelor of Arts in Economics from Pomona College, a Masters of Economics from Colorado State University, and a Ph.D. in Economics from the University of Wisconsin. Dr. McGuckin is a member of both the American Economics Association and the National Association of Regulatory Utility Commissioners.

Dr. McGuckin is retired from New Mexico State University where he was a Professor of Economics for thirty-three years. He has also been an associate for the Center for Public Utilities at New Mexico State University, whose program offerings are officially sectioned by the National Association of Regulatory Utility Commissioners.

Dr. McGuckin is an economics expert in the fields of utilities in electricity, water, wastewater, natural gas and solid waste. In this role, he has provided detailed technical and policy analyses and recommendations to numerous state and federal regulatory bodies. He has focused his consulting efforts on performing cost of service analysis, rate analysis and rate design, regulatory policy development, utility governance, and planning and cost allocation processes for investor-owned electric utility companies. His experience has allowed him to build an in-depth knowledgebase on a wide array of topics including: the appropriate accounting standards and practices for electric utilities, resource planning and resource adequacy, cost recovery mechanisms for utilities, regional transmission planning organizations and ancillary services markets, day ahead energy and operating reserves markets and real time energy and operating reserves markets, transmission hedges, annual revenue rights and financial transmission rights, fuel cost recovery, qualified facilities, avoided cost, certification of transmission, certification of generation or power supply purchases, competitive procurement of supply side resources, market forecasting and futures, and federal regulations impacting or potentially impacting utilities' operations and/or policy.

Dr. McGuckin now pulls from his background and experience in serving the Sisung Group as its chief expert regulatory consultant.

Dr. McGuckin will serve the LPSC in these Dockets by providing economics-related consulting services on an as needed basis.





ROYAL ALEXANDER

Mr. Alexander holds a Bachelor of Arts from Louisiana State University. He also holds a Juris Doctor from Oklahoma City University School of Law. Mr. Alexander is a member of the Louisiana State Bar.

After law school, Mr. Alexander clerked for U.S. District Judge Rebecca F. Doherty in Lafayette, Louisiana and also interned for U.S. District Judge Richard Haik during the voluminous and complex Combustion environmental tort litigation involving CERTCLA/Superfund claims. Mr. Alexander is a frequent lecturer on state and federal constitutional issues, including implication eminent domain, the Takings Clause and

Commerce Clause/interstate commerce.

Mr. Alexander has worked in Washington D.C. for three different Members of Congress and also worked for the Federal Motor Carrier Safety Administration. During his tenure in Washington, he worked with the Department of Energy and FERC on several energy related issues. In Addition his work on DOE issues included numerous energy research project e.g. nuclear energy and security, energy tax incentives, and hydropower and geothermal energy. He currently has his private law practice in Shreveport, Louisiana.

Mr. Alexander will serve the LPSC in these Dockets by providing legal-related consulting services to the Commission on an as needed basis.





ROBERT VOSBERG

Mr. Vosberg holds a Bachelor of Science in Engineering from University of Wisconsin, Platteville.

Mr. Vosberg has nearly forty years practicing in the regulated utility space, including over ten years at Alliant Energy as an Energy Delivery Project Manager. He also has experience with the Wisconsin Electrical Cooperative Association, where he was responsible for direct interaction with State and Federal Regulatory bodies including providing testimony. In this role, Mr. Vosberg also served on committees that provided recommendations to such regulatory bodies for proposed agency rules and regulations. In his role with Scenic Rivers Energy Cooperative, Mr. Vosberg served as the Director of Engineering, where he was responsible for system planning, system protection, equipment procurement, rate schedules, and standards.

Mr. Vosberg has litigation experience related to economic development efforts and other special projects. He has served on local, State and National committees providing technical guidance to various regulatory agencies, regional bodies, economic groups and other associations. Mr. Vosberg has also performed rate equalization studies and other special projects.

Today, Mr. Vosberg provides technical support to various clients relating to new transmission and generation facilities. He has direct responsibility for interactions with multiple Transmission Providers (PJM, MISO including MISO South, ERCOT, SPP, WECC, etc.) for Interconnection and Transmission Service requirements. Mr. Vosberg has extensive knowledge of SERC member utilities including Southern Company, Progress Energy, TVA, Florida Utilities, Electric Municipals and Electric Cooperatives. He provides guidance to clients regarding Transmission Market requirements, including current and future pricing structures, FERC regulatory requirements and State regulatory requirements.

Mr. Vosberg will serve the LPSC in these Dockets by providing economics-related consulting services on an as needed basis.

