UNDOCKETED - LOUISIANA PUBLIC SERVICE COMMISSION, EX PARTE. IN RE: NONBINDING GUIDELINES RELATED TO LARGE LOAD CUSTOMERS.

DATE OF TECHNICAL CONFERENCE: May 07, 2026

SPEAKERS

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Dana Shelton, LPSC Staff
Larry Hand, Entergy Louisiana
Andy Kowalczyk, Southern Renewable Energy Association
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MR. LANE SISUNG: I am going to -- we're going to begin this large load guidelines technical conference. This was initiated by a directive from Commissioner Lewis, and he's here today, and we want to give him an opportunity to kind of kick it off and provide the framework, and then we'll take it from there.

COMMISSIONER DAVANTE LEWIS: Thank you, Lane. And good morning, everyone, and thank you for joining today's technical conference regarding large loads. As you know, this has been a concern not only of Louisianans, but particularly of myself, ensuring that we have adequate consumer protections that we are evaluating these large loads in a correct way. We are thinking about capacity. We are thinking about a variety of things. So I really look forward to fruitful participation from all of you today. Stakeholders, utilities, potential large load customers, our already large load customers here. As we said, this is for feedback. As you know, this Commission has passed the Lightning Amendment, as well as the guidelines regarding large loads. But there are some more questions. There are things that we probably need to consider. We want to hear feedbacks on those two initiatives that we've already undertaken. And this is a collaborative approach that I believe my colleagues and I have all come to the table on. As you will find later on, we will also be accepting written comments until June 19. So if there are additional things that need to be clarified, or whatnot, please do so. We have -- also, we are transcribing this meeting, so there will be a transcript provided

in the near future so you can go back and reference any of the discussions that were had today. But once again, on behalf -- I think I can speak on behalf of all five of us, I want to thank you for your participation today, and look forward to a fruitful discussion. So, Lane, I'll pass it back to you.

MR. SISUNG: Thank you, Commissioner. Okay. So the format today is going to be very open. I have -- there was an agenda that was posted. I have a few talking points to set up that agenda item. I'll give you some of Staff's thoughts on the conversations we've had with Commissioners and where we are on it, and then we're going to open up and ask if anybody has any comments, questions, anything they want to say. They're mics located around the room. If you do have something, you'll have to locate yourself to a mic. I'm sure people will pass them around and share them. And then, as Commissioner Lewis said, it is going to be transcribed for us to be able to go back and look at it, since there's going to be a lot of information in a short time. And also, as he said, there is an opportunity for comments. I'm going to give this to you now, specifically, I'll give it to you at the end, and it will be in the Bulletin. But the docket where these will be able to be filed is X-37921. That will be in the Bulletin tomorrow. That is a docket being opened as a repository for any comments, anything anyone wants to provide in relation to the topics discussed at this technical conference. So that's the format and how we're going to do it and what we're going to do as a follow-up. I think the end goal of all of this will be for Staff to receive all those comments and to prepare a report on what everyone's positions are in this docket. To the extent that there are any recommendations from Staff to the Commission in terms of whether

further rulemaking needs to be opened or a directive needs to be made, that will be included in the report, and then we will take it from there. So that's sort of how we're approaching this. As Commissioner Lewis said, this has been coming at all of us very fast, not only here in this room, not only at the Commission, but as a nation. Everyone's, you know, trying to keep up to figure out how to address this large opportunity that has provided -- keep us competitive as a state and as a nation, and at the same time, protect our electric grid and protect our utility customers from having to incur excessive costs for this. So with that saying, I'm going to take the first item on the proposed agenda, the opening purpose and Commission framing, and just make a few points, make sure that everyone's on the same page, and if any has any questions, give them the opportunity. As Commissioner Lewis said, you know, what the Commission has done to date in this regard is they had the Commission's Lightning Directive. That was in response to Governor Landry's Executive Order called Louisiana Lightning Speed Initiative. And it's very important that it is understood what that is and what that isn't. What it is, it provides a certain criteria net. It provides an opportunity for a utility to not have to abide by the market-based mechanism, which is a timely -- historically, a timely purpose. It can take up to a year sometimes just to get through -- just for the RFPs to be issued, to get all the responses. So MBMs do add time to the process. So it does allow for an exemption from the MBM. What it does not allow for is an exemption from Commission consideration and Commission certification. The utilities still have to come to this Commission with their plan for generation and transmission and explain exactly how they plan to meet this new large load. And there's a process

that can take eight months for the Commission Staff and intervenors to consider all the proposals being made by the utility and to make their arguments to the Commission, so that the Commission can decide whether or not a certification of the generation of transmission, which is the cost that flow to the ratepayers, into rates. So as a starting mechanism, we just want to make sure that it's extremely clear that the Lightning Initiative was not a way to bypass the Commission's consideration of whether or not the costs needed to be incurred for large loads is prudent and in the public interest. It is a method to accelerate how that occurs. And so just wanted to get that as the back drop. After the Lightning Initiative came out, Staff had already been working on concepts, but it became clear to Staff that if that was the route we were going to take, it was very important for us to put out to the community what we believed was the items that needed to be addressed in that accelerated certification so that the utilities, and the potential large load, and the intervenors all could know this is what we want to see when you come to the Commission with a certification. And so that's where the concept of these nonbinding guidelines came out. It was emanated from Staff working with the Commissioners to say, let's make sure that we let everybody know what's important to this Commission, so that when they come to the Commission, we're not saying you absolutely have to meet any specific criteria, but you have to be able to tell us whether or not you met it, and if you didn't meet it, you better tell us why you didn't so that the Commission can decide whether or not that reasons remains in the public interest. So those guidelines have been out, and, you know, they've been digested by utilities and by parties. And so what this effort is, this is moving

to the next level and saying, now that everyone's had a chance to look at those nonbinding guidelines, is there anything in there from a substantive stance that people agree or disagree with, or want to add or subtract? And then from a procedural standpoint, the question will be, is there anything further that needs to be done at the Commission in terms of establishing specific approvals of loads, specific approvals of any other element of how we get a large load on in terms of a process? So the purpose of this technical conference is to go through all of those guidelines, have that open dialogue, and at the end determine if anything needs to be changed in the guidelines and/or if any procedure or process needs to be added. So that's the purpose of this, and that's the end of the first section. So if anyone has any questions or comments, we'll open it up right now. [NONE HEARD] Perfect. All right. For this first section, I'm going to take a break from speaking. Ms. Dana Shelton has been leading the Commission's effort on the FERC rulemaking effort. So, you know, just as a complete backdrop before she begins speaking, you know, not only our state's looking at this, but the DOE issued a rule, and experts start looking at it. And she's going to dive into sort of where that process is, and we'll talk about how, if at all, this technical conference needs to address that. So, Ms. Shelton.

MS. DANA SHELTON: Good morning. I'm Dana Shelton. I am outside counsel for Louisiana Commission Staff on many of its cases involving the FERC and federal rulemakings and jurisdiction, and as well, I've worked on a couple of the large load dockets that have been filed before the Commission involving service provision to new large load customers. I just -- I'm sure you all are aware, there's

a lot of activity now at the federal level addressing the interconnection of large loads. The Department of Energy has gotten involved, has expressed a desire to see the grid move more quickly across the country to accommodate large load. They've ordered -- well, the FERC to start a rulemaking to consider asserting jurisdiction for the first time ever over load interconnection. And the FERC is -- took comments on that rulemaking. They received thousands of pages of comments from hundreds of interested parties, taking a variety of positions. The regulators -- the retail regulators, including the Louisiana Commission, were pretty much singularly aligned on being alarmed about this federal assertion of jurisdiction for the first time over the interconnection of load. The Federal Power Act has forever recognized that it's within the jurisdiction of the states decide how it's load is served. The generating resources, the mix, the retail rates that will be charged, such customers. So, you know, that is what we have done in Louisiana. As you all know, a traditionally regulated state, we have integrated resource plans, we have certification filings, and we are actively engaged in asserting that jurisdiction and overload interconnection including large load for our state, and for, I think -- I can't say this with 100% confidence, but with the vast majority of regulators in NARUC who commented on this, they were similarly concerned and urged the FERC, whatever it does with this rulemaking, do not overstep, and do not get involved in our retail jurisdictional processes. You also -- and just as a matter of timing, the FERC has said it will act on this rulemaking in some form or fashion by June of this year. So it will be done soon. Also, on the federal level, the -- and Mr. Sisung will be addressing this in the next agenda item, but just very high level, the Regional

Transmission Organizations have been very active in examining, in their stakeholder processes, ways to integrate these large loads and whatever transmission they may require and has been -- has passed some changes to how that's done, and they're considering more. So I was interested in being here and really exploring kind of what, you know, our stakeholders here in Louisiana think about this federal jurisdiction. Is there something that is missing here at the state? Something that we need to do to solidify -- like our position to better position ourselves vis-à-vis all these federal activities to ensure that, you know, we maintain the control that -- I mean, at least I think, works to the advantage of all Louisiana customers to have a more local control, more local decision-making over how this load is interconnected. One RTO stakeholder meeting I participated in just yesterday was discussing how cost allocation for the transition interconnection for new large load customers via high load factors, single users, like a data center or more manufacturing, or oil and gas, a large load, how the transmission build out that seems to be imminent to accommodate all this large load, how are those costs going to be allocated? To those customers specifically, to load generally, to the utilities, should it be region-wide, meaning the whole entire footprint of -- this was for the Southwest Power Pool, so big, big footprint, or are we going to do something more granular? And, you know, there was talk about, you know, having respect for what the various states have done and, you know, make sure that whatever kind of rules are passed on cost allocation there, that it doesn't interfere with what the state has done. And for someone -- a state like Louisiana, where so far, and it seems to be in these guidelines, indicate, you know, we're going to require a showing of

generation sufficient to serve these customers and that they're cost supported. They're supported by rates, you know, that are sufficiently covered by these new loads so they, you know, contribute their fair share. Well, if we're doing that, but another state is not and is instead relying on a lot of transmission build out, that is going to be socialized to an entire region. Well, that -- you can see how we could be double hit for those costs. So, you know, and one of the things they referred to was, well we've got -- we need to see for all these large load tariffs that are being developed, how those come to pass before we make any solid rules. So, you know, we -- in Louisiana have taken so far, a more of a bespoke, kind of approach to these large load interconnections so that we can take each instance, and look at it, and see what needs to be done. But these -- a lot of states are looking at, I think because of the quantity of these customers they've had, they're looking at putting this in a tariff, or it could be a rulemaking. Is there any advantage to that? So when we go to deal with federal interests like RTOs and the FERC, that we can say, oh, we've got this tariff, or we've got these rules, is there a benefit to that? Are we better off more nonbinding guidelines, and then bespoke kind of tailored solution or whatever the factual circumstance of some individual situation that is presented to the Commission? So I'm interested in everyone's comments on this and what your perspectives might be.

MR. SISUNG: So as you said, we'll open it up if anyone wants to give comments today on that. And then with every topic, you'll have the opportunity to provide written comments.

MR. LARRY HAND: Hey. Good morning. Larry Hand on behalf of Entergy Louisiana. This isn't a well thought out developed comment, but, you know, as I thought about what you said, Dana, I think the LPSC is being proactive in trying to figure out how to manage these large loads to protect the entirety of the state and the customers of the utilities the LPSC regulates. As we all know, there are some utilities, municipally owned utilities, that aren't regulated by the LPSC. And I think collectively, today, if you added up all that load, you know, you would say, well, that's not a material in terms of the entire statewide load. and so, how they behave -- and I'm not saying they behave one way or the other, but their activity and resource planning may not affect largely everybody else. I think we need to think about, in the context of potential large load additions, you know, should the LPSC be engaging with, I don't know if it's LEPA, whoever, but, you know, engage with them to, you know, just collaborate and share this is how we should think about it. Because as we all know, in MISO, if one regulated utility fails to plan and something happens, it affects everybody. There's no isolating harms. And I think if a large load goes to a muni who is not regulated, and there's some, you know, there's some balances here because munis have smaller geographic areas and these hyperscalers take up a lot of area. So maybe that's a safeguard, but I think we need to think about, you know, do we need engagement either at the legislature, LEPA, you know, those sorts of entities to at least open up dialogue to make sure they understand how the LPSC is thinking about this to protect their customers as well because they're MISO. But just comments to think about.

MR. SISUNG: Thank you, Larry. Anyone else?

MR. ANDY KOWALCZYK: I'll pipe in here. This is Andy Kowalczyk with Southern Renewable Energy Association. I think it's important to distinguish what the difference between a large load that is like a petrochemical facility or like a hyperscaler. The hyperscaler digital infrastructure is more inverter-based, just as kind of an analog. So it's important to consider, you know, the ramping of these resources when they're in training mode, and then that load may drop off and that'd be, you know, 300, 400-megawatts or something like that. So it's important to plan for these sorts of situations and also understand what maybe the long-term impacts are going to be. It's hard to see how the typology of the system will evolve over time, but you can kind of plan better for, you know, say you have like a 500-kV line that's 50 miles or something like that, that you say that you need today. Well, in the next couple of years, it might be determined that there's a single-point contingency while the actual load is functioning and you're providing generation to it to serve that load. It -- there should be an effort made to dig in deeper to kind of like what the characteristics of this load is and how it performs. And also, have the generation of serving this load, too. Whether it's withdrawing more from the system, if there is a system kind of like the Zero-Injection GIA, where there's generation behind the point of interconnection. Is that serving the load more, or are there any more withdrawals from the system? And those are hard questions to answer right now, but after the shovels are in the dirt, and the thing is actually running, I think that that's really important to kind of reevaluate the performance of these loads.

MR. SISUNG: No. I appreciate that. And we actually have, you know, a lot of what you said we're going to be diving into as we move through here, so. But those are all valid points. And, you know, when an overarching thing that you said to start everything off is the nature of the load. And we could not agree more that that is something that we want the stakeholders to discuss as we go through this, as the difference between the hyperscalers and what is -- everything from the difference in operational characteristics and how they should be treated in terms of how they join the system, which I'll talk a little bit about in the next section of MISO, but also in terms of how they should be viewed by the Commission in terms of what, you know, economic benefits they bring, and what is their causational relationship to some of the increased costs that we're seeing? So I think that those are very important things that we have to -- that we're looking to mete out as we have this discussion. Logan, or yes, Susan?

MS. SUSAN MILLER: Thank you. Before Logan asks her question, I just want --

MR. SISUNG: I did not say it, if you could introduce yourself and your organization.

MS. MILLER: Oh, I'm sorry.

MR. SISUNG: Yes, thanks.

MS. MILLER: Susan Miller on behalf of The Alliance of Affordable Energy. Before Logan ask her question, I just want to -- I would be remiss if I did not make clear that The Alliance's participation in this technical conference does not waive our objections to the Lightning Directive and our contention that is was adopted

illegally and is a violation of the Louisiana Constitution. But now, I'll turn it over to Ms. Burke.

MR. SISUNG: Duly noted.

MS. LOGAN BURKE: Hi there. Logan Burke with the Alliance for Affordable Energy. I wanted to ask, based on Larry's point about munis. This is a really important -- and I'm curious if Entergy has any experience of working with munis and kind of working through those questions, I guess, of collaboration in other Entergy states? Obviously, this is happening in Arkansas and Mississippi and parts of Texas, and just curious if there's something instructed there that can be offered here?

MR. HAND: I don't about other states but, you know, I would imagine it's similar to here because a muni, whether they're in Louisiana, Arkansas, Mississippi, they're a wholesale transmission customer. That's what they look like to us. And they will say I need another thousand megawatts at this point. We do a transmission questionnaire like we do with anybody else, so. I don't know that it's different, they just look like a wholesale transmission customer.

MS. SHELTON: One thing, following up on Larry's comment that I did forget to mention, and I know you all are aware of this, and what Larry said is very true. You know, you can -- we're going to be impacted in Louisiana by things that are not jurisdictional to Louisiana and more, you know, national trends because it is an interconnected grid. And a lot of what is prompted this sort of mentality from the federal government, which is -- has an urgency to it, and moving quickly, is problems that are being experienced in other parts of the country, such as in PJM,

where there are -- much bigger capacity shortages. And so we have to be very careful. We've tried to be very careful when dealing with the FERC and others to be cognizant of regional differences and state to-state differences. And yet, we need to be mindful of, like, the big picture. You know, Louisiana doesn't stand alone. Our regulated utilities are not isolated from what non-regulated entities do, so we do have to be mindful of all of that.

MR. SISUNG: All right. Any more comments on the activities at FERC before we move on to the RTOs? [NONE HEARD] All right. We'll now give a overview of what's been happening at the RTOs and then see if any stakeholder would like to provide commentary. I'm going to start with SPP because they have had the fastest track to FERC approvals of a plan. They have been in -- and Dana and I have been heavily involved in this effort over the last year. They move quickly. SPP has a -- and this is going to be important to understand, SPP has a different framework than MISO when it comes terms to capacity. And SPP, you had every year, you have to show up with enough capacity to serve your load. There's not a, you know, a PRA market, there is a you file a workbook, and you identify the load, and you identify enough generation to serve your load, and that is a requirement in SPP. So with that backdrop, they were able to move quickly to sort of integrate this large load interconnection. Because they already had a responsibility to have 100% of the generation to meet their load, so they didn't have to create a framework to create that protection. It already existed. So what they started focusing on was sort of how do we get that load on as quick as we can? And what do we need to study to make sure we can get it on? And at the end of the day, what they have

produced is called HILL, high impact large load; HILLGA, high impact large load generator assessment, that may be what the A stands for; and CHILL, conditional high impact large load, but the basic structure of their framework that they have come in with is that: A) You can't get load on if you don't have generation. That already existed, but it has been re-emphasized within this framework; and then B) They're going to do studies, expedited studies specifically targeted to that large load with increased study requirements to see what network transmission upgrades are necessary. And then those -- those new network transmission upgrades have to be put in service. If you have enough generation, and you have the load ready to come on, but you haven't completed all of that network transmission, that sort of where CHILLs fills in the loop, and what CHILLs is proposed to do is to say you can get interruptible service during the time until all of the network transmission upgrades are built. So they've created a fast path to get load on as quick as they can within their RTO framework. And they've spent a considerable amount of time doing it. It was well received by the stakeholder community. Ultimately, CHILLs got put on a slower timeline for people who were concerned about how the -- how the interruptibility would work, but they worked their way through that. So, in the meantime, SPP also did address ramp rate. That they are restricting large loads to 20-megawatts per minute, I think, on a ramp. They've addressed some of the telemetry requirements. They've required these large loads to have more telemetry, provide the RTO information, so that they can use that in their operations. That was sort of in the background. You know, that really wasn't what was largely focused on as SPP got its path. So that is where we are with SPP. Now, you move

to MISO. MISO has their PRA market and they really rely on market signals to determine whether capacity's brought or not. And I guess we had a conversation with MISO yesterday, and one of our largest concerns is still, you know, how is MISO going to ensure that as the -- especially, as these loads are ramping up, that the adequate generation is there and there's not a over reliance on the PRA, because the PRA does not necessarily provide generation. It provides a financial market to sell if there's not enough generation, but it doesn't necessarily guarantee that generation. And when we're talking about reliability, we want to try to figure out how to make sure that that generation is there to meet this ramping large load. Now, as most people are aware, in -- here in Louisiana, we have the minimum capacity obligation, and we have a very active Commission and the certifications. And so we're doing our part to make sure that's the case. But you got to -- as Dana was saying, we're not on an island. There's a footprint there. So, you know, we think it's important for the stakeholder community to understand what's happening at MISO, to get engaged, because we think it's a very -- it's very important that we focus on making sure that as a region, we responsibly bring this load on and the ability to serve them. So, while MISO's not -- doesn't have a specific focus on that issue, they have put a very -- as opposed to SPP, where sort of the operational picture in the background, MISO's trying to solve those issues with a very heavy reliance on what they've got their large load workgroup -- so many acronyms, large load workgroup which they've started, and they are now putting out to the stakeholder communities ramp rate limitations, oscillation limitations, required telemetry, ride-through standards for the inverter-based type of generation, and then

coordination with system operations. So we as the Staff have been heavily involved in that. And as I said, we talked with them yesterday making sure that we don't -- what we want to preserve is that, we want to protect the grid, but we don't want to see what we -- in Louisiana, we've been hitting large load on the system for decades. And we just don't want MISO to overreach and sort of create standards and guidelines that would be restrictive to our ability to add the load that we've always been able to add because they're trying to address a situation that, you know, really doesn't impact us. So that's where our focus has been, and we'd be interested in knowing if anyone else has those concerns. The other thing that MISO is working on right now, which Andy mentioned, was the -- let me look at the acronym again, ZGIA, zero generator interconnection agreement. And what this is proposing -- and it's taken the stakeholder community a while to really get their head around exactly what's being proposed. But it is a behind the meter kind of concept where the load is going to be masked with a generator, and it's going to give that generator the ability to bypass the queue, and to be studied with that load. The concerns that have been raised with that proposal is, okay, well if that generation goes down, that load still needs to be served. How are we making sure that the transmission system is being built out appropriately and that costs are being allocated appropriately? There have been more meetings on that than I can count. I think the stakeholder group is getting comfortable that the plan that they are trying to go forward with is acceptable, but that's moving forward. So I guess all of that, to wrap up to say that, you know, there's clearly a heavy focus in these RTOs on how to integrate this large load. We have to operate within that world. We are

operating, Staff is participating, making comments, trying to make sure that our jurisdiction is protected, trying to make sure that we're able to get large load on, trying to make sure our system is protected, most importantly. And so we just want to give you a background of what we know, and then open up the floor for comments to see if anybody would like to make any comments with regards to the activities at the RTO. Yes, Logan?

MS. BURKE: Logan Burke. I'm curious, you mentioned that because Louisiana is so used to bringing on, you know, historically large loads, that Staff is concerned that one of these RTOs may overreach in terms of their guidelines, or their framework, or requirements. Can you give us a little sense of what overreach would look like to Staff?

MR. SISUNG: Sure. And it's a little bit -- let's just talk about the ramp rate. We 100% understand the concept between limiting how much a large load can ramp in a short interval of time, but at the same time, a ramp rate as to a North Dakota load on a 138-kV versus a Louisiana load on a 500-kV could be completely different. So when they -- so what our transmission technical expert has said is, look, we get it. If it's in the BPM, in the business practices manual, and we can work through what the appropriate ramp rates are, that makes perfect sense. That's how we want to do the reliability. But if you take broad brush and you just put a rule out there, it could put limitations that would chase large load that would otherwise come in Louisiana away, who wouldn't be creating that same problem. So that's the conversations we've begun with MISO from our perspective on Staff is, we're with you. We want to protect the system. We want to figure the ways to be a partner

with you and protect the system, but we want to make sure that we just don't, you know, overreact and put something in the tariff that gives us no flexibility and would not allow us to get large load on.

MS. SHELTON: There's also, from my perspective, bigger -- or a big broad-brush issue which I alluded to earlier. And if, you know, if these -- if RTOs, and when they're looking at, okay, we've got all this load across their footprints with MISO, very large footprint; SPP, very large footprint. Those are the two RTOs that Louisiana is in. And if we're going to just look at like transmission solutions to serve this large load, or rely too heavily on them, there are costs associated with that that are very large. You know, if they're going to favor, like, one form of generation -- it's not -- and they don't do this explicitly, you know, it's all in the modeling and much more subtle ways, you know, if that's going to happen, you know, in an RTO, it can't undercut what we're trying to do in Louisiana, which is to ensure that generation to back up our large load. And so, you know, we could -- it could have big cost impacts and interfere with how we're trying to manage our state's generation supply and invite or impose unnecessary costs.

MR. SISUNG: Yes, Susan?

MS. MILLER: Susan Miller on behalf of The Alliance. I just want to point out, and I'm sure you're aware of this, the ramp rate concerns aren't just up, they're down as well. NERC just had to issue an Action 3.

MR. SISUNG: Correct.

MS. MILLER: So I just want to make sure that doesn't get lost and, yeah, something has to address both ways, whatever the Commission decides to come up with.

MR. SISUNG: Yeah. It is the sudden shock in either direction.

MS. MILLER: Yes.

MR. HAND: Lane, one last point, if I could. Larry Hand with Entergy Louisiana. I do agree Louisiana has a history of serving large loads. I don't think Louisiana has a history of bringing on immediately or ramping quickly large loads of these sizes, right? And so you think about some of our bigger loads at ELL, they grew organically over the last 60 years. Refineries, things like that. And that's a much different thing to manage than a hyperscaler shows up and says, I'd like 1,000 megawatts in three years with this kind of ramp. Serving that, you know, bringing that type of load on is, I think we're all acknowledging, it's extremely challenging, it must be done carefully. The NERC Level 3 stuff that came out about computational loads, extremely complex, and if we don't get it right, it affects the entire grid --

MR. SISUNG: Yeah.

MR. HAND: -- or triggers costs that maybe the wrong people have to pay, and that's what we need to avoid.

MR. SISUNG: I completely agree with you. And I guess I would seek your feedback as, you know, you guys are heavily -- completely agree with everything you said. We're going to talk about the reliability and getting these large loads on. I raised that issue in relation to what does MISO say we can and can't do versus

what the utilities and the Commission say we can and can't do? So, I agree 100%. These are all new challenges, and we're all struggling with them, and I'm not -- and I think MISO needs to do things. Because we can only control Louisiana. We can't control the rest of the footprint. We just want to -- as I said, we emphasize the word, with a partnership. We want to partner with them to make sure that we're all achieving the goals we need to achieve, but at the same time, provide Louisiana the flexibility to continue our economic development efforts. Did you --

MR. KOWALCZYK: Yeah. Andy again with Southern Renewable Energy Association. And I got a couple things. I think you mentioned the impact is different, a 138-kV line than a 500-kV line. Well, that begs the question of are we planning broadly enough? You know, are we planning big enough for enough headroom on the system? And I think that we can look to long-term planning for, you know, seeing what the benefit of that is for load as well as generation and providing access to a variety of generation options, too. Also, say specifically on the ZGIA efforts, that we support very strongly having more than one point of interconnection, being able to cite, you know, more than one point of interconnection. That's what they allow in HILLGA and SPP, and that provides flexibility for the developer of the load to procure, you know, a portfolio of options, possibly, as well as fast-to-market renewable energy resources, too, that can be built quicker. And as it relates to the kind of, broadly, the fast-lane concept, I think we should consider, you know, the fact that there may, again, be more withdrawals from the system than there are injections to the actual load behind one or more POI, and that we should look at a proposal more like HILLGA, where it provides a, you

know, you have a provisional sort of generation to load option. And then within five years, you need to get service to the rest of the grid. I mean, I think that that could provide, again, more generation to the grid when there is less congestion on the system, and maybe there is less load to serve behind that two [INAUDIBLE] POIs. And it also counteracts the problems with, you know, if there is local generation tripping offline. You have that network integration.

MR. SISUNG: Yeah. I will say that with regards to HILLGA, we were supportive of HILLGA. HILLGA did have sort of a locational requirement. I mean, yes, two points interconnection, but it can't be -- I think it was one -- there's a -- I can't remember what it is, but --

MR. KOWALCZYK: Two to five substations.

MR. SISUNG: Yeah. Two to five substations, right. And I think that kind of framework would be important to maintain in terms of how it was viewed. And I would say on the ZGIA multiple interconnections, as I said, I think the stakeholder communities kind of trying to struggle with understanding that. From our perspective, our comments to date have been that that what they're imposing may be even be too limited on the two points. Our point is, study it correctly and make sure that we identify the right network transmission upgrades that need to be made to support two points of interconnection. Then you get, you know, the speed of not having to go through the queue, but the reliability you need. Our concern is that their two-point of interconnection study may not be robust enough. But we're working through that with them, trying to get a better understanding of it.

MR. KOWALCZYK: Yeah. And I understand, you know, the limits of MISO and SPP and all RTOs and all ISOs and that they are resource-agnostic, at least on paper. But we do think that it's incredibly valuable to consider energy storage as an asset for especially these very quick ramping of large loads. Because energy storage is just way more nimble than your traditional storage generation.

MR. SISUNG: Thank you. All right. Anybody else have any comments with regards to the goings on at the RTOs? [NONE HEARD] All right. Now, we're going to move to one of the most, I guess, important ones and maybe we'll generate the most feedback, and that's how do we define large load? And this was kind of setup a little bit earlier in a comment that Andy had made. You know, are all large loads the same? You know, let's talk about where the Commission is right now. We don't have a definition for large load, but we do have a General Order dated July 29, 2019. It was -- what was it? It had a short name. I'm drawing a blank on what it was, but it says that if you have a peak load -- if you're going to increase your peak load by greater than 5%, then you have to come to the Commission, and you have to come to come to the Commission with a plan, and there's various ways you can accomplish that. You can amend your IRP, if you have an IRP. If you don't have an IRP, you have to come with a certification plan. And there's flexibility to allow you to enter into an ESA, but it's got to be subject to you coming to this Commission and explaining what you're going to do, and to the satisfaction of the Commission, that you're protecting the grid and you're protecting the ratepayers. So we don't have a definition of large load as we sit here today, but we have this that was passed before the first truly large load such as this showed up.

And so, we sort of relied on that as an initial, you know, thing to point to as there's not, you know, there is some Commission guidance on the need to accelerate your planning and your supply when you increase you peak load by more than 5%. So that's how when we develop the guidelines, we didn't define large loads because: A) It's a very broad conversation like we're having right now; and B) we have that 5% kind of backdrop to already tell people you got to come see us and talk to us. So there is no definition for large load in the guidelines. But I think one of the biggest questions out there is, do we want to have the definition for large load, and if we do, do we want to put specific requirements on what that is? And we've already had a couple discussions with this, you know, is reliance on a single megawatt overly simplistic? I mean, it could be, because you could have a moderately sized load in a transmission constrained area, you know, that can create more significant reliability and cost impacts than the opposite of that. The ramp schedules could be different, right? And you may have more concern on how you deal with the ramp schedules than what you would with a more traditional load factor industrial load. Different economic outcomes, right? I mean you have -- what economic outcomes does a data center bring versus what economic center -- benefits does a large industrial new customer bringing tons of new jobs and indirect jobs and sales tax and all those things. I think those are -- so to put a specific definition on large load, and then determine how you approach it, is one of the conversations we would like to have. I don't think there's really that much I need to say more about that than set it up and then just really ask for everyone's, or anyone who wants to thoughts on how should large load be defined, and once you

define that large load, what, ,if any, specific concerns do you think need to be addressed with regards to that definition you have provided? So yeah, sure. Larry?

MR. HAND: So I don't have the answer to what should be considered large load. I think but that there are two -- two facets to it. One is, I think, you know, should this be focused on computational loads? Data centers, hyperscalers, which as we all talked about so far, those are -- their ability to change the level of usage up and down many times a times a second is, you know, makes them unique and worthy of a lot of these considerations. So is this -- should we be thinking more about these rules applying to computational loads? And that might may not be the right term of art, but I think y'all know -- I'm trying to distinguish that between traditional steady state operations that we would see with a chemical plant, refinery, that sort of operation. And the second part, obviously, is what size of load matters? Should these load attach to -- I think in answering the question, we need to think back about the minimum capacity obligation discussions and where we landed with that rule. That rule became up when cooperatives were transitioning from a legacy supplier to new supply options. And the question became, well, what information should the Commission have about how they're serving it and what capacity? And we ended up with a rule, I'm paraphrasing, of course, that says, every utility in the state should plan to cover their load and reserves by 100%, but at a minimum it needs to be 90%, and there was kind of a phase-in approach. At that time, you know, we had a significant amount of surplus dwindling in the region in MISO South. And so I think that was what the Commission decided there was appropriate for those facts. I think as we think about this threshold and what triggers these special

requirements, I think we need to look at the market today, the PRA results that came out, and think about do we want to just rely on the MCO, the 90% minimum, or when you add these new loads, should we be more careful and thoughtful? Just as an example, if load were to be, you know, added in -- in a load pocket, historical load pocket like Amite South, DSG, every megawatt counts, as we know. And so that's one answer. And you could also look there may be, I don't want to call it a load pocket, but load corridors along I-20 developing with announcements in Richland, Caddo, you know, so adding megawatts there, too, could, you know, 10 megawatts, 20, 30, 100, those could all be very impactful. So I don't know what the right answer is, but I don't think a large load -- it should be relational. A large load, you know, for Entergy may not be the same for SWEPCO, may be the same for Cleco. Coming up with just a number of megawatts as that's a large load, I don't think will address the issues we need to be careful about.

MR. SISUNG: Okay.

MR. KOWALCZYK: I don't have a very, like, well-defined answer to this, but I will say that throughout the last couple of years, you know, we've seen a huge uptick in expedited projects request in MISO, and that is an indication of a lot of large loads wanting to interconnect. And because of that, they've had to rethink how they're studying these expedited project requests, and they're doing them in clusters now to see if they're impacts on each other. So, I mean, largeness is certainly an indicator of complexity of a different planning paradigm, in my estimation at least. But I think that what's relational also comes out in those expedited project requests studies, too.. And you find that things are highly

relational the bigger that these loads are, so. I don't know if 50 megawatts is correct, which MISO is considering for their definition. I know that it's also complex that ERCOT adopted something and then everybody came in -- I think it was like 70 or something like that. So everybody came in with requests for 69, or 69.98. It's a tough question to answer but I, you know, there are relational impacts. So it's -- a 500-megawatt load is not the same as a 50-megawatt load.

MR. SISUNG: Yeah.

MS. SHELTON: I think the ANOPR -- the FERC ANOPR suggests 20 megawatts for the definitional threshold, which a lot of people have said is too low. Some have said it's appropriate, but.

MR. KOWALCZYK: And when you see, like, announcements of 2.5-gigawatt data centers, you know, or 5-gigawatt data centers --

MR. SISUNG: Right.

MR. KOWALCZYK: -- it's just like, 20 megawatts?

MS. SHELTON: Right.

MR. SISUNG: Yeah. Yeah. And so I think SPP's -- I thought I had my notes here, and I don't have them in here. But SPP's definition is actually related to the size of the transmission you join, whether or not you're a large load or not large load. So that's an option to be considered here. And, you know, you said they're coming right under, right? That's the conversation that I've actually had with Commissioner Lewis and some of the other Commissioners. The problem is, when you start putting hard floors in, that's what people meet, and that's what they try to shoot to, which is sort of why we were, just as we look in this overall conversation,

the guidelines to us seem like a better approach because the minute -- if I say that a -- I think it was -- where is Justin from? I think Kansas has a large load tariff that says that, you know, 80% of the costs have to be covered. Well, we can do better than that, so. But if you said that in a large load tariff, then there you are. That's the -- that's your negotiating point that you have to protect your customers because you put that out there. So I think that's the concept behind the guidelines versus a hard rule, and that's part of this conversation we're having. You know, do we -- how much of that flexibility do we want to maintain, and if there is something that we want to lockdown, what is it and how narrow do we want to lock that down so that we can provide the best protection for ratepayers that we can? Yes, Susan?

MS. MILLER: Thank you. Susan Miller for The Alliance. I just want to point out, one, that Maryland actually just adopted, in legislation, a 25-megawatt threshold for large load. And we believe in the megawatt large load threshold, but I want to point out, that's the starting point. If Louisiana adopted a tariff, and it said 25 megawatts, yes, everything in 25 or over will go in large load, but that doesn't mean the others get a pass. They're in another tariff. And if -- so the Commission is still looking at them, and presumably looking just as hard if they're 24 megawatts. It creates -- divides up the start of the path. It doesn't create the path. And the problem with guidelines to me is because they're guidelines, they create arguments. You know, if you could put things in a tariff that the Commission ultimately approved, then at least with regard to the tariff terms, there's no more argument over that. The tariff says they get this. The tariff says they can't do that. So it resolves a -- can resolve a number of issues up front that you don't have to

have an argument about in each application. So it lessens the workload for everyone.

MR. SISUNG: Okay. Thank you for that. Yes, Logan?

MS. SHELTON: And I'll just note -- oh so -- oh, Logan is -- I didn't -- no, go ahead. I was just going to follow-up -- comment on that, too. But, go ahead.

MS. BURKE: This is really brief. Logan Burke. The 5% threshold, can -- does Staff have any sense of how many times or if that threshold was tripped before Meta?

MR. SISUNG: The first time I saw it tripped was Meta.

MS. BURKE: Interesting. My concern about the --

MR. SISUNG: I do want to add that it didn't get added until 2019.

MS. BURKE: Nineteen.

MR. SISUNG: Yeah. Just wave.

MS. BURKE: Oh. There you go. And it gives us all a bit of energy. Exercise.

MR. SISUNG: That means I'm putting everyone to sleep.

MS. BURKE: There we go. I don't disagree with Larry's point about this being sort of multifactorial in terms of ramp rate, size, location, and so forth. I think -- I do hope that the Commission doesn't just say megawatt, but thinks about impact. And so I'm curious, let's say even under the 5% threshold rule, if a utility is meant to come in and say, well, we tripped the threshold now. Does that mean that the project -- the process is, I heard you say there're a lot more questions, there's a lot more to consider. How does that square with a truncated process of a application and approval?

MR. SISUNG: I don't think one forestalls the other. I think that, you know, this Commission retains plenary authority to review something in any timeframe that it chooses. I think that you have to balance the protection of customers and rates and reliability with the need for speed to be able to generate the economic development the state's seeking. So I don't have a firm answer for your question. My answer is that that's sort of the balance we're here to talk about, you know. We are sitting here today with sort of an eight-month timeline that has been the framework that we've -- that's been developed. But I think all of that's open for comments and discussions and consideration.

MS. SHELTON: Just to follow-up kind of on what you said, and what I was going to say a moment ago. And I think that's part of why some of these bright-line rules are attractive because they make the -- they make it easier to make decisions. And even like Lane just referenced, one of our colleagues who represents Kansas, the state of Kansas and SPP, and they have a large load tariff. So that's very easy for him to then say, well, we have large load tariff as X, Y, Z. We go in like, well, we have a know it when you see it and, you know, it creates a -- like even a conversational difficulty or communication, just more complexity behind that, and it takes more time. But eight months, if you've got good partners, like if you have a utility who brings, you know, everybody has to do their part. You know, please don't give us a, you know, something that's just terrible to try to deal with in eight months, you know. But if you -- if everybody's kind of very focused and shooting on all cylinders and trying to cooperatively do something, it's a lot, you know, it's a lot -- you know, it's a lot easier to achieve those kind of shorter timeframes than,

you know, a year and a half. And I do think, you know, what Commissioner Coussan said the other day, only in government does eight months seem like, you know, a fast track. If you do prioritize things, you should be able to move, and that's kind of the environment we're in right now.

MR. SISUNG: Yeah.

COMMISSIONER LEWIS: Lane, if I may, I would say on this question, this is something that NARUC has really put pressure on all Commissioners to do. NARUC really wants each state to have its own tariff, and right now, if I'm correct, there are only 12 states not either with a rule -- with a tariff, or under consideration with a tariff, and that would include us New Mexico, Mississippi, Tennessee, Maryland, Maine, and Vermont, New Hampshire, Massachusetts, Rhode Island, and my map is a little, I don't want to say what it is. And so what we've seen, at least I can say this has been a debate among Commissioners. And one of the places that I have seen is some of the states are adopting large load tariffs by utility. Especially in their big utilities in their state, the ones with the largest capacity and service territory has its own specific tariff. And then some states have a more general tariff, so it's kind of is taking almost a dual approach of saying, hey, we're going to evaluate and have a tariff per person, and I don't know if that makes the most sense. But where we're seeing kind of the biggest definition is between the 5 to 99 megawatts. That's where about 25 states have their tariff, is in that 5 to 99 megawatts, and then 2 are 100 megawatts and above, and then few are in the 1 to 5, which I think is just because -- based on their state's population like Wyoming and other states. And so this is going to continue. I think this is something that we

probably do need to address, and it will be a -- Dana, to your point, it will be a glare as NARUC continues, and this has been the talking point that President Rendahl is using. Incoming President Hudson and I were actually were on the panel when he talked about this recently. So I think it something that we do need to solve because I don't want us to be the glaring gray blob on the map, but I also want us to know that we are a different state. We have a very large industrial presence, and we have dealt with larger customers that I think most of the other states are in this kind of data center renaissance. But I do think this is one place where I do think the Commission probably does need to clarify, in a tariff or a rule, what we actually define as a large load pertaining to this moment and kind of separating where we've been previously before. So I just wanted to add that.

MR. SISUNG: Yeah. And I want to circle back, and thank you very much. And I agree that this is a hard thing to rest with. So, first I'll handle that and then I'll come back. So, and I agree. And I'm curious as to how these states -- because if states are getting a bunch of crypto miners and small data centers, and they're creating a standard tariff for that, that makes a lot of sense to me. But when you start talking about in terms of -- I mean, maybe there's a range. When you start talking about in terms of two, three, four, five, six, seven gigs, it is very hard to bring that kind of load on from a financial perspective. So, you know, I think publicly, you know, the Meta deal is the one that's been on the table. They've put up a lot of money upfront, not in the rec. So they put a lot of initial investment. Well, can a tariff handle that kind of flexibility to allow for a utility to be able to negotiate with someone that large to bring them online? So those are the things we

were wrestling with as we look at do we want a tariff that, you know, was is broad and very protective? A) It could provide a minimum that everyone shoots for; B) It could lack the flexibility. But as you said, maybe there's a sweet spot. Maybe there is -- if we're going to try to bring in some of these more standard arranged, maybe that's where the tariff and then the flexibility to remain at the much bigger projects where the Commission would have more flexibility. And then the last point that I'll make, just circling back on these discussions, in terms of the eight months. Just to make sure that the stakeholder community's aware, I know some of the utilities are. I've talked to a lot of their representatives. That infrastructure was setup with our firm has been hired to start working with the utilities before they ever file so that we can tell them what we expect. We have these guidelines, we get to sit down and say, how are covering all of your generation? How are you covering all of your transmission? What is your plan? So by the time they come to file, they know all the expectations that Staff has in terms of how they need to meet it. So hopefully that helps with the eight-month process, because there's a pre-process now in place where we're working with these utilities on a prospective basis before they even file. Yes. Yes, Susan?

MS. MILLER: Susan Miller with The Alliance. I just saw your look of confusion when Commissioner Lewis said Maryland doesn't have a large load tariff. That is correct. The legislature passed the 25-megawatt threshold and directed the Commission to develop a tariff -- a large load tariff. And they're going to have a workgroup going on which includes utilities, data center operators, Staff, and others to hopefully develop a tariff that they can all agree to or all agree to mostly to

present to the Commission. So that's why they have 25-megawatt threshold, but don't actually have a large load tariff yet.

MR. SISUNG: Got it. Thank you for that clarification. Anybody else want to weigh in on the size of large load, or whether there's a definition, or any criteria that would be specifically important? All right. Some of this we've already discussed. I'll go through this next section and then I guess we can take a bathroom break. Load characterization of ramp certainty. I mean, we've hit this in other discussions as we've had here earlier. Let's talk about this, I guess, more in terms of reliability. So I know NERC just came out with information yesterday. I have not had a chance to review it, I don't know if anyone else here has, but there is no doubt that, you know, from this Commission's perspective and from the nation's perspective, we are learning that there has to be a heightened review on the load profile natures of these utilities and how the fast ramping up and down is to be addressed. You know, maybe the answer is MISO and SPP and their limitations in, you know, putting the restrictions on these loads across the footprint. But, so we would just open up that dialogue to anyone if they have -- want to say anything in addition to, you know, any proposed energy consumption, load factors, any -- any types of requirements that this Commission should consider that we haven't already discussed with regards to load characterization and ramp certainty.

MR. KOWALCZYK: I think it's valuable to have that limitation, but I think also, again, energy storage. I think you don't have to worry about that limitation as much if you have on-site storage. And there are data center developers like [INAUDIBLE], that are doing that, and they're integrating that into their actual

facilities. So I don't know where that fits in. It's not a requirement for storage, but it's got an understanding that you need to adhere to these rules unless you have an on-site way to balance things out.

MR. SISUNG: In terms of sizing of that storage, do you have a thought process in terms of how they got a one-gigawatt load?

MR. KOWALCZYK: Is that percentage to load? No, but that's something I could send you from somewhere, developers probably.

MR. SISUNG: Okay.

MR. KOWALCZYK: Yeah. Because we have Google, too. That is -- I think they got 300 megawatts of storage. It's not onsite, but that's how they size it to the 600 megawatts of solar that they have for that facility up in Arkansas. And then they're purchasing from the network as well. But with a drawn-out way of saying I'll get back to you.

MR. SISUNG: Yeah. And we have an opportunity for written comments, that would be a great place to help us get some thoughts on that.

MR. KOWALCZYK: Yeah.

MR. SISUNG: Anybody else? Why don't we don't our first break. Been at it for about an hour now. And we'll come back at 10:20? Ten-minute break good for everyone?

[OFF THE RECORD]

[BACK ON THE RECORD]

MR. SISUNG: One thing that was brought up to me during the break, which I, you know, back towards whether or not we need new tariffs or not. One thing that

is a little unique about Louisiana that we're finding out is that because we have such experience with large industrial loads, that there are scenarios where the current tariffs in place provide enough revenue to address the very things we're concerned about. So, you know, I think as we go through these processes, as more utilities start to make filings and as we start to analyze those, we may find that from a cost basis only, not all these other issues we're talking about, that the current tariffs in place actually are compensatory enough to provide the revenues necessary to cover the cost. Yet to be seen, but that's some initial indications we've seen on some other preliminary stuff we've looked at. All right. The next topic that we have queued up is resource adequacy and capacity responsibility. We talked a lot about the -- there's a lot of overlap here, so I don't want to waste everyone's time. We've talked a lot about, you know, how are we going to ensure that there's enough generation being brought online to serve this load and specifically how are we going to make sure that that's done in the right time so that we're not frontrunning the load ahead of the generation that comes on board. And I think within that conversation, the one thing we didn't discuss that if someone would like to discuss, it's sort of the role of market-based capacity versus owned resources. How much do we want to allow any utility who's bringing on a new large load to say, well, I'm going to go out to the market and find this resource, when we know we're in a capacity-constrained market, and we don't necessarily know that that resource is there. So, should we treat, you know, owned resources and capacity resources any different in terms of our analysis, or any conditions we may put on certification?

I'll throw that out there if anyone would like to comment. That's things that we're looking at and we'll be addressing in the report. Uh-oh. All right.

MR. HAND: So, Lane, I'll take just one quick comment. I mean, --

MR. SISUNG: Hold on. All right.

MR. HAND: When I read the agenda, when I saw a market-based capacity, obviously, I think we should all have access to all options, you know, all tools to serve these large loads whether it's self-built, market, PPA, BOT, you know, all the things. I guess what I thought this question was getting to is a known source of generation regardless of how you procure it, you know, should it be incumbent on the utility serving the large to be able to say -- but it is important from a transmission planning perspective for the TO or MISO when they do these studies for large interconnecting loads to know where -- where is the generator generally that's going to serve this so when they study it. Because unless the generator also went to MISO at the same time, MISO's going to go study a single point of interconnection load and develop a solution set to solve it, which may be a very inefficient solution set. But I think it's important to know also from a transmission planning perspective where -- where is the load to serve, you know, this single large point of interconnection, so you develop the right sort of solutions. That's the only comment I have is I think it is valuable to know the source of the generation. But I'm indifferent, and I think the Commission probably is indifferent as to whether it's owned, new build, existing, market, you know, market-based, if you will. Just knowing where it is I think is important. And we've touched those issues collectively as a group in the MCO, and so I just -- that's my comment on that.

MR. SISUNG: Okay. Two things to add to that. So, in our conversations with MISO, we actually have that conversation of, you know, how are we assuring that the generation is online at the same time? And one of the responses was, well, you know, these transmission studies, if you -- you know, if you don't have the generation and the model, then it's going to show you some pretty expensive transmission solutions, and that's going to be a real impediment to them going forward. And I said, yeah, but it also establishes a practice of favoring remote generation, especially in a load pocket like ours, which say a point of contingencies were raised on transmission lines. So that actually kind of stresses reliability a little bit more. It can stress reliability, it doesn't necessarily stress reliability. So I agree with you that knowledge of the location of the generation is important. Does it have to be -- if you've got, you know, six gig, do you need the identification of six gig or do you need an identification of five? Do you need -- I mean, I think that's sort of the feedback we're kind of looking for in terms of how much information and when do you need to know it, right? So, we're being asked to -- if the Commission's being asked to certify a certain amount of generation, and it's only 50% of the generation for the total load, it's kind of hard for the Commission to look at an incomplete package to kind of know all of the things we're talking about. So I guess that's one thing that we really haven't talked about is, you know, our process currently is you come to the Commission with a transmission and a generator certification, but if you do it in pieces, it doesn't give the Commission the opportunity to look at the whole picture. So that is one thing that I would definitely like feedback on in terms -- if anyone wants to provide it, of, you know,

what are the advantages and risks of allowing sort of these piecemeal certifications so that we can evaluate that and maybe that would be something that comes out as a recommendation from the Commission. All right. Anything else on this topic? Yes, Logan?

MS. BURKE: Just very briefly, Logan Burke for The Alliance. The thing that I think is going to be important here in terms of resource planning is that, for example, in IRPs, that utilities are required to actually include both the demand that is expected and the generation that, you know, is being developed to serve that demand, and if that kind of generation is the right thing to serve that demand. So just want to make sure that we're not having an IRP over here and something else entirely happening over here, that these things are feeding.

MR. SISUNG: Yeah. And it's interesting, and I'm thinking about that as you're saying it, because we are fully supportive of the IRP being -- including all of the information that we have. The IRP results in a five-year action plan, right? I mean, there's a 20-year forward outlook and a 5-year action plan, and I've got and 8-month certification. So the interplay between the IRPs purpose of a five-year action place and the actual certification of the generation to serve the load, I think is an excellent and something we need to work our way through. Because are you just providing that information in the IRP for what the remainder of the action plan is, or is that part of the action plan? I think we need to think through that as part of how that all falls together.

MR. HAND: And, Lane, if I could add to that, you know, one of the challenges we have in the IRP space that we've -- I think this is our fourth cycle? We do load

forecast, looking out, and we haven't done yet an IRP where we had complete visibility on hyperscale data centers, so this is new for us. But in thinking about how we forecast load in the IRPs, we look at a pipeline of economic development projects. They have megawatts attached to it, but also probability of will they come to pass or not? We don't really have line of sight as to which ones will come to pass, so specific locations of the load, but we need to try to plan for a generally load growth if we see it coming and assess probabilities. So I just -- I would be challenged, Logan, to be able to, in an IRP, to -- in my five-year action plan, identify specific generation to serve specific loads. That's challenging, but generally that is the objective, is that five-year plan to say we see a need of this many megawatts; generally, we will need generation purchases, builds, whatever, in the five-year plan. But tying the two together in an IRP, which is a collaborative, you know, multi-year process to a data center knocking on your door and saying I'd like to take service in three years, you know, we're scrambling to get to the Commission. So those two, timing wise, may not sync up very well.

MR. SISUNG: All right. Moving on to the next topic, we've talked a lot about it, transmission interconnection and deliverability. These topics keep folding on top of one another, and we just talked about location of generation. That kind of gets to the deliverability issue of the generation you're providing and the role transmission plays in that deliverability. I think those are all things that we seek feedback on. Anyone has any concerns, thoughts, you know, we'll talk more in the cost recovery part about causation. You know, what, you know, once again, we get back to computational load or to -- or just sort of data centers, that computational

load versus industrial load traditionally, you know, what is -- transmission caused by load mean? I mean, they're -- you know, all load contributes to the need for transmission, you know, there are -- I can come up with two examples on the extremes. One, a data center locates itself in an isolated area, a transmission line has never been on any utility's plans ever in the history of time is identified, and it's not built that it can't come on. I think that's one level of causation. I think on the other side you go that there been transmission plans to increase general load-serving capability, reliability into load pocket zone for a long time, and this new load locates within the load pocket, and it exacerbates that need. Well, is that a direct causation -- is that the same standard of cost allocation? I think that's something we would want feedback on, and I think that those are two distinct questions, and then there's the in between. So, but we would love to get some feedback from the stakeholders on that. And I probably just -- and we'll take it now or in writing, you know.

MR. KOWALCZYK: Yeah. The causation thing is really -- it's always a chicken and an egg thing, I think, with transmission. And, like, at a certain point, you just got to make a decision that you think has been prudently analyzed through an extensive process, and that's something that we always support. But even when you're planning for a contingency, one of the contingencies is just that you have planned or forced outages. And in those cases, like planned outages, you have a fair sense of confidence of what your planned outage schedule is going to look like, but you might be tight. And if there are forced outages because of the load pocket, or within the load pocket, it can create a lot of downstream impacts as we saw on

May 25. So I think it's important to consider, you know, belt and suspenders with this stuff, not gold-plate the system, but really do some due diligence of are we just planning a lot of generation that has the same characteristics and maybe may need to rotate the play of our schedules? Do we have enough backup generation with different characteristics? Do we have that diversity within our portfolio? And also, do we have the option for market purchases when we are tight? So this -- I mean, those are the things that kind of keep me up at night living in New Orleans.

MR. SISUNG: Understood. Thank you.

MR. HAND: So, you know, we certainly support trying to get more transmission lines into load pockets because, by definition, that load pocket has more, you know, load than generation, and we rely on that, those import capabilities. We support it. One of the challenges we had, you said -- and I think you're right, aspirationally, we would love to be able to plan our generation outages methodically, you know, back to back so we don't have more than one generator out, but MISO is the one who allows those. Our RTO and same with SPP, they're the ones who say, yes, you can take that outage. Oftentimes, beyond our control because we don't know what else is happening on the MISO footprint. Sometimes we're not able to take the generation outages when we plan them, so we do need those redundancies sometimes -- new transmission lines to bring additional import capabilities. And we had some very recent, real example of that that just ended, so.

MR. SISUNG: All right. Thank everyone. Moving onto the next topic. Operational control, curtailment, and reliability rights. And I guess the biggest one in this, you know, conversation -- because we've already talked a lot about

operational, controls, ramps, isolation, those issues. But curtailment is one that we haven't discussed, and I think is one that, you know, if you look at what -- kind of how Texas approached it, if you look at kind of how SPP's approaching it, a few transmission upgrades, you have to take interruptible service. MISO is considering a system-wide -- it's only being proposed, it hadn't fleshed out, but a system-wide view as to when you try to bring this load on, you know, if you can't -- if the system can't serve you, not if you don't bring enough generation. But if the system can't serve you, you know, that you would only get a certain amount of firm service and the rest would be interruptible. So, you know, I would like -- you know, feedback comments on the nature of whether this Commission should consider any interruptible requirements or how interruptibles should be reviewed by this Commission. Yes?

MR. HAND: So this is a national issue, you know, we hear about this nationally about how this issue should be treated, and I think each situation is different. So, for example, if a data center were to show up and said utility, I see you have an interruptible rate schedule, I'd like to sign-up for that, I'm willing to be interrupted. They get a discount to the standard embedded firm service rate. But they're willing to be interrupted, so maybe that's okay. Most data centers don't want to be interrupted to the level that those interruptible schedules permit interruption. And so if we are -- and I think, you know, for the data centers we are serving -- trying to serve who want firm service, who want, you know, for lines of reliability. We expect them to pay for the infrastructure needed to provide that, the incremental cost of that to protect other customers. And if we're successful in doing that, is it

reasonable to then say in addition to paying the full incremental cost of the new generation to serve you, we also want you to be interrupted? I don't think that's going to work from a, you know, customer perspective when we -- if we can get them to yes on paying incremental cost, we also can't say, and you're going to be the first one cut if there's any sort of reliability event. Because they have paid more than any other customer on the system in terms of providing that incremental generation, so we need to think about the new customers coming to the state making not only significant investments in their facilities, but also paying for significant investments on the utility infrastructure. We need to be thoughtful about the expectations to interrupt firm load. Once all that generation and infrastructure is there. Prior to that, however, I think on the ramp until we have the resource to serve them, they should be curtailable until we have the resources online to serve them, because otherwise, we are risking reliability of service to existing customers, which is not acceptable.

MR. SISUNG: You cut off my retort. I was going to talk about the -- I think you have to look differently at the ramp period versus the post-ramp period. And so -- but comments on how that would be reviewed? Yes, Logan?

MS. BURKE: Definitely agree on the ramp period needing to be curtailable. But I -- I don't believe that it makes any sense to give these customers a different level of service. We would be supportive of something like Texas has put into place, especially as the weather dynamics continue to change and influence, you know, more need for things like curtailment. You know, if a company wants to be firm 100% of the time, they should build it themselves and not depend on everybody

else to back the risk. But being able to actually respond to the needs of the public interest and preserving the rest of the system, we do think that curtailment should be required.

MR. SISUNG: Okay.

MR. HAND: And could I clarify my statement? I did not mean to suggest that a data center we serve would get a superior level of firm service. If they're paying their way on generation and infrastructure, they will be a firm customer just like our residentials are, just like existing industrials. If we do have a reliability event or curtailment event, we will follow our curtailment priorities, and they will be treated like any other similarly situated customer.

MS. SHELTON: Can I ask a question of Logan on that? My understanding, and correct me if I'm wrong, but I believe that the -- those -- that curtailment in Texas requirement is a company with lower rates. Like, they get something in return for -- they don't pay, but the full freight of being on the system, so there is an exchange there. Whereas, given it's a -- and I'm sorry, I'm just wondering what your position is. If a customer locates in Louisiana and they're paying the same rate as all other firm customers, is it your position that if they're -- but if they're a large load, they need to be subject to an economic kind of curtailment, or some kind of additional curtailment requirement just because of their size? Even if they're paying the same rate as other paying customers?

MS. BURKE: So I think there is some -- here today, I'm not going to be able to answer your question fully. I am -- we're happy to answer those questions in our comments. I think there is a difference between economic curtailment and

preserving the grid, reliability, and resilience. And I think in terms of making sure, for example, that a whole small city next door can maintain services to, you know, preserve life, health, and safety, you know, in those extreme circumstances, I don't think that there should be an extra value to the customer.

MS. SHELTON: So no extra, probably mixing economic curtailment in there made my question cloudy. But really, I would be interested in your views on whether you think they should -- there should be some different treatment via superior service or inferior service just by the nature of the load. If there's no rate difference or they're paying full freight on the rate, that would be, I think, a -- if you could, address that issue, if you were interested in giving us your views on that, that would be good.

MS. BURKE: We'll certainly include that in our comments.

MR. SISUNG: All right. Anyone else want to talk about curtailment?

COMMISSIONER LEWIS: Lane, object. I pulled up, just for a reference, what Logan's referring to is what was called Senate Bill 6 from the Texas Legislature that -- and basically, and I got to double-check your direct question, but it was giving ERCOT the authority to order emergency load reductions or disconnections for large loads during grid stress events. So it was a -- that curtailment is no longer theoretical, that ERCOT would develop rules and have the authority in an emergency load reduction to automatically curtail large load customers as defined by ERCOT.

MR. SISUNG: All right. We get to one that, I guess, has been really the large focus of everything that's been going on in these certifications and discussions, and

that's cost recovery, rate design, and cross-subsidy protection. And once again, we've talked a lot about these issues as we've gotten to this point, but, you know, the Commission's state of position on this is that these large loads need to cover their incremental cost. Then we have to get into determining what their incremental cost is. And so, that sort of rare, you know, feedback would be greatly appreciated. You know, the things that we struggle with is that, you know, how do you allocate -- once again, different kinds of large loads. Different kind -- you got industrial loads that have been spot load added on the system for years and years. They, in and of themselves, are not the driver of this large -- price of capacity and cost of capacity. That's just the -- sort of the normal cost of action. The driver of all these increased costs of capacity that is being felt across the system is definitely being driven by this new computational, new data center, large load all coming to the system at once creating the shortage on capacity and running up those costs. So when we look at allocation of what costs they have to cover. You know, what is that cost that they need to cover in terms of just their generation, system generation, the overall costs? We would like people's viewpoints and feedback on how do we allocated cost and what costs need to be allocated? The Commission is 100% laser-focused on direct incremental cost. We are, you know, we have been, you know, we want to the generators that are being put in, we want to know the cost of the generation that is used to serve that. We want that to be included as a minimum that the customers pay and their full rate should pay more. It should contribute just like everybody else's rates contribute to the transmission system, to the distribution system, since they rely on it, to the administrative needs. So we want to make sure

that we understand what costs need to, at a minimum, be covered in these rates and how they should be allocated. So, we'll open the floor to any discussions for that now, and love to get some written feedback.

MR. KOWALCZYK: How do you determine beneficiaries currently? Just, hey, this transmission enables this load, same as this transmission, the load would not be able to come online, and as well as like a generation? Or is there something further to look at, like congestion on a system on a long period of time?

MR. SISUNG: So, let me make sure I understand what you're saying in terms of beneficiaries. You're talking about allocating generation costs of beneficiary? What do you mean when you say that?

MR. KOWALCZYK: Generation and transmission costs. So when you're looking at a full packet, you're looking at the load that's asking for -- they have in their proposal or their -- what they're asking to be approved. The site and the size of the load, as well as the generation that's prepared to serve that load, as well as the transmission. And they're asking for cost recovery on that, or they're saying that they're good to be on the hook for this much, or something like that. I, you know, I'm so used to the RTO world where they do analyses based on power flow, looking at, you know, what issues are being resolved by said transmission. And I know that there's -- it's got skepticism around that, but I never see like a common factual of that. Of like what's better.

MR. SISUNG: Right.

MR. KOWALCZYK: And I'm just curious if that could not be introduced in this, too? Are we looking at, you know, when they're saying that they are going to be on the hook for this, is that the full extent of their, you know, their responsibility?

MR. SISUNG: Well -- yeah. Let's take transmission of itself because the RTO world -- and I know the experience you're talking about. I mean, -- so there's no doubt that if a large load fully pays for a transmission line, that there are other beneficiaries to that transmission line in terms of reducing congestion, as you said. So it could help reduce the APC, you know, allowing other loads and other generations to jump on the system that otherwise would not be able to jump on the system. So there's no doubt that there are other beneficiaries to that line from -- and that's sort of the discussion I had earlier of the broad range of looking at a transmission line. It's that transmission line that wouldn't be built but for, never was considered, but it's not built but for. Should the utility get the 100% of that cost? There's a transmission line that's been built that was in the plans to be built in the future, this large load accelerated it, it's going to provide all those benefits to other people. How should that be considered? So I do agree, in that term, I would understand how beneficiaries would flow into the equation. I'm still not really -- I'm wrestling with how if the Commission's perspective to date has been that the large load has to pay for all of the generation and all of the directly caused transmission, how beneficiaries would flow into that conversation. I haven't made that connection yet.

MR. KOWALCZYK: I guess it's just a better picture of is the approach rough justice or is the approach an analysis of the system? And I think that that feeds into

long-term. And I know I'm skipping around different numbers, but I think that that feeds into a long-term analysis of like how is -- what does the system look like? And who's benefitting from what? And, you know, it's fine that they are going to be paying for these things, and you've determined cost responsibility that way, but, you know, there may be upgrades in the future that are needed for said data center as well. And we should be clear about, like causation there as well.

MR. SISUNG: Okay. All right. I'd love to get your written comments on that to help me ferret that out better.

MS. SHELTON: I must comment, I don't know the answer to your questions, I think it's a complicated one. But in a stakeholder meeting that I was referring to earlier, yesterday, in SPP, someone, not me, but someone in the audience brought up Entergy's deal with Meta and just sort of the Meta data center in Richland Parish. And they said, well, you know, they're locating three generating units right there on-site. So that's pretty direct. You know, okay, well these are directly incrementally benefit that customer. But what if it's, you know, we're talking more widespread buildout and farther away, how do you decide? Is this caused? You know, [INAUDIBLE] not, it's much harder to link those, and it's a more nuanced analysis. And I don't know that there's an easy answer to that or bright line to draw there. But we're definitely open to suggestions and ideas.

MR. KOWALCZYK: Yeah. I bring it up as more of a Meta process where it's like maybe you can't figure out everything that's going to happen in the next 20 years with these loads. And maybe they do want to be market players in the future. Any computational -- that the ability to do the same things with less computational

power and less load being withdrawn from the system enables them to sell generation to the system, and then you have new beneficiaries. And one of them is the load that's somewhat generation to the system, too, so.

MR. SISUNG: All right. We move to -- oh, I'm so sorry, Logan.

MS. BURKE: Just really briefly. Really glad we are in alignment that this needs to be the Commission's real first focus. One thing that we had brought up previously that hasn't really been considered is all of the both file and operations and maintenance costs of these facilities. In particular with the fuel. We had made a suggestion previously that the Commission require some kind of analysis, especially for extreme events, extreme price volatility, for example, due to this much greater amount of gas on the system, as an example. And that there -- there could be a nodal -- I have to read this because I don't really know it off the top, but a nodal simulation with and without the new large load facility, to understand what the differential is so that then those costs could be assigned to the [INAUDIBLE].

MR. SISUNG: No, those would be fair comments. I know that from, you know, lessons learned as we're moving forward from a Staff perspective and we come -- we have back here fuel as the topic and we also has APC, you know, the full cost of fuel analysis that [INAUDIBLE] runs in that analysis. We do agree that we need to factor in fuel. I think that there is an argument. There have been studies, we've done analysis that actually fuel, because of the generation, because of the MISO market, can produce a net positive because you get payments, your generators, and the payments can be more than the cost that you incurred to get there. So you can have a net margin on your fuel costs. But completely agree, and we've already

issued out our first discovery in the next case. We need to dive into that and really get a full understanding. And I think you are extreme -- your extreme event sensitivity could be -- would be a good comment so that we can get our hands around that. Because those do drive, you know, temporary hardships as they flow through the FAC. So I think that's a fair comment.

MR. HAND: Lane, the only thing I've got there is, I do agree, extreme events can cause price spikes. It's not fair to assume that any particular load is the reason for the price spikes. The reason a price spike is a mismatch between online generation and the load. And so, you can have generation outages of any utility, co-op, IPP. So just to think that it is a large load that is the villain in this scenario is -- is a fallacy, I think. We'd have to look at it case by case to really understand it.

MR. SISUNG: Understood. All right. Moving on, unless anyone else has anything else to the stranded asset and exit risk, near and dear to the cost recovery discussion. You know, the term of these, should there be a required term, should the large loads undertake all of the risks of any remaining revenue requirement of any generators that were acquired to serve them, should the Commission take into consideration the repurposing of that generation, and the benefits that that generation can provide to ratepayers if that large load leaves. Because there's not, you know, the assumption that just because they've turned 15 years, that they leave at 15 years is not established, that's just an assumption. They could very well stay, and then you have zero stranded asset risk, so. And if they leave at a time as utilities have to turn over their generation portfolio and that generation can be better purposed -- put back to purpose, then there is no stranded asset risk. And to the

extent that they're assuming all the utilities sitting on excess generation that can be sold either in the market, or sold to a PPA or sold to ownership, you know, how does that play into the conversation? So I think there's a lot to be talked about with stranded asset risks, and how, you know, the term of these deals can be structured versus how much they pay now versus how much risk is left later. So, open the floor for conversations on the stranded asset risks, and I will -- of course written comments are great as well.

MS. CARRIE TOURNILLON: Carrie Tournillon on behalf of -- pass me the microphone. Carrie Tournillon on behalf of the Louisiana Energy Users Group. I just have a question. In the guidelines under stranded asset and exit risks, I think it's section four. It talks about, you know, the utility needs to demonstrate contract terms [INAUDIBLE] with asset lives. And then the next two bullets kind of go together as an or, where it's excess generation at end of contract can be economically used by remaining load, or adequate financial security, including corporate guarantees, is in place to prevent ratepayers from paying for unneeded generation. And it's that second part of the or, the financial security, can you just kind of, I guess, explain what you're thinking there and how that would work? I know we saw financial guarantees in terms of, like, during the term, like being in place during the term. But I'm trying to understand what you're thinking in terms of how a financial guaranty would be used with respect to the stranded asset and exit risks.

MR. SISUNG: Sure. I mean, there could be a structure put together where, if the large load leaves, they take the assets with them. That they would buy the assets

and take them with them. And under that case, if that was the obligation, financial security to secure that obligation as one scenario within which that could have operated.

MS. TOURNILLON: Okay. And so with the or, it doesn't necessarily mean that you only want one to be demonstrated, I guess, because we might not know upfront if you can repurpose, right? You might not know what the load would be. So is it really an or in terms of what the utility demonstrates, or just that one or the other would happen?

MR. SISUNG: With all this paper, I did not bring the guidelines in front of me. So, you know, I mean, I think the purpose was -- let's just talk about what the broader purpose of it was, was to provide that protection that the customers aren't left with a stranded asset risk. So if I put the or, if I had missed an or, or I hadn't put the or in the right place --

MS. TOURNILLON: And I initially was trying to understand. It sounds like, I mean, like it's -- I would expect that it's to ensure that the one or the other would happen and not that you just demonstrate one because you might not, you know, if you can say -- I'm going to let you read it.

MR. SISUNG: Yeah. I think that's a case of adding something late and not moving the or. So that or probably should be after the end of the first bullet so that all four of those are [INAUDIBLE].

MS. TOURNILLON: Okay. But the point of it is that it would be associated with some requirement that the large load takes the generation with them --

MR. SISUNG: Yes.

MS. TOURNILLON: And then that security is backup to make sure they can afford to do so if it's like the subsidiary?

MR. SISUNG: Correct.

MS. TOURNILLON: Okay. Okay. Thank you.

MR. SISUNG: Anyone else on the stranded asset risk?

MR. EDWARD YIELDING: Lane, Edward Yielding for Commissioner Lewis.

MR. SISUNG: Yes.

MR. YIELDING: Could you explain the minimum bill payment construct in the Meta deal and how bad it speaks to this risk and as consumer protection?

MR. SISUNG: Okay. So, yes. I need to put it all in my head to get you the proper --, so, because you said this risk. So, the minimum bill protects -- the minimum bill is put in place with corporate guarantees to protect the 15-year term. So the stranded asset risk was separate and distinct from the minimum bill, but the minimum bill that was to the revenue requirement for those 15 years of the -- of that, all that generation and other items which I can't remember off the top of my head, but it said that they would pay the full revenue requirements. Customers will see no impact, because our minimum bill will cover that. The stranded asset risk is what happens if they leave at the end of 15 years. And so, there's no more minimum bill at that point. And where that risk was assessed, was in looking in the Meta deal, was in looking at Entergy's long-term generational plans. They would need generation within that next three to four, five years that they were going to have to build anyway. And this generation could step in and replace that generation, and to the extent there was a little bit of delay there, markets available, that the financial

analysis that was done said that there would still be a net present value to benefit the ratepayers, because we have a repurpose for those generations. As we move on to other deals and to other utilities, if there is no such ability to repurpose those, that's where these guidelines come in and say we have to provide a solution for that stranded asset risk because that solution is not going to work. So, I don't know if that helps, but.

MR. YIELDING: Sure. I think Commissioner has a question about accelerated depreciation.

COMMISSIONER LEWIS: No, I was saying that has been a conversation. I mean, I know when I met with some of the credit ratings, S&P Global, that's a question they're asking Commissioners, is how are we considering stranded assets, but also looking at whether or not a requirement, or some type of requirement in the proposals or in these tariffs, have accelerated depreciation as a component of a tariff or an agreement? And I think that is something that we should debate, talk about, look at whether or not that's a tool or an avenue as a consumer protection is accelerated in the depreciation of the asset.

MR. SISUNG: No. Absolutely one of the tools in the toolboxes and something actively under consideration.

MR. HAND: You know, and from Entergy's perspective, it is something we consider when we engage with data centers and we have to look at new generation and thinking about the location of that generation in future utility. Can you more quickly depreciate it to minimize -- I don't want to emphasize. We're talking about what we're referring to as stranded asset risks. I don't think that means stranded

asset harm to customers. Imagine a world today where we're sitting and Louisiana has a surplus of generation of 3 to 5,000 megawatts. Imagine the economic development that we would be getting in this moment. So the mere fact that you may have a surplus of generation, I don't think we should equate that to there's a stranded asset and therefore thereby a harm. It's a totality of the circumstances what future generations resources we need, what opportunities are ahead of us if a data center doesn't renew, and so forth. So, just want to emphasize it is a risk we need to be cognizant of and think about, but it doesn't necessarily mean it's an evil, it could be a blessing at the end of these things.

MR. SISUNG: Should put that in written comments. All right. So, anything else on stranded asset risk? All right. Fuel supply and infrastructure, which we briefly touched on. You know, not only do you have the cost of the actual fuel that you buy, these large loads are requiring, you know, new reservation fees, new infrastructure to be built, and deliver gas to the generators that need to support them. You know, when we look at that analysis to determine the total cost of fuel versus the total benefits the fuel provides, we want to make sure that those costs of that increased infrastructure are included within there and that they are recovered. And if they're not recovered through that analysis, then they need to be considered for the larger scale of cost recovery. So we just put this here because we believe that it's sort of -- it's out there, it's been discussed, but there is a recovery mechanism already built into the markets. The MISO markets, the SPP markets, to the extent that these costs are included in those analyses. So we are -- we think it's important that you look at those to make sure that all the analyses are including all the costs

in the appropriate place. So, just open that up for conversation, if anyone has any comments. [NONE HEARD] All right. We're getting close to the end. Very similar stuff. This is all overlapping, but people may have specific comments on this. It has been mentioned, and we talked about the extreme weather events and perhaps the impact they may have on the LMPs and when it ultimately gets passed through to customers. But, you know, to what extent do we need to look at the -- to the energy market impacts as we review these things, I think is sort of what this point was getting to. And happy to take any additional comments that we may not have already received. [NONE HEARD] All right. Well, then this gets sort of to the -- to something that, you know, is pretty straightforward, you know, but we'll take any comments to the extent that the Commission approves a large load and, you know, puts any type of requirements to monitor it or evaluate it after the fact, what should those requirements be? You know, in the Meta deal we've got some follow-ups on system stability, you know, we have prudence reviews, we're monitoring during construction, that's sort of the format that's been laid out. Is there anything else that we should be looking at? You know, any feedback we can get on what the stakeholder thinks, how these large loads need to be monitored after the approval and after they go into service? Take comments now and written comments. [NONE HEARD] All right. Then that's the good news. We're getting to the end. Proposed closing session next steps. We've already kind of discussed them. We've had a lot of discussion here today. I really appreciate everyone who participated, gave their feedback. It is extremely appreciated. It'll be equally appreciated to get that feedback in writing. Our goal is to try to put together a good

report for the Commission, to have the most information they can have from the stakeholder group about what their concerns are, what their solutions are. We really want to provide a broad-based structure. And once again, on the substance, on what we should be looking at, and if you have suggestions on process, we want that as well, because we want to be able to get the Commission the full gamut of options and what the stakeholder community thinks. I guess with that, I'm going to open it up for any final questions that -- if there's something I didn't cover anyone wants to say? And then Commissioner Lewis, you want to say goodbye?

COMMISSIONER LEWIS: No, Lane, thank you for guiding us through this. And I want to thank everyone for your participation in this. This has been something that I think I can share all my colleagues are vastly interested to ensure that we are still protecting Louisiana consumers while also opening the door for economic development and progress for the state. And so, if you did not share anything today, I -- please do submit your comments in writing in the X docket that Lane -- I don't have the number. You can --

MR. SISUNG: Yeah. So just in case anyone came in late and they're interested, it will be in tomorrow's Bulletin. But otherwise, it's X-37921. X-37921.

COMMISSIONER LEWIS: And for clarity, this would just be a repository docket. There will be no need for intervention. It will be simple, just filing comments for consideration for a report to us. And also encourage, even those who are reading the transcript, to submit your comments into that repository docket, and we will continue this conversation and hopefully get to some resolution for us all

that showcases Louisiana is here and has a good regulatory framework for everyone to participate and also protect Louisiana people. So, that's all I have.

MR. SISUNG: Thank you. All right. Goodbye, everybody.

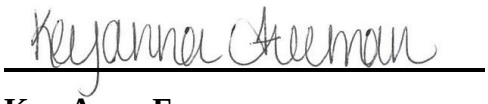
(WHEREUPON, THE TECHNICAL CONFERENCE WAS ADJOURNED)

I hereby certify that the foregoing pages 1 through 59 are true and correct to the best of my knowledge of the Technical Conference held on May 07, 2026 in Baton Rouge, Louisiana.

Rough Draft by:

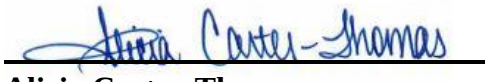
Alicia Carter-Thomas, **May 14, 2026**
Court Reporter **Date**

Proofed by:



Key-Anna Freeman, **May 15, 2026**
Court Reporter **Date**

Finalized by:



Alicia Carter-Thomas, **May 18, 2026**
Court Reporter **Date**