



July 30, 2026

VIA OVERNIGHT MAIL

Ms. Kris Abel
Records Division
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North Fifth Street
Baton Rouge, LA 70802

**Re: Entergy Louisiana, LLC, In re: Application for Certification of
Generation and Transmission Resources and Other Relief;
Docket No. U-37882**

Dear Ms. Abel:

Please find enclosed for filing with the Louisiana Public Service Commission the original and three copies of the Direct Testimony of Devi Glick on behalf of Sierra Club in the above-referenced matter. If you have any questions regarding this filing, please contact me.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Tony Mendoza", written over a light gray background.

Tony Mendoza
Sierra Club
2101 Webster St., Suite 1300
Oakland, CA - 94612-3011
(540) 325-8727
tony.mendoza@sierraclub.org

Certificate of Service

I, Tony Mendoza, hereby certify that on the 31st day of July, 2026, I have caused copies of the Direct Testimony of Devi Glick on behalf of Sierra Club to be served upon all known parties on the Official Service List for Docket No. U-37882 via electronic mail.

/s/ Tony Mendoza _____
Tony Mendoza

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

APPLICATION OF ENTERGY	)	
LOUISIANA, LLC FOR	)	
CERTIFICATION OF GENERATION	)	DOCKET NO. U-37882
AND TRANSMISSION RESOURCES	)	
AND OTHER RELIEF PURSUANT TO	)	
THE COMMISSION’S <i>LIGHTENING</i>	)	
<i>INITIATIVE</i>	)	

Direct Testimony of Devi Glick

On Behalf of Sierra Club

Public Version

July 31, 2026

TABLE OF CONTENTS

LIST OF EXHIBITS	ii
LIST OF WORKPAPERS	ii
LIST OF FIGURES.....	ii
LIST OF ABBREVIATIONS	ii
INTRODUCTION AND PURPOSE OF TESTIMONY	1
FINDINGS AND RECOMMENDATIONS	4
OVERVIEW OF LOAD, GENERATION, AND TRANSMISSION PLAN	7
EVEST IS NOT COVERING THE FULL COST OF THE ASSETS NEEDED TO SERVE ITS LOAD.....	14
I. ELL’s Analysis and Claims.....	16
II. Incremental Costs and Resources to Serve the Evest Data Center’s Load.....	18
ELL IS EXPOSING RATEPAYERS TO HIGH FUTURE COST AND RISK BY BUILDING FOR LARGE LOAD.....	23
I. The Early Termination Provisions Do Not Sufficiently Protect Ratepayers.....	24
II. Ratepayers are at Risk of Being Left With Stranded Assets	25
III. Ratepayers are Exposed to Credit and Customer-Diversity Risk.....	28
IV. Ratepayers are Exposed to Increased Fuel Price Volatility.....	30
V. Ratepayers are Exposed to Increased Health Impacts from Plant Emissions	34
VI. ELL Did Not Robustly Evaluate Renewable and Other Alternatives to the Proposed CCCTs	35

LIST OF EXHIBITS

DG-1:	Resume of Devi Glick
DG-2:	Public Company Responses to Data Requests
DG-3:	Highly Sensitive Protected Materials Company Responses to Data Requests
DG-4:	Attorney Eyes Only Company Responses to Data Requests

LIST OF WORKPAPERS

Glick Workpaper 1: AEO Peak load by customer category.xlsx

Glick Workpaper 2: Staff 1-1 Exhibit RDJ-2 Analysis Model_AEO_SC calcs.xlsx

LIST OF FIGURES

AEO Figure 1. ELL summer peak load by customer category	10
---	----

LIST OF ABBREVIATIONS

BESS	Battery Energy Storage System	MMC	Minimum Monthly charge
CIAC	Contribution in Aid of Construction	NERC	North American Electric Reliability Corporation
ELL	Entergy Louisiana, LLC.	NPVRR	Net Present Value Revenue Requirement
DLR	Dynamic Line Ratings	RFP	Request for Proposal
ESA	Electric Service Agreement	SLEPA	Southeast Louisiana Portfolio Area
FAC	Fuel Adjustment Clause		
MISO	Mid-continent Independent System Operator		

INTRODUCTION AND PURPOSE OF TESTIMONY

1 **Q Please state your name and occupation.**

2 **A**My name is Devi Glick. I am a Senior Principal at Synapse Energy Economics, Inc
3 ("Synapse"). My business address is 485 Massachusetts Avenue, Suite 3, Cambridge,
4 Massachusetts 02139.

5 **Q Please describe Synapse Energy Economics.**

6 **A**Synapse is a research and consulting firm specializing in energy and environmental
7 issues, including electric generation, transmission and distribution system reliability,
8 ratemaking and rate design, electric industry restructuring and market power, electricity
9 market prices, stranded costs, efficiency, renewable energy, environmental quality, and
10 nuclear power.

11 Synapse's clients include state consumer advocates, public utilities commission staff,
12 attorneys general, environmental organizations, federal government agencies, and
13 utilities.

14 **Q Please summarize your work experience and educational background.**

15 **A**At Synapse, I conduct economic analysis and write testimony and publications that focus
16 on a variety of issues related to electric utilities. These issues include power plant
17 economics, electric system dispatch, integrated resource planning, environmental
18 compliance technologies and strategies, and valuation of distributed energy resources. I
19 have submitted expert testimony and comments in over 70 different proceedings before
20 state utility regulators in more than 25 states.

21 In the course of my work, I develop in-house models and perform analysis using
22 industry-standard electricity power system models. I am proficient in the use of

spreadsheet analysis tools, as well as widely used optimization and electric dispatch models. I have directly run EnCompass and PLEXOS and have reviewed inputs and outputs for several other models.

Before joining Synapse, I worked at Rocky Mountain Institute (“RMI”), focusing on a wide range of energy and electricity issues. I have a master’s degree in public policy and a master’s degree in environmental science from the University of Michigan, as well as a bachelor’s degree in environmental studies from Middlebury College. I have 14 years of professional experience as a consultant, researcher, and analyst. A copy of my current resume is attached as Exhibit DG-1.

Q On whose behalf are you testifying in this case?

A I am testifying on behalf of Sierra Club.

Q Have you testified previously before the Louisiana Public Service Commission (“Commission”)?

A Yes, I testified in Docket U-37425, where Entergy Louisiana, LLC (“Entergy”, “ELL”, or “the Company”) sought approval to build three new combined-cycle combustion turbines (“CCCT”) to serve the Laidley data center, and Docket No. U-36932, Cleco Power LLC’s 2024 rate case. I also filed testimony in two dockets in Texas related to Entergy Texas Inc., PUC Docket No. 53719 and PUC Docket No. 52487.

Q What is the purpose of your testimony in this proceeding?

A In my testimony for this proceeding, I evaluate several topics: First, I evaluate whether ELL has established the need for the seven proposed CCCTs totaling 5,278 megawatts (“MW”) and the three separate battery energy storage system projects (“BESS”) totaling

1 [REDACTED]¹ Second, I evaluate whether the data center customer (“Evest” or “the
2 Customer”) is covering its full incremental cost of service through the proposed Large
3 Load, High Load Factor Power Service Rate Schedule (“Rate Schedule LLHLFPS-L”),
4 and the minimum monthly charge during the term of the Electric Service Agreement
5 (“ESA”) as well as its allocated share of fixed and variable costs and associated riders.
6 Third, I evaluate whether the data center is covering the full incremental cost of
7 transmission expansion projects being built to serve the data center, particularly the West
8 Fork Creek (“WFC”) to St. Laundry transmission line. Fourth, I review whether the
9 contract terms and other protections in place are sufficient to protect ELL’s other
10 ratepayers from early termination, stranded asset risk, default risk, and fuel price
11 volatility risks. Finally, I look at whether ELL adequately considered alternatives to the
12 Proposed Generators.

13 **Q How is your testimony structured?**

14 **A** In Section 20, I summarize my findings and recommendations for the Commission.
15 In Section 3, I summarize ELL’s application and proposal including the data center load,
16 the generation plan, the transmission plan, and the tariff and ESA. I outline the items for
17 which the Company seeks approval in this application as well as what it is not seeking
18 approval for.
19 In Section 4, I review the contract costs and contract structure and assess ELL’s claim
20 that the Customer is paying its fair share and more.

¹ Direct Testimony of Phillip R. May at 32.

1 In Section 5, I review the risks and protection to ELL's other ratepayers. In particular, I
2 look at whether ELL has properly protected ratepayers from stranded asset risk, credit
3 default and customer diversity, and fuel price volatility. I also look at the risks of locking
4 ratepayers into such a large quantity of gas resources without adequate alternatives
5 analysis.

6 **Q What documents do you rely upon for your analysis, findings, and observations?**

7 **A** My analysis relies primarily upon the workpapers, exhibits, and discovery responses of
8 ELL witnesses associated with this proceeding, as well as discovery from other
9 proceedings where applicable. To a limited extent, I also rely on certain external, publicly
10 available documents.

FINDINGS AND RECOMMENDATIONS

11 **Q Please summarize your findings.**

12 **A** My primary findings are:

- 13 1. The data center load is unprecedented in size; it will be the largest in Meta's
14 portfolio and likely the largest in the United States.
- 15 2. The Customer is not covering the full incremental cost of the new generation and
16 transmission assets needed to serve its load. It is instead paying for the
17 depreciation costs of the assets while under contract and leaving a large
18 undepreciated balance of [REDACTED] at the end of the contract period.
- 19 3. ELL has not justified why four of the planned generators will be depreciated over
20 a 20-year contract while the other three will be depreciated over a 32-year
21 lifetime.

- 1 4. ELL has not justified passing the cost of the West Fork Creek to St. Laundry
2 transmission line on to all ratepayers given that it would not be needed but for
3 Meta's load.
- 4 5. The contract termination provisions and other contract terms do not provide
5 sufficient protections for existing customers from stranded asset risks if the
6 Customer exits the contract early or does not renew the contract at the end of the
7 20-year contract.
- 8 6. The contract terms do not comply with Governor Landry's executive order that
9 the data centers should "fully fund" the generation, transmission, and other
10 infrastructure they require.
- 11 7. The credit guarantee does not sufficiently protect customers if Evest defaults on
12 its payments.
- 13 8. ELL did not justify selection of the seven CCCTs over alternatives, such as a
14 portfolio with less gas and incremental solar PV and battery energy storage, with
15 the kind of robust modeling or alternatives analysis that is standard and expected
16 in evaluating need and whether a project is in the public interest.
- 17 9. The data center load [REDACTED]
18 [REDACTED] ELL has also not robustly evaluated the potential for load flexibility
19 at the new data center, grid enhancing technologies ("GETs"), or other alternative
20 technologies to reduce system costs as it expands its system to meet new customer
21 demand.
- 22 10. Construction of the proposed CCCTs will increase ELL's other customers'
23 exposure to fuel price volatility.

11. Given the substantial cost of the proposed gas generators and transmission investments, and the risks to Entergy's existing customers who may be required to bear a significant portion of those costs, I do not find the Project to be in the public interest unless the application is modified to increase protections for the non-data center customers as outlined in the recommendations below.

Q Please summarize your recommendations.

A Based on my findings, I offer the following chief recommendations:

1. The Commission should find that the Project is not in existing customers' interests and deny all certifications and approvals Entergy has requested.
2. If the Commission approves the Project, it should require the following:
 - a. Amend the ESA to depreciate all CCCTs over the 20-year contract term and update the minimum monthly charge ("MMC") to reflect the updated incremental cost.
 - b. Amend the ESA to depreciate the cost of the West Fork Creek to St. Laundry transmission line over the 20-year contract term and update the MMC to reflect the updated incremental cost.
 - c. Amend the ESA terms regarding Customer termination or non-renewal of the contract to require ELL to seek approval to keep in rate-base any assets that the Company seeks to retain that result in a reserve margin above the required level.
 - d. Amend the ESA to require that the Customer cover its entire share of fuel costs through the FAC process, separately from what the rest of the Company's ratepayers cover.

- 1 e. Amend the Meta Guarantee to include the net-book value of the three
2 Pointe Coupee plants for their entire lifetime.
3 f. Require ELL to conduct robust alternatives analysis to determine whether
4 the proposed resource options represent the lowest-cost, lowest-risk suite
5 of resources.

OVERVIEW OF LOAD, GENERATION, AND TRANSMISSION PLAN

6 **Q What does the Company request in the Application?**

7 **A** ELL makes six major requests related to transmission and generation facilities in the
8 Application.

9 First, the Company requests that the Commission find that ELL's proposal to construct
10 seven new CCCTs (total capacity 5.3 GW) serves the public convenience and necessity
11 and is in the public interest, and therefore that it is prudent.² To the extent required by
12 law, ELL also requests that the Commission find its proposal to construct or acquire [REDACTED]
13 [REDACTED] of BESS is prudent.³

14 Second, ELL makes several requests related to the proposed CCCT and BESS resources.
15 It requests that both the CCCTs and the BESS be categorized as system resources, with
16 fuel costs recovered through the existing FAC mechanism.⁴ It also requests that the
17 Commission finds that it has satisfied the requirements for an exemption from the formal
18 Request for Proposal ("RFP") process.⁵ Additionally, it requests that the Commission

² Application at 27.

³ Direct Testimony of Laura K. Beauchamp at 4.

⁴ Application at 27–28.

⁵ *Id.* at 28.

1 approve a depreciable life of 20 years for the Richland Parish CCCTs and 32 years for the
2 Pointe Coupee CCCTs.⁶

3 Third, ELL requests that the Commission finds that it has satisfied the requirements for
4 entering an ESA with the Customer.⁷

5 Fourth, ELL makes several requests related to its proposed transmission projects. It
6 requests that the Commission finds that the Customer-Funded transmission projects are
7 exempt from the requirements of the Transmission Siting Order.⁸ It requests that the
8 Commission finds that all its other proposed transmission projects are in the public
9 interest and appropriately sited.⁹

10 Fifth, ELL requests approval for several provisions of its proposed Sustainability
11 Agreement, including an expedited procurement process for its proposed future
12 renewable additions and permission to assign Alternative Energy Credits from the
13 Waterford 3 uprate to the Customer.¹⁰

14 Sixth, Entergy requests approval of its proposed accounting treatment for the proposed
15 CCCTs, BESS, and transmission resources as laid out in the ESA and Contribution in Aid
16 of Construction (“CIAC”) agreements it has negotiated with the Customer.¹¹

⁶ *Id.* at 33.

⁷ *Id.* at 28.

⁸ *Id.* at 29.

⁹ *Id.* at 29–30.

¹⁰ *Id.* at 30–31.

¹¹ *Id.* at 31.

Q What is the Customer's projected load and current schedule to take service?

A The Customer's projected maximum demand is [REDACTED].¹² ELL expects that the Customer will operate with a [REDACTED] percent load factor, which translates to an annual energy consumption of [REDACTED].¹³ This is roughly equivalent to retail sales in the states of [REDACTED].¹⁴ The data center load is unprecedented in size; it will be the largest in Meta's portfolio and likely the largest in the United States.¹⁵ The Customer plans to begin taking power for construction activities in [REDACTED] and ramp up to full capacity by [REDACTED].¹⁶

Q How does the Customer load impact ELL's overall load?

A [REDACTED] shows ELL's coincident peak load by customer category. Evest and Laidley are the two hyperscale Meta data centers located in Louisiana; Evest is the prospective Customer in this docket, while Laidley is the data center that ELL sought approval to serve in docket U-37425. In [REDACTED], the first full year the Evest data center is at its full load, Evest will account for roughly [REDACTED] of ELL's total load.¹⁷ That same year, the Evest and Laidley data centers together will account for [REDACTED] of

¹² Direct Testimony of Laura K. Beauchamp at 38.

¹³ *Id.*

¹⁴ U.S. Energy Information Administration (EIA), "EIA-923 Power Plant Operations Report" (Sept. 18, 2025), *available at* <https://www.eia.gov/electricity/data/state/>.

¹⁵ Meta, "Global Data Center Fleet" (last visited July 23, 2026), *available at* <https://datacenters.atmeta.com/all-locations/#united-states>.

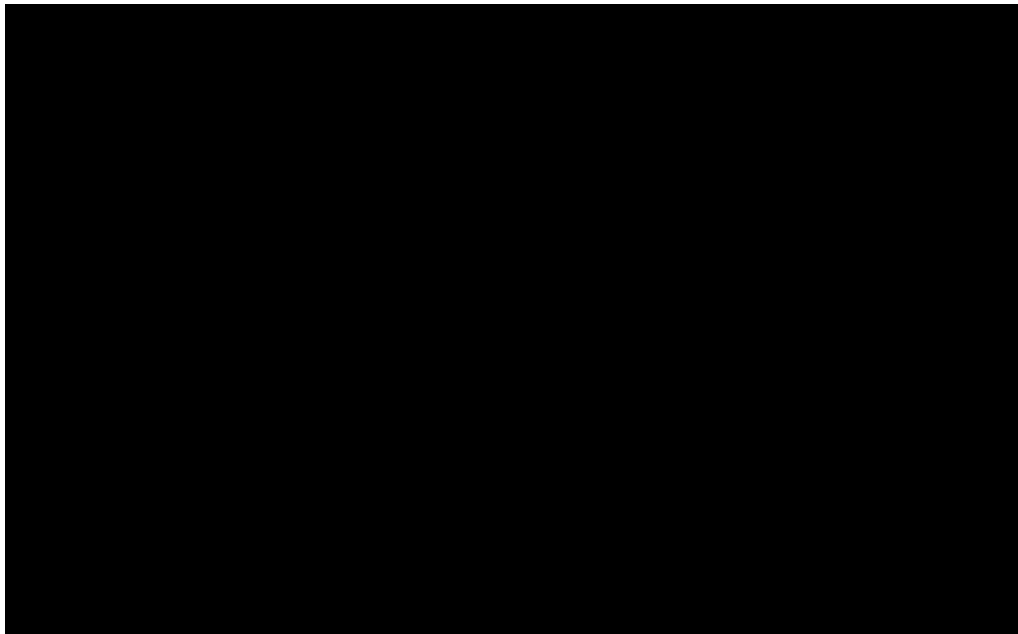
¹⁶ Direct Testimony of Laura K. Beauchamp at 43.

¹⁷ Glick Workpaper 1; Company's AEO Response to Sierra Club Data Request No. 1-1, "SIERRA 1-1 BP26 ELL PART AB_AEO.xlsx;" Company's AEO Response to Sierra Club Data Request No. 2-3, "SIERRA 2-3."

ELL’s total load.¹⁸ Overall, ELL projects that its peak load will [REDACTED] over the next six years ([REDACTED] 2026–2032).

On an energy basis, the [REDACTED] of annual consumption from the Customer represents a [REDACTED] increase in annual energy sold by ELL statewide relative to projected 2026 sales, which ELL projects will be 64 TWh.¹⁹ Similar to peak load, ELL expects its total energy consumption will increase by 92 percent from 2026–2032, reaching 123 TWh by 2032.²⁰

AEO Figure 1. ELL summer peak load by customer category



¹⁸ Glick Workpaper 1; Company’s AEO Response to Sierra Club Data Request No. 1-1, “SIERRA 1-1 BP26 ELL PART AB_AEO.xlsx;” Company’s AEO Response to Sierra Club Data Request No. 2-3, “SIERRA 2-3.”

¹⁹ Glick Workpaper 1; LPSC Docket No. U-37764, “ELL 2027 IRP Supplemental Data Filing,” at 10 (Apr. 24, 2026) *available at* https://www.energylouisiana.com/wp-content/uploads/2027-ELL-IRP-Data-Assumptions-Supplemental_2026_04_24_PUBLIC.pdf.

²⁰ Glick Workpaper 1; LPSC Docket No. U-37764, “ELL 2027 IRP Supplemental Data Filing,” at 10 (Apr. 24, 2026) *available at* https://www.energylouisiana.com/wp-content/uploads/2027-ELL-IRP-Data-Assumptions-Supplemental_2026_04_24_PUBLIC.pdf.

Source: Company's AEO Response to Sierra Club Data Request No. 1-1, "SIERRA 1-1 BP26 ELL PART
AB_AEO.xlsx;" Company's AEO Response to Sierra Club Data Request No. 2-3, "SIERRA 2-3."

Q How is ELL proposing to meet the Evest data center's load?

A ELL proposes building seven new 1x1 CCCT generators with a combined installed capacity of 5,278 MW.²¹ The Company plans to install four of the CCCTs near the Customer's site in Richland Parish, and the remaining three CCCTs near the Big Cajun site in Pointe Coupee Parish.²² In addition to the CCCTs, the Company also proposes to acquire of BESS capacity.²³ ELL is also seeking certification in separate proceedings for a capacity credit purchase agreement (Bayou Cove CCPA), and a nuclear uprating at the Waterford 3 Steam Electric Station. The combined capacity of these resources will meet the energy and capacity needs of the Customer, including estimated transmission losses and the Planning Reserve Margin Requirement ("PRMR") established by the Midcontinent Independent System Operator ("MISO") for ELL.²⁴ The Company estimates a total capital investment of approximately \$13 billion for the CCCTs, approximately billion for the BESS resources,²⁵ and for the Waterford 3 uprate.²⁶

²¹ Direct Testimony of Laura K. Beauchamp at 4.

²² *Id.* at 3–4.

²³ *Id.* at 4.

²⁴ *Id.* at 6.

²⁵ Direct Testimony of Phillip R. May at 33–34.

²⁶ Direct Testimony of Elizabeth C. Ingram at 10.

Q Is ELL also making transmission investments to serve the Evest Project?

A Yes. ELL proposes making several large transmission investments to serve the Project.

ELL estimated a total capital investment of approximately [REDACTED] for transmission

investments and upgrades.²⁷ The Company describes two categories of transmission

facilities: (1) facilities funded solely by the Customer and (2) System Improvement

facilities that will be added to ELL's rate base and paid for by all customers.

Customer-funded projects include the West Fork Creek substation, 20–30 miles of 230

kilovolt ("kV") transmission lines located adjacent to Project Evest or on the project site,

and nine new switching stations to connect the Customer's load to the ELL Transmission

System.²⁸ In addition, the Customer will fund the construction of a 500 kV transmission

line between the Smalling substation in Louisiana and the El Dorado substation in

Arkansas.²⁹ The Customer-funded projects are estimated to cost [REDACTED].³⁰

Non-Customer-funded projects include the St. Landry Switching Station and the

transmission line connecting West Fork Creek to the St. Landry Switching Station.³¹ The

St. Landry Switching Station will cost \$67 million and the West Fork Creek to St. Landry

transmission line will cost \$1.4 billion, for a total combined cost of \$1.5 billion.³²

²⁷ Direct Testimony of Daniel Kline at 31.

²⁸ *Id.* at 13.

²⁹ *Id.* at 14.

³⁰ *Id.* at 31 (This total does not include the portion of the Smalling to El Dorado transmission line located in Arkansas).

³¹ Direct Testimony of Laura K. Beachamp at 11.

³² Direct Testimony of Daniel Kline at 31.

Q What is the Company’s justification for the ELL-funded System Improvement transmission projects?

A The West Fork Creek to St. Landry 500 kW line is classified as system improvement, but as the Company admits, it is not technically needed for North American Electric Reliability Corporation (“NERC”) compliance.³³ ELL defends its designation by claiming it anticipates a new NERC standard, BAL-008-1, that could be implemented in the future and could make the line necessary to allow ELL to conduct periodic maintenance and maintain system reliability overall. The Company also claims this line will improve resilience during extreme weather events.³⁴ While these things may be true, ELL also clearly states it is the addition of the Evest Project, Project Laidley, and other high-load factor loads, that is driving the need for the new transmission project.³⁵ Given that the project would not be needed but for the new Customer, ELL has not justified why all ELL customers should pay for the line.

Q How will the Customer be charged for the generation and transmission projects outlined above?

A The Customer and Company negotiated an ESA that specifies how the Customer will be charged for electricity service.³⁶ The Customer will take service under the Company’s Rate Schedule LLHLFPS-L and will be subject to the Formula Rate Plan rate adjustment,

³³ *Id.* at 23.

³⁴ *Id.* at 21-24.

³⁵ Direct Testimony of Ryan D. Jones at 46.

³⁶ Direct Testimony of Laura K. Beauchamp at 8.

1 the fuel adjustment clause (“FAC”), and an allocated share of other riders including the
2 storm cost rider and the resilience plan costs.³⁷

3 The initial term of the ESA is for 20 years.³⁸ The ESA has automatic renewals for
4 subsequent 5-year periods, but either party can provide advance notice of intent to not
5 renew at least 36 months in advance of the end of the original term or any renewal term.³⁹

6 The contract also has termination provisions discussed in Section 50 below.

7 Separately, the Customer is contributing

8 [REDACTED] through its CIAC agreement.⁴⁰ [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED].⁴¹ As discussed above, the Customer is

12 also contributing approximately ⁴² through the CIAC for the cost of the

13 Customer-funded transmission projects.⁴³

**EVEST IS NOT COVERING THE FULL COST OF THE ASSETS NEEDED TO SERVE
ITS LOAD**

³⁷ Direct Testimony of Phillip R. May at 38–39.

³⁸ *Id.* at 35-36.

³⁹ *Id.* at 36.

⁴⁰ *Id.* at 34.

⁴¹ *Id.* at 47.

⁴² Direct Testimony of Thomas Kidd at 5.

⁴³ Direct Testimony of Phillip R. May at 34.

1 **Q** **Please summarize your understanding of what costs the data center Customer is**
2 **covering to serve its load.**

3 **A** As discussed above, the Customer is taking service under an ESA. ELL states that it has
4 set the minimum bill under the ESA such that the charges are sufficient to offset the
5 incremental revenue requirement of the investments and costs necessary to serve the
6 Customer during the initial 20-year term.⁴⁴ ELL claims that by paying the minimum bill
7 only, the Customer would cover its incremental cost and make a small contribution
8 towards system embedded costs during the term of the ESA. If the Customer's load
9 materializes as expected and therefore the Customer pays much more than its minimum
10 bill, according to ELL, revenue from the Customer will cover its incremental cost and
11 also contribute about \$2 billion towards system embedded costs.

12 The reality is that the MMCs fall just shy of the Customer's incremental cost. And
13 covering the full incremental revenue requirement is not the same as covering the full
14 revenue requirement of the incremental resources—which the Customer is *not* covering.
15 Also, as I will explain below, in the event of an early contract termination, or at the end
16 of the 20-year ESA term through non-renewal, non-data center customers will be left
17 with stranded assets and unpaid asset balances for the generators and transmission
18 projects.

⁴⁴ *Id.* at 39.

I. ELL's Analysis and Claims

Q What does ELL claim about the minimum bill and charges under the ESA?

A ELL asserts that the minimum bill charges under the ESA are sufficient to offset the incremental revenue requirement of the investments and costs necessary to serve the Customer during the 20-year ESA.⁴⁵ As mentioned above, the Customer is [REDACTED] and paying upfront for a transmission project.

The minimum bill represents a revenue stream that the Customer is committing to pay to ELL even if it never takes a kWh of energy. The Company's claim here is that the minimum bill more than covers the revenue requirement of the projected incremental fixed costs of serving the Customer's load.⁴⁶ By paying the minimum bill only, ELL is claiming that the Customer would cover its incremental cost and make a small contribution towards system embedded costs (\$860 million) during the term of the ESA.⁴⁷ But, as highlighted above, this is just during the term of the ESA.

Q What benefits does ELL claim it will see if the Customer operates as projected?

A Company Witness Jones modeled the Customer's projected consumption over the 20-year contract term and estimates approximately \$2 billion in contributions from the Customer to system costs that would otherwise be borne solely by ELL's other customers in rates.⁴⁸ This breaks down as \$1.27 billion towards ELL's embedded cost of service and

⁴⁵ *Id.*

⁴⁶ Direct Testimony of Ryan D. Jones at 60.

⁴⁷ *Id.* at 24.

⁴⁸ *Id.* at 5.

1 \$695 million towards storm and resilience costs—all of which ELL states would have
2 otherwise been covered by ELL’s existing customers.⁴⁹

3 Once again, this analysis assumes that the Customer takes power at projected levels, and
4 that the costs are recovered in accordance with the Formula Rate Plan. This analysis
5 estimates Customer revenue in excess of costs of \$1.27 billion. In addition, the Customer
6 is expected to contribute \$695 million towards Securitized Storm Rider Cost and
7 Resilience Rider cost. This sums to around \$2 billion in projected contributions from the
8 Customer in excess of incremental fixed costs.⁵⁰ This analysis does not consider other
9 benefits such as contributions to the Company’s Energy Efficiency and low-income
10 programs. In other words, if the Customer’s load materializes as expected, revenue from
11 the Customer will cover its incremental cost and also contribute about \$2 billion towards
12 system embedded costs.

13 **Q Explain more about the embedded cost and Riders that the Customer is covering.**

14 **A**The Resilience and Securitization riders are charges that all customers are subject to. ELL
15 is correct that if the fixed costs are spread over more customers, then the cost per
16 customer is lowered. This is what the \$695 million represents. But it is also true that as a
17 member of the grid, these are costs that the Customer should be contributing to and
18 paying.

19 The Company claims that this contribution reduces the billing factors applicable to other
20 customers from these riders to 35 percent.⁵¹ This is true specifically for other customers

⁴⁹ *Id.* at 60-61.

⁵⁰ *Id.* at 5.

⁵¹ *Id.* at 25.

1 on the transmission system, but for customers on the distribution system – who have to
2 pay both transmission and distribution charges - the reduction is estimated at 10 percent
3 or about \$2.14 per month.⁵² The net present value of these payments is \$451 million.⁵³

4 **II. Incremental Costs and Resources to Serve the Evest Data Center's Load**

5 **Q How will future ratepayers be exposed to risks given that the Company asserts that**
6 **during the term of the ESA, the MMC covers the full annual revenue requirement**
7 **of the incremental projects at issue in this case?**

8 **A** First, the MMC does not cover the full incremental revenue requirements since it falls
9 short by \$31 million. Second, the Customer is covering the incremental revenue
10 requirement just for the length of the contract. That is not the same as the Customer
11 paying for the entire cost of the generators and transmission projects. The incremental
12 revenue requirement refers to the monthly depreciation charges for the generators and
13 system transmission project. The Customer pays for those charges over the length of the
14 contract. But when the contract ends, so do the payments. If the assets' depreciation
15 schedules were matched to the contract length, this would not be a problem for existing
16 non-data center customers, but that is not the case here. The generators and ELL-funded
17 system transmission project will not be fully depreciated by the end of the original
18 contract period; and there will be a remaining balance on many of the assets.⁵⁴ Therefore
19 all ELL ratepayers could be responsible for paying for the remaining plant balance at the
20 end of the contract.

⁵² Exhibit RDJ-3.

⁵³ Staff 1-1 Exhibit SD-2 Workbook _AEO.

⁵⁴ *Id.* at 16.1

ELL claims that the Customer is covering more than its incremental cost—specifically \$1.27 billion towards embedded costs. But once again that is assuming the Customer uses the amount of energy projected. And the remaining undepreciated plant balance is expected to [REDACTED] for the CCCTs and [REDACTED] million for the WFC to St. Landry 500kV transmission line.⁵⁵ The presence of an undepreciated plant balance at the end of the ESA creates a stranded asset risk for the non-data center ratepayers.

Q Explain the incremental generation costs and how the Company will recover those.

A The new CCCT generators are estimated to have a capital cost of \$13 billion, the BESS resources are estimated to cost [REDACTED],⁵⁶ and the Waterford 3 uprates are estimated to cost [REDACTED].⁵⁷

When all other lifecycle costs including taxes, depreciation, return on investment, and operations and maintenance are added, the revenue requirement over the initial term of the ESA is [REDACTED] for the generation assets, [REDACTED] for the BESS and [REDACTED] for the Waterford 3 uprate. At the end of the contract period in August 2048, ELL projects that [REDACTED] will remain in net plant value for the generators, which represents [REDACTED] of the net book value of the generators. The BESS project [REDACTED]

[REDACTED]

[REDACTED].⁵⁸

⁵⁵ Glick Workpaper 2 (Calculated based on Exhibit RDJ-2 Rate Analysis Model_AEO); Direct Testimony of Daniel Kline at 33.

⁵⁶ Direct Testimony of Phillip R. May at 33–34.

⁵⁷ Direct Testimony of Elizabeth C. Ingram at 10.

⁵⁸ Glick Workpaper 2 (Calculated based on Exhibit RDJ-2 Rate Analysis Model_AEO).

Q Explain the incremental transmission costs and how the Company will recover those.

A The Company estimates capital spending of [REDACTED] for the transmission investments and upgrades.⁵⁹ Those include Customer-funded transmission investments, and non-Customer funded transmission investments. Critically, all transmission cost estimates are considered Class 5 which means there is a wide margin of error in the cost estimate.⁶⁰

The Customer-funded transmission facilities will be exclusively paid for by Evest, at a cost of [REDACTED]⁶¹ through the CIAC agreement.⁶² The Customer is contributing [REDACTED] net present value (“NPV”) in the form of transmission CIAC, [REDACTED]
[REDACTED].⁶³

The St. Landry Switching Station and the transmission line connecting West Fork Creek to the St. Landry Switching Station⁶⁴ are all categorized as “System Improvements,” meaning that they provide, according to ELL, benefits to ELL’s system as a whole and will be spread across ELL’s rate base.⁶⁵ The ELL-funded transmission projects are

⁵⁹ Direct Testimony of Daniel Kline at 31.

⁶⁰ Direct Testimony of Daniel Kline at 32; Company’s Response to Staff Data Request No. 1-128, “STAFF 1-128.”

⁶¹ Direct Testimony of Daniel Kline at 31 (This total does not include the portion of the Smalling to El Dorado transmission line that is located in Arkansas).

⁶² Direct Testimony of Laura K. Beauchamp at 11.

⁶³ Direct Testimony of Thomas Kidd at 5.

⁶⁴ Direct Testimony of Laura K. Beauchamp at 11.

⁶⁵ *Id.*; Direct Testimony of Daniel Kline at 32.

1 projected to have a [REDACTED]⁶⁶ capital cost. The NPVRR of the ELL-funded
2 transmission projects over the term of the ESA will be [REDACTED].⁶⁷
3 ELL claims that revenue from the Customer under the ESA is sufficient to cover the cost
4 of these projects during the term of the ESA. If the ESA is terminated early, ELL expects
5 a termination fee to mitigate some of the project cost. Assuming the contract is not
6 terminated early, ELL expects that [REDACTED] million will be remaining in rate base at the end
7 of the ESA term.⁶⁸ ELL claims that ELL customers will be left with only 16 percent of
8 the project cost on an NPV basis,⁶⁹ but the nominal net plant value in 2048 represents
9 about [REDACTED] of the book value.⁷⁰

10 **Q What is the total revenue requirement that the Customer is expected to cover?**

11 **A** Witness Jones calculates that the sum of the annual revenue requirement over the original
12 term is [REDACTED].⁷¹ The Customer is expected to pay [REDACTED] in MMC over
13 the original contract term.⁷² This is the minimum revenue expected from the Customer.
14 Using projections of Customer consumption, Jones estimates that the Customer will pay
15 [REDACTED] in base revenue over the initial term of the ESA plus \$695 million in
16 Securitization and Resilience Riders.⁷³ As discussed above, Jones calculates the total

⁶⁶ Direct Testimony of Samrat Datta at 15; Direct Testimony of Daniel Kline at 31.

⁶⁷ Exhibit RDJ-2 Rate Analysis Model_AEO.

⁶⁸ Direct Testimony of Daniel Kline at 33.

⁶⁹ *Id.* at 33-34.

⁷⁰ Glick Workpaper 2; Exhibit RDJ-2 Rate Analysis Model_AEO.

⁷¹ Direct Testimony of Ryan D. Jones at 17.

⁷² *Id.* at 19.

⁷³ *Id.* at 23-24.

1 contribution to the embedded cost of service at \$1.27 billion.⁷⁴ This is based on the
2 difference between the incremental revenue requirement and the test year revenue.

3 As discussed below, the \$1.27 billion contribution to embedded costs represents [REDACTED]
4 [REDACTED] in undepreciated plant balances for both the generation and
5 transmission assets that is expected remain at the end of the original 20-year contract
6 period. Further, the timing of the Customer's payments does not match with when the
7 costs will be incurred. So while current ratepayers may see a contribution to embedded
8 costs, future ratepayers beyond 2048 will not benefit and instead will be stuck paying the
9 undepreciated balance without the benefit of the Customer contributing to existing
10 embedded costs.

11 Additionally, the estimated \$1.27 billion contribution to embedded costs is assuming that
12 the Customer takes power at projected levels. Under just the MMC assumption, the entire
13 [REDACTED] will be left to the remaining ratepayers.

14 **Q Are there other costs that Evest has not agreed to pay?**

15 **A** Yes. To serve the new CCCT plants, ELL will incur additional fixed costs associated
16 with gas pipelines to serve each site. These costs are not explicitly allocated from ELL to
17 the Customer. Instead, ELL indicated that fixed fuel demand charges are embedded
18 through the power plant's offer price into the energy market and recovered through
19 energy margins in the wholesale market and through the FAC dockets.⁷⁵

⁷⁴ *Id.* at 60-61.

⁷⁵ Company's AEO Response to Staff 1-17, "STAFF 1-17;" Company's Response to Sierra Club 1-8, "SIERRA 1-8."

Q Please summarize the costs that the Customer is not contractually bound to pay.

A The Customer is not contractually bound to pay for the revenue requirement of the proposed CCCTs or the ELL-funded transmission line beyond the term of the contract. This amounts to [REDACTED] in undepreciated plant balances. Additionally, the Customer is not required to pay for any fixed pipeline costs or gas commodity costs above what any other customer would pay.

**ELL IS EXPOSING RATEPAYERS TO HIGH FUTURE COST AND RISK BY
BUILDING FOR LARGE LOAD**

Q Do you have any concerns with the protections and risk exposure posed to ratepayers?

A Yes. I am concerned specifically about (1) stranded asset risks for existing customers in the event that the Customer terminates the contract early or does not extend the contract beyond its initial term; (2) risk to customers from concentration of ELL's business in a single customer and insufficient credit guarantees; (3) risk of exposure to increased fuel price volatility; and (4) health impacts from the emissions from the CCCTs ; (5) risk of locking ELL customers into gas resources without adequate consideration of alternatives

Q What provisions does the ESA have to protect existing ratepayers?

A There are a number of provisions in the ESA intended to protect existing ratepayers. These include the 20-year contract term, the minimum-monthly charges (discussed above), collateral requirements, and contract termination fee and terms.

I. The Early Termination Provisions Do Not Sufficiently Protect Ratepayers

Q What happens if the Customer decides to terminate the ESA prior to the end of the 20-year term?

A If the Customer were to terminate the ESA prior to the end of the 20-year term, this would trigger an identification and liquidation process in which the Company would select which of the generators it wishes to retain and would seek to liquidate the others.

The Customer would also pay a series of fees:

and final

termination payments.⁷⁶ There are three categories of generators for the purposes of an early termination process:

1. Liquidated generators: The Customer will pay ELL for the net book value of all assets that ELL does not opt to retain, less whatever ELL earns in selling the assets.⁷⁷
2. Future generators: For generators that the Company opts to keep but does not immediately need, the Customer will pay ELL for the amount by which the net book value exceeds the future generators' value.⁷⁸
3. Stranded generators: The Customer will pay ELL for the net book value of all unsold assets that ELL does not opt to retain, as well as decommissioning costs.⁷⁹

⁷⁶ Direct Testimony of Laura K. Beauchamp at 30

⁷⁷ *Id.* at 32.

⁷⁸ *Id.*

⁷⁹ *Id.*

Q Do you have any concerns with the termination provisions?

A Yes, I am concerned about the process that ELL will use to determine which Liquidated Generators to retain. It's unclear whether the Company will be required to support its determination with robust analysis or any Commission approval. I am also concerned that future generators could be retained even if they are not immediately needed. It's unclear how the costs will be passed on to ratepayers in the event that ELL opts to retain a generator in advance of when it needs it to serve load. The Commission should require the Company to seek approval and support its request with robust analysis if it wants to retain any generators that would put its capacity position above the required reserve margin.

II. Ratepayers are at Risk of Being Left With Stranded Assets

Q Explain your concerns with stranded asset risk for the generators.

A In the event the Customer does not renew at the end of the 20-year contract, I am concerned that the remaining cost of plants will be the responsibility of ratepayers whether the plants are needed to serve load or not.

Company Witness May states that the MMC is set such that during the course of the ESA, the full cost of the BESS will be paid for and the generators will be [REDACTED] depreciated (i.e., [REDACTED] of gas plant balance will remain in rate base at end of contract period⁸⁰). But as discussed above, that still leaves a large undepreciated balance. Specifically, Richland Units 1-4 have a 20-year depreciation schedule and therefore will be 90 percent depreciated over the 20-year term of the ESA. Point Coupee Units 1-3, on

⁸⁰ Direct Testimony of Phillip R. May at 34

1 the other hand, have a 32-year depreciation schedule, consistent with other CCCTs
2 approved by the Commission.⁸¹ The Company's justification for the different depreciable
3 lives is not robust or well supported.⁸² Specifically, ELL indicated that the Point Coupee
4 units have a longer depreciable life than the Richland units because they are located
5 within ELL's Southeast Louisiana Portfolio Area ("SLEPA") region, whereas the
6 Richland Parish units are more isolated from significant, non-Customer load at the
7 current time.⁸³

8 As discussed above, the four plants in Richland Parish will be over [REDACTED]
9 depreciated at end of the contract, but that still leaves over [REDACTED] in an
10 undepreciated plant balance. The three plants at Pointe Coupee will have an even larger
11 plant balance remaining—specifically [REDACTED] or [REDACTED] of the plant balance.
12 Combined the generators will have over [REDACTED] of their net plant balance remaining
13 for an undepreciated balance of [REDACTED].⁸⁴ This could all be the responsibility of the
14 non-data center customers.

15 **Q Do you have any concerns with the Company's proposed transmission project?**

16 **A** The West Fork Creek to St. Landry 500 kW line is classified as system improvement, and
17 ELL is proposing that all customers be responsible for its cost. The Company claims that
18 the line will bring system-wide benefits and be indirectly funded by Customer revenue
19 during the term of the ESA.⁸⁵ I am concerned that ELL has not supported building the

⁸¹ Direct Testimony of Ryan D. Jones at 16.

⁸² Company's Response to Sierra Club Request 2-4, "SIERRA 2-4."

⁸³ *Id.*

⁸⁴ Glick Workpaper 2; Exhibit RDJ-2 Rate Analysis Model_AEO.

⁸⁵ Application at 17.

1 transmission line and passing the costs on to non-data center customers. Witness May
2 says that the customer transmission revenue requirement will be fully offset during the
3 term of the ESA.⁸⁶ For the non-Customer funded transmission asset, 54 percent of the
4 asset useful life will remain by the end of contract period (2048).⁸⁷ I find that beyond the
5 term of the ESA, if the contract is not renewed, over [REDACTED] of the plant balance equal
6 to [REDACTED]⁸⁸ will remain at the end of the contact period for other ratepayers to pay.

7 **Q What is the total undepreciated balance you expect to remain at the end of the**
8 **contract period?**

9 **A** Combining the [REDACTED] balance from the generators and [REDACTED] balance from
10 the transmission, the balance will be [REDACTED] in 2048 when the contract expires.⁸⁹

11 **Q Are there any state-wide policies that are relevant to these concerns?**

12 **A** Yes. Governor Landry put out an executive order saying data centers have to fully fund
13 the resources that they are causing on the electric grid.⁹⁰ The Customer is not fully
14 funding the resources it is causing—it's just funding the bulk of them during the term of
15 the contract. To comply with the executive order and fully fund the resources, the assets'
16 depreciation schedules have to be aligned with the contract term.

⁸⁶ Direct Testimony of Phillip R. May at 34.

⁸⁷ Direct Testimony of Daniel Kline at 34.

⁸⁸ Glick Workpaper 2; Direct Testimony of Daniel Kline at 33.

⁸⁹ Glick Workpaper 2.

⁹⁰ State of Louisiana, Exec. Order No. JML 26-058 (June 25, 2026), *available at* <https://gov.louisiana.gov/assets/2026-Executive-Orders/JML-26-058.pdf>.

Q What are your concerns with the generation and transmission assets having an undepreciated balance at the end of the ESA?

A When a resource has an undepreciated balance, it means that ratepayers are still paying for the plant—regardless of whether they need the asset to meet load. It’s speculative at present whether ELL’s ratepayers will need any of the proposed generation resources to meet load when the contract expires in 2048. And if ELL does not need the asset, but they are still in rate base, then they will become stranded assets—that is assets that are not paid off but also not providing value to ratepayers.

Additionally, there are ongoing capital expenditures that have been added to the plant balance and rate base as the plant ages. These expenditures have also been amortized and any remaining balance will also be the responsibility of non-Customer ratepayers.

III. Ratepayers are Exposed to Credit and Customer-Diversity Risk

Q Are you concerned about the concentration of ELL’s business in one customer?

A Yes. As Company ELL Witness Kidd acknowledges, there is a risk to other ratepayers of the utility concentrating business in a single customer (Meta).⁹¹ This is because ELL’s financial performance will become tied strongly with the Customer’s performance. When the Evest data center reaches its full load, it will account for roughly [REDACTED] of ELL’s total load.⁹² That same year, the Evest and Laidley data centers

⁹¹ Direct Testimony of Thomas Kidd at 24-25.

⁹² Glick Workpaper 1; Company’s AEO Response to Sierra Club Data Request No. 1-1, “SIERRA 1-1 BP26 ELL PART AB_AEO.xlsx;” Company’s AEO Response to Sierra Club Data Request No. 2-3, “SIERRA 2-3.”

1 together will account for [REDACTED] of ELL's total load.⁹³ As discussed above, this could
2 impact the Company's credit rating, result in a stranded asset risk discussed above, or
3 shift costs to other customers. All of these factors put other ratepayers at risk.

4 **Q Why is the Company's credit rating important?**

5 **A** The Company's credit rating impacts its cost of borrowing. If the current project makes
6 the Company look riskier to investors, that will make future investors less likely to lend
7 money to ELL at favorable borrowing rates. If ELL only has access to higher cost capital,
8 that means that future projects needed to supply existing or other new non-data center
9 customers will be more costly. And this means higher rates for existing ratepayers as new
10 generation and other resources are added to the grid.

11 **Q Is the Company taking measures to protect ratepayers from the risk of the**
12 **Customer defaulting and exiting the agreement?**

13 **A** Yes, but they could be stronger. As discussed above, there is the MMC, the CIAC,
14 transmission termination fees, as well as financial assurances that include a Meta
15 Guaranty. But I am concerned that in the ESA, ELL is removing the net book value of
16 Pointe Coupee units from the credit guarantee calculation on each of the fifth, seventh,
17 and ninth anniversaries of the Service Commencement Date.⁹⁴ The Company justified
18 this by stating that the Company expects existing resources to be deactivated in that area
19 and new resources to be needed around those dates anyways. Therefore, the value of
20 these plants is removed from the ESA Guaranty as a result of the expected market value

⁹³ Glick Workpaper 1; Company's AEO Response to Sierra Club Data Request No. 1-1, "SIERRA 1-1 BP26 ELL PART AB_AEO.xlsx;" Company's AEO Response to Sierra Club Data Request No. 2-3, "SIERRA 2-3."

⁹⁴ Direct Testimony of Thomas Kidd at 28.

1 of the Proposed Generators and/or the expected long-term resource planning needs of and
2 benefits for customers.

3 But this presumes that the proposed CCCTs would be the lowest cost resource to serve
4 ratepayers needs at that future time and that the proposed CCCTs are of an appropriate
5 size compared to the supposedly retiring resources. In the event that the Customer
6 defaults, ratepayers would essentially be stuck with the CCCTs regardless of whether
7 other resources can more economically serve their load.⁹⁵ This does not align with best
8 practices in resource planning.

9 **IV. Ratepayers are Exposed to Increased Fuel Price Volatility**

10 **Q How will the construction of the proposed seven new CCCTs change ELL's overall**
11 **reliance on gas?**

12 **A** Currently, ELL gets about [REDACTED] of its summer firm capacity and [REDACTED] of its
13 annual generation from gas.⁹⁶ By 2032, the first full year the Customer is ramped up,
14 Entergy projects that the share of its summer firm capacity from gas will be roughly the
15 same ([REDACTED]), but the share of generation from gas will increase to approximately [REDACTED]
16 [REDACTED]
17 [REDACTED]. By 2045, ELL projects

⁹⁵ Company's Response to Staff 1-89, "STAFF 1-89."

⁹⁶ Company's HSPM Response to Staff 1-1, "Staff 1-1 BP26 and Evest L&Cs_HSPM.xlsx."

1 that around [REDACTED] of its generation will come from gas—up from [REDACTED] in its
2 base scenario without the Evest project.⁹⁷

3 **Q Is there risk in the Company relying so heavily on gas generation resources?**

4 **A**Yes. Heavy reliance on gas resources to serve the data center also increases risk for
5 Entergy’s existing ratepayers. As Entergy’s share of generation from gas increases over
6 time, customer exposure to fuel price volatility will increase. Entergy proposes to classify
7 the proposed CCTs in this docket as system resources, with fuel costs recovered from
8 all ratepayers through the existing FAC mechanism.⁹⁸ This means that when gas prices
9 spike or increase, the added fuel costs will be spread across all ratepayers, not just the
10 Meta data center.

11 **Q Explain the risks posed to ELL ratepayers by fuel price volatility.**

12 **A**High reliance on gas resources can expose ratepayers to fuel price volatility for which
13 ratepayers cannot plan. Gas is a global commodity which means that both domestic and
14 global market forces impact the price and demand for the resource. After roughly doubling
15 from 2019 to 2024, North American liquified natural gas (“LNG”) export capacity is
16 projected to more than double again by 2029, from current levels of 11.4 billion cubic feet
17 (“Bcf”) per day to more than 28 Bcf per day in 2029.⁹⁹ To put this in perspective, U.S. total

⁹⁷ Company’s HSPM Supplemental Response to Sierra 2-1, “Staff_2-11_Supplement_ELL_Generation_BP26_and_Evest_HSPM.xlsx;” Company’s HSPM Supplemental Response 2 to Sierra 2-1, “Sierra 2-11 Add 2 Supplement_ELL_Generation_BP26_and_Base_HSPM.”

⁹⁸ Application at 27–28.

⁹⁹ Young, J., “North America’s LNG export capacity could more than double by 2029.” U.S. EIA (Oct. 16, 2025), *available at* <https://www.eia.gov/todayinenergy/detail.php?id=66384>.

gas consumption in 2023 averaged roughly 89 Bcf per day.¹⁰⁰ This leaves domestic markets exposed to global market dynamics.

Q How are volatile fuel costs passed through to ratepayers?

A Fuel costs are a direct pass-through, meaning that they are directly passed on to customers. Entergy has little incentive to minimize these costs, because it can recover whatever amount it spends from ratepayers. When the market is constrained and prices spike, ratepayers may face unexpected bill increases as a result of increased fuel charges. This happened in 2022 when Russia invaded Ukraine and European gas customers turned increasingly to U.S. gas. This drove up domestic gas prices, and those high costs were passed on directly to ratepayers. ELL experienced elevated gas prices throughout 2022, particularly during the summer. ELL noted that its fuel factor in August 2022 was one of the highest since 2008, and that the gas prices it experienced that month were 200 percent higher than in August 2021 and 400 hundred percent higher than August 2020.¹⁰¹ In an effort to prevent rate shock among its customers, Entergy deferred nearly \$225 million in fuel and purchased power costs over the course of 2022.¹⁰² Another recent example of gas price volatility was the dramatic spike in gas prices caused by Winter Storm Fern in January 2026. In its FAC filing the following month, ELL reported that gas prices increased by a factor of 10 during the storm (from less than \$3

¹⁰⁰ U.S. EIA, “Natural Gas Consumption by End Use” (June 30, 2026), *available at* https://www.eia.gov/dnav/ng/ng_cons_sum_dcu_nus_a.htm.

¹⁰¹ Entergy, Fuel Adjustment Clause Filing (Sept. 29, 2022), *available at* <https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=CSDUeW0xRi0%3d>

¹⁰² Entergy, Fuel Adjustment Clause Filing (Oct. 28, 2022), *available at* <https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=7fmuSQ9sI4g%3d>.

1 per Million British Thermal Units (“MMBtu”) to over \$30 per MMBtu), causing ELL to
2 incur \$189 million of incremental fuel costs. This would have resulted in a bill increase
3 of \$39 for the average residential customer in March 2026. To reduce rate shock, ELL
4 requested permission to recover these costs over a longer four-month period.¹⁰³ Absent
5 action from the Commission, ELL and its shareholders are not impacted by these gas
6 price spikes since these costs are entirely passed on to ratepayers.
7 ELL can manage its fuel cost risk as part of its integrated resource plan modeling, and in
8 planning its future resource mix. Reducing its reliance on fossil resources is the best way
9 to protect its ratepayers from these future price volatility risks.

10 **Q How can the Commission protect ratepayers from the risk of over-reliance on gas**
11 **generation?**

12 **A** The best way for ELL to reduce fuel price volatility and risk to ratepayers is through
13 proactive planning that takes into account the value of resource diversity. By reducing the
14 share of its generation from gas resources and relying more on zero marginal cost
15 renewables like solar and wind, ELL will reduce its exposure to gas market and price
16 volatility.

17 For gas resources that ELL does add to its system, fuel cost sharing represents one
18 possible mechanism the Commission could use to protect ELL’s ratepayers from fuel
19 price volatility risk. Fuel cost sharing is a practice whereby the Company shares the risk
20 of fuel price volatility and uncertainty with ratepayers. In the event of an under-recovery,

¹⁰³ Entergy, Fuel Adjustment Clause Filing (Feb. 26, 2026), available at
<https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=ZnfFU%2fpw%2f0I%3d>.

1 the under recovered balance is shared between the ratepayers and the Company (for
2 example, 90/10).

3 ELL should also investigate whether large-load customer additions, such as the Meta data
4 center in this docket, are causing the share of ELL's annual energy from gas to increase
5 more than it would have in the absence of large-load additions. If this is the case, the
6 Commission may need to explore novel techniques for re-allocating fuel price volatility
7 risk back to the data center customers, for example, through the ESA terms so that this
8 burden does not fall on existing ratepayers.

9 One way to do this would be to amend the FAC process to separate the fuel costs used to
10 serve the new gas plants—both the fixed costs and commodity costs—from the fuel costs
11 incurred to serve the rest of the system. The Commission could then require ELL to
12 amend the ESA to require the Customer to cover these separate fuel costs. This will
13 protect the rest of the system from the increase in gas price exposure that it is imposing
14 on the system.

15 **V. Ratepayers are Exposed to Increased Health Impacts from Plant Emissions**

16 **Q Did ELL evaluate the health and emissions impacts of the proposed CCCTs on its**
17 **ratepayers and people in the vicinity of the proposed plants?**

18 **A** No, I see no discussion of the emission impacts of the proposed project beyond the
19 discussion of necessary air permits in the testimony of Company Witness Halland.¹⁰⁴

¹⁰⁴ Direct Testimony of Jeremy Halland at 5.

Q What are the main emissions impacts you expect to see from the addition of seven new CCCTs to the region?

A I would expect to see an increase in carbon dioxide (“CO₂”) emissions as well as other air pollutants including nitrogen oxide (“NO_x”), as well as particulate matter (“PM”). I use the Lake Charles Power Station, a 1,000 MW Combined Cycle Plant that was built in 2020 as a proxy. I assume that the seven new CCCTs have similar capacity factors (67 percent in 2023) and emissions rates to the Lake Charles Plant. Based on these assumptions, I find that the new plants are expected to add 771 tons of NO_x and 12.2 million tons of CO₂¹⁰⁵ to the air each year. CO₂ emissions are significant for their global impact, but NO_x emissions are concerning because of their more localized impact on regional air quality. Specifically, NO_x reacts with other chemicals in the air to form PM and ozone—both of which can cause harmful respiratory impacts when inhaled.¹⁰⁶

VI. ELL Did Not Robustly Evaluate Renewable and Other Alternatives to the Proposed CCCTs

Q Did ELL evaluate alternatives to its proposed resource additions?

A No, not robustly. Company Witness Beauchamp discusses the alternatives that the Company evaluated, specifically: (1) constructing all new CCCTs with minimal transmission facilities and no renewables; (2) building a 2x1 CCCT in lieu of two of the 1x1 CCCTs; and (3) serving the Customer through transmission alone.¹⁰⁷ Witness

¹⁰⁵ EPA, “eGrid with 2023 Data,” *eGrid* (June 12, 2025), *available at* <https://www.epa.gov/egrid/detailed-data>.

¹⁰⁶ EPA, “Basic Information about NO₂,” Nitrogen Dioxide (NO₂) Pollution (June 24, 2026), *available at* <https://www.epa.gov/no2-pollution/basic-information-about-no2>.

¹⁰⁷ Direct Testimony of Laura K. Beauchamp at 77-78.

Beauchamp stated that the Company determined all were infeasible or inferior.¹⁰⁸

Witness Beauchamp also notes that the Company considered renewable resources but dismissed them because they “are not a viable alternative to the Proposed Generators because of the Customer’s around-the-clock load profile.”¹⁰⁹

What is missing from the Company’s analysis is any manner of optimized capacity expansion modeling, or at the very least evaluation of a hybrid portfolio solution with a combination of renewables, BESS and gas resources (both combustion turbines and CCCTs). The Company has not conducted any capacity expansion modeling since its 2023 IRP, which pre-dates the addition of both the Laidley and Evest data centers to Entergy’s system.¹¹⁰ It is unclear why ELL tested such a limited set of resource options given the extraordinary magnitude of the proposed additional load in this docket, and the relative ease (for a large, experienced utility) with which such modeling could be completed. Without robust modeling, ELL has not demonstrated that the seven proposed CCCTs are the lowest-cost manner of serving demand.

Q How much new renewable and storage capacity does ELL have planned, according to its most recent business plan?

A According to ELL’s 2026 business plan, the Company plans to build over [REDACTED] [REDACTED].¹¹¹ Separately, in Docket U-36697, ELL received Commission approval to build 3 GW of solar PV with no further approval

¹⁰⁸ *Id.* at 78-79.

¹⁰⁹ *Id.* at 79.

¹¹⁰ Company’s Response to Sierra 1-3, “SIERRA 1-3.”

¹¹¹ Company’s AEO Response to Staff 1-23, “Staff 1-23 BP26_ELL_AURORA_Zonal_Input_Documentation_AEO.pdf” at 20.

1 required for each individual project, provided that the project costs are below a certain
2 threshold. The Company indicated that its 3 GW RFP resulted in the Commission
3 certifying and approving 400 MW of solar PV (included in the [REDACTED] total from the
4 business plan)—specifically the Bogalusa West Solar Facility and the Cypress Harvest
5 Solar Facility.¹¹²

6 **Q Is ELL building any renewables to meet the data center demand?**

7 **A** ELL is not directly seeking approval for any renewables to serve the Customer in this
8 docket. It does have a Sustainability Agreement established with the Customer. Among
9 other provisions, the Sustainability Agreement states that ELL will develop—and the
10 Customer will fund—2.5 GW of incremental solar, onshore wind, hybrid resources,
11 and/or other types of renewable resources.¹¹³ These resources will be incremental to the
12 1.5 GW of renewables associated with the Laidley data center.

13 **Q Is the Customer procuring incremental renewables to meet any of its own**
14 **sustainability goals?**

15 **A** The Customer appears to be interested in procuring incremental renewables to offset the
16 emissions associated with the CCCTs. This aligns with its corporate goal of matching its
17 electricity use with 100 percent clean energy.¹¹⁴ However, the Sustainability Agreement
18 does not oblige ELL or the Customer to procure renewables or include any penalties if it

¹¹² LPSC Docket No. U-36697, Order No. U-36697-A (Nov. 14, 2025), *available at*
<https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=TM%2b8a41im98%3d>;
LPSC Docket No. U-36697, Order No. U-36697-B, (May 1, 2026), *available at*
<https://lpscpubvalence.lpsc.louisiana.gov/portal/PSC/ViewFile?fileId=LOAjkNw7D9s%3d>.

¹¹³ Direct Testimony of Elizabeth C. Ingram at 6–7.

¹¹⁴ Meta, “Energy,” Sustainability (last visited July 23, 2026), *available at*
<https://sustainability.atmeta.com/energy/>.

1 fails to do so. All it does is expedite approval for 2.5 GW of renewable resources and
2 outline how the resources will be paid for. And even if ELL does procure sufficient
3 renewables to meet 100 percent of the Customer's load, that does not take the seven
4 CCCTs off ELL's system; it just moves the associated emissions to ELL's other
5 customers.

6 **Q What other options should ELL be considering?**

7 **A** To address load growth of this scale at the lowest cost, ELL should draw on the full range
8 of solutions available, rather than focusing exclusively on traditional large-scale supply-
9 side resources such as the proposed CCCTs. Technologies including distributed energy
10 resources ("DER"), advanced transmission technologies ("ATTs") such as grid-
11 enhancing technologies ("GETs"), and load flexibility can all reduce the cost of serving
12 new large-load customers. While these technologies will not eliminate the need to build
13 new generation resources, they will help reduce the quantity of new resources needed by
14 ensuring that existing grid resources are fully utilized. Entergy should maximize the
15 potential of these technologies before turning to new supply-side resources.

16 **Q What are Grid Enhancing Technologies?**

17 **A** GETs is a broad term that covers a range of hardware and software grid technologies that
18 can improve operational flexibility and improve grid performance. Software solutions can
19 enhance control, protection, metering, and response while hardware solutions can improve
20 physical assets and infrastructure that transmits electricity. Some examples include:

- 21 • Dynamic Line Ratings ("DLR") and Dynamic Transformer Ratings which utilize
22 sensors to calculate line and transformer ratings based on real-time weather
23 conditions rather than using the conservative static rating.

- 1 • Flexible AC Transmission Systems (“FACTS”) are devices that control voltage
2 levels that help dynamically support system voltage across operating conditions,
3 reduce losses, and help with system voltage recovery following a loss event.
- 4 • Fixed Series Capacitor Banks (“FSCs”) are devices that compensate for the
5 impedance of overhead lines and reduce voltage drops at points of connection.
- 6 • Advanced Power Flow Controllers (“APFC”) are modular devices that can be
7 quickly deployed to allow grid operators to divert electricity flows to avoid
8 congested areas.
- 9 • Topology Optimization (“TO”) is a software technology that allows grid operators
10 to re-route power flows around congested areas.

11 A number of studies have evaluated and quantified potential benefits from various
12 GETs.¹¹⁵

- 13 • A 2026 report from the Columbia SIPA Center on Global Energy Policy found
14 that GETs and other techniques to optimize the existing power system (including
15 demand response and large-load flexibility) could “unlock supply in the form of
16 underutilized capacity,” reducing costs for infrastructure buildout to serve load
17 growth.¹¹⁶

¹¹⁵ Miller, Y., Quinlan, M., “To Ease Energy Transmission Gridlock, States Look to Grid-Enhancing Technologies,” Pew (May 8, 2024), *available at* <https://www.pewtrusts.org/en/research-and-analysis/articles/2024/05/08/to-ease-energy-transmission-gridlock-states-look-to-grid-enhancing-technologies>.

¹¹⁶ “Millican, R., Arent, D., Sandalow, D., *Electricity Affordability and Load Growth: Diagnosing and Fixing the Problem*, Center on Global Energy Policy at Columbia SIPA, at 1 (June 2026), *available at* https://www.energypolicy.columbia.edu/wp-content/uploads/2026/06/LoadGrowth_Commentary_CGEP_051926.pdf.

1 • A study from CIGRE evaluated DLRs and found that the technology could increase
2 transmission capacity 33 percent in the winter and 19 percent in the summer. The
3 pay-back of the technology was extremely short—at less than six months.¹¹⁷

4 • Separate studies from RMI (partnered with Quanta Technologies)¹¹⁸ and Brattle
5 Group¹¹⁹ found that nationwide GETs could deliver \$5 billion in savings by
6 reducing wholesale energy costs, and between \$2 billion and \$8 billion annually
7 (based on data from the past decade) in reducing grid congestion costs.¹²⁰

8 A study for RMI evaluated GET projects across five states in the PJM region (Illinois,
9 Indiana, Ohio, Pennsylvania, and Virginia) and found that they could help connect 6.6
10 GW of new solar PV, wind, and storage by 2027. Further, GET solutions were found to
11 be substantially less expensive than traditional network upgrades required for

¹¹⁷ Engel, K., et. al., “An Empirical Analysis of the Operational Efficiencies and Risks Associated with Static, Ambient Adjusted, and Dynamic Line Rating Methodologies,” CIGRE-US National Committee, at 2 (July, 2 2021), *available at* <https://cigre-usnc.org/wp-content/uploads/2021/11/An-Empirical-Analysis-of-the-Operational-Efficiencies-and-Risks-Associated-with-Line-Rating-Methodologies.pdf>.

¹¹⁸ Siegner, K., et. al., “GETting Interconnected in PJM: Grid-Enhancing Technologies (GETs) Can Increase the Speed and Scale of New Entry from PJM’s Queue,” RMI (Feb. 2024), *available at* <https://rmi.org/insight/analyzing-gets-as-a-tool-for-increasing-interconnection-throughput-from-pjmsqueue/>.

¹¹⁹ Tsuchida, T., Ross, S., Bigelow, A., “Unlocking the Queue with Grid-Enhancing Technologies.” Brattle Group (Feb. 1, 2021), *available at* https://watt-transmission.org/wp-content/uploads/2021/02/Brattle_Unlocking-the-Queue-with-Grid-Enhancing-Technologies_Final-Report_Public-Version.pdf90.pdf.

¹²⁰ Chatterjee, N., “Grid technology could save billions but for a policy vacuum,” Utility Dive (Mar. 25, 2024), *available at* <https://www.utilitydive.com/news/grid-technology-could-save-billions-Chatterjee/711068/>.

1 interconnection.¹²¹ The value of GETs is highlighted by a recent law passed in
2 Pennsylvania, which requires the state’s utilities to study the potential for advanced
3 transmission technologies when they propose to upgrade existing transmission projects or
4 build new ones.¹²²

5 **Q Are GETs intended to replace all proposed generation?**

6 **A** No. GETs are not intended to displace the need for new generation to serve large and
7 concentrated data center load, but rather to ensure that ratepayers are getting the most of
8 out the existing technology and infrastructure on the grid. While data center load growth
9 is front and center in the current integrated resource plan, the electric grid is still facing
10 issues around electric vehicle load, home electrification, renewable curtailment, and
11 transmission congestion. GETs can help ELL address these and other challenges, increase
12 the deployment of renewables to the grid, and increase the utilization and efficiency of
13 the resources that are already built—and all at a lower cost than relying on new
14 generation solutions or even existing network upgrade solutions. ELL should conduct a
15 study of the potential for GETs to lower system costs and increase utilization of its
16 existing assets.

17 **Q What is load flexibility and how does it work?**

18 **A** ELL builds its system to meet peak demand. If an end-use customer, such as the data
19 center, has flexible load and is able to reduce its electricity consumption during times of

¹²¹ Siegner, K., et. al., “GETting Interconnected in PJM: Grid-Enhancing Technologies (GETs) Can Increase the Speed and Scale of New Entry from PJM’s Queue,” RMI, at 6 (Feb. 2024), *available at* https://rmi.org/app/uploads/dlm_uploads/2024/02/GETs_insight_brief_v3.pdf.

¹²² Howland, E., “Pennsylvania House unanimously passes advanced transmission technology bill,” Utility Dive (May 5, 2026), *available at* <https://www.utilitydive.com/news/pennsylvania-house-advanced-transmission-technology-bill-gets/819303/>.

1 system peak by moving that consumption to hours in the day with lower demand, then
2 ELL does not need to maintain as much generating capacity or operate its most expensive
3 peaking resources as often. With new large loads coming online, managing peak is
4 especially important for ELL to reduce or defer capital spending.
5 In 2025, Duke University published a study that quantifies the capacity already available
6 to the system if new loads are designed to be curtailable for a small number of hours each
7 year.¹²³ Specifically, the study evaluated the amount of new (incremental) load that can
8 be served in each balancing authority before temporary curtailment is needed. The study
9 was repeated with assumptions of various levels of curtailment including 0.25 percent,
10 0.5 percent, and 1.0 percent of the time. The study found that MISO has between 11.6
11 and 18.5 GW of excess headroom, depending on the level of curtailment (0.25 percent to
12 1 percent). Further, the study found that during nearly 90 percent of hours that require
13 load curtailment, less than 50 percent of new load is curtailed.

14 **Q How could load flexibility reduce system costs for ELL?**

15 **A** Load flexibility at the data center could reduce how much capacity ELL needs to build to
16 meet the data center's load, or it could allow ELL to utilize some of the CCCT capacity
17 built to serve the data center for other customers. In exchange, the data center could be
18 compensated for the value it provides by curtailing its load with a demand-response
19 program.

¹²³ Norris, T., Profeta, T., Patino-Echeverri, D., Cowie-Haskell, A., *Rethinking Load Growth: Assessing the Potential for Integration of Large Flexible Loads in US Power Systems*, Nicholas Institute for Energy, Environment & Sustainability, Duke University (2025), available at <https://nicholasinstitute.duke.edu/publications/rethinking-load-growth>.

1 During its ramp-up period, a portion of the load from the Meta data center will [REDACTED]

2 [REDACTED]¹²⁴ This demonstrates
3 that load flexibility is technically feasible for the data center customer. However, Entergy
4 notes that “the Customer was not interested in being a demand response customer post-
5 ramp period, as it does not meet their operational requirements.”¹²⁵ It is unclear whether
6 Entergy could have negotiated further with the Customer about the potential for load
7 flexibility after the initial ramp-up period.

8 **Q What do you recommend to the Commission regarding the Company’s alternative**
9 **analysis?**

10 **A** The Commission should deny the Company’s application and require it to conduct robust
11 alternatives analysis to justify its request. ELL should not be allowed to build system
12 resources without demonstrating that they are the lowest cost option to meet load.

13 **Q Does this conclude your testimony?**

14 **A** Yes.

¹²⁴ Direct Testimony of Laura K. Beauchamp at 6-7.

¹²⁵ Company’s Response to Sierra 1-22, “SIERRA 1-22.”

AFFIDAVIT

Devi Glick, being first duly sworn, deposes and says that she is the same Devi Glick whose testimony accompanies this signed affidavit: that such testimony was prepared by her; that she is familiar with the contents thereof; that the facts set forth therein are true and correct to the best of her knowledge, information and belief; and that she does adopt the same as her sworn testimony in this proceeding.

Devi Glick

Devi Glick

Subscribed and sworn before me by Devi Glick on this 14 day of July, 2026.

Elana M. Nevins

Notary Public

Notary ID No.



My Commission Expires: September 25, 2032

Devi Glick, Senior Principal

Synapse Energy Economics | 485 Massachusetts Avenue, Suite 3 | Cambridge, MA 02139 | 617-453-7050
dglick@synapse-energy.com

PROFESSIONAL EXPERIENCE

Synapse Energy Economics Inc., Cambridge, MA. *Senior Principal*, May 2022–Present; *Principal Associate*, Jun 2021–May 2022; *Senior Associate*, Apr 2019–Jun 2021; *Associate*, Jan 2018–Mar 2019

Conducts research and provides expert witness and consulting services on energy sector issues.

Examples include:

- Modeling for resource planning using PLEXOS and Encompass utility planning software to evaluate the reasonableness of utility IRP modeling.
- Modeling for resource planning to explore alternative, lower-cost and lower-emission resource portfolio options.
- Providing expert testimony in rate cases on the prudence of continued investment in, and operation of, coal plants based on the economics of plant operations relative to market prices and alternative resource costs.
- Providing expert testimony and analysis on the reasonableness of utility coal plant commitment and dispatch practice in fuel and power cost adjustment dockets.
- Serving as an expert witness on avoided cost of distributed solar PV and submitting direct and surrebuttal testimony regarding the appropriate calculation of benefit categories associated with the value of solar calculations.
- Reviewing and assessing the reasonableness of methodologies and assumptions relied on in utility IRPs and other long-term planning documents for expert report, public comments, and expert testimony.
- Evaluating utility long-term resource plans and developing alternative clean energy portfolios for expert reports.
- Co-authoring public comments on the adequacy of utility coal ash disposal plans, and federal coal ash disposal rules and amendments.
- Analyzing system-level cost impacts of energy efficiency at the state and national level.

Rocky Mountain Institute, Basalt, CO. Aug 2012–Sept 2017

Senior Associate

- Led technical analysis, modeling, training and capacity building work for utilities and governments in Sub-Saharan Africa around integrated resource planning for the central electricity grid energy. Identified over one billion dollars in savings based on improved resource-planning processes.
- Represented RMI as a content expert and presented materials on electricity pricing and rate design at conferences and events.

-
- Led a project to research and evaluate utility resource planning and spending processes, focusing specifically on integrated resource planning, to highlight systematic overspending on conventional resources and underinvestment and underutilization of distributed energy resources as a least-cost alternative.

Associate

- Led modeling analysis in collaboration with NextGen Climate America which identified a CO2 loophole in the Clean Power Plan of 250 million tons, or 41 percent of EPA projected abatement. Analysis was submitted as an official federal comment which led to a modification to address the loophole in the final rule.
- Led financial and economic modeling in collaboration with a major U.S. utility to quantify the impact that solar PV would have on their sales and helped identify alternative business models which would allow them to recapture a significant portion of this at-risk value.
- Supported the planning, content development, facilitation, and execution of numerous events and workshops with participants from across the electricity sector for RMI's Electricity Innovation Lab (eLab) initiative.
- Co-authored two studies reviewing valuation methodologies for solar PV and laying out new principles and recommendations around pricing and rate design for a distributed energy future in the United States. These studies have been highly cited by the industry and submitted as evidence in numerous Public Utility Commission rate cases.

The University of Michigan, Ann Arbor, MI. *Graduate Student Instructor*, Sept 2011–Jul 2012

The Virginia Sea Grant at the Virginia Institute of Marine Science, Gloucester Point, VA. *Policy Intern*, Summer 2011

Managed a communication network analysis study of coastal resource management stakeholders on the Eastern Shore of the Delmarva Peninsula.

The Commission for Environmental Cooperation (NAFTA), Montreal, QC. *Short Term Educational Program/Intern*, Summer 2010

Researched energy and climate issues relevant to the NAFTA parties to assist the executive director in conducting a GAP analysis of emission monitoring, reporting, and verification systems in North America.

Congressman Tom Allen, Portland, ME. *Technology Systems and Outreach Coordinator*, Aug 2007–Dec 2008

Directed Congressman Allen's technology operation, responded to constituent requests, and represented the Congressman at events throughout southern Maine.

EDUCATION

The University of Michigan, Ann Arbor, MI

Master of Public Policy, Gerald R. Ford School of Public Policy, 2012

Master of Science, School of Natural Resources and the Environment, 2012

Masters Project: *Climate Change Adaptation Planning in U.S. Cities*

Middlebury College, Middlebury, VT

Bachelor of Arts, 2007

Environmental Studies, Policy Focus; Minor in Spanish

Thesis: *Environmental Security in a Changing National Security Environment: Reconciling Divergent Policy Interests, Cold War to Present*

PUBLICATIONS

Glick, D., T. Gyalmo, D. Karabakal, L. Metz, C. Resor. 2024. *Review of Tennessee Valley Authority's Draft 2025 Integrated Resource Plan*. Synapse Energy Economics for Sierra Club.

Biewald, B., D. Glick, S. Kwok, K. Takahashi, J. Carvallo, L. Schwartz. 2024. *Best Practices in Integrated Resource Planning: A guide for planners developing the electricity resource mix of the future*. Synapse Energy Economics and Lawrence Berkeley National Laboratory for The Energy Foundation.

Kwok, S., D. Glick, R. Anderson, T. Gyalmo. 2023. *Review of Southwestern Public Service Company 2023 Integrated Resource Plan*. Synapse Energy Economics for Sierra Club.

Kwok, S., J. Smith, D. Glick. 2023. *Review of Cleco Power's 2021 IRP Report*. Synapse Energy Economics for Sierra Club.

Addleton, I., D. Glick, R. Wilson. 2021. *Georgia Power's Uneconomic Coal Practices Cost Customers Millions*. Synapse Energy Economics for Sierra Club.

Glick, D., P. Eash-Gates, J. Hall, A. Takasugi. 2021. *A Clean Energy Future for MidAmerican and Iowa*. Synapse Energy Economics for Sierra Club, Iowa Environmental Council, and the Environmental Law and Policy Center.

Glick, D., S. Kwok. 2021 *Review of Southwestern Public Service Company's 2021 IRP and Tolk Analysis*. Synapse Energy Economics for Sierra Club.

Glick, D., P. Eash-Gates, S. Kwok, J. Tabernero, R. Wilson. 2021. *A Clean Energy Future for Tampa*. Synapse Energy Economics for Sierra Club.

Glick, D. 2021. *Synapse Comments and Surreply Comments to the Minnesota Public Utility Commission in response to Otter Tail Power's 2021 Compliance Filing Docket E-999/CI-19-704*. Synapse Energy Economics for Sierra Club.

Eash-Gates, P., D. Glick, S. Kwok, R. Wilson. 2020. *Orlando's Renewable Energy Future: The Path to 100 Percent Renewable Energy by 2020*. Synapse Energy Economics for the First 50 Coalition.

Eash-Gates, P., B. Fagan, D. Glick. 2020. *Alternatives to the Surry-Skiffes Creek 500 kV Transmission Line*. Synapse Energy Economics for the National Parks Conservation Association.

Biewald, B., D. Glick, J. Hall, C. Odom, C. Roberto, R. Wilson. 2020. *Investing in Failure: How Large Power Companies are Undermining their Decarbonization Targets*. Synapse Energy Economics for Climate Majority Project.

Glick, D., D. Bhandari, C. Roberto, T. Woolf. 2020. *Review of benefit-cost analysis for the EPA's proposed revisions to the 2015 Steam Electric Effluent Limitations Guidelines*. Synapse Energy Economics for Earthjustice and Environmental Integrity Project.

Glick, D., J. Frost, B. Biewald. 2020. *The Benefits of an All-Source RFP in Duke Energy Indiana's 2021 IRP Process*. Synapse Energy Economics for Energy Matters Community Coalition.

Camp, E., B. Fagan, J. Frost, N. Garner, D. Glick, A. Hopkins, A. Napoleon, K. Takahashi, D. White, M. Whited, R. Wilson. 2019. *Phase 2 Report on Muskrat Falls Project Rate Mitigation, Revision 1–September 25, 2019*. Synapse Energy Economics for the Board of Commissioners of Public Utilities, Province of Newfoundland and Labrador.

Camp, E., A. Hopkins, D. Bhandari, N. Garner, A. Allison, N. Peluso, B. Havumaki, D. Glick. 2019. *The Future of Energy Storage in Colorado: Opportunities, Barriers, Analysis, and Policy Recommendations*. Synapse Energy Office for the Colorado Energy Office.

Glick, D., B. Fagan, J. Frost, D. White. 2019. *Big Bend Analysis: Cleaner, Lower-Cost Alternatives to TECO's Billion-Dollar Gas Project*. Synapse Energy Economics for Sierra Club.

Glick, D., F. Ackerman, J. Frost. 2019. *Assessment of Duke Energy's Coal Ash Basin Closure Options Analysis in North Carolina*. Synapse Energy Economics for the Southern Environmental Law Center.

Glick, D., N. Peluso, R. Fagan. 2019. *San Juan Replacement Study: An alternative clean energy resource portfolio to meet Public Service Company of New Mexico's energy, capacity, and flexibility needs after the retirement of the San Juan Generating Station*. Synapse Energy Economics for Sierra Club.

Suphachalasai, S., M. Touati, F. Ackerman, P. Knight, D. Glick, A. Horowitz, J.A. Rogers, T. Amegroud. 2018. *Morocco–Energy Policy MRV: Emission Reductions from Energy Subsidies Reform and Renewable Energy Policy*. Prepared for the World Bank Group.

Camp, E., B. Fagan, J. Frost, D. Glick, A. Hopkins, A. Napoleon, N. Peluso, K. Takahashi, D. White, R. Wilson, T. Woolf. 2018. *Phase 1 Findings on Muskrat Falls Project Rate Mitigation*. Synapse Energy Economics for Board of Commissioners of Public Utilities, Province of Newfoundland and Labrador.

Allison, A., R. Wilson, D. Glick, J. Frost. 2018. *Comments on South Africa 2018 Integrated Resource Plan*. Synapse Energy Economics for Centre for Environmental Rights.

Hopkins, A. S., K. Takahashi, D. Glick, M. Whited. 2018. *Decarbonization of Heating Energy Use in California Buildings: Technology, Markets, Impacts, and Policy Solutions*. Synapse Energy Economics for the Natural Resources Defense Council.

Knight, P., E. Camp, D. Glick, M. Chang. 2018. *Analysis of the Avoided Costs of Compliance of the Massachusetts Global Warming Solutions Act*. Supplement to 2018 AESC Study. Synapse Energy Economics for Massachusetts Department of Energy Resources and Massachusetts Department of Environmental Protection.

Fagan, B., R. Wilson, S. Fields, D. Glick, D. White. 2018. *Nova Scotia Power Inc. Thermal Generation Utilization and Optimization: Economic Analysis of Retention of Fossil-Fueled Thermal Fleet to and Beyond 2030–M08059*. Prepared for Board Counsel to the Nova Scotia Utility Review Board.

Ackerman, F., D. Glick, T. Vitolo. 2018. *Report on CCR proposed rule*. Prepared for Earthjustice.

Lashof, D. A., D. Weiskopf, D. Glick. 2014. *Potential Emission Leakage Under the Clean Power Plan and a Proposed Solution: A Comment to the US EPA*. NextGen Climate America.

Smith, O., M. Lehrman, D. Glick. 2014. *Rate Design for the Distribution Edge*. Rocky Mountain Institute.

Hansen, L., V. Lacy, D. Glick. 2013. *A Review of Solar PV Benefit & Cost Studies*. Rocky Mountain Institute.

TESTIMONY

Virginia State Corporation Commission (Case No. PUR-2026-00058 and Case No. PUR-2026-00078):

Direct Testimony of Devi Glick in Virginia Electric and Power Company's application to revise its fuel factor pursuant to Virginia Code § 56-249.6; and application to Petition of Virginia Electric and Power Company for a financing order authorizing the issuance of deferred fuel cost bonds pursuant to Va. Code § 56-249.6:2. On behalf of Sierra Club. July 13, 2026.

North Carolina Utilities Commission (Docket No. E-100, Sub 207): Direct Testimony of Devi Glick in the matter of 2025 Biennial Consolidated Carbon Plan and Integrated Resource Plans of Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC, Pursuant to N.C.G.S. §§ 62-2(a)(3a), 62-110.1, 62-110.9, and Commission Rule R8-60A. On behalf of North Carolina Sustainable Energy Association. March 30, 2026.

New Mexico Public Regulation Commission (Case No. 25-00066-UT): Direct Testimony of Devi Glick in the matter of Southwestern Public Service Company's application requesting: (1) issuance of certificates of public convenience and necessity to construct and operate wind, solar, battery, and thermal generation projects and associated facilities; (2) issuance of certificates of public convenience and necessity, location approval, and right-of-way width approval, for transmission lines; (3) authorization of related ratemaking principles including accrual of an allowance for funds used during construction; (4) variances on abandonment of Tolk Generating Station and Class II affiliate transactions; (5) other associate relief. On behalf of New Mexico Department of Justice. December 23, 2025.

Kentucky Public Service Commission (Case No. 2025-00175): Direct Testimony of Devi Glick in the Application Of Kentucky Power Company For Approval Of (1) A Certificate Of Public Convenience And Necessity To Make The Capital Investments Necessary To Continue Taking Capacity And Energy From The Mitchell Generating Station After December 31, 2028, (2) An Amended Environmental Compliance Plan, (3) Revised Environmental Surcharge Tariff Sheets, And (4) All Other Required Approvals And Relief. On behalf of Sierra Club. November 6, 2025.

Public Utilities Commission of Ohio (Case No. 24-153-EL-RDR): Direct Testimony of Devi Glick in the Matter of the Legacy Generation Resource Rider Audits Required by R.C. 4928.148 for Duke Energy Ohio Inc., the Dayton Power and Light Company dba AES Ohio, and Ohio Power Company dba AEP Ohio. On behalf of Office of the Ohio Consumers' Counsel. November 4, 2025.

Michigan Public Service Commission (Case No. U-21428): Direct Testimony and Exhibits of Devi Glick in the application of Indiana Michigan Power Company for a power supply cost recovery reconciliation proceeding for the 12-month period ended December 31, 2024. On behalf of Attorney General Dana Nessel, Citizens Utility Board of Michigan, and Sierra Club. October 17, 2025.

Indiana Utility Regulatory Commission (Cause No. 38707-FAC 145): Direct Testimony and Exhibits of Devi Glick in the application of Duke Energy Indiana, LLC for approval of a change in its fuel cost adjustment for electric service and for approval of a change in its fuel cost adjustment for high pressure steam service, in accordance with Indiana Code §8-1-2-42, Indiana Code §8-1-2-42.3, and various orders of the Indiana Utility Regulatory Commission. On behalf of Sierra Club. September 3, 2025.

Virginia State Corporation Commission (Case No. PUR-2025-00037): Direct Testimony of Devi Glick in Virginia Electric and Power Company application for approval of a CPCN to construct/operate the proposed Chesterfield Energy Reliability Center Electric, generation/transmission facilities and approval of designated rider CERC. July 25, 2025.

Virginia State Corporation Commission (Case No. PUR-2025-00058 and Case No. PUR-2025-00059): Direct Testimony of Devi Glick in Virginia Electric and Power Company's 2025 biennial review of the rates, terms, and conditions for the provision of generation, distribution, and transmission services pursuant to Virginia Code § 56-585.1; and Virginia Electric and Power Company's application to revise its fuel factor pursuant to Virginia Code § 56-249.6. On behalf of Sierra Club. July 16, 2025.

Iowa Utilities Commission (Docket RPU-2025-0001): Cross Rebuttal Testimony of Devi Glick in MidAmerican Energy Company Application for a Determination of Ratemaking Principles. On behalf of the Environmental Intervenors. June 19, 2025.

Iowa Utilities Commission (Docket RPU-2025-0001): Direct Testimony of Devi Glick in MidAmerican Energy Company Application for a Determination of Ratemaking Principles. On behalf of the Environmental Intervenors. April 11, 2025.

Louisiana Public Service Commission (Docket No. U-37425): Direct Testimony of Devi Glick in the Application of Entergy Louisiana, LLC. for approval of generation and transmission resources proposed in

connection with services to a significant customer project in north Louisiana, including proposed rider, and request for timely treatment. On behalf of Sierra Club. April 11, 2025.

Michigan Public Service Commission (Case No. U-21262): Direct Testimony of Devi Glick in the matter of the Application of Indiana Michigan Power Company for approval of a Power Supply Cost Recovery Plan and Factors (2025). On behalf of Attorney General Dana Nessel, Citizens Utility Board of Michigan, and Sierra Club. March 4, 2025.

Virginia State Corporation Commission (Case No. PUR-2024-00184): Direct Testimony of Devi Glick in re: Virginia Electric and Power Company's 2024 Integrated Resource Plan filing pursuant to Virginia Code to §56-597 *et seq.* On behalf of Sierra Club and NRDC. February 28, 2025.

Michigan Public Service Commission (Case No. U-21262): Direct Testimony of Devi Glick in the matter of the Application of Indiana Michigan Power Company for a Power Supply Cost Recovery Reconciliation proceeding for the 12-month period ended December 31, 2023. On behalf of the Michigan Attorney General, Sierra Club, and Citizens Utility Board of Michigan. October 16, 2024.

State of Vermont Public Utility Commission (Case No. 24-2945-PET): Direct testimony of Devi Glick in Petition of VT Real Estate Holdings 2 LLC ("Fair Haven Solar") for a Certificate of Public Good, pursuant to 30 V.S.A. § 248, authorizing the installation and operation of a 20 MW solar electric generation facility off Airport Road in Fair Haven, Vermont to be known as the "Fair Haven Solar Project". On behalf of VT Real Estate Holdings 2 LLC. September 17, 2024

Public Service Commission of South Carolina (Docket No. 2024-203-E): Direct Testimony of Devi Glick in Application of Kingstree East 230 for a certificate of environmental compatibility and public convenience and necessity for the construction and operation of a 249 MW AC solar and battery facility in Williamsburg County, South Carolina Pursuant to S.C.Code Ann. § 58-33-10 *et. Seq.*, and request to proceed with initial construction work, S.C. Code Ann. § 58-33-110(7). On behalf of Kingstree East 230 LLC. August 9, 2024.

Indiana Utility Regulatory Commission (Cause No. 46038): Direct Testimony of Devi Glick in Petition of Duke Energy Indiana, LLC Pursuant to Indiana code §§ 8-1-2-42.7 and 8-1-2-61, for authority to modify its rate and changes. On behalf of Citizens Action Coalition of Indiana, Inc. July 11, 2024.

State of Vermont Public Utility Commission (Case No. 23-1447-PET): Rebuttal testimony of Devi Glick in the Petition of VT Real Estate Holdings 1 LLC for a Certificate of Public Good, pursuant to 30 V.S.A. § 248, for a 20 MW ground-mounted solar array in Shaftsbury, Vermont. On behalf of VT Real Estate Holdings 1 LLC ("Shaftsbury Solar"). Revised June 27, 2024.

State of Vermont Public Utility Commission (Case No. 23-1447-PET): Direct testimony of Devi Glick in the Petition of VT Real Estate Holdings 1 LLC ("Shaftsbury Solar") for a Certificate of Public Good, pursuant to 30 V.S.A. § 248, authorizing the installation and operation of a 20 MW solar electric generation facility off Holy Smoke Road in Shaftsbury, Vermont to be known as the "Shaftsbury Solar Project". On behalf of VT Real Estate Holdings 1 LLC ("Shaftsbury Solar"). Revised June 27, 2024.

Iowa Utilities Board (RPU-2023-002): Supplemental Testimony of Devi Glick in re: Interstate Power and Light Company, Proposed Rate Increase. On behalf of Environmental Intervenors. June 21, 2024.

Florida Public Service Commission (Docket No. 20240026-EI): Direct testimony of Devi Glick in petition for rate increase by Tampa Electric Company. On behalf of Sierra Club. June 6, 2024.

Iowa Utilities Board (RPU-2023-0002): Surrebuttal Testimony of Devi Glick in re: Interstate Power and Light Company, Proposed Rate Increase. On behalf of Environmental Intervenors. June 3, 2024.

Iowa Utilities Board (RPU-2023-0002): Direct Testimony of Devi Glick in re: Interstate Power and Light Company, Proposed Rate Increase. On behalf of Environmental Intervenors. April 16, 2024.

Michigan Public Service Commission (Case No. U-21051): Direct Testimony of Devi Glick in the Matter of the application of DTE Electric Company for reconciliation of its power supply cost recovery plan (Case No. U-21050) for the 12 months ended December 31, 2022. On behalf of Michigan Environmental Council. March 8, 2024.

Michigan Public Service Commission (Case No. U-21427): Direct Testimony of Devi Glick in the matter of the Application of Indiana Michigan Power Company for approval of a Power Supply Cost Recovery plan and factors (2024). On behalf of Sierra Club and Citizens Utility Board of Michigan. March 4, 2024.

Georgia Public Service Commission (Docket No. 55378): Direct Testimony of Devi Glick and Lucy Metz in Re: Georgia Power Company's 2023 Integrated Resource Plan Update. On behalf of Sierra Club. February 15, 2024.

Louisiana Public Service Commission (Docket No. U-36923): Direct Testimony of Devi Glick in the Application of Cleco Power LLC for: (1) Implementation of changes in rates to be effective July 1, 2024; and (2) extension of existing formula rate plan. On behalf of Sierra Club. February 5, 2024.

Public Service Commission of South Carolina (Docket No. 2023-154-E): Supplemental Testimony of Devi Glick in re: 2023 Integrated Resource Plan for the South Carolina Public Service Authority. On behalf of Sierra Club. January 29, 2024.

Public Service Commission of South Carolina (Docket No. 2023-154-E): Surrebuttal Testimony of Devi Glick in re: 2023 Integrated Resource Plan for the South Carolina Public Service Authority. On behalf of Sierra Club. November 17, 2023.

Public Utilities Commission of Ohio (Case No. 21-477-EL-RDR): Direct Testimony of Devi Glick in the Matter of the OVEC Generation Purchase Rider Audits Required by 4928.148 for Duke Energy Ohio, Inc. the Dayton Power and Light Company, and AEP Ohio. On behalf of Union of Concerned Scientists and the Citizens Utility Board. October 10, 2023.

Public Service Commission of South Carolina (Docket No. 2023-154-E): Direct Testimony of Devi Glick in re: 2023 Integrated Resource Plan for the South Carolina Public Service Authority. On behalf of Sierra Club. September 22, 2023.

Public Utilities Commission of Ohio (Case No. 20-165-EL-RDR): Direct Testimony of Devi Glick in the matter of the review of the Reconciliation Rider of the Dayton Power and Light Company. On behalf of Office of the Ohio Consumers' Counsel. September 12, 2023.

Virginia State Corporation Commission (Case No. PUR-2023-00066): Direct Testimony of Devi Glick in re: Virginia Electric and Power Company's 2023 Integrated Resource Plan filing pursuant to Virginia Code to §56-597 *et seq.* On behalf of Sierra Club. August 8, 2023.

Public Utility Commission of Texas (PUC Docket No. 54634): Direct Testimony of Devi Glick in the application of Southwestern Public Service Company for authority to change rates. On behalf of Sierra Club. August 4, 2023

Arizona Corporation Commission (Docket No. E-1345A-22-0144): Surrebuttal Testimony of Devi Glick in the matter of the application of Arizona Public Service Company for a hearing to determine the fair value of the utility property of the company for ratemaking purposes, to fix a just and reasonable rate of return thereon, and to approve rate schedules designed to develop such return. On Behalf of Sierra Club. July 26, 2023.

Arizona Corporation Commission (Docket No. E-01345A-22-0144): Direct Testimony of Devi Glick in the matter of the application of Arizona Public Service Company for a hearing to determine the fair value of the utility property of the company for ratemaking purposes, to fix a just and reasonable rate of return thereon, and to approve rate schedules designed to develop such return. On Behalf of Sierra Club. June 5, 2023.

Virginia State Corporation Commission (Case No. PUR-2023-00005): Direct Testimony of Devi Glick in the Petition of Virginia Electric & Power Company for revision of rate adjustment clause, Rider E, for the recovery of costs incurred to comply with state and federal environmental regulations pursuant to §56-585.1 A 5 e of the Code of Virginia. On behalf of Sierra Club. May 23, 2023.

New Mexico Public Regulation Commission (Case No, 22-00286-UT): Direct Testimony of Devi Glick in the matter of Southwestern Public Service Company's application for: (1) Revisions of its retail rates under advance no. 312; (2) Authority to abandon the Plant X Unit 1, Plant X Unit 2, and Cunningham Unit 1 Generating Stations and amend the abandonment date of the Tolk Generating Station; and (3) other associated relief. On behalf of Sierra Club. April 21, 2023.

Michigan Public Service Commission (Case No. U-20805): Direct Testimony of Devi Glick in the matter of the Application of Indiana Michigan Power Company for a Power Supply Cost Recovery Reconciliation proceeding for the 12-month period ended December 31, 2021. On behalf of Michigan Attorney General. April 17, 2023.

Michigan Public Service Commission (Case No. U-21261): Direct Testimony of Devi Glick in the matter of the application of Indiana Michigan Power Company for approval to implement a Power Supply Cost Recovery Plan for the twelve months ending December 31, 2023. On Behalf of Sierra Club. March 23, 2023.

New Mexico Public Regulation Commission (Case No. 19-00099-UT / 19-00348-UT): Direct Testimony of Devi Glick in the matter of El Paso Electric Company's Application for Approval of Long-Term Purchased Power Agreements with Hecate Energy Santa Teresa, LLC, Buena Vista Energy, LLC, and Canutillo Energy Center LLC. On Behalf of New Mexico Office of the Attorney General, January 23, 2023.

Arizona Corporation Commission (Docket No. E-01933A-22-0107): Direct Testimony of Devi Glick in the matter of the application of Tucson Electric Power Company for the establishment of just and reasonable rates and charges designed to realize a reasonable rate of return on the fair value of the properties of Tucson Electric Power Company devoted to its operations throughout the state of Arizona for related approvals. On Behalf of Sierra Club. January 11, 2023.

New Mexico Public Regulation Commission (Case No. 22-00093-UT): Direct Testimony of Devi Glick in the amended application for approval of El Paso Electric Company's 2022 renewable energy act plan pursuant to the renewable energy act and 17.9.572 NMAC, and sixth revised rate no. 38-RPS cost rider. On Behalf of New Mexico Office of the Attorney General, January 9, 2023.

Iowa Utilities Board (Docket No. RPU-2022-0001): Supplemental Direct and Rebuttal Testimony of Devi Glick in MidAmerican Energy Company Application for a Determination of Ratemaking Principles. On behalf of Environmental Intervenors. November 21, 2022.

Public Utility Commission of Texas (PUC Docket No. 53719): Direct Testimony of Devi Glick in the application of Entergy Texas, Inc. for authority to change rates. On behalf of Sierra Club. October 26, 2022.

Virginia State Corporation Commission (Case No. PUR-2022-00051): Direct Testimony of Devi Glick in re: Appalachian Power Company's Integrated Resource Plan filing pursuant to Virginia Code §56-597 *et seq.* On behalf of Sierra Club. September 2, 2022.

Public Service Commission of the State of Missouri (Case No. ER-2022-0129, Case No. ER-2022-0130): Surrebuttal Testimony of Devi Glick in the matter of Every Missouri Metro and Every Missouri West request for authority to implement a general rate increase for electric service. On behalf of Sierra Club. August 16, 2022.

Iowa Utilities Board (Docket No. RPU-2022-0001): Direct Testimony of Devi Glick in MidAmerican Energy Company Application for a Determination of Ratemaking Principles. On behalf of Environmental Intervenors. July 29, 2022.

Public Service Commission of the State of Missouri (Case No. ER-2022-0129, Case No. ER-2022-0130): Direct Testimony of Devi Glick in the matter of Every Missouri Metro and Every Missouri West request for authority to implement a general rate increase for electric service. On behalf of Sierra Club. June 8, 2022.

Virginia State Corporation Commission (Case No. PUR-2022-00006): Direct Testimony of Devi Glick in the petition of Virginia Electric & Power Company for revision of rate adjustment clause: Rider E, for the

recovery of costs incurred to comply with state and federal environmental regulations pursuant to §56-585.1 A 5 e of the Code of Virginia. On behalf of Sierra Club. May 24, 2022.

Oklahoma Corporation Commission (Case No. PUD 202100164): Direct Testimony of Devi Glick in the matter of the application of Oklahoma gas and electric company for an order of the Commission authorizing application to modify its rates, charges, and tariffs for retail electric service in Oklahoma. On behalf of Sierra Club. April 27, 2022.

Public Utility Commission of Texas (PUC Docket No. 52485): Direct Testimony of Devi Glick in the application of Southwestern Public Service Company to amend its certifications of public convenience and necessity to convert Harrington Generation Station from coal to natural gas. On behalf of Sierra Club. March 25, 2022.

Public Utility Commission of Texas (PUC Docket No. 52487): Direct Testimony of Devi Glick in the application of Entergy Texas Inc. to amend its certificate of convenience and necessity to construct Orange County Advanced Power Station. On behalf of Sierra Club. March 18, 2022.

Michigan Public Service Commission (Case No. U-21052): Direct Testimony of Devi Glick in the matter of the application of Indiana Michigan Power Company for approval of a Power Supply Cost Recovery Plan and Factors (2022). On Behalf of Sierra Club. March 9, 2022.

Arkansas Public Service Commission (Docket No. 21-070-U): Surrebuttal Testimony of Devi Glick in the Matter of the Application of Southwestern Electric Power Company for approval of a general change in rate and tariffs. On behalf of Sierra Club. February 17, 2022.

New Mexico Public Regulation Commission (Case No. 21-00200-UT): Direct Testimony of Devi Glick in the Matter of the Southwestern Public Service Company's application to amend its certifications of public convenience and necessity to convert Harrington Generation Station from coal to natural gas. On behalf of Sierra Club. January 14, 2022.

Public Utilities Commission of Ohio (Case No. 18-1004-EL-RDR): Direct Testimony of Devi Glick in the Matter of the Review of the Power Purchase Agreement Rider of Ohio Power Company for 2018 and 2019. On behalf of the Office of the Ohio Consumer's Counsel. December 29, 2021.

Arkansas Public Service Commission (Docket No. 21-070-U): Direct Testimony of Devi Glick in the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs. On behalf of Sierra Club. December 7, 2021.

Michigan Public Service Commission (Case No. U-20528): Direct Testimony of Devi Glick in the matter of the Application of DTE Electric Company for reconciliation of its power supply cost recovery plan (Case No. U-20527) for the 12-month period ending December 31, 2020. On behalf of Michigan Environmental Council. November 23, 2021.

Public Utilities Commission of Ohio (Case No. 20-167-EL-RDR): Direct Testimony of Devi Glick in the Matter of the Review of the Reconciliation Rider of Duke Energy Ohio, Inc. On behalf of The Office of the Ohio Consumer's Counsel. October 26, 2021.

Public Utilities Commission of Nevada (Docket No. 21-06001): Phase III Direct Testimony of Devi Glick in the joint application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of their 2022-2041 Triennial Intergrade Resource Plan and 2022-2024 Energy Supply Plan. On behalf of Sierra Club and Natural Resource Defense Council. October 6, 2021.

Public Service Commission of South Carolina (Docket No. 2021-3-E): Direct Testimony of Devi Glick in the matter of the annual review of base rates for fuel costs for Duke Energy Carolinas, LLC (for potential increase or decrease in fuel adjustment and gas adjustment). On behalf of the South Carolina Coastal Conservation League and the Southern Alliance for Clean Energy. September 10, 2021.

North Carolina Utilities Commission (Docket No. E-2, Sub 1272): Direct Testimony of Devi Glick in the matter of the application of Duke Energy Progress, LLC pursuant to N.C.G.S § 62-133.2 and commission R8-5 relating to fuel and fuel-related charge adjustments for electric utilities. On behalf of Sierra Club. August 31, 2021.

Michigan Public Service Commission (Docket No. U-20530): Direct Testimony of Devi Glick in the application of Indiana Michigan Power Company for a Power Supply Cost Recovery Reconciliation proceeding for the 12-month period ending December 31, 2020. On behalf of the Michigan Attorney General. August 24, 2021.

Public Utilities Commission of Nevada (Docket No. 21-06001): Phase I Direct Testimony of Devi Glick in the joint application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of their 2022-2041 Triennial Intergrade Resource Plan and 2022-2024 Energy Supply Plan. On behalf of Sierra Club and Natural Resource Defense Council. August 16, 2021.

North Carolina Utilities Commission (Docket No. E-7, Sub 1250): Direct Testimony of Devi Glick in the Matter of Application Duke Energy Carolinas, LLC Pursuant to §N.C.G.S 62-133.2 and Commission Rule R8-5 Relating to Fuel and Fuel-Related Charge Adjustments for Electric Utilities. On behalf of Sierra Club. May 17, 2021.

Public Utility Commission of Texas (PUC Docket No. 51415): Direct Testimony of Devi Glick in the application of Southwestern Electric Power Company for authority to change rates. On behalf of Sierra Club. March 31, 2021.

Michigan Public Service Commission (Docket No. U-20804): Direct Testimony of Devi Glick in the application of Indiana Michigan Power Company for approval of a Power Supply Cost Recovery Plan and factors (2021). On behalf of Sierra Club. March 12, 2021.

Public Utility Commission of Texas (PUC Docket No. 50997): Direct Testimony of Devi Glick in the application of Southwestern Electric Power Company for authority to reconcile fuel costs for the period May 1, 2017- December 31, 2019. On behalf of Sierra Club. January 7, 2021.

Michigan Public Service Commission (Docket No. U-20224): Direct Testimony of Devi Glick in the application of Indiana Michigan Power Company for Reconciliation of its Power Supply Cost Recovery Plan. On behalf of the Sierra Club. October 23, 2020.

Public Service Commission of Wisconsin (Docket No. 3270-UR-123): Surrebuttal Testimony of Devi Glick in the application of Madison Gas and Electric Company for authority to change electric and natural gas rates. On behalf of Sierra Club. September 29, 2020.

Public Service Commission of Wisconsin (Docket No. 6680-UR-122): Surrebuttal Testimony of Devi Glick in the application of Wisconsin Power and Light Company for approval to extend electric and natural gas rates into 2021 and for approval of its 2021 fuel cost plan. On behalf of Sierra Club. September 21, 2020.

Public Service Commission of Wisconsin (Docket No. 3270-UR-123): Direct Testimony and Exhibits of Devi Glick in the application of Madison Gas and Electric Company for authority to change electric and natural gas rates. On behalf of Sierra Club. September 18, 2020.

Public Service Commission of Wisconsin (Docket No. 6680-UR-122): Direct Testimony and Exhibits of Devi Glick in the application of Wisconsin Power and Light Company for approval to extend electric and natural gas rates into 2021 and for approval of its 2021 fuel cost plan. On behalf of Sierra Club. September 8, 2020.

Indiana Utility Regulatory Commission (Cause No. 38707-FAC125): Direct Testimony and Exhibits of Devi Glick in the application of Duke Energy Indiana, LLC for approval of a change in its fuel cost adjustment for electric service. On behalf of Sierra Club. September 4, 2020.

Indiana Utility Regulatory Commission (Cause No. 38707-FAC123 S1): Direct Testimony and Exhibits of Devi Glick in the Subdocket for review of Duke Energy Indian, LLC's Generation Unit Commitment Decisions. On behalf of Sierra Club. July 31, 2020.

Indiana Utility Regulatory Commission (Cause No. 38707-FAC124): Direct Testimony and Exhibits of Devi Glick in the application of Duke Energy Indiana, LLC for approval of a change in its fuel cost adjustment for electric service. On behalf of Sierra Club. June 4, 2020.

Arizona Corporation Commission (Docket No. E-01933A-19-0028): Reply to Late-filed ACC Staff Testimony of Devi Glick in the application of Tucson Electric Power Company for the establishment of just and reasonable rates. On behalf of Sierra Club. May 8, 2020.

Indiana Utility Regulatory Commission (Cause No. 38707-FAC123): Direct Testimony and Exhibits of Devi Glick in the application of Duke Energy Indiana, LLC for approval of a change in its fuel cost adjustment for electric service. On behalf of Sierra Club. March 6, 2020.

Public Utility Commission of Texas (PUC Docket No. 49831): Direct Testimony of Devi Glick in the application of Southwestern Public Service Company for authority to change rates. On behalf of Sierra Club. February 10, 2020.

New Mexico Public Regulation Commission (Case No. 19-00170-UT): Testimony of Devi Glick in Support of Uncontested Comprehensive Stipulation. On behalf of Sierra Club. January 21, 2020.

Nova Scotia Utility and Review Board (Matter M09420): Expert Evidence of Fagan, B, D. Glick reviewing Nova Scotia Power's Application for Extra Large Industrial Active Demand Control Tariff for Port Hawkesbury Paper. Prepared for Nova Scotia Utility and Review Board Counsel. December 3, 2019.

New Mexico Public Regulation Commission (Case No. 19-00170-UT): Direct Testimony of Devi Glick regarding Southwestern Public Service Company's application for revision of its retail rates and authorization and approval to shorten the service life and abandon its Tolk generation station units. On behalf of Sierra Club. November 22, 2019.

North Carolina Utilities Commission (Docket No. E-100, Sub 158): Responsive testimony of Devi Glick regarding battery storage and PURPA avoided cost rates. On behalf of Southern Alliance for Clean Energy. July 3, 2019.

State Corporation Commission of Virginia (Case No. PUR-2018-00195): Direct testimony of Devi Glick regarding the economic performance of four of Virginia Electric and Power Company's coal-fired units and the Company's petition to recover costs incurred to company with state and federal environmental regulations. On behalf of Sierra Club. April 23, 2019.

Connecticut Siting Council (Docket No. 470B): Joint testimony of Robert Fagan and Devi Glick regarding NTE Connecticut's application for a Certificate of Environmental Compatibility and Public Need for the Killingly generating facility. On behalf of Not Another Power Plant and Sierra Club. April 11, 2019.

Public Service Commission of South Carolina (Docket No. 2019-2-E): Surrebuttal testimony of Devi Glick in the Annual review of based rates for fuel costs for South Carolina Electric & Gas Company. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. March 29, 2019.

Public Service Commission of South Carolina (Docket No. 2019-2-E): Direct testimony of Devi Glick in the Annual review of based rates for fuel costs for South Carolina Electric & Gas Company. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. March 19, 2019.

Public Service Commission of South Carolina (Docket No. 2018-3-E): Surrebuttal testimony of Devi Glick regarding annual review of base rates of fuel costs for Duke Energy Carolinas. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. August 31, 2018.

Public Service Commission of South Carolina (Docket No. 2018-3-E): Direct testimony of Devi Glick regarding the annual review of base rates of fuel costs for Duke Energy Carolinas. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. August 17, 2018.

Public Service Commission of South Carolina (Docket No. 2018-1-E): Surrebuttal testimony of Devi Glick regarding Duke Energy Progress' net energy metering methodology for valuing distributed energy resources system within South Carolina. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. June 4, 2018.

Public Service Commission of South Carolina (Docket No. 2018-1-E): Direct testimony of Devi Glick regarding Duke Energy Progress' net energy metering methodology for valuing distributed energy

resources system within South Carolina. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. May 22, 2018.

Public Service Commission of South Carolina (Docket No. 2018-2-E): Surrebuttal testimony of Devi Glick on avoided cost calculations and the costs and benefits of solar net energy metering for South Carolina Electric and Gas Company. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. April 4, 2018.

Public Service Commission of South Carolina (Docket No. 2018-2-E): Direct testimony of Devi Glick on avoided cost calculations and the costs and benefits of solar net energy metering for South Carolina Electric and Gas Company. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. March 23, 2018.

Resume updated September 2025

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37882

Response of: Entergy Louisiana, LLC
to the First Set of Data Requests
of Requesting Party: Sierra Club

Question No.: SIERRA 1-3

Part No.:

Addendum:

Question:

Regarding capacity expansion modeling:

- a. Did the Company complete any capacity expansion modeling for this Application? If not, please identify the most recent capacity expansion modeling the Company completed.
 - b. Provide a summary of the scenarios, inputs, and outputs from the most recent capacity expansion modeling identified in part (a).
 - c. What modeling software did the Company use for the modeling described in part (a)?
-

Response:

ELL incorporates in full the General Objections served with these Requests. Subject to and without waiving the objections, the Company responds as follows.

- a. No capacity expansion modeling was performed for this Application. Due to the energy and capacity needs of the Customer's electrical load, and the timeline by which electric service was desired by the Customer, the resource options available to the Company that would have been able to meet the Customer's needs while also ensuring the reliability and resource adequacy of the system were limited. The Company was able to utilize long-term resource planning best practices and experience is developing the portfolio of resources needed to serve the Customer. This resource plan was then evaluated with the production cost simulations and the resource adequacy analyses (the latter of which was particularly instrumental in the determination of the amount of non-firm load needed prior to the commercial operations date of the combined cycle power plants) described in Company witness Mr. Datta's Direct Testimony. The last capacity expansion modeling run for Entergy Louisiana, LLC is the 2023 IRP. All information related to the 2023 IRP is available at the website below, specifically pages 86 – 90.

[Louisiana Integrated Resource plan 2023 - Entergy Louisiana](#)

- b. See the response to subpart (a)
- c. See the response to subpart (a) for any modeling done for this filing. The 2023 IRP capacity expansion modeling was done using Aurora.

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37882

Response of: Entergy Louisiana, LLC
to the First Set of Data Requests
of Requesting Party: Sierra Club

Question No.: SIERRA 1-8

Part No.:

Addendum:

Question:

Regarding firm gas supply at the proposed CCCT units:

- a. For each of the proposed CCCTs, what costs does the Company anticipate it will incur to obtain firm gas supply at each unit? Please provide a detailed description of these costs by category (e.g., capital, pipeline upgrades, transport, storage, etc.).
 - b. Please explain how the Company plans to recover costs for firm gas transport. Will the Evest customer cover these costs in full? If not, please explain in detail how these costs will be allocated.
 - c. Please explain how the Company will recover firm gas transport costs in the event that the Evest Customer terminates its contract before the initial 20-year term expires.
 - d. Please explain how the Company will recover firm gas transport costs if the Customer chooses not to renew the contract at the end of the 20-year term.
 - e. If not already provided, what is the estimated capital cost of the gas pipeline infrastructure required to serve the proposed CCCTs? If not already provided, how will the Company recover the capital cost of the pipeline infrastructure required to serve the proposed CCCTs (i.e., how will those costs be allocated between Evest and existing customers)?
-

Response:

ELL incorporates in full the General Objections served with these Requests. Subject to and without waiving the objections, the Company responds as follows.

- a. See the Company's response to Staff 1-17.
- b. Gas transportation costs are recoverable from all customers through the Fuel Adjustment Clause and allocated pursuant to that rider. As such, these costs

are not covered under the Customer's minimum monthly charge and will not necessarily be covered by the customer in full. The Customer will share in the Company's cost for firm gas transportation and fuel for all of its generating facilities, and the cost purchased power incurred by ELL for the benefit of all of its customers.

- c. In the event that Evest terminates its contract before the initial 20-year term expires, its obligations to firm gas transport costs are prescribed in Section 8 of Rider 1 to the ESA. See HSPM-AEO Exhibit LKB-2.
- d. If the Customer elects not to renew the contract, the Company will determine whether firm transportation capacity is needed to support ongoing operation of the plant. If capacity is no longer required, it may choose not to renew firm transportation agreements, and no associated costs would be recovered from Customers.
- e. See the Company's response to Staff 1-157.

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37882

Response of: Entergy Louisiana, LLC
to the First Set of Data Requests
of Requesting Party: Sierra Club

Question No.: SIERRA 1-22

Part No.:

Addendum:

Question:

Regarding the potential for load flexibility at the Evest data center:

- a. Did the Company engage in any discussions with Meta about the potential for load flexibility at the Evest data center, after the ramp-up period? Explain why or why not.
 - b. Please provide data on the hourly load shape of demand from the Evest data center.
-

Response:

ELL incorporates in full the General Objections served with these Requests. Subject to and without waiving the objections, the Company responds as follows.

- a. Yes. The Customer was not interested in being a demand response customer post-ramp period, as it does not meet their operational requirements.
- b. See the Company's response to Staff 1-66.

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37882

Response of: Entergy Louisiana, LLC
to the Second Set of Data Requests
of Requesting Party: Sierra Club

Question No.: SIERRA 2-4

Part No.:

Addendum:

Question:

Refer to the direct testimony of Company witness Jones at 16 regarding the depreciable lives of the Proposed Generators.

- a. Explain why location impacts the depreciable lives of the assets.
 - b. Did the Company propose to the Customer accelerated depreciation for the Pointe Coupee units?
 1. If yes, explain why the Customer was not willing to accept accelerated depreciation terms for these units.
 2. If no, explain why not.
-

Response:

ELL incorporates in full the General Objections served with these Requests. Subject to and without waiving the objections, the Company responds as follows.

- a. The location of the Proposed Generators on its own does not impact the depreciable lives of the assets. However, location was considered as part of the Company's proposal regarding depreciable lives of the assets due to their proximity to ELL's larger load pocket. For instance, the Point Coupee units have a 32 year depreciable life because they are firmly located within ELL's SLEPA region, whereas the Richland parish units are more isolated from significant, non-Customer load at the current time. A 20 year depreciable life was established for Richland Parish generators due to this consideration; this provides further protection for ELL's other customers from costs associated with the potential for stranded assets.
- b. The Company objects to this request as not relevant to the Company's request in this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. As noted in the Direct Testimony of Ryan D. Jones "[t]he Company is not asking the Commission to approve

the terms of the ESA” or other aspects of its agreements with the Customer. See response to Question 67 in the Direct Testimony of Ryan D. Jones. Those Customer agreements have been offered as support for why the requested resources, and other requested relief, are in the public interest. Accordingly, only the final terms of the agreements with the Customer are relevant in this proceeding.

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37882

Response of: Entergy Louisiana, LLC
to the First Set of Data Requests
of Requesting Party: Louisiana Public Service
Commission Staff

Question No.: STAFF 1-89

Part No.:

Addendum:

Question:

Regarding the Direct Testimony of Thomas Kidd page 28, please explain the rationale behind removing from the calculation of the remaining net book value one of the Pointe Coupee Units 1-3 on each of the fifth, seventh, and ninth anniversaries of the Service Commencement Date.

Response:

The Company objects to the “Instructions” included with the request to the extent they seek to impose any obligations or requirements on ELL that exceed the obligations or requirements provided for in the articles of the Louisiana Code of Civil Procedure. The Company further objects to the directive that “these requests are continuing so as to require supplemental responses” as such directive seeks to impose obligations beyond what is required under the Louisiana Code of Civil Procedure, Article 1428. Subject to and without waiving the objections, the Company responds as follows.

As explained in the Direct Testimony of Laura Beauchamp, siting the Pointe Coupee Units 1-3 in the Southeast Louisiana Planning Area, an area in which load growth has historically been significant and in which there is expected to be deactivation of existing generation, is expected to benefit existing customers over the term of the Customer Agreements (as defined in Mr. Kidd’s Direct Testimony at Question 7). Given those resources’ value to ELL customers after the in-service date, ELL concluded that those resources would likely be retained at or around the applicable dates and were excluded from the ESA Guaranty as a result of the expected market value of the Proposed Generators and/or the expected long-term resource planning needs of and benefits for customers.

It is worth noting that the Customer Agreements provide important protections that obligate the Customer to pay for the net book value of the Proposed Generators in the event the ESA is terminated early which obligation is further insured by additional forms of collateral. Additionally, ELL has the contractual right (if the ESA is terminated early) to select and retain resources that have already been built and (at least partially) paid for that support ELL’s resource planning capacity needs.

ENTERGY LOUISIANA, LLC
LOUISIANA PUBLIC SERVICE COMMISSION
Docket No. U-37882

Response of: Entergy Louisiana, LLC
to the First Set of Data Requests
of Requesting Party: Louisiana Public Service
Commission Staff

Question No.: STAFF 1-128

Part No.:

Addendum:

Question:

Direct Testimony of Kline, page 31, Table I presents Class 5 estimated costs for the proposed Transmission Facilities totaling approximately \$3,169 million.

Regarding these estimates, please provide the following:

- a. Provide all supporting documentation for the Class 5 cost estimates presented in Table 1, including but not limited to:
 - i. engineering studies,
 - ii. quantity takeoffs,
 - iii. unit cost assumptions,
 - iv. vendor quotes, and
 - v. benchmarking analyses.
- b. Identify all assumptions underlying the Class 5 estimates, including assumptions related to:
 - i. scope definition,
 - ii. routing and siting,
 - iii. material costs,
 - iv. labor costs,
 - v. permitting and right-of-way acquisition, and
 - vi. schedule.
- c. For each major cost component in Table 1, provide the estimated range of uncertainty (e.g., P50, P90, or equivalent) and the basis for such ranges.

- d. Explain how the Company evaluated the risk that actual costs may differ materially from the Class 5 estimates, including any sensitivity analyses performed.
 - e. Identify all contingencies included in the Class 5 estimates and explain how such contingencies were determined.
 - f. Provide all updates to the Class 5 estimates since the filing of Kline's testimony and identify the reasons for any changes.
-

Response:

The Company objects to the “Instructions” included with the request to the extent they seek to impose any obligations or requirements on ELL that exceed the obligations or requirements provided for in the articles of the Louisiana Code of Civil Procedure. The Company further objects to the directive that “these requests are continuing so as to require supplemental responses” as such directive seeks to impose obligations beyond what is required under the Louisiana Code of Civil Procedure, Article 1428. Subject to and without waiving the objections, the Company responds as follows.

Information responsive to this request has been designated as Highly Sensitive Protected Material (“HSPM”) and will be produced only to the appropriate Reviewing Representatives in accordance with the Confidentiality Agreement in effect and executed in this docket. HSPM files will be served upon appropriate reviewing representatives through an OpenText™ Core Share link. Any downloads of such files shall be treated in accordance with the applicable provisions of the Confidentiality Agreement regarding duplication of HSPM files.

- a. (i.-v.) Entergy’s Class 5 estimate was developed in accordance with Entergy’s cost estimating processes and in alignment with the Association for the Advancement of Cost Engineering International (AACE) guidelines. The basis for Entergy’s Class 5 estimates are parametric cost estimates obtained from recently completed Facilities Studies and/or executed projects of similar scope and scale. Please also see the HSPM attachment.
- b. i.) Class 5 estimate scope was based on the Planning Assessment performed by Entergy's Transmission Planning team. ii.) Routing and siting of Entergy's facilities were based on desktop analysis of the project site and customer discussions. iii.) Material costs were embedded within the parametric Class 5 estimate for each component. iv.) Labor costs were embedded within the parametric Class 5 estimate for each component. v.) Permitting & right-of-way acquisition costs were embedded within the parametric Class 5 estimate for each component. vi.) Duration schedule

included in the Class 5 estimate was based on projected equipment lead times and parametric analysis.

- c. Transmission Facilities costs shown in Table 1 are based on Entergy's Class 5 estimate with a cost accuracy range of -50% to +100%, in accordance with Entergy's Cost Estimating Processes and in alignment with the Association for the Advancement of Cost Engineering International (AACE) guidelines.
- d. The basis for Entergy's Class 5 estimates are parametric cost estimates obtained from recently completed Facilities Studies and/or executed projects of similar scope and scale.
- e. Cost uncertainty of 15% was added to the parametric cost estimate for each Transmission Facilities component and is included in the Table 1 values.
- f. No additional Transmission Facilities Class 5 estimates have been completed since the filing of Kline's testimony.