Bidder Comments Received

- **(OCC) Occidental Chemical Corporation -1.** The 2024 CCCT RFP excludes existing resources from bidding into it due to the limitation that only new developmental resources are eligible.
    - Throughout 2024 ELL has conducted an RFP that specifically targeted Existing Resources, allowing bids for Energy and Capacity from existing natural gas generation and also capacity credits from renewable resources. *See*, LPSC Docket No. X-37158, *In re: Request for Proposals for Existing Energy and Capacity Resources*; *See also*, https://spofossil.entergy.com/ENTRFP/SEND/2024ELLExistingResourceRFP/Index.htm

- **(OCC) Occidental Chemical Corporation-2.** The 2024 CCCT RFP excludes resources from bidding into it that do not meet the 600-800MW summer rating capacity limits.
    - In addition to seeking up to 2,000 MW in this RFP, ELL also seeks locational diversity due to resource needs in both the SELPA and WOTAB regions. Considering that one purpose of the RFP is to market test a generating resource in both SELPA and WOTAB, ELL believes that limiting the permissible capacity range per resource to the aforementioned values will enhance its ability to conduct a fair, comparable assessment. Lastly, the technology ELL intends to market test is generally in the 680MW to 730 MW range. Notwithstanding its need to market test resources in that range, ELL has expanded that range for purposes of determining eligibility to participate in this RFP, decreasing the lower limit and increasing the upper limit, in an effort to be more inclusive and broaden the universe of resources and potential bidders who may be eligible to participate – an approach which the Independent Monitor for this RFP has endorsed.

- **(OCC) Occidental Chemical Corporation-3.** The 2024 CCCT RFP is preferential to ELL because at this time, according to the MISO website, there are no active CCCT generation resource projects listed in the 2024 or earlier MISO DPP.
    - ELL's RFP is designed to avoid giving preferential treatment to its self-build alternatives by allowing other potential bidders a reasonable opportunity to enter resources into the MISO 2024 DPP Queue if they so choose as part of their intended participation in the RFP. The window for participation in MISO's DPP 2024 cycle has not yet closed, as of the date of this response. It should be noted that ELL has recently learned that MISO is renaming the 2024 DPP Queue to the 2025 DPP Queue to align with the calendar year. MISO has indicated that the 2025 DPP Queue should remain open until Q3 of 2025. ELL intends to update RFP documents to reflect this change.

- **<u>LEUG Louisiana Energy Users Group-1.</u>** The RFP is discriminatory against existing resources by limiting eligibility to new developmental resources and excluding existing resources.

    - See response to OCC-1 above.

- **<u>LEUG Louisiana Energy Users Group-2.</u>** The RFP is discriminatory with respect to the size of proposed resources by limiting eligibility to resources sized between 600-800 MW;

    - See response to OCC-2 above.

- **<u>LEUG Louisiana Energy Users Group-3.</u>** The RFP is discriminatory with respect to requiring that resources either already have an existing interconnection agreement with MISO or already be included in the 2024 or earlier MISO interconnection Definitive Planning Phase queue; and

    - See response to OCC-3 above.

- **<u>LEUG Louisiana Energy Users Group-4.</u>** The RFP fails to include consideration of customer-centered-options.

    - In LPSC Docket R-35462, LEUG has recommended that the Commission change the regulated model in Louisiana to allow select industrial customers to bypass the utility and purchase energy directly from unregulated entities, among other things. While LEUG has not provided a specific, actionable proposal, this alternative scheme is being proposed to allow industrial users to obtain power at a lower price than ELL's embedded cost to serve all customers (including those in the industrial, residential, and commercial classes). In the rulemaking, LEUG has not demonstrated with detailed analysis how this alternative scheme protects the remainder of ELL's customers from higher costs. Moreover, results from jurisdictions that have implemented recommendations offered by LEUG, or similar thereto, demonstrate that these recommendations result in significantly higher costs to all other customers. At this time, the LPSC Staff has not recommended that the Commission depart from the rate regulated model, nor has the Commission voted to allow it. In prior orders, the LPSC indicated that it would not pursue alternative schemes like this unless it is proven that all customers will benefit. Even if the Commission were to allow LEUG's proposal, which is uncertain at best without compelling evidence of benefits to all customers, it will take years to develop and implement rules required to protect all customers from harms and cost shifts followed by several years for the industrials to build new generation. It would be irresponsible resource planning, and unreasonable, for ELL to rely on a resource option that is currently not permitted in Louisiana when it has a resource need in 2030. Further, ELL notes that some of the customer-centered-options that LEUG is advocating for are currently permitted via the Commission Order issued on August 1, 2024 in the aforementioned docket, and thus not necessary to include in this RFP.