Whit Cox, Regulatory Director, Southern Renewable Energy Association

On a broad scale, **SREA** is concerned that the lack of long-term regional transmission planning in MISO South has resulted in Entergy proposing new gas plants to meet new load from data centers, first in Mississippi and now in Louisiana. The ability to access a wider marketplace of options is absent, because a more robust regional network is too. To the extent that clean and renewable energy is not already lined up in the interconnection queue ready to serve this new customer in Louisiana, it is because of the lack of regional transmission planning in MISO South. That lack of regional transmission planning gives Entergy an excuse to build new gas plants by claiming that the "urgent" need from new data centers does not allow time for the development of renewable energy.

SREA is concerned by the sheer amount of new gas-fired generation Entergy is proposing in Louisiana: 2,262 MW total from 3 new 754 MW gas plants. For comparison, this is 3 times the size of the new gas power plant Entergy is building in Mississippi to power Amazon's new data center there, and over 20 times the size of the gas-fired Bayou Power Station Entergy proposed earlier this year in Louisiana. SREA is concerned about the large amount of greenhouse gas emissions these 3 new gas plants will produce, and the unproven nature of the technology Entergy is proposing to install "in the future" to mitigate the greenhouse gas emissions that will be produced by these gas power plants. Entergy is proposing to add huge amounts of greenhouse gas emissions, with proposals to mitigate those emissions "in the future" with largely unproven technologies and upgrades. Entergy recently suspended its Bayou Power Station, which is 20 times smaller, due to "potential changes to the estimated cost of the project." The lesson Entergy should have learned from the Bayou Power Station docket is to propose commercially proven technologies with known costs, such as wind, solar, and battery storage. Instead, Entergy has decided to propose a project that conceals the true future costs.

SREA is concerned that Entergy is not proposing competitive procurement for the proposed 2,262 MW of new gas generation, such as a Request for Proposals (RFP) that would allow clean and renewable energy technologies to be considered. If given a fair opportunity to complete, SREA's members could potentially develop some or all of this energy and capacity with lower costs and no GHG emissions. However, Entergy is not allowing clean and renewable energy technologies a reasonable opportunity to serve the new customer, despite the supposed "significance of the Customer's clean energy funding commitments."

Finally, SREA is concerned that Entergy has apparently ignored the recent capacity expansion modeling that its own employees have conducted for integrated resource

planning in Louisiana. Notably, <u>Entergy's capacity expansion modeling</u> did not indicate that it should add any new CCCT gas plants with hydrogen or CCS upgrades in any scenario or strategy. Rather than diversify its portfolio with a proven clean and renewable technology that was recommended by its own modeling last month, Entergy is proposing unproven technologies with uncertain costs.