**Context and Background:**

John D. Wilson, representing the Southern Renewable Energy Association (SREA), provides cross-answering testimony responding specifically to points raised by the Louisiana Energy Users Group (LEUG) and the Sierra Club regarding Entergy Louisiana LLC’s (ELL) proposed generation and transmission resources intended to serve a large industrial customer (Meta) in North Louisiana.

**Key Sections and Responses:**

**I. Response to LEUG Regarding Compliance with Tariff Rules:**

* **Concerns Identified by LEUG Witness Dauphinais**:
  + The proposed Corporate Sustainability Rider (CSR) violates the Commission's Tariff Rules by:
    1. Potentially giving Meta preferential renewable energy access ahead of customers on waiting lists for renewable energy (Geaux Zero program).
    2. Creating discriminatory renewable market access by offering exclusive arrangements to Meta not available to other industrial customers.
    3. Establishing CSR charges outside of ELL's formal electric tariff structure.
* **Wilson's Response**:
  + Agrees partially with LEUG concerns:
    1. Confirms that Meta is given an exclusive renewable access route distinct from other customers.
    2. Clarifies ELL intends to acquire renewable resources outside of the existing "3 GW Order," making the CSR distinct and not conflicting with existing waitlisted customers.
    3. Concurs that establishing CSR outside of official tariff documentation violates Commission rules, especially by fixing an average demand level through contract rather than through established tariff mechanisms.
  + **Recommendation**:
    1. Commission should deny the approval of proposed new gas-fired generation, primarily due to tariff rule violations.
    2. Alternatively, if exemptions are granted, conditions should require ELL to offer CSR terms equitably to other large industrial customers, resolving discriminatory issues.

**II. Response to Sierra Club Regarding Grid-Enhancing Technologies (GETs):**

* **Concerns Raised by Sierra Club Witness Glick**:
  + ELL did not adequately assess the potential benefits of GETs to reduce costs and improve grid efficiency.
  + Suggested requiring ELL to conduct a comprehensive GETs analysis.
* **Wilson's Response**:
  + Agrees with Sierra Club's recommendation.
  + Proposes a broader GETs study to benefit all customers, not solely the single customer (Meta).
  + Suggests filing this study as part of ELL’s 2025 Integrated Resource Plan (IRP) within nine months following the Commission’s decision on the application.

**III. Additional Concerns Regarding Expedited Certification Process (Wind Energy):**

* **Critique of ELL’s exclusion of wind energy resources** from expedited certification for renewable energy procurement.
* ELL cited consistency with prior "3 GW Order," which limited expedited certification to solar and hybrid storage.
* Wilson argues this exclusion lacks sufficient justification and unduly restricts competitive renewable procurement processes, potentially denying ratepayers low-cost renewable resources.
* **Recommendation**:
  + Commission should require inclusion of wind resources in the expedited renewable procurement process proposed by ELL.

**Summary of Recommendations:**

Wilson reiterates and extends recommendations made in his original direct testimony:

1. **Denial of ELL's requested new gas-fired generation** due to non-compliance with tariff and market-based mechanism (MBM) rules.
2. Clarification on CSR charges concerning Tariff Rules definitions and implications.
3. Resolution of discriminatory CSR terms by mandating equitable renewable resource access for similarly situated industrial customers.
4. Comprehensive GETs study, encompassing benefits for all customers, to be filed in IRP and compliance filings.
5. Inclusion of wind energy resources in ELL's expedited renewable procurement process.

**Conclusion:**

Wilson's cross-answering testimony reinforces previous concerns about regulatory compliance and equitable renewable resource access, while advocating broader considerations of renewable and grid-enhancing technologies to ensure long-term economic and environmental benefits for all ratepayers.