



# Southern Renewable Energy Association

P.O. Box 14858, Haltom City, TX 76117

October 23, 2019

Ms. Terri Lemoine Bordelon  
Records Section  
Louisiana Public Service Commission  
Galvez Building, 12<sup>th</sup> Floor  
602 North Fifth Street  
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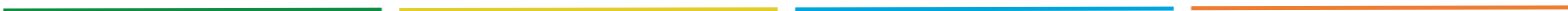
RE: LPSC Docket No. I-34693. *Integrated Resource Planning (“IRP”) Process for Cleco Power LLC, Pursuant to General Order Dated April 20, 2012*

Dear Ms. Bordelon,

Please find an original and four copies of the Southern Renewable Energy Association (SREA) stakeholder written comment in LPSC Docket No. I-34693 in Re: Cleco Power LLC Integrated Resource Planning process Pursuant to the General Order R-30021 (Corrected) issued April 20, 2012.

Sincerely,

Simon Mahan  
SREA Executive Director



BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION

CLECO POWER LLC

DOCKET: I-34693

IN RE: 2019 INTEGRATED RESOURCE  
PLANNING (“IRP”) PROCESS FOR  
CLECO POWER LLC, PURSUANT TO GENERAL  
ORDER APRIL 20, 2012

**SOUTHERN RENEWABLE ENERGY ASSOCIATION’S COMMENTS REGARDING  
CLECO POWER LLC’S FINAL 2019 INTEGRATED RESOURCE PLAN**

The Southern Renewable Energy Association (SREA) is an industry-led initiative that promotes responsible use and development of wind energy, solar energy, energy storage, and transmission solutions in the South. SREA has been an active stakeholder in the Cleco Power LLC’s Integrated Resource Planning (IRP) and we appreciate Cleco’s thoughtful consideration of stakeholder comments.

SREA is largely satisfied with Cleco’s Final IRP. Cleco has taken stakeholder comment seriously, and has clearly demonstrated effort to resolve comments by intervening parties. As a result, Cleco’s IRP identifies a need for up to 1,000 megawatts (MW) of wind energy and up to 400 MW of solar energy. Cleco plans to issue a request for proposals (RFP) for renewable energy for at least 500 MWs. SREA strongly supports Cleco’s desire to issue a renewable energy RFP, and we encourage the company to expeditiously file an expanded renewable energy RFP. In February 2019, SREA filed an additional letter, encouraging Cleco to move forward on its Action Plan. SREA also encourages the company to develop a framework to fairly evaluate energy storage options associated with wind energy and solar energy proposals.

We encourage Cleco to continually review cost and performance assumptions regarding renewable energy resources, and energy storage devices. New technology is changing rapidly, and updated cost and performance assumptions ensure Cleco will be able to accurately evaluate new opportunities. To that end, for the next IRP, we recommend Cleco adopt the National Renewable Energy Lab's Annual Technology Baseline as its data source regarding renewable energy resources.

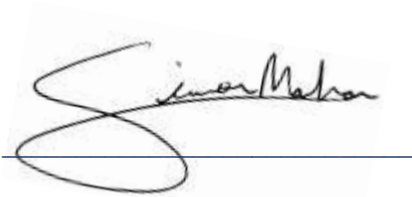
SREA also encourages Cleco to evaluate moving away from the AURORA software program. As mentioned by Cleco previously, AURORA can create planning abnormalities if capacity assumptions are not adequately compensated. Cleco's recognition of AURORA's limitations, and willingness to resolve those, highlight a significant shift compared to Entergy Louisiana's misuse of the software program. Whereas Cleco's IRP shows substantial renewable energy deployment in the very near term, Entergy's IRP shows that effectively nothing should be done in the next four or five years.

We would like to emphasize that this round of Louisiana IRP's has been a positive experience with SWEPCO and Cleco. While both SWEPCO and Cleco have taken stakeholder engagement seriously, Entergy did not. The divergences are stark: both SWEPCO and Cleco's IRPs show significant need for renewable energy resources in the very near-term. Entergy's IRP is a "do nothing" plan for the next five years. While SWEPCO and Cleco may have not adopted all of the recommendations provided by SREA, we are impressed by the earnestness of the companies to protect their ratepayers. Entergy adopted no significant recommendations from any intervening party.

SREA appreciates Cleco's willingness to engage stakeholders and their thoughtful consideration of our comments. We agree with much of Cleco's Draft IRP and would like to make the following recommendations:

- Immediately issue a Request for Proposals for up to 1,400 MW of renewable energy, based on Cleco's own IRP results identifying such a need.
- Allow for maximum flexibility for bidders' proposals regarding location, size, technology type, contractual abilities, and operational dates.
- Encourage energy storage, but do not count energy storage against the RFP threshold.
- Issue a 100 MW/400 MWh RFP for energy storage as a pilot program.

Respectfully submitted:

A handwritten signature in black ink that reads "Simon Mahan". The signature is written in a cursive style and is positioned above a solid horizontal line.

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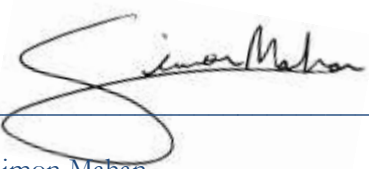
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I hereby certify that I have this 23rd day of October 2019 served copies of the foregoing pleading upon all other known parties of this proceeding by email.



Simon Mahan