



DEPARTMENT OF CONSERVATION AND ENERGY

December 15, 2025

VIA STATUTORILY PRESCRIBED E-MAIL

The Honorable Bob Hensgens, Chairman
Senate Natural Resource Committee

The Honorable Brett Geymann, Chairman
House Natural Resources and Environment Committee

**Re: Summary Report for Proposed Rule
Regulation of Solar Power Generation Facilities (LAC 43:I.5101-5121)
Proposed on August 20, 2025**

The Louisiana Department of Conservation and Energy (“C&E”), Office of the Secretary, proposes to adopt LAC 43:I.5101-5121 in accordance with the Administrative Procedure Act, La. R.S. 49:950 *et seq.*, and under the authority of La. R.S. 30:1154 and Act 555 of the 2022 Regular Legislative Session. The proposed rule requires permits to construct and operate solar power generation facilities and sets forth regulations governing the decommissioning and required financial security of such facilities.

On August 8, 2025, in accordance with La. R.S. 49:966(B) and (C), the department forwarded the Notice of Intent and other statutorily required documents to the Office of the Governor, presiding officers of the House and Senate, and the appropriate legislative committees. A public hearing was held on September 26, 2025.

Pursuant to La. R.S. 49:961(B) and 966(D)(1)(b), C&E submits the following summary report.

I. Summary of Public Hearing Testimony and the Agency’s Responses

A public hearing was held on Friday, September 26, 2025, at 9:00 a.m. to receive comments on the proposed rule. Attendees included representatives from the solar and renewable industry, a general farm organization, a Louisiana urban, rural, and regional planning nonprofit organization, and C&E staff.

Testimony was given by Blan Holman with Southern Renewable Energy Association. His testimony is summarized below, followed by C&E’s responses.

Decommissioning included in leases. The solar development industry is interested in being responsible land stewards. Many solar facilities are built on leased land, and the leases typically contain decommissioning provisions. The proposed regulations properly recognize that those

protections may already be in place, while also noting that C&E is required by statute to implement bonding and decommissioning requirements.

Response: C&E acknowledges the comment and has revised the regulatory text for clarity. See Response to Comment 31 for additional discussions.

Timeframe for compliance and suggested grace period. The proposed regulations may inadvertently delay projects once the rules go into effect. The proposed rules give projects that commence construction before the effective date 180 days to register and submit a complete permit application. However, projects scheduled to start construction shortly after the effective date would be required to go through the entire permitting process. For example, if the proposed rules take effect this November, a project scheduled to begin construction in December 2025 would be unable to complete construction as scheduled by February 2027, since it would have to step back and go through the rule's permitting process and hearing requirements. So, a project that was planned to go online in early 2027 would be delayed by six months or potentially into 2028. Our written comments proposed extending the 180-day grace period to projects that commence construction within four months after the effective date. The permit application also requires a demonstration of financial security before starting construction, which is inconsistent when applied with the grace period. The 180-day grace period should also be applied uniformly across all requirements: registration, permit application, the ability to use an existing agreement, and demonstrating financial security.

Response: C&E acknowledges the comment and has revised the regulatory text to set the Effective Date to July 1, 2026. Setting a future effective date promotes fair treatment and consistent implementation of the rules, while also ensuring mature projects, as described in the example, have sufficient time to prepare and adjust project schedules to meet the requirements set forth in the rules. See Responses to Comment 16 and 17 for additional discussions.

Notice timelines. We submitted comments about the timelines and dates for the notice and cure period and hearings. More clarity and certainty on these would give developers some certainty on how long notice and comment window will take.

Response: C&E acknowledges the comment. The timeframes provided within the rule represent maximum periods for C&E actions, not fixed or mandatory delays. The timeframes are included to ensure transparency and predictability regarding C&E's administrative and technical review process and account for publication schedules imposed by parish journals. They do not constrain C&E from acting more quickly when possible and appropriate. See Response to Comment 19 for additional discussions.

Salvage value and decommissioning. Recommends removing "gross" from the rules on decommissioning bonds and letters of credit. As written, the proposed rules do not allow the salvage value to be netted out of the decommissioning cost. The salvage value is extremely significant as useful equipment can be worth millions. Believes the statute allows salvage value to be considered in setting the bond and letter of credit.

Response: C&E acknowledges the comment and has revised the regulatory text. C&E’s authority on deducting salvage value from the decommissioning cost is limited by the language of La. R.S. 30:1154(A)(9)(b)(iii). See Response to Comment 40 for additional discussions.

Fees. The proposed fees of \$15 per acre for the application and annual maintenance fee of \$15 per acre is excessive. For example, fees for a 500-megawatt facility over a 20-year period would total over a million dollars. Given that the program’s budget is \$300,000, the proposed fees generate far more revenue than needed to pay for the program. Recommended changing the fee structure to \$10 per acre for applications and \$5 per acre for annual maintenance.

Response: C&E acknowledges the comment and has revised the regulatory text to mirror La. R.S. 30:1154. See Response to Comment 43 for additional discussions.

II. Summary of Comments Received and the Agency’s Responses and Proposed Actions Resulting From Public Comments

C&E received a total of 43 written comments on the proposed rule from commenters, who are developers and organizations within the solar and renewable energy industry and one general farm organization. The comments received are summarized below and organized by section or topic.¹ The department’s responses, which include a concise statement of the principal reasons for and against adopting any of the suggested amendments or changes and any proposed actions resulting from the comments, are provided below each summary.

§5101. Definitions

COMMENT 1:	<p>The clearing and grading required in the construction process is extensive and takes up several months before the start of the proposed definition of construction. Commenter provides the following redline to the definition of Construction and recommends that any clearing and grading that requires the issuance of, and compliance with, a SWPPP be deemed “construction” under the proposed rule:</p> <p><u>“Construction—activities that require a Storm Water Pollution Prevention Permit from the Louisiana Department of Environmental Quality prior to their commencement, including land clearing and site grading, necessary for the installation of solar devices, equipment, and other materials or structures necessary for the operation of a solar power generation facility. Construction does not include the performance of preliminary activities to prepare the site, such as clearing, grading, testing, and surveying.....”</u></p>
RESPONSE:	C&E acknowledges and appreciates the comment. After careful consideration, C&E will not adopt the suggested changes.

¹ See Appendix, List of Commenters (written).

	<p>Including activities that require a Storm Water Pollution Prevention Permit (“SWPPP”) from the Louisiana Department of Environmental Quality (“LDEQ”), which include clearing and grading, in the definition of “construction” would promote a more comprehensive approach to addressing environmental concerns early in the permitting process. However, C&E has no jurisdiction or ability to regulate the SWPPP program. Including SWPPP-triggering activities in the proposed definition of “construction” would make the issuance of the permit dependent or contingent upon LDEQ, which could introduce delays. Moreover, C&E’s regulatory authority provided by La. R.S. 30:1154(D)(1) is focused on decommissioning and related financial security requirements and not broader site development activities.</p>
RESULT:	C&E will not make any changes to the regulatory text at this time.
COMMENT 2:	<p>The definition of “Designated Operator” is unclear in how a person would become recognized as such.</p> <p>Commenter suggests the following revision to clarify and make consistent with §1505(A), “...facility and who, <u>is authorized</u> on behalf of all responsible parties, is as...”</p>
RESPONSE:	<p>C&E acknowledges the comment and suggested revision.</p> <p>The revised definition clarifies the role and responsibilities of the designated operator.</p>
RESULT:	C&E will revise the regulatory text.
COMMENT 3:	Commenter suggests adding pandemic or epidemic to the definition of a “Force Majeure Event.”
RESPONSE:	<p>C&E acknowledges the comment and suggested revision.</p> <p>The suggested change is not necessary as the proposed definition provides an illustrative list of potential force majeure events.</p>
RESULT:	C&E will not make any changes to the regulatory text at this time.
COMMENT 4:	<p>Commenter’s redline to the definition of “Material Change” suggests removing the ownership or leasing structure clause in the definition’s second sentence as such change should only be considered under this definition if it results in a change in responsible party, which is already included within the definition.</p> <p>Commenter’s redline further suggests the following revisions, “...a <u>material</u> change to the location of solar devices or the point of interconnection; a change in the form, provider, or amount of financial security; <u>a material</u> change to the decommissioning plan; or a change of <u>an increase in</u> the decommissioning cost estimate by 10 percent or more.”</p>

RESPONSE:	<p>C&E acknowledges comment.</p> <p>The suggested change is not necessary. Acknowledging ownership and leasing structure of a facility site separate from a change in any responsible party is relevant for C&E recordkeeping. The proposed definition provides an illustrative list and maintains consistent language and structure that can aid in reader understanding and interpretation.</p>
RESULT:	<p>C&E will not make any changes to the regulatory text at this time.</p>
COMMENT 5:	<p>Commenter requests clarification on whether a repower or execution of a new Power Purchase Agreement (PPA) would constitute “material changes” and what implications this may have for compliance and permit modification.</p>
RESPONSE:	<p>C&E acknowledges the comment. No change is necessary as the comment does not suggest an amendment or change.</p> <p>C&E is directed by La. R.S. 30:1154(9)(b)(i) to consider assets when determining the adequacy of the financial security requirement. These assets could include solar devices and other equipment and materials necessary for operating the facility that belong to the designated operator or a responsible party. If these assets change in a way that effects the requirements and activities detailed within the decommissioning plan or the amount of financial security required to secure the cost of decommissioning activities, then the change likely is a material change.</p>
RESULT:	<p>C&E will not make any changes to the regulatory text at this time.</p>
COMMENT 6:	<p>Commenter’s redline to the definition of “Responsible Party” provides a technical revision by deleting “or legal entity” as it is included in the definition of “Person.”</p> <p>Commenter suggests that in situations where a facility is owned by a sublessee, the sublessee should be a responsible party and the lessee of the land from the landowner should not be a responsible party.</p> <p>Commenter seeks clarification whether the department intends to consider an industrial development board (IDB) or other tax-exempt authority that owns a facility under a PILOT arrangement (Payment in Lieu of Taxes) and leases the facility to the facility operator as a Responsible Party.</p>
RESPONSE:	<p>C&E acknowledges and appreciates the comment. The use of defined terms makes other definitions less redundant avoids potential confusion when used throughout the rules.</p> <p>The definition of “Responsible Party” is meant to identify all persons with an ownership stake in a facility and persons subject to complying with the property lease. La. R.S. 30:1154(9)(a)(iii) directs C&E to ensure the permit’s financial security requirement will comply with the provisions of</p>

	the property lease between the landowner and the lessee. The statutory reference to compliance with the property lease includes a sublessee, or any other entity, that owns the facility since the sublessee’s rights and obligations arise from the lease authorizing “the exploration, development, and production of solar energy.”
RESULT:	C&E will address the technical change but make no other changes to the regulatory text at this time.
COMMENT 7:	The current draft lacks clarity in its definitions and calculations of “gross decommissioning cost” and “salvage value.” Commenter suggests providing clear definitions for these terms.
RESPONSE:	C&E acknowledges the comment. No change is necessary as the comment does not suggest an amendment or change. Salvage value is defined in Section 5101 within the parameters provided by La. R.S. 30:1154. Separate revisions to Sections 5113(C)(7) and 5115(E) address the comment request to clarify and define gross decommissioning cost.
RESULT:	C&E will not make any changes to the regulatory text at this time.

§5103. Applicability

COMMENT 8:	Concerned that nothing in the proposed Rules clearly preempts local governments from adopting duplicative or more burdensome decommissioning rules. Commenter’s redline suggests the following addition to the end of Paragraph (B)(1), “ <u>..., except that a local government shall not impose removal or restoration obligations or require financial assurance securing such obligations that are more stringent than or additional to those provided for in this Chapter[.]</u> ”
RESPONSE:	C&E acknowledges the comment. While the suggested changes would streamline the permitting process and requirements for decommissioning solar power generation facilities, they are beyond C&E’s statutory authority. La. R.S. 30:1154(D)(1) authorizes C&E to issue permits for the construction and operation of solar facilities by promulgating rules that require facilities to have a decommissioning plan and an amount of financial security to ensure proper site closure. The statute does not explicitly provide that these rules preempt a local parish’s authority to impose similar or more burdensome requirements on decommissioning. Additionally, there is clear legislative intent in other statutes requiring C&E to regulate and issue permits on other matters involving solar power generation facilities that allow local governing

	authorities to choose to impose their own requirements on the statute’s subject matter. <i>See</i> Act 279 of the 2025 Regular Session.
RESULT:	C&E will not make any changes to the regulatory text at this time.
COMMENT 9:	Commenter suggests that the “Effective Date” of the Decommissioning/Security Proposed Regulations not be prior to January 1, 2026. “Effective Date” is currently defined as the final promulgation of the regulations.
RESPONSE:	C&E acknowledges the comment. No discussion is necessary as the comment does not suggest an amendment or change.
RESULT:	C&E will revise the definition of “Effective Date” to be July 1, 2026. By setting the Effective Date to July 1, 2026, the start of the permitting program aligns with Fiscal Year 2027, facilitating smooth budget planning and resource allocation for C&E. The change also would provide sufficient time for affected stakeholders to develop protocols and obtain or revise existing decommissioning plans and financial security that complies with the rules.
COMMENT 10:	The proposed effective date of November 22 raises significant concerns for projects currently in development. Many are striving to begin construction before the expiration of federal tax credits but may be unable to proceed if permit issuance is delayed. Requiring a decommissioning permit prior to commencing construction, in combination with a four-month minimum issuance period, creates a critical gap that could jeopardize project viability and access to federal incentives.
RESPONSE:	C&E acknowledges the comment. No discussion is necessary as the comment does not suggest an amendment or change. La. R.S. 30:1154 requires a permit issued pursuant to these rules to construct or operate a solar power generation facility with a footprint of ten or more acres.
RESULT:	See Result to Comment 9.

§5105. General Requirements for Solar Power Generation Facilities

COMMENT 11:	Commenter requests confirmation that the permit referenced in Section 5109(C) is the same as that in Act 279/HB 459.
RESPONSE:	C&E acknowledges the comment. No discussion is necessary as the comment does not suggest an amendment or change. C&E confirms that text of Subsection (C) is referring to permits issued by C&E under Act 279 of the 2025 Regular Session. The reference was added to promote administrative efficiency by reducing duplicative submissions,

	minimizing processing delays, and allowing for more coordinated review and oversight.
RESULT:	C&E will make a minor technical change.
COMMENT 12:	Recommends that the department consider additional opportunities for streamlining the permitting process. For instance, the department should consider combining the solar decommissioning permit and the solar permits required pursuant to Act 279 of 2025. A combined permit could help to streamline the process for larger facilities that are subject to both permitting requirements.
RESPONSE:	C&E acknowledges and appreciates the comment. No discussion is necessary as the comment does not suggest an amendment or change. The text of Subsection (C) addresses the recommendation.
RESULT:	See Result to Comment 11.
COMMENT 13:	Requests, once implemented, that the department and the Secretary use minimal tolerance in deviating from these standards where given discretion to the rules established to maintain a high level of expectation that these facilities be properly maintained for their useful life; or be properly decommissioned once they are out of production.
RESPONSE:	C&E acknowledges and appreciates the comment. No discussion is necessary as the comment does not suggest an amendment or change.
RESULT:	C&E will not make any changes to the regulatory text at this time.

§5109. Permit Requirement

COMMENT 14:	<p>Suggests consideration of not requiring permitting for “construction” on a Facility site. Some of the greatest potential impacts to neighboring land, particularly agricultural land, do not come from the facility once it is in operation but from changes to the landscape, drainage, and alternative land use. Commenter provides that soil health, flood management, and local economies are just a few of the items impacted once site prep begins, which can occur rapidly if deforestation, grading, or other changes to the surface are initiated.</p> <p>Requests that the department consider requiring environmental impact studies as a part of the initial permitting process prior to construction or preparation of the site. Commenter believes that the environmental impact needs to include acute focus on drainage and natural resource impacts beyond the footprint of the Facility. Site restoration is considered for land, “to the extent practicable,” and requires it to be “restored to resemble its condition prior to construction.” If permitting needs to be initiated prior to site preparation how will the department determine what is reasonable to</p>
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	require the Designated Operator to be held to should the property be decommissioned or abandoned? If drainage is changed, topsoil removed or eroded, or hazardous materials be placed on or in our soils then how will the department hold the permit holder to an adequate threshold of “practicable” site restoration?
RESPONSE:	<p>C&E acknowledges and appreciates comment and its concerns. No discussion is necessary as the comment does not suggest an amendment or change to the regulatory text.</p> <p>C&E acknowledges the potential impacts to the environment from a facility’s site preparation activities. However, C&E only has authority under La. R.S. 30:1154 to promulgate rules focused on decommissioning and financial security for site closure, and the permitting process to carry out said rules. C&E’s authority does not expand to pre-construction activities, such as requiring an environmental impact study. Environmental issues related to construction are regulated by the LDEQ, and an environmental impact study or similar requirement may be required by a parish ordinance to obtain a permit on the local level.</p>
RESULT:	C&E will not make any changes to the regulatory text at this time.
COMMENT 15:	Commenter’s redline suggests technical and clarifying revisions to Subsection (A): “the designated operator of a proposed solar power generation facility shall provide <u>send</u> written notice.... The notice shall ... and the <u>projected</u> location of all electric transmission...”
RESPONSE:	C&E acknowledges the comment. The suggested changes may improve readability and could provide a more accurate and practical description of the facility’s layout for this phase of the project.
RESULT:	C&E will change the regulatory text.
COMMENT 16:	Concerned that mature projects scheduled to become operational or commence construction in the next several months could experience serious disruption without additional revisions to Subsection (B) due to Rule’s notice provisions. For example, a project already scheduled to commence construction in November or December of this year could see its construction and placed-in-service dates delayed several months due to the notice time periods. That kind of unexpected delay, occurring late in projects’ multi-year development process, could jeopardize tax credit eligibility and render the projects financially unviable. Similarly, if a project were scheduled to become operational later this year, it might see that placed-in-service date delayed due to the need to comply with the regulation’s timelines before becoming operational. Given the uncertainty regarding the effective date of these rules, it would be consistent with legislative intent to allow some additional time to projects that commence

	<p>construction shortly after the rules are adopted, so as to not cause unnecessary delays in construction.</p> <p>Commenter’s redline of the second sentence of Subsection (B) suggests adding the following language to avoid significant disruption of projects poised to bring cost-effective Louisiana businesses and ratepayers, “The designated operator of a facility that has commenced construction or is in operation before <u>four months after</u> the effective date of these rules shall have one year from the effective date to submit an administratively complete permit application.”</p>
RESPONSE:	<p>C&E acknowledges the comment.</p> <p>The addition of a four-month delay after the Effective Date to submit a permit application would give mature projects the ability to continue activities on schedule without disruption. The suggested four-month extension could also be interpreted as treating projects that fall outside the 4-month window unfairly. C&E recognizes the need for consistency across all compliance deadlines for registering with C&E, applying for a permit, and meeting financial security requirements. Therefore, C&E will revise the Effective Date to July 1, 2026. Setting the Effective Date to align with the start of the fiscal year will also facilitate smooth budget planning and resource allocation for C&E. The change also would provide sufficient time for affected stakeholders to develop protocols and obtain or revise existing decommissioning plans and financial security that complies with the rules.</p>
RESULT:	See Result to Comment 9.
COMMENT 17:	<p>While Section 5109(B)(5) has been changed to remove the requirement that an applicant provide “proof” of financial security with application, it still requires that such security is due to the secretary before a permit can be issued. It is customary practice across state and local regulations to require a bond be delivered several years after a project is constructed, not before, since such assurances are intended to protect against the abandonment of infrastructure in place. Consistent with best practices in other states, the regulations should provide a schedule that allows for financial assurance to be provided in increasing increments once a project is operational.</p> <p>Commenter suggests that the department should consider following financial assurance schedules adopted by other states and recommends revising the proposed Rule to provide a payment schedule similar to Tennessee, which provides a reasonable middle ground.</p> <ul style="list-style-type: none"> • Tennessee: requires 5% at commercial operations date (“COD”), 50% by year 10, and 100% by year 15. Tenn. Code Ann. § 66-9-207.

	<ul style="list-style-type: none"> • Texas: allows delivery of financial assurance to be delayed until the 20th anniversary of COD or lease termination if earlier. Tex. Utilities Code § 302.0005. • Michigan: state law provides that “the financial assurance may be posted in increments as follows: (i) At least 25% by the start of full commercial operation. (ii) At least 50% by the start of the fifth year of commercial operation. (iii) 100% by the start of the tenth year of commercial operation.
RESPONSE:	<p>C&E acknowledges and appreciates the comment.</p> <p>A schedule that enables the required financial security to be provided in gradually increasing amounts after the facility becomes operational would align with other state and local regulations. However, La. R.S. 30:1154 can be interpreted as requiring delivery of the full amount estimated to ensure the costs of site closure activities are covered. See La. R.S. 30:1154(9)(a)(iii). Collecting the full estimated decommissioning cost is not guaranteed when calling on bonds and letters of credit. Requiring 100 percent of the estimated decommissioning cost up front when using conditional financial instruments aligns with the legislative intent to ensure site closure at any time.</p> <p>Nevertheless, the statute does allow C&E’s secretary to approve of other forms of financial assurances, allowing C&E to provide different requirements where there is less collection risk. The cash payment option in Section 5115(C)(3) will provide a payment schedule based on MWhs generated at a rate determined by the Natural Resources Trust Authority.</p>
RESULT:	C&E will not make any changes to the regulatory text at this time.
COMMENT 18:	<p>Section 5109(B)(9) of the Rule requires “any other information required by the department” for issuing permits under this Subpart “or that is relevant and reasonable” to implement the rules.” Commenter respectfully submits that the scope of this provision is broad, uncertain and largely unknowable by permittees in advance, and could therefore result in significant delays in submitting complete permit applications.</p> <p>Commenter recommends deleting Section 5109(B)(9) or requiring the department to post any information requirements publicly and in advance of applications so that projects are not delayed by unforeseen and unforeseeable information requirements that only become clear after an initial application has been submitted.</p>
RESPONSE:	<p>C&E acknowledges the comment.</p> <p>Deleting or narrowing the section would give permittees a clearer understanding on permit application requirement, and posting information on application requirements in advance could clarify the application process. The scope of Paragraph (B)(9) is not unlimited; it only seeks</p>

	<p>information that is relevant and reasonable to the permitting process. The provision is meant to capture other applicable permits and their requirements to facilitate the more efficient permitting process contemplated by Section 5105(C).</p>
<p>RESULT:</p>	<p>C&E will not make any changes to the regulatory text at this time.</p>
<p>COMMENT 19:</p>	<p>Due to changes in federal tax law this summer, the need for projects to quickly start and continue construction has dramatically increased, with tax credit eligibility hinging on substantially shortened dates and more rigid timelines for commencing construction, continuing construction, and placing projects in service. After the department’s 60-day timeframe to review permit applications for administrative completeness, Commenter is concerned that the remainder of the review process, without additional safeguards, could swamp that improvement and render many projects ineligible for tax credits and thus make them infeasible. There is no timeframe for the department review of deficiency cures; a lengthy (30 day) time for publishing notice of completion after issuance; no specified timeframe receiving public comment and requests for hearing; and no specified timeframe for deciding whether to hold a hearing or for holding a hearing. Further, there is no specified remedy in the event that the department does not meet the applicable deadlines.</p> <p>Commenter recommends a 30-day initial review period for administrative completeness as contained in ACP’s Model Regulations for Utility-Scale Solar Energy Systems.</p> <p>The rules should provide that the application is deemed administratively complete if the department does not issue a written notice within the applicable timeframe. Commenter further recommends the following timeframes:</p> <ul style="list-style-type: none"> • 15-day period for review of deficiency cures and decision on completeness; • 15-day period for publishing notice of completion after issuance; • 30-day period for receiving public comments and requests for hearing; • 15-day period for deciding whether to hold a hearing; and • 30-day period in which to hold any hearing. <p>Taken together, these timelines would mean that even where an applicant submits an administratively complete application, where a hearing is requested and held, a Department decision would occur approximately 95 days after submission, while a single round of curing incompleteness would stretch the timeline to 180 days assuming the applicant is able to provide missing information within 15 days. These timelines are consistent with efforts to accelerate permitting review timelines in other</p>

	states and ensure that projects move forward on a commercially expedience pace without facing the unbounded delays in the current rule.
RESPONSE:	<p>C&E acknowledges the comment.</p> <p>Shorter and fixed deadlines for each step of the review and notice process could help developers plan projects with more certainty and could help them meet new federal tax credit deadlines. Clear deadlines for department decisions would ensure an efficient review process and reduce administrative delays. On the other hand, shorter and fixed review timeframes may compromise the quality of the review process, especially for complex, large-scale project that could require more analysis. Moreover, the proposed remedy of automatically deeming an application complete if the department misses its notice of completion deadline would conflict with statutory obligations and could expose the department to legal actions.</p>
RESULT:	C&E will revise the regulatory text.
COMMENT 20:	Agriculture is a heavily regulated industry, and Commenter can appreciate the need for efficiency in communication between a regulatory agency and a permit applicant. Commenter encourages the department to hold true to these timelines both for the permit applicant and the agency in their part of review and execution.
RESPONSE:	C&E acknowledges comment. No discussion is necessary as the comment does not suggest an amendment or change to the regulatory text.
RESULT:	C&E will not make any changes to the regulatory text at this time.
COMMENT 21:	<p>Commenter recommends that the public comment period be clearly time delimited to provide certainty for all parties and avoid undue delays.</p> <p>Urges the department to clarify the grounds upon which public hearings may be called, and to specify whether hearings on page 3 of the draft apply to both the initial permit and decommissioning plans.</p> <p>The permit process detailed in the rules feels discretionary and heavily reliant on public input and hearings for what is fundamentally an administrative procedure. Commenter encourages the department to streamline these steps where possible.</p>
RESPONSE:	C&E acknowledges comment. No discussion is necessary as the comment does not suggest an amendment or change to the regulatory text. Subsection (D) specifies the public hearing is focused on the decommissioning plan and financial security requirement in a permit application.
RESULT:	C&E will revise the regulatory text.

COMMENT 22:	In terms of landowner notice and potential for public hearings, Commenter would like to see consideration given to a more detailed communication plan as a part of this rule by the department upon completion. While the journal of record locally, and statewide, are great resources, we encourage the department to additionally consider more modern approaches to further notify and educate adjacent landowners and the general public of solar siting in the future. Commenter appreciates and supports the inclusion of LDAF and LDWF in the public notice process. We request that the departments co-develop communication protocols beyond simply interagency notification to maximize public knowledge of permitting applications where possible. In summary, public education and engagement need to be sustained related to solar siting and permitting beyond this initial rulemaking process.
RESPONSE:	C&E acknowledges comment. No discussion is necessary as the comment does not suggest an amendment or change to the regulatory text. In addition to Subsection (A)'s requirement that developers inform adjacent landowners and local authorities about future locations, C&E will work with LDAF, LDWF, and other agencies to establish communication practices and ensure interests under their jurisdiction are appropriately considered.
RESULT:	C&E will not make any changes to the regulatory text at this time.
COMMENT 23:	Commenter's redline suggests adding the following language to the end of Subsection (F), " <u>Prior to taking any such action to suspend or revoke an active permit, the department shall provide notice to the designated operator and a reasonable opportunity for the designated operator to address the department's concerns regarding such material change.</u> "
RESPONSE:	C&E acknowledges comment. The added language aligns with basic principles of administrative fairness and due process and could avoid unnecessary enforcement actions or appeals. On the other hand, the addition is potentially redundant as Section 5117(B) contains notice and cure language applicable to the current proposed text.
RESULT:	C&E will not make any changes to the regulatory text at this time.

§5113. Decommissioning Requirements

COMMENT 24:	Decommissioning regulations should function as landowner-centric consumer protection measures. A balanced decommissioning policy will serve to: <ul style="list-style-type: none"> • Establish clear statewide baseline requirements; • Preserve freedom of contract so landowners can waive or strengthen certain requirements, allowing them to leverage that
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	<p>liberty to advance their own interests and enjoy the benefit of their bargain;</p> <ul style="list-style-type: none"> • Enhance development and investor certainty by Preempting duplicative local rules that create uncertainty and patchworks of conflicting ordinances; and • Help drive industry accountability by ensuring that “bad actors” cannot externalize costs onto host communities.
RESPONSE:	C&E acknowledges comment. No discussion is necessary as the comment does not suggest an amendment or change to the regulatory text.
RESULT:	C&E will not make any changes to the regulatory text at this time.
COMMENT 25:	<p>Commenter encourages the department to set a high standard and a low tolerance for extensions of decommissioning activities. Louisiana’s farm acreage continues to shrink and competition for tillable land is at an all time high. Allowing facilities to drag their feet once decommissioning is initiated would further exacerbate local impacts and be a waste of our state’s natural resources and a drain on our economy. Landowners have a right to use their property as they see fit, but Commenter insists that proper management and enforcement of this decommissioning rule be dually considered once these rules are in place.</p>
RESPONSE:	C&E acknowledges comment. No discussion is necessary as the comment does not suggest an amendment or change to the regulatory text.
RESULT:	C&E will not make any changes to the regulatory text at this time.
COMMENT 26:	<p>Commenter is encouraged to see the department is requiring the operator to submit a detailed waste management plan and they believe it should be a part of the renewal process and that inventories should be updated along with the permitting and financial securities. The rule, however, is vague and does not provide where the materials, particularly hazardous materials, will be disposed of. Commenter asks the department to consider strengthening this portion to include requirements of identifying specific landfills or other waste management sites that agree to accept all Facility waste, should decommissioning be necessary. The landfill, or waste management site of record, should be updated at each permit renewal or change of Designated Operator to ensure the waste management plan can be executed at the value provided with the financial security provided.</p> <p>If the materials cannot be handled in the parish of the Facility, then what additional costs would be incurred upon decommissioning or abandonment? If local waste management is not an option, Commenter requests that the department consider the permit incomplete.</p>

RESPONSE:	<p>C&E acknowledges and appreciates the comment. No discussion is necessary as the comment does not suggest an amendment or change to the regulatory text.</p> <p>The handling, transportation, and disposal of waste and hazardous materials fall under the regulatory jurisdiction of LDEQ, not C&E. The proposed rule requests information regarding waste management only as it relates to decommissioning activities to ensure operators demonstrate a plan for proper waste handling at the end of the facility's life.</p>
RESULT:	C&E will not make any changes to the regulatory text at this time.
COMMENT 27:	Commenter's redline suggests clarifying references to subsections in Paragraphs (C)(6) and (7).
RESPONSE:	C&E acknowledges the comment. Because the comment only makes a technical, non-substantive change, no discussion is necessary.
RESULT:	C&E will revise the regulatory text to refer to the correct subsections.
COMMENT 28:	<p>Commenter's redline suggests the following revisions to Subparagraph (C)(7)(d):</p> <p>If the financial security instrument is a performance bond, an irrevocable letter of credit, or both, a contingency <u>an escalation</u> rate, which is an increase of the gross cost by a percentage determined by the department, <u>not to exceed the percentage set forth below</u>, shall be added to the net decommissioning cost. The contingency <u>escalation</u> rate accounts for:</p> <ul style="list-style-type: none"> i. <u>estimated future inflation until the cost estimate is revised in accordance with Subsection (D), not to exceed two percent per annum;</u> and ii. the margin of error inherent in estimations and allows for flexibility in responding to unexpected decommissioning costs.
RESPONSE:	C&E acknowledges the comment. The contingency rate was intended to ensure bonds and letters of credit would secure the full cost of decommissioning over the lifespan of a facility. Replacing it with an escalation rate that tracks inflation maintains the same protections while reducing the potential for overestimation. It will also simplify the requirement as a uniform approach will make administering the program more efficient.
RESULT:	C&E will revise the regulatory text.
COMMENT 29:	The financial security calculation includes a contingency rate. Commenter is concerned that this could significantly increase front-end costs based on worst-case scenarios that will not feasibly transpire for a newly constructed and operating solar facility with a useful lifespan and contractual obligations to generate for decades to come.

	Commenter recommends removing the contingency rate. Alternatively, if the Rule includes a contingency rate, the rate should be defined as no more than 10% over the useful life of the facility.
RESPONSE:	C&E acknowledges the comment.
RESULT:	C&E will revise the regulatory text. See Result to Comment 28.
COMMENT 30:	Commenter’s redline suggests revising Paragraph (C)(8) to include, “... chosen by the <u>District</u> designated operator....”
RESPONSE:	C&E acknowledges the comment. The suggested revision could provide additional, clarifying information in connection with the provision. The term, however, is not defined or used elsewhere in the proposed rules and would likely cause confusion.
RESULT:	C&E will not make any changes to the regulatory text at this time.
COMMENT 31:	Given that “decommissioning agreement” is not a defined term in the Rule, it is unclear whether a lease agreement that includes a decommissioning plan would qualify as a decommissioning agreement referred to in Subsection (E), or whether this would need to be a separate agreement. Commenter requests clarification that “decommissioning agreement” includes a lease with a decommissioning plan and thus does not need to be a separate agreement.
RESPONSE:	C&E acknowledges the comment. “Decommissioning agreement” as used in Subsection (E) was intended to refer to any terms or conditions on decommissioning in a lease, not a separate agreement.
RESULT:	C&E will revise the regulatory text for clarity.
COMMENT 32:	Texas (SB 760, 2021), Tennessee (SB 1925, 2022), Georgia (HB 300, 2024), and Arkansas (HB1525, 2025) have enacted legislation on solar decommissioning with overwhelming bipartisan support. Commenter provides these measures appropriately addressed the balance between the interest of the state in protecting valuable and finite natural resources, while recognizing the sophistication and autonomy of landowners, maintaining the sacred place that private property rights occupy in the very fabric of our Republic. These statutes emphasize that no party has a greater interest in the stewardship of land than the very landowner themselves. They provide for strict but fair decommissioning practices that ensure private transactions remain private through the requirement that developers provide financial assurances directly to the landowner, rather than creating a situation where both parties are reliant on the state.
RESPONSE:	C&E acknowledges the comment. No discussion is necessary as the comment does not suggest an amendment or change to the regulatory text.

	The proposed rules balance a landowner’s rights and the statute’s decommissioning requirements. See Section 5113(F).
RESULT:	C&E will not make any changes to the regulatory text at this time.
COMMENT 33:	A particular project may have multiple leases with multiple landowners, so there should not be a requirement that all landowners sign the same written document. Commenter recommends revising Subparagraph (F)(1)(b) to: “written document(s), such as a lease or leases, signed by all affected landowner(s) and two witnesses, evidencing unequivocal consent by the landowner(s) to the alternate decommissioning plan.”
RESPONSE:	C&E acknowledges the comment. The recommended addition could provide a clear example of the type of document required. Adding the example could also make the paragraph ambiguous by not listing other types of documents.
RESULT:	C&E will revise the regulatory text.

§5115. Financial Security Requirements

COMMENT 34:	<p>Commenter owns, operates, and maintains every project they develop rather than developing projects to flip them like most of the solar industry and emphasizes owning the underlying property where their projects are sited rather than leasing.</p> <p>Commenter recommends including a provision that exempts developers who own the land their projects occupy—similar to the “affiliated entities” exemption in Tennessee law—from posting financial assurances. This provision is essential and justified not only because it safeguards the private property rights of Commenter’s company and every other landowner, but also because it creates a framework that acknowledges and rewards responsible ownership and stewardship, as well as the alignment of incentives between the landowner and the broader community.</p>
RESPONSE:	C&E acknowledges and appreciates the comment. C&E’s statutory authority does not extend to creating exemptions beyond those expressly provided in La. R.S. 30:1154(9)(c). Because the comment does not suggest an amendment or change to the regulatory text that C&E is authorized to make, no discussion is necessary.
RESULT:	C&E will not make any changes to the regulatory text at this time.
COMMENT 35:	Commenter’s redline suggests revising Paragraphs (C)(1) and (2) to delete “gross” from the decommissioning cost estimate and adding references to “other financial security” that may be released upon proof of decommissioning or that replaces a form of financial security.

RESPONSE:	C&E acknowledges the comment. Removing “gross” could cause confusion as the term reinforces how the bond or letter of credit must cover the total cost of decommissioning a facility. On the other hand, removing “gross” and adding “other financial security” may help clarify how operators may use the various forms of financial security provided for in the proposed rules to calculate and meet the requirement.
RESULT:	C&E will revise the regulatory text.
COMMENT 36:	The current draft lacks clarity in its definitions and calculations of “gross decommissioning cost” and “salvage value.” Commenter recommends providing clear definitions for these terms and suggests revising Paragraph (C)(1) to require calculation based on “net decommissioning cost” rather than “gross,” as the former reflects the actual cost burden to the project owner and aligns with best industry practice.
RESPONSE:	C&E acknowledges the comment. Salvage value is defined in Section 5101 of these rules and in accordance with La. R.S. 30:1154(E)(1). Revisions to other comments have addressed the request to clarify the gross decommissioning cost calculation.
RESULT:	C&E will revise the regulatory text. See Result to Comment 35.
COMMENT 37:	Requests further clarification in for Paragraph (C)(1) to confirm that the bond should be equal to 100% of the net decommissioning cost (i.e., gross cost minus salvage value), and to ensure that the rules explicitly require deduction of salvage value before determining the financial assurance amount.
RESPONSE:	C&E acknowledges the comment. The financial security options in Paragraph (C)(1) and (2) should be equal to 100 percent of the estimated decommissioning cost, and the salvage value may be deducted if C&E is provided with a first priority lien as set forth in Subsection (E).
RESULT:	C&E will revise the regulatory text. See Result to Comment 35.
COMMENT 38:	Commenter’s redline suggests the following revisions to Subsection (E), “The salvage value of solar devices, integrated equipment, and other materials associated with a facility may be deducted from the gross decommissioning cost estimate during the bankruptcy of the designated operator if the designated operator <u>or facility owner</u> provides the department with a lien of first priority in an amount equal to the salvage value as itemized in the decommissioning plan, and sufficient to assure the department determines that the salvageable materials are will be available during if decommissioning occurs during a bankruptcy of the designated operator. ”
RESPONSE:	C&E acknowledges the comment.

RESULT:	C&E will revise the regulatory text.
COMMENT 39:	<p>La. R.S 30:1154 states that the secretary “may consider only the salvage value” in a bankruptcy. The proposed language of Subsection (E) appears to be at odds with the statute in that it states that the salvage value may be deducted from gross decommissioning cost in a bankruptcy.</p> <p>Commenter suggests the following revision to Subsection (E): “<u>During a bankruptcy of the designated operator, the department may allow the decommissioning cost estimate to consist of only the salvage value of the solar devices, integrated equipment, and other materials associated with a facility may be deducted from the gross decommissioning cost estimate during the bankruptcy of the designated operator if the designated operator provides the department with a lien of first priority in an amount equal to the salvage value as itemized in the decommissioning plan, and the department determines the salvageable materials are available during decommissioning.</u>”</p>
RESPONSE:	C&E acknowledges the comment.
RESULT:	C&E will revise the regulatory text. See Result to Comment 38.
COMMENT 40:	<p>Subsection (E) prohibits the use of salvage value to offset from the full cost of decommissioning, unless the designated operator is in bankruptcy and provides a lien. This is contrary to prevailing practices in other jurisdictions, which recognize that financial security for decommissioning costs – basically, an insurance product provided for a worst-case scenario that the solar facility operator does not decommission the facility – should be sized according to the net costs of decommissioning in such a scenario, <i>i.e.</i>, the likely actual costs. For instance, Georgia defines financial assurance as at least equal to the estimated removal and restoration costs, minus the salvage value, plus any portion of the facility’s value pledged to secure outstanding debt. See Ga. Code Ann., § 46-3-69.1(a).</p> <p>Section 5113(C)(7) recognizes this basic equation, specifying that a “decommissioning cost estimate” should include gross decommissioning costs, equipment salvage value, and “net decommissioning costs, calculated as the difference between the gross costs and the salvage value.” Further, Section 5115(A) that requires the posing of security states that the security must be “in an amount that will ensure sufficient funds are available for all decommissioning activities” and “shall secure the cost of decommissioning. . . .” The regulations then change course with Section 5113(C)(7) requiring that an operator can only meet the financial security requirement by submitting a performance bond or letter of credit in an amount “equate to 100 percent of the gross decommissioning cost estimate, while separately requiring cash payments to be made on a quarterly basis to be “used by the department to decommission facilities” where they have been abandoned or otherwise not decommissioned.</p>

	<p>Section 5117’s enforcement provisions provide the department can call upon the financial security instrument to decommission the facility and seek redress against the responsible parties if funds are insufficient, but they do not provide for any means of returning funds to those parties if the funds are in excess of actual decommissioning costs. Further, where the department holds a lien for the salvage value of the solar equipment, Section 5117(C)(3) requires that the landowner permit the department to enter the property and “retrieve the items to be salvaged as permissible by right.”</p> <p>Taken together, these provisions mean that, in an individual decommissioning case, the department could: (1) redeem a financial instrument for the cash value of gross decommissioning costs, (2) seize and liquidate salvage property worth millions of dollars in excess of those costs, and (3) not return any funds to the responsible party even though the cash proceeds exceed actual decommissioning costs – as they almost by definition will. That result cannot be what the legislature intended when it directed the department to promulgate regulations “designed to encourage the development and use of solar energy,” (R.S. 30:1154(A)) and it strains, and arguably exceeds, state and federal Constitutional bounds on commandeering private property for public use without just compensation. Nor does the result square with the regulations themselves, which correctly recognize the difference between gross and net decommissioning costs, which includes salvage proceeds as an offset.</p> <p>Commenter requests that the regulations be modified to require that responsible parties post security sufficient to cover net decommissioning costs.</p> <p>La. R.S. 30:1154(A)(9)(b)(iii) states that the secretary: “...may consider only the salvage value of the facility and associated infrastructure in determining the estimated cost of site closure and remediation if the materials are available in decommissioning during a bankruptcy of the facility owner or operator.” This language is unclear on its face. Read literally, it allows the secretary to “consider only” the facility’s salvage value available during bankruptcy in determining estimated remediation costs, which would yield a nonsensical estimate (since it would consider only salvage value, not remediation costs). To the extent it was instead meant to limit consideration of salvage value in estimated decommissioning costs, it seems to only to limit that consideration where the materials may not be available in the event of a bankruptcy. Thus, where the Secretary is satisfied that the materials would be available, even in the event of a bankruptcy, their salvage value may be considered.</p> <p>Further, the above limitation on when salvage value can be considered relates only to one of three factors that the Secretary must consider in determining the adequacy of a bond or other financial security, namely the “estimated cost of site closure and remediation.” The other two factors that</p>
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	<p>must be considered -- (i) the assets, debts, and compliance history of the applicant or permittee, and (ii) the condition and capacity of the facilities to be covered by such security – require the department to consider the broader facts concerning the facility and the applicant, including the “condition and capacity” of the solar facilities covered by the security. Accordingly, in excluding consideration of the value of facilities covered by the security in setting the determining the amount of financial security, the regulations run afoul of the statute.</p> <p>Commenter recommends that the department consider the value of facility equipment in setting the amount and requirements of a facility’s financial security. In estimating the cost of site closure and remediation, the department should consider the explicit salvage value of facility property and equipment where such materials would be available to the department in the event of a bankruptcy. Commenter’s redline recommends revising Section 5115(C) by replacing “gross” with “net” for the decommissioning cost estimate referenced in Paragraphs (1) and (2).</p>
RESPONSE:	<p>C&E acknowledges the comment.</p> <p>C&E’s authority on deducting salvage value from the decommissioning cost is limited by the language of La. R.S. 30:1154(A)(9)(b)(iii). Subsection (E) provides a mechanism allowing value of salvaged materials (<i>i.e.</i>, the “salvage value”) to be deducted from the estimated decommissioning cost while ensuring the entire estimated cost of site closure is available in the event the owner or operator with outstanding debts goes bankrupt. In the event C&E is required to decommission a facility, it will consider any documented preferences of the landowner (5113(F)), only call upon the funds necessary to complete the decommissioning activities, and any remaining funds will be returned to the appropriate parties.</p>
RESULT:	<p>C&E will revise the regulatory text in Subsection (C) and Subsection (E). See Responses and Results to Comment 35 and 38.</p>

§5117. Enforcement

COMMENT 41:	<p>Subsection (A) rightly anticipates regulatory inspections, and we recognize the necessity of state oversight. However, for safety and liability reasons, it is imperative that operators receive advance notice before any site visit, and that a facility representative be present to accompany inspectors. These sites are major power generation facilities and critical infrastructure, and strict safety protocols must be observed.</p>
RESPONSE:	<p>C&E acknowledges comment. No discussion is necessary as the comment does not suggest an amendment or change to the regulatory text. Subsection (A) can be interpreted as implicitly requiring coordination with</p>

	the designated operator or their representative for inspections via the notice requirement.
RESULT:	C&E will not make any changes to the regulatory text at this time.
COMMENT 42:	Commenter requests that the department provide future education and clarification of Subsection (F) regarding landowner liability related to financial securities. If an expectation or legal ramification is incumbent on the landowner as a result of the financial security established under this permitting process, then the department should use all resources available to educate landowners on these risks prior to them entering into any lease agreement that would establish their liability as such. Commenter pledges to partner with the department in this regard and would be more than happy to provide appropriate platforms for such education to landowners, should the department develop proper education and outreach on this subject.
RESPONSE:	C&E acknowledges and appreciates the comment. No discussion is necessary as the comment does not suggest an amendment or change to the regulatory text.
RESULT:	C&E will not make any changes to the regulatory text at this time.

§5121. Fees

COMMENT 43:	<p>The Legislature granted the department with discretion to set a lower fee in statute and directed that regulations shall be designed to encourage the development and use of solar energy. The \$15 per acre fees could be excessively high, particularly for larger projects. For instance, a 500 MW solar power generation facility that uses 7 acres per MW could incur a \$52,500 application fee and up to a \$52,500 annual fee. The FEIS says the proposed new rule is estimated to cost \$304,511 in FY 25, \$310,602 in FY 26, and \$316,814 in FY 27. A \$52,500 application fee for a program with an estimated cost of approximately \$300,000 is excessive. Further, although Section 5121(D) provides that the annual monitoring and maintenance fee is capped by a designated operator’s pro-rata share of the department’s budgeted costs for implementing and administering these provisions, this cap does not provide sufficient certainty to investors.</p> <p>Commenter recommends reducing the application fees to no more than \$10/acre and reducing the annual monitoring and maintenance fees to no more than \$5/acre. Additionally, the department should set a reasonable cap on the application fee, such as no more than \$30,000. Reducing the fees to more reasonable amounts would be consistent with the public policy.</p>
RESPONSE:	C&E acknowledges the comment. La. R.S. 30:1154(D)(1)(a) gives C&E discretion to set the application fee at a maximum of \$15 per acre. Subsection (D) of proposed rule aligns with the authority provided in La.

	R.S. 30:1154(D)(1)(d). Variability in annual regulatory fees may raise an investor's perceived risk for a project. On the other hand, setting a fixed or capped rate could result in underfunding. A flexible annual fee based on all operators' pro-rata share promotes fairness and allows C&E to make adjustments based on its resources and participation in the program.
RESULT:	C&E will revise the regulatory text.

III. Revisions to the Proposed Rule Since Submitting Notice of Intent

A revised copy of the proposed rule with redline revisions is attached. Revisions were made as a result of the comments received, make slight technical and clarifying changes where necessary in response to the comments and after further review of the text, and adjust all references to the department after its reorganization.

The department anticipates publishing the final rule in the Louisiana Register as soon as permissible under the Administrative Procedure Act. Please inform us of your decision on whether or not you intend to hold a hearing as permitted by La R.S. 49:966(D).

If you have any questions, please do not hesitate to contact me at (225) 342-4165 or Elizabeth.Ferrier@la.gov or Morgan Rogers at (225) 342-0572 or Morgan.Rogers2@la.gov.

Very truly yours,



Elizabeth Ferrier

Attorney, Louisiana Department of Conservation and Energy

CC: Emily Andrews, Special Counsel, Office of the Governor
Dustin Davidson, Secretary, Louisiana Department of Conservation and Energy
Blake Canfield, Executive Counsel, Louisiana Department of Conservation and Energy
Andrew Young, Executive Director, Office of State Resources, Louisiana Department of Conservation and Energy
Morgan Rogers, Attorney, Louisiana Department of Conservation and Energy

Attachments: Appendix, List of Commenters (written)
Notice of Intent, published August 20, 2025
Revised Redline of Rule

Appendix: List of Commenters (written)

Comment No.(s)	Commenter
1	John Jacobs, Bradley Murchison, on behalf of Recurrent Energy
2	Whit Cox, Southern Renewable Energy Association
3-4	Isaac M. Gregorie, Jr., Kean Miller, LLP, on behalf of CleanGen, Inc.
5	Jordan Gleeson, Cornerstone, on behalf of Advanced Power Alliance
6	Isaac M. Gregorie, Jr., Kean Miller, LLP, on behalf of CleanGen, Inc.
7-8	Jordan Gleeson, Cornerstone, on behalf of Advanced Power Alliance
9	Isaac M. Gregorie, Jr., Kean Miller, LLP, on behalf of CleanGen, Inc.
10-11	Jordan Gleeson, Cornerstone, on behalf of Advanced Power Alliance
12	Whit Cox, Southern Renewable Energy Association
13-14	Richard Fontenot, Louisiana Farm Bureau Federation
15	Isaac M. Gregorie, Jr., Kean Miller, LLP, on behalf of CleanGen, Inc.
16-19	Whit Cox, Southern Renewable Energy Association
20	Richard Fontenot, Louisiana Farm Bureau Federation
21	Jordan Gleeson, Cornerstone, on behalf of Advanced Power Alliance
22	Richard Fontenot, Louisiana Farm Bureau Federation
23	Isaac M. Gregorie, Jr., Kean Miller, LLP, on behalf of CleanGen, Inc.
24	Sam O'Rourke, Silicon Ranch Corporation
25-26	Richard Fontenot, Louisiana Farm Bureau Federation
27-28	Isaac M. Gregorie, Jr., Kean Miller, LLP, on behalf of CleanGen, Inc.
29	Whit Cox, Southern Renewable Energy Association
30	Isaac M. Gregorie, Jr., Kean Miller, LLP, on behalf of CleanGen, Inc.
31	Whit Cox, Southern Renewable Energy Association
32	Sam O'Rourke, Silicon Ranch Corporation
33	Whit Cox, Southern Renewable Energy Association
34	Sam O'Rourke, Silicon Ranch Corporation
35	Isaac M. Gregorie, Jr., Kean Miller, LLP, on behalf of CleanGen, Inc.
36-37	Jordan Gleeson, Cornerstone, on behalf of Advanced Power Alliance
38	Isaac M. Gregorie, Jr., Kean Miller, LLP, on behalf of CleanGen, Inc.
39	Matthew Fantaci, Carver Darden
40	Whit Cox, Southern Renewable Energy Association
41	Jordan Gleeson, Cornerstone, on behalf of Advanced Power Alliance
42	Richard Fontenot, Louisiana Farm Bureau Federation
43	Whit Cox, Southern Renewable Energy Association