



December 31, 2018

Ms. Katherine Collier  
Executive Secretary  
Mississippi Public Service Commission  
PO Box 1174  
Jackson, MS 39725-1174

RE: **MPSC Docket No: 2018-UA-267**  
CONTINUED MODERNIZATION OF THE GENERATING FACILITIES OF ENTERGY  
MISSISSIPPI, LLC WITH THE ACQUISITION OF THE SUNFLOWER SOLAR FACILITY  
IN SUNFLOWER COUNTY, MISSISSIPPI

**MOTION TO INTERVENE**

Dear Ms. Collier,

**BEFORE THE MISSISSIPPI PUBLIC SERVICE COMMISSION**

COMES NOW 25x'25 Initiative (25x'25) and files this Motion to Intervene to the Mississippi Public Service Commission (Commission) in regards to the above referenced docket.

1. The 25x'25 is a diverse, grassroots alliance of nearly 1000 agriculture, forestry, conservation, business and environmental organizations (including several based in Mississippi) working collaboratively to advance the goal of securing 25 percent of the nation's energy needs from renewable sources by the year 2025.
2. 25x'25 views the construction and operation of utility-scale solar as an important measure to increase the amount of electricity supplied to citizens and businesses that is generated by renewable energy sources. New, cost-competitive energy resources can help homeowners, businesses and industries save money in the long-term and serve as a driver for economic development by creating local jobs and attracting new business entities who wish to access dedicated sources of renewable energy.
3. While Entergy Mississippi, LLC's investment in utility-scale solar energy generation can help meet a variety of energy diversity, economic development, and environmental goals, the financing and acquisition model of build-own-transfer (employed in this filing) must be thoroughly compared to the costs and benefits of a build-own-operate model. Furthermore, the build-own-transfer model should be compared to the costs and benefits of executing a long-term power purchase agreement whereby Entergy Mississippi, LLC would take the entire output of the solar energy produced by the Sunflower Solar Facility,

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as it is generated, in exchange for payments made on a rate per megawatt-hour of energy basis according to a fixed price schedule. This model has been shown to put long-term downward pressure on rates as well as protect customers from the risk of construction cost overruns with respect to the project. Under a power purchase agreement, the utility company is paying only for energy received and, therefore, no recovery for capital investment or fixed costs will be required.

4. With this filing, Entergy Mississippi, LLC is seeking approval to implement a community solar offering for customers, sourced initially from the Bright Future solar facilities. The Bright Future facilities were “pilot projects” implemented in 2015 to help Entergy collect data and study the feasibility of solar energy. In essence, the Bright Sources facilities are research projects and utilize solar panels manufactured by Stion, which closed its Hattiesburg manufacturing facility in 2017.
5. While a representative of 25x’25, I am also an electric customer of this public utility as defined in Section 77-3-3(d)(i) of the Mississippi Code of 1972, as amended, and I have significant interest in this project as a residential customer using 1,000 kWh per month would see a net increase in rates of approximately \$1.38 per month..
6. 25x’25 intends to submit additional comments at the appropriate time in regards to the above referenced docket.

WHEREFORE, PREMISES CONSIDERED, 25x’25 requests that the Commission grant 25x’25’s Motion to Intervene under this docket.

Sincerely,



Brent Bailey  
State Activities Coordinator  
25x’25 Initiative  
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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via email with a copy of the Response of the 25x'25 Initiative:

Katherine Collier, Executive Secretary  
Mississippi Public Service Commission  
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Frank Farmer, Attorney for the Commission  
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Jeremy Vanderloo  
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This 31<sup>st</sup> day of December, 2018.

*Brent Bailey*

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