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February 21, 2025

VIA HAND DELIVERY

Ms. Krys Abel
Records Division
Louisiana Public Service Commission
602 North 5th Street, 12th Floor
Baton Rouge, LA 70802

Re: LPSC Docket No. U-37394; South Louisiana Electric Cooperative Association, ex parte,
*In re: Petition for approval of abandonment of electric facilities located in Terrebonne
and Lafourche Parishes pursuant to Commission General Order dated July 9, 2008 (R-
30301).*

Dear Ms. Abel:

Enclosed for filing in the above referenced docket, please find testimonies in support of
South Louisiana Electric Cooperative Association from the following individuals:

1. Mr. Matthew Peters;
2. Mr. Jason Guy;
3. Mr. Scotti Henry;
4. Mr. Steven Portero;
5. Mr. Tim Allen; and
6. Mr. Tommy Boudreaux

If any additional information is needed, please feel free to contact me. Thank you and with kindest regards,

Sincerely,

Kara B. Kantrow

Enclosure: as stated

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**SOUTH LOUISIANA ELECTRIC COOPERATIVE
ASSOCIATION**

DOCKET NO. U-37394

*In re: Petition for Approval of Abandonment of electric facilities located in Terrebonne and
Lafourche Parishes pursuant to Commission General Order
dated July 9, 2008 (R-30301)*

**DIRECT TESTIMONY
OF
TIMOTHY J. ALLEN
ON BEHALF OF
SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION**

FEBRUARY 2025

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I. INTRODUCTION AND BACKGROUND

Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. My name is Timothy J. Allen. I work for Apache Louisiana Minerals LLC (“ALM”) at the business address of 1913 La Terre Ct., Houma, Louisiana 70363. The mailing address Post Office Box 206, Houma, LA 70361-0206. ALM is a subsidiary of Apache Corporation, which is headquartered in Houston.

Q. ON WHOSE BEHALF ARE YOU FILING THIS DIRECT TESTIMONY?

A. I am a Professional Land Surveyor and the General Manager of ALM, overseeing the surface of land owned by Apache, including land located in Terrebonne Parish within SLECA’s service area. I am providing this testimony in my capacity as General Manager of ALM.

Q. WHAT IS YOUR INVOLVEMENT WITH SLECA AND WITH THIS MATTER?

A. ALM has three commercial accounts with SLECA and, as I will testify further below, has a camp that lost power as a result of the loss of the Lake Line. As I will further testify, ALM will be detrimentally affected for several reasons if the Lake Line infrastructure is rebuilt by SLECA.

II. POSITION ON SLECA’S PETITION

Q. PLEASE ELABORATE ON THESE DETRIMENTAL IMPACTS AS WELL AS YOUR POSITION ON THE ISSUES IN THIS MATTER.

1 A. Sure. ALM was also a customer on the Lake DeCade “Lake Line” where we maintain a
2 camp on Bayou Penchant. The last bill we received from SLECA for the ALM camp was
3 dated 9/20/2021, following disruption of service by Hurricane Ida.

4 ALM is the second largest private landowner in coastal Louisiana. We manage over
5 275,000 acres of predominately wetland property in six coastal parishes including
6 Terrebonne, where one of the “Lake Lines” is located (near Lake DeCade). We have
7 extensive experience and knowledge of the effort by others to provide electric service to
8 and across wetland environments. This ‘Lake DeCade line’ is approximately 31.3 miles
9 long, with 18.6 miles of that falling on ALM property – roughly 59.4%.

10 ALM is the successor to LA-TERRE Co., Inc., which originally granted the servitude to
11 SLECA in 1968. I’ve personally been aware of this particular line for over forty years.
12 ALM became the owner of the property on which this line is partially situated in 2003. I
13 became General Manager in 2006.

14 Each time this particular distribution line has been knocked out by hurricanes or tropical
15 storms, ALM (and our predecessor companies) staff would coordinate with SLECA and
16 their contractors regarding ingress and egress corridors, equipment type selected, periods
17 and duration of work, etc. in order to minimize impacts to our property and conflicts with
18 other lessees and users. Marsh buggies have been the go-to tool of choice each time and
19 that equipment each time has caused much damage to the property. With the advent of
20 multi-engine airboats adapted to electric utility line repairs, ALM put SLECA on notice
21 that we would demand the use of airboats in lieu of buggies to minimize marsh damage on
22 our land.

1 Following Hurricane Ida, we met with SLECA on several occasions to discuss removal of
2 their damaged and downed infrastructure on ALM property to eliminate these hazards. I
3 was made aware that SLECA was also having discussions with FEMA regarding the
4 replacement of the line, which would need to be substantially “hardened” to current FEMA
5 standards. I advised that the number of campsite leases on ALM property continues to
6 decline after every storm event and the ongoing problems of coastal erosion. I advised that
7 we were not interested in them placing any infrastructure on our property which would be
8 more substantial than what existed previously. ALM only has 40 campsite leases (meters)
9 that would be actively serviced if this line were reactivated. Their annual campsite rental
10 was based upon the availability and convenience of electric service to their camps. Seeing
11 the difficult position that SLECA was in after Hurricane Ida and the unlikely ability for
12 them to quickly supply electric service again, ALM reduced the campsite rental
13 accordingly.

14 Regarding the servitude for the SLECA line across our property, there is a provision which
15 could cause the agreement to cease and terminate following a one-year period of nonuse.
16 We have allowed SLECA to “abandon in place” some of the power poles that are in
17 vegetated wetland areas because of the substantial property damage which would result in
18 their removal due to the need for heavy amphibious marsh buggy type equipment.

19 ALM customarily provides servitudes for public works projects and utility companies at
20 no cost because these works are for the public good and ALM prides itself on being good
21 corporate citizens. However, because of the enormous expenditure to SLECA, its entire
22 membership (including ALM), and the taxpayers of America who would be subsidizing
23 FEMA’s portion of the replacement line cost, I made SLECA aware that we would NOT

1 grant a new servitude for this foolish enterprise, and that their projected costs should also
2 include the cost of expropriation of land rights from ALM if they chose to continue.

3 As previously mentioned, ALM has a camp that was formerly serviced by SLECA.
4 Following Hurricane Ida, we purchased a new generator to supply electricity for that camp.
5 Our other campsite lessees can do the same, which I would imagine most if not all probably
6 already have.

7 Q. SO, DO YOU SUPPORT SLECA'S PETITION TO ABANDON THESE SERVICES
8 AND TO NOT RECONSTRUCT THE LAKE LINE?

9 A. I do. These camp accounts are recreational and are neither residential nor commercial.
10 Other members should not be paying the cost of a rebuild of the Lake Line. As I stated
11 earlier, generators are a great option for these camps and could not burden others who do
12 not receive any benefit from the reconstruction.

13
14 **III. CONCLUSION**

15 Q. DO YOU BELIEVE THAT IT IS FAIR AND REASONABLE FOR THE FULL SLECA
16 MEMBERSHIP TO PAY THE COST OF RECONSTRUCTING THESE ELECTRIC
17 LINES?

18 A. No, I do not.

19 Q. WHAT IS YOUR REQUEST TO THE LPSC?

20 A. I ask that the LPSC grant SLECA's Petition for Abandonment and allow SLECA to
21 abandon the service to these camps.

22 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

23 A. Yes, it does.

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

**SOUTH LOUISIANA ELECTRIC COOPERATIVE
ASSOCIATION**

DOCKET NO. U-37394

*In re: Petition for Approval of Abandonment of electric facilities located in Terrebonne and
Lafourche Parishes pursuant to Commission General Order
dated July 9, 2008 (R-30301)*

AFFIDAVIT OF WITNESS

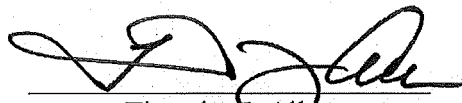
I, Timothy J. Allen, being duly sworn, depose

that the Direct Testimony in the

above referenced matter on behalf of

South Louisiana Electric Cooperative Association

is true and correct to the best of my knowledge, information, and belief.


Timothy J. Allen

Subscribed and sworn before

Me, Notary Public, this 19th day of

February, 2025.

Notary Signature :

Renee Thibodeaux

Printed Name of Notary:

Renee Thibodeaux

La. Bar Roll No./Notary No.

149283

My commission expires

at death

