



Phelps Dunbar LLP  
11 City Plaza  
400 Convention Street  
Suite 1100  
Baton Rouge, LA 70802  
225 346 0285

November 15, 2022

37864-0002

Paul F. Guarisco  
Partner  
paul.guarisco@phelps.com  
Direct 225 376 0241

RECEIVED

NOV 15 2022

VIA HAND DELIVERY

Mr. Brandon Frey  
Executive Secretary  
Louisiana Public Service Commission  
602 North Fifth Street  
Baton Rouge, LA 70802

LA Public Service Commission

Re: **National Water Infrastructure, LLC, In Re: Application for Approval of Hurricane Ida Costs Recovery Rate Rider**

Dear Secretary Frey:

Enclosed is an original and three copies of the Application of National Water Infrastructure, LLC ("NWI") for Approval of Hurricane Ida Costs Recovery Rate Rider.

Also enclosed as part of the Application are the following Exhibits:

- CONFIDENTIAL Exhibit A – NWI's Itemized Schedule of Storm Costs;
- Exhibit B – Affidavit of Thomas Pertuit, Chief Executive Officer of NWI;
- Exhibit C – NWI Storm Rider Calculation; and
- Exhibit D – NWI Hurricane Ida Costs Recovery Rate Rider.

CONFIDENTIAL Exhibit A contains confidential, proprietary, and competitively sensitive information not necessary to be disclosed to the public. Accordingly, NWI respectfully requests that CONFIDENTIAL Exhibit A be accepted and maintained by the Commission as confidential information, exempt from public disclosure, pursuant to Rule 12.1 of the Commission's Rules of Practice.

**NWI respectfully requests that notice of this filing be published in the Commission's next available Official Bulletin for a 15-day notice period.**

Thank you for your courtesies regarding this matter, and should you have questions concerning the enclosed, please let us know.

Sincerely,

Paul F. Guarisco

Copy: Ryan King

ROUTE TO	<i>bull-15 days</i>	ROUTE FROM
DEPT. <u>bull</u>	DATE <u>11/15</u>	DEPT. _____
DEPT. _____	DATE _____	DEPT. _____
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BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

A Public Service Commission

NATIONAL WATER  
INFRASTRUCTURE, LLC, Ex Parte

DOCKET NO. U-\_\_\_\_\_

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*In Re: Application for Approval of Hurricane Ida Costs Recovery Rate Rider*

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**APPLICATION FOR APPROVAL OF HURRICANE IDA COSTS RECOVERY  
RATE RIDER**

NOW BEFORE the Louisiana Public Service Commission (“Commission” or “LPSC”), through undersigned counsel, comes National Water Infrastructure, LLC (“NWI”, or “Company”), and respectfully requests that the Commission approve the establishment of a tariff Rate Rider to recover the costs incurred by the Company due to Hurricane Ida, as set forth herein.

1.

NWI is an LPSC-regulated utility that currently provides wastewater utility service to approximately 16,914 residential customers and approximately 195 commercial customers in Ascension, East Baton Rouge, Iberville, Livingston, and St. Tammany Parishes in Louisiana. NWI’s principal offices are located at 37458 Cornerview Road, Geismar, Louisiana 70734. NWI is responsible for the safe and reliable planning, engineering, construction, operation, maintenance, and monitoring of its wastewater utility systems.

2.

Many of NWI’s current sewerage system assets were acquired in 2020 from the prior operating utility, Ascension Wastewater Treatment, Inc. (“AWT”), which was also a utility regulated by the LPSC. NWI’s acquisition of the AWT sewerage system assets was approved by the LPSC by Letter of Non-Opposition issued April 3, 2020, in Docket No. S-35482.

3.

NWI's current flat rates for residential and commercial sewerage customers are \$45.00 and \$55.00, per month, respectively.<sup>1</sup> The Company is not seeking adjustment to these rates as part of this filing. NWI currently has a base rate case pending before the LPSC in Docket No. U-36383, which will determine the Company's adjusted base rates, among other things. The purpose of this filing is to obtain Commission approval of a tariff Rate Rider to recover the costs incurred by NWI due to Hurricane Ida. The Hurricane Ida costs sought to be recovered herein through the Rate Rider are not included as part of the Company's pending base rate case.

#### HURRICANE IDA COSTS RECOVERY

4.

On August 29, 2021, Hurricane Ida made landfall near Port Fourchon, Louisiana, as a Category 4 hurricane, with sustained winds of 150 miles per hour. Hurricane Ida inflicted extensive damage to the Louisiana inland, including NWI's service territory. The logistical challenges and measures taken by the Company to ensure that wastewater service was not interrupted and/or timely restored were complex, costly, necessary and prudent.

5.

The attached Confidential Exhibit A, *en globo*,<sup>2</sup> itemizes the capital costs and expenses that NWI has incurred due to the damage caused by Hurricane Ida, as well as for the restoration of wastewater services subsequent to the storm, which amounts total \$410,197.26 (the "Storm Costs"). These prudently incurred Storm Costs were related to fence repairs, fuel costs, pump and

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<sup>1</sup> See NWI's First Revised Sewage Services Tariff, effective as of October 5, 2021.

<sup>2</sup> Confidential Exhibit A contains confidential, proprietary and competitively sensitive information not necessary to be disclosed to the public. Pursuant to LPSC Rule 12.1, NWI respectfully requests that Confidential Exhibit A be accepted and maintained by the Commission as confidential information exempt from public disclosure.

generator rentals, and tree removal. The Storm Costs are not eligible for recovery from any third-party source, such as insurance. NWI respectfully requests approval to recover these necessary, reasonable and prudent Storm Costs through a tariff Rate Rider.

6.

NWI proposes that the Rate Rider become effective on the first of the month following the issuance of an Order in this proceeding, and that the Rate Rider remain in effect for 12 months or until all of the Storm Costs have been recovered. NWI estimates the per-customer monthly bill impact and charge would be \$2.00 for both residential and commercial customers, if recovered over a 12-month period.

7.

The Rate Rider Storm Costs charge will be listed as an individual line item on each customer's monthly bill and be identified as the "Hurricane Ida Costs Recovery Charge." All funds collected via the Rate Rider shall be solely applied to the recovery of the Storm Costs.

### **EXHIBITS AND SUPPORTING AFFIDAVIT**

10.

Pursuant to Rule 13(E) of the Commission's Rules of Practice and Procedure, NWI has attached the following Exhibits in support of its requested relief herein:

Exhibit A: CONFIDENTIAL – NWI's Itemized Schedule of Storm Costs

Exhibit B: Affidavit of Thomas Pertuit, Chief Executive Officer of NWI

Exhibit C: NWI Storm Rider Calculation

Exhibit D: NWI Hurricane Ida Costs Recovery Rate Rider

11.

Pursuant to Article IV, Section 21(D)(1) of the Louisiana Constitution, an advertisement will be placed in the official state journal and in the official journal of the following affected parishes: Ascension, East Baton Rouge, Iberville, Livingston, and St. Tammany. Copies of the Proofs of Publication will be filed with the Commission in accordance with the Rules of Practice and Procedure of the Commission.

12.

NWI requests that notices, correspondence, and other communications regarding this matter be directed to the following:

John O. Shirley  
Paul F. Guarisco  
Taylor J. Boudreaux  
PHELPS DUNBAR LLP  
II City Plaza  
400 Convention Street, Suite 1100  
Baton Rouge, Louisiana 70802  
Telephone: 225-376-0241  
Facsimile: 225-381-9197  
Email: [paul.guarisco@phelps.com](mailto:paul.guarisco@phelps.com)  
Email: [john.shirley@phelps.com](mailto:john.shirley@phelps.com)  
Email: [taylor.boudreaux@phelps.com](mailto:taylor.boudreaux@phelps.com)

Ryan King  
General Counsel  
National Water Infrastructure  
37458 Cornerview Road  
Geismar, Louisiana 70734  
Telephone: 225-673-3156  
Facsimile: 225-755-4592  
Email: [rking@nwila.com](mailto:rking@nwila.com)

NWI requests that the foregoing individuals be placed on the Official Service List for this matter.

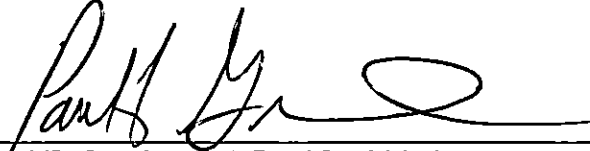
13.

NWI further respectfully requests that notice of this filing be published in the Commission's next available Official Bulletin with a fifteen (15) day notice period.

**[prayer and signatures on following page]**

**WHEREFORE**, National Water Infrastructure, LLC respectfully requests that after all appropriate proceedings, hearings and considerations, its Application be approved by the Commission and be granted any and all other general and equitable relief available under the premises.

Respectfully submitted this 15<sup>th</sup> day of November, 2022.



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Paul F. Guarisco LA Bar No: 22070

John O. Shirley LA Bar No: 8023

Taylor J. Boudreaux Bar Roll No: 37042

**PHELPS DUNBAR LLP**

II City Plaza | 400 Convention Street, Suite 1100

Baton Rouge, Louisiana 70802

Telephone: 225-376-0241

Facsimile: 225-381-9197

Email: paul.guarisco@phelps.com

Email: john.shirley@phelps.com

Email: taylor.boudreaux@phelps.com

*Counsel for National Water Infrastructure, LLC*