CO:SK:H.H.B

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2021 SEP 30 AM IO: 47
LA PUBLIC SERVICE
COMMISSION

KYLE C. MARIONNEAUX

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KARA B. KANTROW kara@mklawla.com

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September 30, 2021

## **VIA HAND DELIVERY**

Ms. Terri Bordelon Records and Recordings Louisiana Public Service Commission 602 N. Fifth St. Galvez Bldg., 12<sup>th</sup> Fl. Baton Rouge, LA 70802

Re: Docket No. U-36002, Utilities, Inc. of Louisiana, ex parte, In re: Formula Rate Plan Annual Report Filing for the Test Year ending on December 31, 2020

## Dear Ms. Bordelon:

Please allow this correspondence serve as Utilities, Inc. of Louisiana's (hereinafter referred to as "UIL") formal response to the Louisiana Public Service Commission Staff's (hereinafter referred to as the "Commission Staff") August 27, 2020 Staff Report and Recommendation (hereinafter referred to "Staff's Recommendation") in connection with the above-captioned filing. UIL is in general agreement with Staff's Recommendation; however, there remain a few outstanding issues, namely regarding the following topics, all of which have been discussed with Commission Staff: (1) Allowance of an additional \$81,128 of operating expenses identified as "Outside Service – Other" associated with allocations of outside contractor services; (2) A rate base allowance of an additional \$672,846 related to book value increases and UIL's allocated portion of shared services assets; and (3) various corresponding flow-through inclusions for working capital and tax purposes. Furthermore, and in connection therewith, attached hereto is a revised rate schedule illustrating the updated proposed rates.

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

Sincerely,

Kara B. Kantrow

Enclosure: as stated

cc: Barlow Holley (via email)

Lane Sisung (via email)

## Utilities, Inc. of Louisiana Summary of Current and Proposed Rates

\* / \_k

		RATES						AVERAGE BILL					
u Complete		Current		Proposed		Difference		Current		Proposed		Difference	
ervice			2500000				Notes de la constante de la co				en e		
Residential Volumetric		46.00		40.65			\$	29.95	\$	33.06	\$	3.1	
Base Facility Charge	\$ \$	16.89	\$		\$	1.76							
Volumetric Rate	\$	3.45	\$	3.81	\$	0.36							
Residential Irrigation							\$	57.48	\$	63.47	\$	5.9	
Base Facility Charge	\$	16.89	\$	18.65	\$	1.76							
Volumetric Rate	\$	3.45	\$	3.81	\$	0.36							
Residential Flat Rate	\$	28.96	\$	-	\$	-	\$	-	\$	14) <u>-</u>	\$	-	
Commercial Volumetric							Ś	162.67	\$	179.61	ċ	16.9	
Base Facility Charge	\$	69.67	\$	76.92	ċ	7.25	ş	102.07	Þ	1/9.01	Þ	10.	
Volumetric Rate	\$	3.67		4.05		0.38							
volumetric nate	Ş	3.67	Ş	4.05	Ş	0.36							
Commercial Irrigation							\$	234.54	\$	258.97	\$	24.	
Base Facility Charge	\$	69.67	\$	76.92	\$	7.25							
Volumetric Rate	\$	3.67	\$	4.05	\$	0.38							
Commercial Flat Rate	\$	28.96	\$	-	\$	-	\$	-	\$	-	\$	-	
ater Service				0°5521 123 125 125 125 125 125 125 125 125 125 125				WK 16.71 L MARKET L'ENWELL OF GARLET	00 000 000 000 000 000 000 000 000 000			LUNGOON OF LONGON	
Residential Volumetric							\$	45.11	\$	49.41	\$	4.	
Base Facility Charge	\$		\$	36.24		3.15							
Volumetric Rate	\$	2.09	\$	2.29	\$	0.20							
Residential Flat Rate	\$	44.19	\$	48.40	\$	4.21	\$	44.19	\$	48.40	\$	4.	
Commercial Volumetric													
Base Facility Charge - 5/8" Meter	\$	57.57	\$	63.05	\$	5.48	\$	85.44	\$	93.58	\$	8.	
Base Facility Charge - 3/4" Meter	\$	57.57	\$	63.05	\$	5.48	\$	67.67	\$	74.11	\$	6.	
Base Facility Charge - 1" Meter	\$	57.57	\$	63.05	\$	5.48	\$	106.88	\$	117.05	\$	10.	
Base Facility Charge - 1.5" Meter	\$	96.93	\$	106.16	\$	9.23	\$	236.45	\$	258.96	\$	22.	
			\$	212.34	\$	18.46	\$	463.78	\$	507.94	\$	44.	
Base Facility Charge - 2" Meter	\$	193.88	Ş	212.54				194.62	\$	213.15	\$	18.	
Base Facility Charge - 2" Meter Base Facility Charge - 2.5" Meter	\$ \$	193.88 193.88	\$	212.34	\$	18.46	\$	13 1.02		020 47	4		
,					\$ \$	18.46 29.54	\$	847.75	\$	928.47	\$	80.	
Base Facility Charge - 2.5" Meter	\$	193.88	\$	212.34			\$	847.75		1,153.55	\$		
Base Facility Charge - 2.5" Meter Base Facility Charge - 3" Meter	\$	193.88 310.19	\$	212.34 339.73	\$	29.54	\$	847.75	\$	1,153.55		100.	
Base Facility Charge - 2.5" Meter Base Facility Charge - 3" Meter Base Facility Charge - 4" Meter	\$ \$ \$	193.88 310.19 310.19	\$ \$ \$	212.34 339.73 339.73	\$	29.54 29.54	\$ \$ \$	847.75 1,053.26	\$	1,153.55 1,833.30	\$	100. 159.	
Base Facility Charge - 2.5" Meter Base Facility Charge - 3" Meter Base Facility Charge - 4" Meter Base Facility Charge - 6" Meter	\$ \$ \$ \$	193.88 310.19 310.19 310.19	\$ \$ \$	212.34 339.73 339.73 339.73	\$ \$ \$	29.54 29.54 29.54	\$ \$ \$	847.75 1,053.26 1,673.91	\$ \$ \$	1,153.55 1,833.30 2,404.83	\$	100. 159.	
Base Facility Charge - 2.5" Meter Base Facility Charge - 3" Meter Base Facility Charge - 4" Meter Base Facility Charge - 6" Meter Base Facility Charge - 6" Meter Base Facility Charge - 8" Meter Volumetric Rate  Commercial Flat Rate	\$ \$ \$ \$ \$	193.88 310.19 310.19 310.19 310.19	\$ \$ \$ \$ \$	212.34 339.73 339.73 339.73 339.73	\$ \$ \$ \$	29.54 29.54 29.54 29.54	\$ \$ \$	847.75 1,053.26 1,673.91 2,195.76	\$ ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ;	1,153.55 1,833.30 2,404.83 bove	\$	100. 159. 209.	
Base Facility Charge - 2.5" Meter Base Facility Charge - 3" Meter Base Facility Charge - 4" Meter Base Facility Charge - 6" Meter Base Facility Charge - 8" Meter Volumetric Rate  Commercial Flat Rate Formulaic Flat Rate	\$ \$ \$ \$ \$ \$ \$ \$ \$	193.88 310.19 310.19 310.19 310.19 6.33 44.19	\$ \$ \$ \$ \$	212.34 339.73 339.73 339.73 339.73 6.94 48.40	\$ \$ \$ \$ \$	29.54 29.54 29.54 29.54 0.60	\$ \$ \$ \$	847.75 1,053.26 1,673.91 2,195.76 Include 44.19	\$ ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ;	1,153.55 1,833.30 2,404.83 bove 48.40	\$ \$ \$	100. 159. 209.	
Base Facility Charge - 2.5" Meter Base Facility Charge - 3" Meter Base Facility Charge - 4" Meter Base Facility Charge - 6" Meter Base Facility Charge - 8" Meter Volumetric Rate  Commercial Flat Rate Formulaic Flat Rate Customer 1	\$ \$ \$ \$ \$ \$	193.88 310.19 310.19 310.19 310.19 6.33 44.19	\$ \$ \$ \$ \$ \$ \$ \$	212.34 339.73 339.73 339.73 339.73 6.94 48.40	\$ \$ \$ \$ \$	29.54 29.54 29.54 29.54 0.60 <b>4.21</b> 6.31	\$ \$ \$ \$ \$ \$	847.75 1,053.26 1,673.91 2,195.76 Include 44.19 66.29	\$ : \$ : \$ : \$ : \$ : \$ : \$ : \$ : \$ : \$ :	1,153.55 1,833.30 2,404.83 bove 48.40 72.60	\$ \$ \$	100. 159. 209.	
Base Facility Charge - 2.5" Meter Base Facility Charge - 3" Meter Base Facility Charge - 4" Meter Base Facility Charge - 6" Meter Base Facility Charge - 8" Meter Volumetric Rate  Commercial Flat Rate Formulaic Flat Rate Customer 1 Customer 2	\$ \$ \$ \$ \$ \$ \$	193.88 310.19 310.19 310.19 6.33 44.19 66.29 109.15	\$ \$ \$ \$ \$ \$ \$ \$ \$	212.34 339.73 339.73 339.73 6.94 48.40 72.60 119.54	\$ \$ \$ \$ \$ \$ \$ \$ \$	29.54 29.54 29.54 29.54 0.60 <b>4.21</b> 6.31 10.39	\$ \$ \$ \$ \$ \$	847.75 1,053.26 1,673.91 2,195.76 Include 44.19 66.29 109.15	\$ : \$ : \$ : \$ : \$ : \$ : \$ : \$ : \$ : \$ :	1,153.55 1,833.30 2,404.83 bove 48.40 72.60 119.54	\$ \$ \$ \$	100. 159. 209. <b>4.</b> 6. 10.	
Base Facility Charge - 2.5" Meter Base Facility Charge - 3" Meter Base Facility Charge - 4" Meter Base Facility Charge - 6" Meter Base Facility Charge - 8" Meter Volumetric Rate  Commercial Flat Rate Formulaic Flat Rate Customer 1 Customer 2 Customer 3	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	193.88 310.19 310.19 310.19 6.33 44.19 66.29 109.15 117.10	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$	212.34 339.73 339.73 339.73 6.94 <b>48.40</b> 72.60 119.54 128.26	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	29.54 29.54 29.54 29.54 0.60 <b>4.21</b> 6.31 10.39 11.15	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	847.75 1,053.26 1,673.91 2,195.76 Include 44.19 66.29 109.15 117.10	\$ : \$ : \$ : \$ : \$ : \$ : \$ : \$ : \$ : \$ :	1,153.55 1,833.30 2,404.83 bove 48.40 72.60 119.54 128.26	\$ \$ \$ \$ \$ \$	100. 159. 209. 4. 6. 10.	
Base Facility Charge - 2.5" Meter Base Facility Charge - 3" Meter Base Facility Charge - 4" Meter Base Facility Charge - 6" Meter Base Facility Charge - 8" Meter Volumetric Rate  Commercial Flat Rate  Formulaic Flat Rate Customer 1 Customer 2 Customer 4	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	193.88 310.19 310.19 310.19 6.33 44.19 66.29 109.15 117.10 128.15	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	212.34 339.73 339.73 339.73 6.94 48.40 72.60 119.54 128.26 140.35	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	29.54 29.54 29.54 29.54 0.60 <b>4.21</b> 6.31 10.39 11.15 12.20	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	847.75 1,053.26 1,673.91 2,195.76 Include 44.19 66.29 109.15 117.10 128.15	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	1,153.55 1,833.30 2,404.83 bove 48.40 72.60 119.54 128.26 140.35	\$ \$ \$ \$ \$ \$ \$ \$	100. 159. 209. 4. 6. 10. 11.	
Base Facility Charge - 2.5" Meter Base Facility Charge - 3" Meter Base Facility Charge - 4" Meter Base Facility Charge - 6" Meter Base Facility Charge - 6" Meter Volumetric Rate  Commercial Flat Rate  Customer 1 Customer 2 Customer 4 Customer 5	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	193.88 310.19 310.19 310.19 6.33 44.19 66.29 109.15 117.10 128.15 154.67	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	212.34 339.73 339.73 339.73 6.94 48.40 72.60 119.54 128.26 140.35 169.39	\$\$\$\$\$ \$\$\$\$\$\$	29.54 29.54 29.54 29.54 0.60 <b>4.21</b> 6.31 10.39 11.15 12.20 14.73	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	847.75 1,053.26 1,673.91 2,195.76 Include 44.19 66.29 109.15 117.10 128.15 154.67	\$ : \$ : \$ : \$ : \$ : \$ : \$ : \$ : \$ : \$ :	1,153.55 1,833.30 2,404.83 bove 48.40 72.60 119.54 128.26 140.35 169.39	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	80.100.1159.1209.11.11.11.11.11.11.11.11.11.11.11.11.11	
Base Facility Charge - 2.5" Meter Base Facility Charge - 3" Meter Base Facility Charge - 4" Meter Base Facility Charge - 6" Meter Base Facility Charge - 8" Meter Volumetric Rate  Commercial Flat Rate  Formulaic Flat Rate Customer 1 Customer 2 Customer 4	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	193.88 310.19 310.19 310.19 6.33 44.19 66.29 109.15 117.10 128.15	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	212.34 339.73 339.73 339.73 6.94 48.40 72.60 119.54 128.26 140.35	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	29.54 29.54 29.54 29.54 0.60 <b>4.21</b> 6.31 10.39 11.15 12.20	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	847.75 1,053.26 1,673.91 2,195.76 Include 44.19 66.29 109.15 117.10 128.15	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	1,153.55 1,833.30 2,404.83 bove 48.40 72.60 119.54 128.26 140.35	\$ \$ \$ \$ \$ \$ \$ \$	100. 159. 209. 4. 6. 10. 11.	