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MAY 29 2024

LA Public Service Commission

Irish Environmental, L.L.C.
300 Pierremont Rd Unit 13
Shreveport, Louisiana 71106

May 13, 2024

Louisiana Public Service Commission
Attention: Brandon Frey, Executive Secretary
602 North 5th Street
Baton Rouge, Louisiana 70802

Re: Request to Approve a Change of Management of Irish Environmental, L.L.C.

Dear Mr. Brandon Frey;

Irish Environmental, L.L.C. ("company"), respectfully requests the approval from the Louisiana Public Service Commission ("LPSC") to change the management/membership of the company as required by the LPSC General Order dated March 18, 1994.

Please refer to the attachments to this letter for further documentation supporting this request. Note that no request is being made to create a new regulated wastewater utility company. Irish Environmental, L.L.C., as the regulated utility company, will remain the operating regulated utility and no assets are being transferred to any other organization. No request is being made that would alter the regulatory jurisdiction of the Commission or the ability of the Commission to effectively regulate and audit the public utility's operation in the State.

Please use the following contact information when sending correspondence pertaining to this request.

Lyn B. Irish, Jr., Ph.D.
271 County Road 6876
Natalia, Texas 78059

Rickey Ables
P.O. Box 916
Oak Grove, Louisiana 71263

Thank you for your assistance in this matter.

ROUTE TO _____ ROUTE FROM _____
DEPT. Legal-Publish? DATE 5/29 DEPT. _____
DEPT. _____ DATE _____ DEPT. _____
DEPT. _____ DATE _____ DEPT. _____
DEPT. _____ DATE _____ DEPT. _____

1524 78467

Sincerely,

IRISH ENVIRONMENTAL, L.L.C.

A handwritten signature in black ink, appearing to read 'Lyn B. Irish, Jr.', written in a cursive style.

Lyn B. Irish, Jr., Ph.D.
Manager

Attachments

ATTACHMENT A
Background and Reason for Change of Management

Irish Environmental, L.L.C. (the "company") is a small one-employee company that performs the maintenance and operation of the wastewater collection system and treatment plants that serve approximately 130 homes total in the Bartholomew Landing/Fleur de Lis Subdivisions, located in Sterlington, Louisiana. As the sole owner/employee of the company, Mr. Lyn B. Irish, Jr. has always provided the hands-on maintenance and operation of the treatment plants. Unfortunately, Mr. Irish has experienced severe health issues over the past two years and is currently living with health problems that prevent him from performing any maintenance/operational work on the wastewater systems. In other words, Mr. Irish is no longer capable of operating the wastewater utilities that serves the Bartholomew Landing and Fleur de Lis Subdivisions due to health reasons.

For this reason, the company hired Mr. Rickey Ables in 2023 to work with and assist Mr. Irish in the operation and maintenance of the Bartholomew Landing/Fleur de Lis sewage utilities. Under the company's continued direction, Mr. Ables has become fully knowledgeable and capable of operating the wastewater utilities. Now, to continue uninterrupted service of the wastewater utilities, the company is requesting a change of operating and management personnel. Specifically, the company is requesting that Lyn B. Irish, Jr., the current sole member of the limited liability company, be replaced by Rickey Ables and Jeanne Ables, as the only two members of Irish Environmental, LLC. This change will allow the company to provide better service and shorter response times when critical, time-sensitive services are required during the operation of the wastewater utility.

ATTACHMENT B

Analysis of the Eighteen (18) Factors required by the 1994 General Order to Determine Transfer of Ownership

1) Is the Transfer in the Best Public Interest

The transfer of ownership of Irish Environmental, L.L.C. to Mr. Rickey Ables is fully in the best interest of the ratepaying residents of the Bartholomew Landing and Fleur de Lis subdivisions for reasons including, but not necessarily limited to, the following:

- Mr. Irish is no longer physically capable of operating Irish Environmental, LLC. However, Mr. Ables is immediately able to continue the operation of Irish Environmental, LLC in a seamless transition.
- Mr. Ables has specifically operated the Bartholomew Landing/Fleur de Lis Subdivisions wastewater utilities under the supervision of Mr. Irish and Irish Environmental, L.L.C. Mr. Ables has demonstrated that he has the technical knowledge and skills required to provide safe, reliable, and adequate service to the residents of Bartholomew Landing/Fleur de Lis Subdivisions.
- Mr. Ables has been the owner of a Louisiana Department of Environmental Quality (LDEQ) wastewater discharge permit in the past and he has the personal knowledge and expertise to responsibly maintain the current LDEQ wastewater discharge permits that are owned by Irish Environmental, L.L.C.
- The current Irish Environmental, L.L.C. operations office is located in Shreveport, LA, which is approximately 125 miles from the Bartholomew Landing/Fleur de Lis Subdivisions sewage utility. The new business office, under the direction of Mr. Ables, will now be located in Oak Grove, LA, which is only 45 miles from the sewage utility. This proximity will insure a much quicker response when critical, time-sensitive services are required during the operation of the wastewater utility.

2) Is the Purchaser Willing and Able to Provide adequate Service?

Mr. Rickey Ables has owned his own business for over twenty (20) years. In the past, Mr. Ables has been an owner of a Louisiana Department of Environmental Quality (LDEQ) wastewater discharge permit and has personal knowledge of the requirements needed to responsibly maintain a LDEQ wastewater discharge permit. Furthermore, Mr. Ables has demonstrated that he has the experience, technical knowledge and skills needed to provide safe, reliable, and adequate

service to the residents served by the Bartholomew Landing/Fleur de Lis Subdivisions sewage utility.

3) **Will the Transfer Maintain or Improve the Financial Condition of the Utility?**

Yes, the financial condition of the Bartholomew Landing/Fleur de Lis Subdivisions sewage utility will be maintained, and likely improved, by the transfer of ownership of Irish Environmental, L.L.C.

4) **Will the Transfer Improve the Quality of Service?**

Yes. Currently, the Irish Environmental, L.L.C. operations office is located in Shreveport, LA, which is approximately 125 miles from the Bartholomew Landing/Fleur de Lis Subdivisions sewage utility. The new business office, under the direction of Mr. Ables, will be located in Oak Grove, LA, which is only 45 miles from the physical location of the sewage utility. The proximity of the new business operations office will insure a much quicker response time when critical, time-sensitive services are required during the operation of the sewage utility.

5) **Will the Transfer Provide Net Benefits to Ratepayers?**

Yes. The ratepayers will benefit greatly from having the new service operations office located in closer proximity to the utility facilities.

6) **Will the Transfer Adversely Affect Competition?**

No. There is no other known entity interested in the ownership and/or control of the Bartholomew Landing/Fleur de Lis Subdivisions wastewater utility.

7) **Will the Transfer Maintain or Improve the Quality of Management of the Utility Doing Business with the State?**

Yes. The new owner of Irish Environmental, LLC has over twenty (20) years of business experience owning and operating LDEQ Wastewater Discharge Permits similar to the permits owned by Irish Environmental, L.L.C.

8) **Is the Transfer Fair and Reasonable to the Affected Utility?**

Yes. The utility service will continue uninterrupted.

9) **Is the Transfer Fair and Reasonable to the Public Utility Shareholders?**

Not Applicable to this transfer.

10) **Will the Transfer be Beneficial to the State and Local Economies?**

This transfer will have no net effect on the State and local economy.

11) Will the Transfer preserve the Jurisdiction and Ability of the Commission to Effectively Regulate the Utility?

Yes. The Commission will continue to regulate Irish Environmental, L.L.C. as the registered regulated wastewater utility entity.

12) Will the Transfer Create any Adverse Consequences?

No.

13) Past History of the Acquiring Entity with State Agencies?

Mr. Ables has previously owned wastewater discharge permits issued by the Louisiana Department of Environmental Quality. He is fully knowledgeable and capable of maintaining the wastewater discharge permits owned by Irish Environmental, L.L.C.

14) Does the Acquiring Entity have the Financial Ability to Operate the Utility?

Yes. Irish Environmental, L.L.C. has shown the ability to successfully operate financially under the past customer rate of \$21.00/month. Mr. Ables will have the benefit of operating under the newly approved rate of \$27.00/month (per Order Number U-36680 dated March 18, 2024).

15) Does the Acquiring Entity have the Ability to Make Needed Repairs?

Yes. Mr. Ables will have the benefit of operating under the newly approved rate of \$27.00/month (per Order Number U-36680 dated March 18, 202) which will provide funding for any needed repairs.

16) Does the Acquiring Entity have the Ability to Obtain all Necessary Permits?

Yes. However, Irish Environmental, L.L.C. already owns the needed permits as required by the Louisiana Department of Environmental Quality.

17) Will Financing the Transfer Effect Encumbering Assets or Impact Rates?

No. The transfer will not require any outside financing.

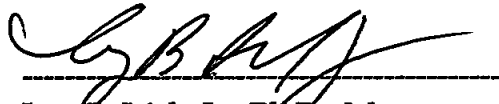
18) Are there any Conditions that Should be Attached to the Proposed Acquisition?

No.

ATTACHMENT C
Affidavit

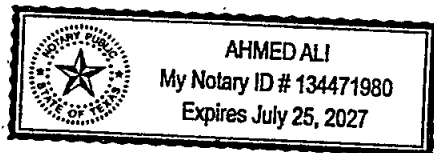
CERTIFICATION

I hereby certify this document and attachments were prepared under my direction and the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.


Lynn B. Irish, Jr., Ph.D., Manager
Irish Environmental, L.L.C.

May 6, 2024
Date

Sworn and subscribed before me this 6 day of May, 2024.




NOTARY PUBLIC - STATE OF TEXAS