



Total Environmental Solutions, Inc.

P. O. BOX 14059
BATON ROUGE, LOUISIANA 70898-4056
1824 RYDER DRIVE 70808
TELEPHONE 800-372-9712 / 225-766-4477 FAX 225-766-4470
www.totalenvironmentalsolutions.com

RECEIVED

NOV - 2 2020

October 29, 2020 LA Public Service Commission

Brandon Frey, Executive Secretary
Louisiana Public Service Commission
P. O. Box 91154
Baton Rouge, LA 70821-9154

VIA Email and 1st Class Mail

**Re: Request for Letter of Approval for Non-Opposition concerning the
Transfer of Country Lane Water Customers, Lafayette Parish to
Lafayette Utility Systems (LUS)**

Dear Executive Secretary Frey,

Enclosed please find Total Environmental Solutions, Inc.'s (TESI) 18-point letter regarding the above captioned request.

I have also enclosed a Letter of Agreement from Lafayette Utilities System (LUS) confirming their intention to accept TESI's customers into their water system at no cost to TESI.

In advance, thank you for your attention to this matter.

Sincerely,

Melanie C. McCartt

Melanie C. McCartt
Manager of Customer Relations

Attachments

cc: Craig Greene, Louisiana Public Service Commissioner District 2
Wayne Owens, CEO

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**Re: Request for Letter of Approval for Non-Opposition concerning the
Transfer of Country Lane Water Customers, Lafayette Parish to
Lafayette Utility Systems (LUS)**

Dear Secretary Frey:

I am writing to petition affirmative Louisiana Public Service Commission ("Commission") action on approval of non-opposition for Total Environmental Solutions, Inc. ("TESI") to transfer the referenced water customers to Lafayette Utility Systems (LUS). Country Lane Subdivision is located in Lafayette, Lafayette Parish.

To aid the Commission to find in our favor, we offer the following considerations in response to the eighteen points laid out by the General Order of the Commission dated March 18, 1994.

1. The transfer of Country Lane Subdivision water customers to LUS is in the public interest. LUS is an established public utility with adequate manpower and expertise to properly improve and maintain the water system and provide potable water for the customers.
2. LUS is ready, willing and able to provide safe, reliable and adequate service to the residents of Country Lane Subdivision. LUS is currently providing water service to other customers in Country Lane Subdivision.
3. The transfer will maintain the financial condition of TESI, since it will no longer be required by the LA Department of Health and Hospitals (LDHH) to drill an additional water well at an exorbitant cost to TESI, to meet LDHH's requirements at this one facility.

4. The proposed transfer will greatly improve the quality of service because LUS intends to connect Country Lane Subdivision water customers its water mains which are already in place inside Country Lane Subdivision and are being utilized by other residences in this same subdivision.
5. The transfer will provide net benefits to TESI's remaining ratepayers in both the short term and the long term. No additional monies will be needed to upgrade/replace this particular system and the impact on TESI's statewide rate base will not be significantly reduced by transferring Country Lane Subdivision's seven (7) customers to LUS.
6. Concerning adversely affecting competition, we see no significant competition at work in the area. No impact is anticipated.
7. The transfer will maintain the quality of management of the resulting water and sewerage district, as well as that of the municipality doing business in the local area.
8. This transfer will be fair and reasonable to TESI's employees since this change will allow them to devote more of their time and energy to the remaining systems.
9. This transfer would be fair and reasonable to the stockholder. TESI is wholly owned by South Louisiana Electric Cooperative Association, so there is only one shareholder, which is in agreement with the proposed transfer.
10. This transfer will be beneficial on an overall basis to State and local economies and to the communities in the area served by TESI and LUS. Country Lane Subdivision water customers would be a connected to a water main owned by LUS, whereby making it more efficient and economical for the consumer.
11. This transfer will cease the jurisdiction of the Commission, since LUS is an entity of Lafayette Parish.
12. TESI does not expect adverse consequences resulting from the transfer, since LUS has a water main within Country Lane Subdivision.
13. The history of TESI's compliance with regulatory authorities in this State and other jurisdictions remains very positive. TESI was formed for the sole purpose of repairing and properly operating systems that had been previously improperly operated. This we are currently doing under a Consent Decree, which we follow diligently. TESI has presented to the Commission and other regulators detailed plans and reports of compliance that have received acceptance. It is because of TESI's diligent planning and compliance that it believes this transfer is in the best interest of all parties: TESI, LUS, but most importantly the customer.
14. LUS has the financial ability to operate this utility and to maintain the quality of the physical system.

15. Country Lane Subdivision water system is over twenty (20) years old, serving 7 customers (7) water customers. LDHH requires all water systems to have at least two water wells or an emergency water connection.
16. LUS can obtain all necessary health, safety and other permits.
17. TESI and LUS have agreed to transfer the water customers at no charge to TESI (see attached proposed Act of Sale).
18. The only conditions attached to this proposal are made a part of the proposed Act of Sale (see attached).

TESI will continue to be the sewer provider for the seven (7) customers.

Should the Commission have further questions in this regard please contact Melanie McCartt, Manager of Customer Relations at 800-372-9712, ext 3003 or mmccartt@tesi-usa.com.

Sincerely,

Wayne Owens

Wayne Owens
Chief Executive Officer

WO/mcm

Attachments

cc: Craig Greene, LPSCommissioner District 2, w/o attachments
Melanie McCartt, Manager of Customer Relations-w/o attachments



Improving the way you live

October 26, 2020

Patrick Broderick
Total Environmental Solutions, Inc. (TESI)
1824 Ryder Drive (70808)
P.O. Box 14059 (70898)
Baton Rouge, LA

Re: Letter of Agreement
Country Lane Water Transfer
City of Lafayette, Lafayette Parish

Dear Mr. Broderick:

Lafayette Utilities System (LUS) owns and operates the water distribution system along Country Lane in the City of Lafayette, Lafayette Parish, Louisiana. This system serves 16 customers off of 8" and 2" main lines. Total Environmental Solutions, Inc. (TESI) also owns and operates a water well and water distribution system along Country Lane that serves 7 customers (418 Failla Road, 100 Country Lane, 107 Country Lane, 108 Country Lane, 111 Country Lane, 117 Country Lane, and 119 Country Lane). TESI wishes to shut down their well and transfer the customers to the LUS system.

LUS approves this transfer request and agrees to begin serving these 7 customers. The LUS water mains along Country Lane have the capacity to provide domestic and firefighting water service to the proposed customers. The proposed customers are subject to LUS policies, fees, and rates.

For questions or comments feel free to contact Bryan Guidry at (337)291-5872.

Sincerely,

A handwritten signature in black ink, appearing to read "Lowell Duhon", written over a horizontal line.

Lowell Duhon
Interim Director, Lafayette Utilities System

Xc: Jeffrey Stewart, Bryan Guidry, Karen Hoyt, Craig Gautreaux