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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE CORPORATE NAME)
CHANGE OF SUEZ WATER IDAHO INC. TO)
VEOLIA WATER IDAHO, INC.)
CASE NO. VEO-W-22-01
SUZ-W-22-01
COMMENTS OF THE
COMMISSION STAFF

COMES NOW the Staff of the Idaho Public Utilities Commission (“Staff”), by and through its Attorney of record, Chris Burdin, Deputy Attorney General, and submits the following comments.

BACKGROUND

On April 8, 2022, Veolia Environment S.A. (“Veolia”) filed a letter with the Commission stating that its acquisition of SUEZ S.A. (“SUEZ”) was completed on January 18, 2022. Veolia claimed that the Competition and Markets Authority provided antitrust clearance for the transaction in the United Kingdom on March 10, 2022, clearing the way for the Veolia and SUEZ to commence the integration of the Veolia North America and the SUEZ North America (“SNA”) businesses, which include SUEZ Water Idaho Inc. Veolia explained that as part of the integration, there would be a rebranding of the SNA businesses to the Veolia brand.

At the Commission's April 28, 2022, Decision Meeting, Staff recommended that the Commission treat the Tariff Advice as an Application¹ and process the case by Modified Procedure to allow additional time to review Veolia's proposal and for public input. To accomplish this, Staff also recommended the Commission suspend the proposed effective date pursuant to *Idaho Code* § 61-622(4).

Additionally, the Commission observed that Veolia had not requested a change to the corporate name on the Certificate of Public Convenience and Necessity ("CPCN") No. 143. The Commission noted that Veolia's application was likely premature until such a request was made and reviewed by the Commission.

Veolia stated that if the name change was approved, customers would continue to receive water service under the same rates, terms, and conditions as were presently on file with the Commission. Veolia included a copy of its Commission approved tariffs with the indicated name change and a proposed effective date of May 1, 2022.

STAFF ANALYSIS

Staff has reviewed the Application, tariffs, and other necessary documents to confirm that the proposed filing will not harm customers. Staff confirmed that the proposed tariffs with the name change have the same rates, terms, and conditions as the current tariffs on file with the Commission. Staff reviewed the Secretary of State website² and confirmed the name Veolia Water Idaho, Inc. was adopted on March 28, 2022, which is consistent with the Company's Application.

Veolia has requested to change the name on its tariffs. Staff is concerned that SUEZ has not complied with the Commission's directive, ordering SUEZ to amend CPCN No. 143 "to reflect the acquisition of Eagle Water's service territory and customers." Order No. 35247 at 20. Staff recommends Veolia comply with Order No. 35247 and file an amended CPCN that includes the Eagle Water service territory. During informal discussions with Veolia, Staff became aware that the Company had begun surveying their entire Eagle Water service territory, and the Company indicated that it may need up to 60 days to complete and file an amended CPCN. Therefore, Staff recommends approval of the name change contingent upon the Company filing an amended CPCN that includes the Eagle Water service territory within 60 days of the Commission's Final Order in

¹ See Commission Rule of Procedure 134.02, IDAPA 31.01.01.134.02.

² sosbiz.idaho.gov.

this case. After review of the amended CPCN, Staff will make its recommendations regarding its findings in a decision memo to the Commission.

As of May 24, 2022, there have been no public comments on Veolia's application.

STAFF RECOMMENDATION

Staff recommends approval of the name change contingent upon Veolia filing an amended CPCN that includes the Eagle Water service territory within 60 days of a Commission's Final Order on the name change.

Respectfully submitted this *24th* day of May 2022.



Chris Burdin
Deputy Attorney General

Technical Staff: Travis Culbertson
Chris Hecht
Kevin Keyt

i:umisc/comments/veow22.1_suzw22.1cbtncwvhksk comments

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 24TH DAY OF MAY 2021, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NOS. SUZ-W-22-01/VEO-W-22-01, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

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