

RECEIVED

2022 NOV 10 PM 3: 11

IDAHO PUBLIC UTILITIES COMMISSION

Preston N. Carter, ISB No. 8462
Morgan D. Goodin, ISB No. 11184
Givens Pursley LLP
601 W. Bannock St.
Boise, ID 83702
Telephone: (208) 388-1200
Facsimile: (208) 388-1300
prestoncarter@givenspursley.com
morgangoodin@givenspursley.com

Attorneys for Veolia Water Idaho, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF VEOLIA WATER
IDAHO, INC.'S APPLICATION TO AMEND
BRIAN WATER SURCHARGE AND
REFUND CUSTOMERS.

Case No. VEO-W-22-03


VEOLIA WATER IDAHO INC.'S REPLY
COMMENTS

Veolia Water Idaho, Inc. (“Veolia” or “Company”) submits these comments in response to the comments filed in this case by the Idaho Public Utility Commission Staff (“Staff Comments”).

Veolia appreciates Staff’s concerns and diligence in reviewing the Application in this case, as well as Staff’s general support for approving the tariff revisions. Staff Comments at 2. Regarding administration of the credit, Veolia does not dispute that Staff’s analysis is theoretically sound, but it is difficult to implement. *See id.* at 2–3. Staff’s recommendation—crediting individual customer principal balances on the date the payments were made—creates complexity. Because this would need to be computed manually and tracked individually, Staff’s method would increase overall costs as well as the likelihood of mistakes. It may also be more difficult for customers to understand than a one-time credit. Finally, Veolia’s proposal of the one-time credit benefits customers by returning the refund now rather than waiting.

In light of the Application, the supporting information, and the comments received in the case, Veolia respectfully requests that the Commission issue an order granting the relief sought in the Application.

DATED: November 10, 2022.


By: _____
Preston N. Carter
Givens Pursley LLP
Attorneys for Veolia Water Idaho, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on November 10, 2022, I caused a true and correct copy of the foregoing to be served upon the following parties as indicated below:

Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
P.O. Box 83720
Boise, Idaho 83720-0074
jan.noriyuki@puc.idaho.gov
secretary@puc.idaho.gov

- Email
- U.S. Mail
- Fax
- Hand Delivery



Preston N. Carter