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Attorneys for Veolia Water Idaho, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION
OF VEOLIA WATER IDAHO, INC. FOR
APPROVAL OF FIRE HYDRANT
CONVEYANCE, INSTALLATION, AND
OPERATION AGREEMENT

Case No. VEO-W-23-04
PETITION FOR
REVISION/RECONSIDERATION

Pursuant to Commission Rule of Procedure 331, Veolia Water Idaho, Inc. (Veolia or Company) respectfully submits the following Petition for Revision/Reconsideration of Order No. 36122.

Background

In this proceeding, Veolia requested that the Commission approve an agreement (“Agreement”) between Veolia and the Whitney Fire District (“District”) regarding the transfer of ownership of fire hydrants within the District.

In Order No. 36122, the Commission approved the Agreement, subject to the condition that Veolia and the District amend the Agreement to change the definition of “private hydrant,” and file the revised Agreement within thirty days. Veolia and the District are pursuing this amendment and anticipate filing the revised Agreement within the thirty-day timeframe.

Request for revision/reconsideration

In reviewing the Order, Veolia identified several places in which the terms of the Agreement are not accurately described. While Veolia does not believe that these items impact the substance of the Order, Veolia requests that the Order be revised to ensure that there is no misunderstanding between the parties or other stakeholders.

- On page 3, the Order states: “The Company will **replace** 1/5 of the operational hydrants per year for five years.”
 - Under the Agreement, the Company will obtain ownership of 1/5 of the operational hydrants each year. The Company will not necessarily need to replace all of the hydrants it obtains ownership of. The Company respectfully requests that the Order be amended to read, “The Company will **obtain ownership of** 1/5 of the operational hydrants per year for five years.”
- On page 3, the Order states: “Thus, the Company will **replace** up to 200 hydrants during the term of the Agreement”
 - Under the Agreement, the Company will install up to 200 new hydrants. Hydrants will be replaced as needed; the Agreement does not place a floor or a ceiling on the number of hydrants to be replaced. The Company respectfully requests that the Order be amended to read, “The Company will **install** up to 200 **new** hydrants during the term of the Agreement”
- On page 3, the Order states: “If the Agreement is approved, the costs associated with the maintenance and repairs are expected to decrease after the Company **replaces all operational hydrants** during the first five years of the Agreement.”


- Under the Agreement, the Company is not obligated to replace all operational hydrants during the first five years of the Agreement. Veolia respectfully requests that this sentence be amended to read, “If the Agreement is approved, the costs associated with the maintenance and repairs are expected to decrease after the Company **replaces or repairs hydrants, as necessary, after inspection pursuant to the Agreement.**”

Conclusion

Veolia respectfully requests that Order No. 36122 be revised as set forth above.

Dated: April 18, 2024.

GIVENS PURSLEY LLP

By 


Preston N. Carter
Attorneys for Veolia Water Idaho, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on April 18, 2024 I caused a true and correct copy of the foregoing to be served upon the following parties as indicated below:

Monica Barrios-Sanchez
Commission Secretary
Idaho Public Utilities Commission
P.O. Box 83720
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monica.barriossanchez@puc.idaho.gov

- Email
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- Fax
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