



Louisiana Public Service Commission

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May 9, 2025

VIA HAND DELIVERY

Louisiana Public Service Commission
Records and Recordings
602 N. Fifth Street
Galvez Building, 12th Fl.
Baton Rouge, LA 70802

LA PUBLIC SERVICE COMM
MAY 9 2025 PM3:29

Re: Docket U-37394, South Louisiana Electric Cooperative Association, ex parte. In re: Petition for approval of abandonment of electric facilities located in Terrebonne and Lafourche Parishes pursuant to Commission General Order dated July 9, 2008 (R-30301).

To whom it may concern:

Enclosed for filing in the above-captioned matter is *Staff Report and Recommendation with Testimony of Thomas Broady in support of the Staff Recommendation on Behalf of the Louisiana Public Service Commission*. Please file the enclosed into the record of the above-captioned docket. If you have any questions regarding this filing, please do not hesitate to contact me.

Sincerely,

Braeden Smith (Bar Roll 40951)
Staff Attorney
Louisiana Public Service Commission
Phone: (225) 342-9888
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cc: Service List (via email)

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

DOCKET NO. U-37394

SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION,

EX PARTE

In re: Petition for Approval of Abandonment of Electric Facilities Located in Terrebonne and Lafourche Parishes pursuant to Commission General Order dated July 9, 2008 (R-30301)

STAFF REPORT AND RECOMMENDATION

Procedural History

On September 25, 2024, Southeast Louisiana Electric Cooperative Association (“SLECA” or the “Cooperative”) filed a petition for approval of abandonment of electric facilities located in Terrebonne and Lafourche Parishes (the “Request”) pursuant to Louisiana Public Service Commission (“LPSC” or the “Commission”) General Order dated July 9, 2008 (the “General Order”).¹ Notice of this proceeding was published in the Commission’s Official Bulletin #1333 dated September 27, 2024. Approximately 74 requests for intervention were filed at various times throughout Staff’s review of the filing and are listed in Broady Exhibit A which is attached to this report.

SLECA is a Louisiana non-profit, rural electric cooperative organized and existing under the Electric Cooperative Act of the State of Louisiana (“R.S. 12:401, et seq.”). SLECA was first incorporated on May 10, 1938 and is domiciled in Terrebonne Parish. As an electric cooperative, the LPSC has jurisdiction over the rates and services of SLECA pursuant to Article IV, section 21 (B) of the Louisiana Constitution. SLECA provides retail services to approximately 21,367 service connections in the Parishes of Assumption, Lafourche, Saint Martin, Saint Mary, and Terrebonne.² SLECA owns and maintains approximately 1,500 miles of distribution lines connecting 9 substations, while serving approximately 21,000 members. Approximately 80% of its service connections are considered residential. SLECA is governed by a nine (9) member Board of Directors elected by the Cooperative’s membership. As a Cooperative, SLECA has no stock and obtains long term debt financing from the Rural Utilities Services (“RUS”), and supplemental lends such as the Federal Financing Bank (“FFB”), the National Rural Utilities Cooperative Finance Corporation (“CFC”) and CoBank.

¹ General Order (R-30301) dated July 9, 2008 is a prohibition of abandonment of electric or natural gas distribution facility or service without prior commission approval.

² 2023 Annual Report to LPSC by SLECA.

SLECA's Request

SLECA's petition is requesting the abandonment of electric facilities that were damaged and/or destroyed during the 2021 hurricane season which included the aftermath of Hurricane Ida. SLECA indicated that approximately 4,000 poles were damaged or downed, close to 1,000 transformers damaged, and hundreds of miles of electric lines were downed. SLECA contends that repair work is ongoing and they are continuing to work with FEMA for reimbursement for storm recovery costs. However, some sections of SLECA's pre-2021 hurricane season infrastructure have not been rebuilt. The distribution facilities that once served camps located in Lake De Cade, Lake Fields, Island at the end of Four Point Road, and Grand Pass (the "Lake Line") are areas that have not been rebuilt. SLECA's petition indicated that the infrastructure in this area was destroyed by the 2021 hurricane season and has since been removed. Additionally, SLECA believes it is in their best interests to not reconstruct the Lake Line, thereby abandoning service under the General Order.

SLECA's petition indicates that the Lake Line serves only camp property and is comprised of approximately 44.5 linear miles of distribution throughout remote marshes, bayous, and lakes. SLECA has further indicated that no electric service has been supplied to the approximately 282 camp meters served by the Lake Line since the 2021 hurricane season. SLECA has also indicated that the location, along with the exposure in some areas, and the type of infrastructure needed to provide safe and reliable power raises safety concerns, access issues in the event of an emergency, and is cost prohibitive to the Cooperative and its members. For these reasons, SLECA believes it is in the best interest of the Cooperative for the infrastructure to be abandoned.

SLECA's petition indicated that it was compliant with the General Order and provided a narrative and supporting details as to each of the requirements of the General Order. SLECA provided the following based on each requirement of the General Order:

1. Copies of various mailings sent to affected members regarding the status of service on the Lake Line since the 2021 Hurricane Seasons was supplied as Exhibit 1 the petition.
2. Copies of the Customer Notices that were mailed on August 21, 2024 to the individual camp owners whose service will not be restored because of the proposed abandonment to their billing address on file with the Cooperative. This was supplied as Exhibit 2 and in accordance with Paragraph B.1 of the General Order.
3. In accordance with Paragraph B.2 of the General Order, SLECA provided the following information as part of the petition:
 - a. The area in which the electrical distribution facilities are proposed to be abandoned, and electrical service discontinued are made up of remote recreational camps which are only-accessible by boat. Many of these properties are owned by the state or other major land corporations which lease the property to the camp owner/members. When the distribution lines servicing these remote locations were originally constructed in the late 1960's, the topography of the area was much different than what exists today. Due to continuing coastal erosion, and subsidence, the land mass and vegetation has changed. In the 1960's there was much more "solid ground" and trees which aided in preserving the infrastructure during extreme weather events. Today, the coastline and infrastructure along the coast is much more vulnerable to tidal surge and wind damage. In many instances, SLECA has

suffered extensive damage for tropical systems that are not named events, or federal disaster declarations. The specific areas proposed to be abandoned include:

- i. Lake De Cade: Specifically, a distribution segment from the Falgout Canal Substation, commencing at Latitude 29.413636, Longitude -90.785139 thence running Southwest along the southern border of Lake De Cade to a point of intersection with lines traversing North through Bay Long, Southwest along Bayou de Cade and Southeast along the Southern end of Raccourci Bay, ending near Lake Penchant. The total length of the segment to be abandoned is approximately 30.8 miles.
 - ii. Grand Pass Specifically, the distribution segment traversing from the Falgout Canal Substation, commencing at Latitude 29.327909, Longitude -90.853091 thence running Southwest along the Southern Border of Mud Lake to a point of ending at the pass between Lake Mechant and Calliou Lake; specifically, Latitude 29.266896, Longitude -90.934822. The total length of this segment to be abandoned is approximately 8.77 miles.
 - iii. Lake Fields: Specifically, the distribution segment traversing from the Landry Substation, commencing at Latitude 29.680870, Longitude -90.58881 thence running South — Southeast along the eastern border of Lake Fields to a point of ending at Bayou Lafourche; specifically, Latitude 29.637454, Longitude -90.559586. The total length of 'the distribution segment to be abandoned is approximately 4.74 miles.
 - iv. Four Point Specifically, the distribution segment traversing from the Dulac Substation, commencing at Latitude 29.308209, Longitude -90.715075 thence running South across a navigable body of water to a point of ending on Four Point Island, adjacent to the Houma Navigation Canal: specifically, Latitude 29.30550, Longitude -90.715564. The total length of the segment to be abandoned is approximately 0.19 miles.
- b. SLECA provided Exhibit 3 to the petition, which is an overview map of the aforementioned Lake Line facilities.
 - c. In accordance with Paragraph B.2 (b) of the General Order, SLECA indicated there was no active service lines and/or meters serving the affected camps as the Lake Line has been removed and not replaced since its destruction from the 2021 hurricane season.
 - d. In accordance with Paragraph B.2 (c) of the General Order, SLECA indicated the date of abandonment is immediate and that the previous infrastructure was removed after its destruction from the 2021 hurricane season. Additionally, as no power has been provided to the camps since the 2021 hurricane season, the process of abandonment is now limited only to the required filing with the Commission seeking approval of the same.
4. In accordance with Paragraph B.3 of the General Order, SLECA has attached affidavits from the official journals for Terrebonne and Lafourche Parishes as well as the official sate journal as Exhibit 4 which demonstrate a proof of publication of notice in each of those journals.
 5. In accordance with Paragraph B.4 of the General Order, SLECA provided a narrative that provided information regarding annual revenues from each of the affected camp owners as well as the cost estimates if they were to move forward with replacing the utility assets. SLECA asserted at the time of the application that the estimated cost to replace the Lake Line would be approximately \$105 million. Of that total SLECA indicated that FEMA

would likely pay approximately 90% of the total leaving SLECA membership responsible for approximately \$10.5 million. In addition to the actual rebuild costs, SLECA would be responsible for additional costs such as environmental permitting, environmental mitigation, procurement of rights-of-way, etc. that were also estimated at the time of the application to be approximately \$5 million. SLECA membership would additionally be responsible for any interest costs associated with the cost of the rebuild. SLECA has indicated that they reasonably believe that the cost to SLECA members would be at least \$15.5 million plus applicable interest costs. SLECA also made mention of operational costs of providing ongoing maintenance to these assets were excessive due to the terrain and remote areas requiring special equipment to access.

6. In accordance with Paragraph B.5 of the General Order, SLECA has advised that the Lake Lines were likely built in the 1960's and that portions of the line have been destroyed and rebuilt multiple times. SLECA has indicated that the majority of the infrastructure was removed after the 2021 hurricane season and that all remaining infrastructure removal was to be completed by the end of September 2024. Accordingly, SLECA has indicated that there no future use for the facilities that SLECA seeks to abandon.
7. In accordance with Paragraph B.6 of the General Order, SLECA has indicated that no other utilities will be affected by the proposed abandonment.
8. In accordance with Paragraph B.7 of the General Order, SLECA asserts that there is no current line to be maintained or preserved as the line was destroyed during the 2021 hurricane season and has been removed.
9. In accordance with Paragraph B.8 of the General Order, SLECA asserts that affected members can and are utilizing generators as an alternative for electric service and that none of the affected members have received any electric service from SLECA since the 2021 hurricane season. SLECA indicated that they believe the cost of a generator to serve the average size affected camp is approximately \$1,000.
10. In accordance with Paragraph B.9 of the General Order, SLECA has indicated that there will be no environmental impacts of the proposed abandonment, as all of the environmental impacts have been mitigated by virtue of clearing the line after it was destroyed.
11. In accordance with Paragraph B.10 of the General Order, SLECA has indicated that it has never before filed a request to abandon facilities.

SLECA submitted the testimony of Mr. Matthew Peters, Mr. Jason Guy, Mr. Scotti Henry, Mr. Steven Portero, Mr. Tim Allen, and Mr. Tommy Boudreaux in support of its application on February 21, 2025. Mr. Peters is the General Manager of SLECA, Mr. Jason Guy is a Program Manager with Royal Engineering who provided SLECA with consulting services related to the Lake Line repair project, Mr. Scotti Henry is a SLECA member and ratepayer, Mr. Steven Portero is a SLECA member and ratepayer, Mr. Tommy Boudreaux is a SLECA member and ratepayer, and Mr. Tim Allen is a Professional Land Surveyor and General Manager of Apache Louisiana Minerals, LLC ("ALM"). Mr. Allen indicated that ALM has multiple commercial accounts with SLECA, including a camp account that is affected the proposed abandonment and is the property owner on which a portion of the Lake Line was located.

Commission Authority

The Commission exercises regulatory jurisdiction over all utility companies pursuant to Article 4, Section 21, of the Louisiana Constitution and applicable Commission Orders adopted pursuant to that authority.

La Const. Art. IV, Sec. 21 provides in pertinent part:

The Commission shall regulate all common carriers and public utilities and have such other regulatory authority as provided by law. It shall adopt and enforce reasonable rules, regulations, and procedures necessary for the discharge of its duties, and perform other duties provided by law.

General Order dated July 9, 2008:

Approval of this transaction is specifically required pursuant to the Commission's General Order dated July 9, 2008.

Any electric or natural gas utility that proposes to abandon all or any portion of its facilities subject to the jurisdiction of the Louisiana Public Service Commission must first provide written notice of the proposed abandonment to each individual customer whose service would be discontinued, and must file with the Commission a petition for approval. Where it is not feasible to do so prior to an unexpected interruption in the use of facilities to provide service, the utility shall provide written notice and file a petition for approval in the event that the utility subsequently determines not to restore permanent service...

...Temporary disconnection of or failure to provide service due to a public safety emergency or natural disaster shall not be considered an abandonment or permanent discontinuance of service under the terms of this Order. If a utility determines, however, not to restore permanent service as a result of the public safety emergency or natural disaster, the utility shall file an application under the terms of this Order.

Audit Staff Review

Audit Staff conducted a thorough review of this application and its exhibits, the direct testimony filed by SLECA in support of its application as well as responses to data requests submitted by Staff and intervenors. Staff's review also consisted of a review of the annual reports and current financial health of SLECA, the requirements to abandon facilities as indicated in the General Order, as well as a review of past actions taken by the Commission in regard to abandonment of Electric Facilities.

In regard to the requirements of the General Order, SLECA bears the burden of showing that it satisfied the requirements enumerated in the General Order. Specifically, SLECA must provide proof of written notification to the individual customers whose service may be discontinued as a result of the proposed abandonment, mailed to their current billing address. SLECA included with its Request copies of ongoing communication in the form of letters mailed to individual customers. These communications appeared to have been sent out in October of 2021, July of 2022, and April of 2023. These correspondences provided certain updates, including notice of prolonged outage of service, an update in regard to SLECA's options they were discussing moving forward toward repairs, as well as notice of existing damaged infrastructure removal. SLECA provided notice in a letter dated August 21, 2024 that came from the Board of Directors that outlined the reasoning that led them to the decision to seek to abandon the Lake Line and which also outlined the process moving forward including the filing of the Request and the members ability to voice their opinions. This is further evidenced by the number of interventions received on behalf of SLECA member ratepayers in this proceeding. As evidenced by the letters included in the Request, Staff believes that SLECA has done their due diligence in properly notifying affected individual customers of

the proposed abandonment and has fulfilled the notice requirement of Paragraph B.1 of the General Order.

The second requirement of the General Order requires that the petition include a description of the proposed abandonment or discontinuation of service that includes a detailed description of the area in which facilities are proposed to be abandoned and/or customer's service may be discontinued as a result of such abandonment, including map. Additionally, petitions should indicate the number and class of customers whose service may be discontinued as a result of the proposed abandonment, the proposed date of abandonment, a detailed description of the process that is expected to implement the abandonment, and an estimation of the time frame for completion.

SLECA provided a description of the proposed abandonment that identified the areas affected by latitudinal and longitudinal markings, a description of the geographical features, the types of services offered, the affected number of member ratepayers, as well as a description of the actual assets that made up the differing areas within the Lake Line. SLECA identified the Lake Line area as being made up of remote recreational camps which are only accessible by boat with many of the properties being owned by the State of Louisiana or other major land corporations which lease the properties to the camp owners. The number of ratepayers was provided to be a total of approximately 282 camp meters that which utilized either a Rate 50 for camp/remote service (approximately 260 meters) or a Rate 60 for small power service of remote area (approximately 20 meters). SLECA indicated in the Request that the Lake Line consisted of approximately 30.8 miles of line along the southern border of Lake De Cade, approximately 8.77 miles of line in the Grand Pass area from the Falgout Canal Substation and along the southern border of Mud Lake, approximately 4.74 miles of line in the Lake Fields area from the Landry substation and southeast along the eastern border of Lake Fields, and approximately 0.19 miles from the Dulac substation across a navigable water way and ending on Four Point Island. Additionally, SLECA has indicated that no service has been provided to any of the affected member ratepayers since the 2021 hurricane season, that there are no active service lines and/or meters service the affected member ratepayer properties, that the Lake Line has already been removed and not replaced, and the date of abandonment should be considered immediate. SLECA further indicated that the only remaining process is the current proceeding with the Commission seeking approval of the abandonment. Additionally, SLECA provided a mapping of each of the areas included in the Lake Line in Exhibit 3 of the Request.

Based on the information provided in the Request, Staff believes that SLECA has provided an adequate description of the proposed abandonment and has met the requirements of the Paragraph B.2 of the General Order.

The third requirement of the General Order requires that the petitioner provide a proof of publication in the official state journal and in the journal in each parish within the geographical area of the abandoned facilities. The notice is required to include the petitioners name, address, and phone number, a detailed description of the areas proposed to be abandoned, the proposed date of abandonment, and a toll-free number to the Commission. SLECA attached Exhibit 4 to the Request that included proof of publications for the Advocate, the official Journal of the State of Louisiana as well as The Daily Comet in Lafourche Parish and The Houma Courier in Terrebonne Parish. As evidenced by Exhibit 4, Staff believes that SLECA has met the requirements of Paragraph B.3 of the General Order.

The fourth requirement of the General Order requires that the petitioner provide an economic analysis of expected revenue, operations and maintenance expenses, and replacement and repair costs of the facility, should the utility be required to continue to operate and maintain the service.

SLECA's Request included an analysis that outlined what revenues could reasonably be expected to be realized based on the average customer bill of the two camp rates in their Tariff of the affected areas. SLECA's analysis indicated that SLECA, on average over the previous 7 year period of service, billed on average \$46.18 for a monthly bill for the affected member ratepayers of the Lake Line. Broken down, SLECA indicated that its Rate 50 tariff is utilized by approximately 260 member-ratepayers with an average bill of approximately \$46.00 per month and that its Rate 60 tariff is utilized by approximately 20 member ratepayers with an average bill of approximately \$100.00 per month. SLECA's analysis indicated that the Rate 50 rate contributed approximately \$552 in revenue per member ratepayer a year and the Rate 60 rate contributed approximately \$1,200 in revenue per member ratepayer per year. This is summarized in the table below:

# of Meters	Tariff Rate	Minimum Bill	Average Monthly Bill	Average Yearly Revenue	# of Meters	Total Yearly Revenue
260	Rate 50	\$ 25.00	\$ 46.00	\$ 552.00	260	\$143,520.00
20	Rate 60	\$ 30.00	\$ 100.00	\$ 1,200.00	20	\$ 24,000.00
						\$167,520.00

In addition to the revenue analysis, SLECA provided an estimate of the expected cost to replace the Lake Line to be approximately \$105,194,712.00. SLECA indicated it has diligently worked with the Federal Emergency Management Agency ("FEMA") regarding reimbursement related to the Lake Line rebuild. SLECA has indicated that FEMA would designate the Lake Line Rebuild as an at-cost project, meaning that the total overall cost of the project could increase. Regardless of the cost, SLECA's share of the cost of the rebuild would be 10% of the total cost of reconstruction. SLECA has estimated that the SLECA would be responsible for approximately \$10.5 million of the expected cost to rebuild the Lake Line. Additionally, SLECA has determined that it would expect to have additional expenses that are not reimbursable through FEMA and that they would bear 100% of the burden of those expenses. Those expenses would include environmental permitting, environmental mitigation, and additional procurement of rights-of-way. SLECA has estimated that these additional costs would be approximately \$5 million. Therefore, at a minimum, SLECA's has indicated that they would be responsible for \$15.5 million in expenses associated with rebuilding the Lake Line plus interest costs which would come at market rates during the building process. SLECA has broken this down to an estimated cost to rebuild and provide service to be approximately \$54,964 per meter. SLECA further indicated that this cost does not include yearly maintenance expenses. SLECA indicated that annual labor costs for maintenance after regular storms cost the Cooperative between \$142,000 and \$311,000 in previous years. This information is summarized in the table below:

Lake Line Rebuild Estimates from Request	
Total Number of Customers	280
Total Expected Rebuild Cost	\$ 105,194,712.00
FEMA Share of Rebuild Costs	\$ 94,675,240.80
SLECA Share of Rebuild Costs	\$ 10,519,471.20
Additional Costs	\$ 5,000,000.00
SLECA Expected Minimum Cost	\$ 15,519,471.20
Expected Minimum Cost Per Meter	\$ 55,426.68

In addition to what was submitted in the Request, SLECA provided an update to these costs in the Direct Testimony that was submitted on February 21, 2025. SLECA utilized the services of a Mr. Jason Guy of Royal Engineering as it relates to costs associated with the Lake Like repair project. The testimony submitted by Mr. Guy indicates that costs for the Lake Line repair project has gone up significantly. Mr. Guy's testimony indicated that the updated costs figured in expenses based on a January 2025 cost outlook and increased the total cost of the rebuild by approximately \$24 million and increased the additional costs associated with environmental permitting and right-of-way work by approximately \$6.5 million to \$18 million. This would put SLECA's burden of the cost between \$24.4 million and \$35.9 million. This is summarized in the table below:

Lake Line Rebuild Estimates from Testimony	
Total Number of Customers	280
Total Expected Rebuild Cost	\$ 129,194,712.00
FEMA Share of Rebuild Costs	\$ 116,275,240.80
SLECA Share of Rebuild Costs	\$ 12,919,471.20
Additional Cost Low End	\$ 11,500,000.00
Additional Cost High End	\$ 23,000,000.00
SLECA Expected Low End Cost	\$ 24,419,471.20
SLECA Expected High End Cost	\$ 35,919,471.20
Expected Low End Cost Per Meter	\$ 87,212.40
Expected High End Cost Per Meter	\$ 128,283.83

The Direct Testimony of Mr. Peters outlined SLECA's decision making process that indicated that the cost to rebuild the Lake Line would create an undue burden that could not reasonably recovered from revenues associated with the Rate 50 and Rate 60 rate schedules and likely need to be recovered from all SLECA ratepayers. Mr. Peters testimony further indicates that the Cooperative does not believe it is a reasonable action to spend the money to supply services to recreational camps while the entire membership would subsidize the cost of doing so. Additionally, Mr. Peters indicated that the ongoing maintenance costs alone were more than what was being collected from rates and would make the decision to rebuild even more unsustainable. Staff additionally created an estimate of the rebuild costs over a 30-year term to SLECA's existing lake line customers as well as the total overall membership. Staff's analysis indicated that customer bills for all SLECA members would increase approximately \$3-\$5 per month for the next 30 years if SLECA were to move forward with the rebuild of the Lake Line Project. That information is found in the following chart:

Lake Line Rebuild Per Customer Estimates	
Total Number of SLECA Customers	21420
SLECA Expected Low End Cost	\$ 24,419,471.20
SLECA Expected High End Cost	\$ 35,919,471.20
Expected Low End Monthly Cost Per Customer 30 Yrs	\$ 3.17
Expected High End Monthly Cost Per Customer 30 Yrs	\$ 4.66

Staff submitted data requests seeking clarity on the cost estimates provided in the application as well as the what was resubmitted with the expected increases in the Direct Testimony that was filed in February of 2025. SLECA provided discovery responses from their consultant that provided a breakdown of the costs associated with the rebuilding of the Lake Line. Staff believes that the consultant's report and analysis of the expected costs to rebuild the Lake Line is reasonable. From experience, Staff would further caution that continued delay in work would likely see continued increases in material and labor costs associated with work being done.

Staff sought additional information in data requests as it relates to any communities that are being served that would be similar in nature to recreational camps as described by those being served by the Lake Line. SLECA indicated they have an additional group of customers served under the camp rate tariffs, but that the location of that community made resupplying service significantly easier and lower cost after the 2021 hurricane seasons. SLECA indicated that the Persimmon Pass assets serve approximately 97 accounts under the Rate 50 tariff. Based on information provided by SLECA, Persimmon Pass would be the last group of customers SLECA currently serves under the Rate 50 tariffed rate.

SLECA's economic analysis took each of the separate groups of lines and treated them as group although there exists a significant difference in the number of assets and location of these facilities. For instance, Four Point Island's assets include 4 poles and 9 meters, whereas Lake Decade consists of 489 poles and 158 meters. This is a stark difference in terms of assets and labor to put those assets into service. SLECA's responses to data requests indicated their belief that it would make less economic sense to approach the repair in segments rather than as a whole as repairs and replacements to different parts of the Lake Line and not others would significantly increase the cost share for others.

As it pertains to the requirements of the Paragraph B.4 of the General Order, Staff believes that SLECA has not fully met the requirements of the Order. SLECA has provided an in-depth review and analysis of the overall project to be completed, but has treated these four separate groups of assets as a singular one in its review. Staff's concern is that these separate groups of assets are in different geographic locations and are not connected to one another in a manner that would require all of them to be repaired or replaced in order to provide service. SLECA's economic analysis took the four groups of assets as an all or nothing approach when determining the economic reasonings for the abandonment.

Staff would agree that any sort of recovery of expenses of a project of this magnitude would likely need to be through a subsidization of all SLECA ratepayers as the total cost, regardless of

additional financial assistance from FEMA or other government agencies, would be too heavy of a burden to reasonably collect from just the affected member ratepayers. Staff's review of the updated expected costs if borne by all SLECA ratepayers would be approximately \$3-5 per month over the next 30 years. If this cost was instead borne just by the affected member ratepayers, it would be approximately \$240-356 per month over the next 30 years. This information can be found in the table below.

Lake Line Rebuild Per Lake Line Customer Estimates	
Total Number of SLECA Customers	280
SLECA Expected Low End Cost	\$ 24,419,471.20
SLECA Expected High End Cost	\$ 35,919,471.20
Expected Low End Monthly Cost Per Customer 30 Yrs	\$ 242.26
Expected High End Monthly Cost Per Customer 30 Yrs	\$ 356.34

The fifth requirement of the General Order requires SLECA to provide a description of past, present, and as applicable, future uses of the facility sought to be abandoned. SLECA's Request indicated that the Lake Line was likely built in the 1960's and that since that time portions of the line have been destroyed and rebuilt multiple times. SLECA has indicated that the Lake Line has been used to serve camps in Terrebonne and Lafourche Parishes. SLECA additionally reiterated that due to the destruction of the Lake Line from the 2021 hurricane season and subsequent work to remove the damaged remaining infrastructure, that very little infrastructure or no infrastructure currently exists and that there is no future use of existing facilities that SLECA seeks to abandon. Staff agrees with SLECA's responses and believes that SLECA has met the requirements of Paragraph B.5 of the General Order.

The sixth requirement of the General Order requires SLECA to provide a list of any other utilities that will be affected, to the extent necessary to implement LPSC General Order dated December 7, 1989 (regarding prohibition against termination of service by a providing utility against a consuming utility). SLECA has indicated that no utilities would be affected by the proposed abandonment. Staff would also note that no utilities intervened in the proceeding as well. Staff believes that SLECA has met the requirements of Paragraph B.6 of the General Order.

The seventh requirement of the General Order requires SLECA to provide what efforts, if any, they have taken to maintain, preserve or otherwise continue the use of the subject facility and to avoid the proposed abandonment, including but not limited to detailed descriptions and itemizations of the applicant's maintenance, preservation and other similar efforts with regard to the subject facility during the five (5) years prior to the date of the application. SLECA provided a short narrative that reiterated that there was no current line to be maintained or preserved and that it was destroyed by the 2021 hurricane seasons and that all infrastructure was removed. SLECA did indicate that over the last five (5) years, the line has seen more frequent repairs due to corrosion, harsh environmental surroundings, storms, and strong winds. Although not explicitly stated in the application in response to Paragraph B.7, Staff would also suggest that SLECA engaging with local professionals and FEMA in regard to a potential rebuilding project, the costs of materials, labor, etc., would suggest that SLECA also took a proactive step in determining actual costs associated with the project. Staff believes that SLECA has met the requirements of Paragraph B.7 of the General Order.

The eight requirement of the General Order requires SLECA to provide if there is an existence of alternative energy sources for the consumer and the estimated cost per customer to convert to each alternative energy source. SLECA indicated in the Request that the affected members so desiring can and are utilizing a generator as an alternative to electric service. SLECA indicated that affected members have not received electric service from SLECA since the 2021 hurricane season and that upon information and belief that some affected members have purchased generators and that SLECA has estimated the cost for a generator to serve the averages size affected camp to be approximately \$1,000. Staff requested additional information in regard to SLECA's assertion of the cost of generators for affected members. SLECA provided a cost estimate for a residential generator to be approximately \$1,000 that would serve what they would expect to be the average electrical load. Staff would like to highlight that the cost of a generator shouldn't be the only expected cost to be considered as an alternative energy source. Generators have a significantly shorter lifespan than traditional electrical lines and the individual cost of generator is not the only costs that should be considered. As with SLECA's responses to data requests for their own repair/replacements, there would likely be a significant labor cost associated with the installation of a whole home generator, maintenance, and fueling expenses in a such a remote area. Nevertheless, Staff believes that SLECA has provided correct information that the only additional source of electrical power would be through individual generators and therefore has met the requirements of Paragraph B.8 of the General Order.

The ninth requirement of the General Order requires SLECA to provide a narrative indicating what, if any, environmental impacts and consequences may result from the abandonment together with a complete disclosure of the Applicant's efforts to ascertain such impacts and consequences, including whether the abandonment is sought for environmental reasons, including but not limited to shoreline erosion. SLECA's Request outlined that there would be no environmental impacts as a result of the proposed abandonment as any current or future environmental impacts have been mitigated by virtue of clearing the line after its complete destruction. Additionally, in the Direct Testimony filed by SLECA after the Request was made, Mr. Tim Allen indicated that they had significant concerns as to mitigation of environmental impacts if any work or rebuild was to occur and they would seek not only to not grant a right-of-way to SLECA to perform the work, but seek to require work processes that would be less impactful to the marsh in and around the assets. This concern for the marsh being mitigated by use of airboats instead of marsh buggy's is one example. Staff believes that SLECA has met the requirements of Paragraph B.9 of the General Order.

The tenth requirement of the General Order asks for a list of previously filed requests for abandonment by the Applicant of any affiliated company. SLECA has indicated that they have never filed a request for abandonment of any facilities. Staff has found no history of SLECA filing for an abandonment of assets in the past with the LPSC. Staff believes that SLECA has met the requirements of Paragraph B.10.

The last requirement of the General Order asks that SLECA provide an affidavit containing a sworn statement by a responsible utility executive that the utility has complied with all of the rules and regulations herein, and that all representations contained in the petition for abandonment and/or discountenance of service are true and correct. SLECA filed an affidavit of Mr. Matt Peters, General Manager of SLECA in Exhibit 5 to the Request. Staff believes that SLECA has met the requirements of Paragraph B.11 of the General Order.

Conclusion

Staff has reviewed the Request, along with its accompanying exhibits and additional testimony filed by SLECA into the proceeding in support of the Request. Additionally, Staff has reviewed multiple sets of data requests and reviewed the many interventions that have been requested in the proceeding. Staff's review has found that, although SLECA has met the majority of the requirements under the General Order, that they have not provided enough information for Staff to agree that the proposed abandonment should be considered in the public interest.

Staff's position is that SLECA has treated each of the four groups of assets as a whole when making its economic assumptions, although these groups have varying geographical locations, and are not directly tied to one another on singular line, and have significantly varying needs in terms of actual assets to be replaced in terms of volume. Before Staff could agree with SLECA that the abandonment of all of the included assets in the Lake Line's be considered in the public interest, SLECA should provide an analysis and determination where the individual groups of assets are considered piecemeal rather than in whole. Staff generally agrees with SLECA's assertions that the individual costs to just affected member ratepayers taking service from the Lake Line assets would be untenable as indicated in our previous analysis. Additionally, Staff would agree that even if the full customer base would be responsible the costs associated with SLECA's share of the Lake Line rebuild project that that additional \$3-5 per month for a period of 30 years to serve such a small number of customers would also be considered untenable as it would raise rates for a service territory already stricken with significant economic hardships from the 2021 hurricane season.

However, without fully understanding or knowing the costs associated with each group of individual assets within the Lake Line project, Staff cannot say that it would be in the public interest to abandon all of the assets in their entirety.

Attached Exhibits:

1. Broady Exhibit 1 List and Date of Filed Interventions

Intervenor	Intervention Filing Date
Guidroz Family	10/14/2024
Covington Family	10/14/2024
Mike Brignac	10/15/2024
Toby Baudoin	10/15/2024
Carl and Melanie O'Gwynn	10/15/2024
Murphy Loupe	10/15/2024
Craig Leonard	10/15/2024
Patrick Porche	10/15/2024
Jerry Percle	10/15/2024
Cleveland Matherne	10/15/2024
Wilbert J. Bernard	10/15/2024
E. Paul Blanchard	10/15/2024
Allyson Breaux	10/16/2024
Keith Poole	10/16/2024
Brian Boss	10/16/2024
Walter Boss	10/16/2024
Danal Boss	10/16/2024
Ricardo Valdes	10/16/2024
Lorie Young	10/16/2024
Sara Boudreaux	10/16/2024
Jeffrey Marcel	10/16/2024
Roy Kramer	10/16/2024
Wayne Templet	10/16/2024
Timothy Boudreaux	10/16/2024
Warren M Sanamo Jr.	10/16/2024
Jeremy Brady	10/16/2024
Andy Simon	10/16/2024
Mary Ahnweiler	10/16/2024
Lee and Michelle Scott	10/16/2024
Thomas Dykes	10/16/2024
Tommy Pertuit	10/17/2024
Chester & Deborah Terrebonne	10/17/2024
Amy and Jake Leblanc	10/18/2024
Chelsey Bennet	10/18/2024
Joel Brent Story	10/22/2024
Kerry Wainwright	10/22/2024
Korey Alario	10/22/2024
Michael Neil	10/22/2024
Ernest Forsythe	10/22/2024
Philip Carlos	10/22/2024
Charles K Weaver Jr.	10/22/2024
Hugh Ledet	10/22/2024
Issac Dantin	10/23/2024
Michael and Donna Harlow	10/23/2024
Angela Price	10/23/2024
Kerry Mathrene	10/23/2024
Joey and Wanda Vedros	10/23/2024
Taylor Theriot	10/23/2024
Larry Glynn	10/23/2024
Cedric Bernard	10/23/2024
Keith Himel	10/23/2024
Matt Benoit	10/23/2024
Christine Himel	10/23/2024
Heather Benoit	10/23/2024
Troy Morvant	10/23/2024
Douglas Horn	10/23/2024
Dave Theriot	10/23/2024
Kristen Pertuit	10/23/2024
Amanda Gautreaux	10/23/2024
Stan Bussey III	10/23/2024
Emile Blanchard	10/28/2024
David Waitz	10/28/2024
Steve Pitre	10/31/2024
Rick Wiley	10/31/2024
Donald Lefort	10/31/2024
Richard Bourg	11/7/2024
Bruce and Lisa Messick	12/18/2024
Steve Richard	1/15/2025
Philip Richard	1/15/2025
Richard Bourgeois	1/24/2025
Francis Bourgeois	1/24/2025
Keith Meleine	2/20/2025
Jeremy Brady	3/12/2025
Jason Melancon	4/9/2025
Phillip Gouaux	4/14/2025
Dina Duplantis Blake	4/28/2025
Grady Covington	5/2/2025

LOUISIANA PUBLIC SERVICE COMMISSION

LA PUBLIC SERVICE COMM
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DOCKET NO. U-37394

SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION,

EX PARTE.

*In re: Petition for Approval of Abandonment of Electric Facilities Located in Terrebonne and
Lafourche Parishes pursuant to Commission General Order dated July 9, 2008 (R-30301)*

TESTIMONY OF THOMAS BROADY

IN SUPPORT OF THE

STAFF RECOMMENDATION

ON BEHALF OF THE

LOUISIANA PUBLIC SERVICE COMMISSION

May 9, 2025

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Thomas Broady. My business address is the Galvez Building, 12th Floor, 602
3 North 5th Street, Baton Rouge, Louisiana, 70802.

4
5 **Q. WHERE ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am employed at the Louisiana Public Service Commission ("LPSC" or the
7 "Commission") as an Audit Manager. My position involves the examination, review,
8 analysis, and evaluation of accounting records, reports, financial statements, and other
9 documents of utilities under the jurisdiction of the LPSC.

10
11 **Q. PLEASE PROVIDE YOUR EDUCATIONAL AND PROFESSIONAL**
12 **BACKGROUND.**

13 A. I earned a Bachelor's Degree in Education with concentrations in Mathematics and History
14 from Nicholls State University. I then graduated from Western International University
15 with a Master's Degree in Accounting as well as Master's Degree in Business
16 Administration. I have been employed by the LPSC since May of 2018 and was previously
17 an Account Manager for a regional service company. Since my employment with the
18 LPSC, I have attended and participated in various educational conferences with the
19 National Association of Regulatory Utility Commissioners ("NARUC"), including rate
20 schools, educational and technical conferences, and annual policy summits on utility
21 regulation. I have also attended and participated in annual financial forums as an active
22 member of the Society of Utility and Regulatory Financial Analysts ("SURFA").

23
24 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN REGULATORY PROCEEDINGS**
25 **REGARDING UTILITY RATES?**

1 A. Yes. I have previously presented testimony on dozens of occasions before the Commission
2 in various dockets and proceedings.
3

4 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

5 A. I am testifying on behalf of the Louisiana Public Service Commission Staff.
6

7 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

8 A. The purpose of my testimony is to provide an overview of my recommendation to the
9 Commission regarding South Louisiana Electric Cooperative Association's ("SLECA" or
10 the "Cooperative") petition for approval of abandonment of electrical facilities located in
11 Terrebonne and Lafourche Parishes pursuant to Commission General Order dated July 9,
12 2008.
13

14 **Q. PLEASE PROVIDE A BRIEF OVERVIEW OF THE COOPERATIVE IN TERMS**
15 **OF ITS SERVICE TERRITORY AND THE NUMBER OF MEMBERS IT SERVES.**

16 A. SLECA is a Louisiana non-profit rural electric distribution cooperative. The Cooperative
17 provides retail electric service to approximately 21,367 members and owns and maintains
18 approximately 1,500 miles of distribution lines in the Parishes of Assumption, Lafourche,
19 Saint Martin, Saint Mary, and Terrebonne. SLECA is governed by a nine (9) member
20 board of directors and has its main headquarters is located in Houma, Louisiana.
21

22 **Q. WHEN DID THE COOPERATIVE SUBMIT THE PETITION SEEKING TO**
23 **ABANDON THE ELECTRIC FACILITIES IN TERREBONNE AND LAFOURCE**
24 **PARISHES?**

1 A. The Cooperative filed its application requesting an abandonment of the electric facilities
2 located in Terrebonne and Lafourche Parishes on September 25, 2024.
3

4 **Q. DID YOU REVIEW THE COOPERATIVE'S REQUEST AND ANY ADDITIONAL**
5 **DOCUMENTATION PROVIDED BY THE COOPERATIVE IN SUPPORT OF ITS**
6 **REQUEST?**

7 A. Yes, I reviewed the Cooperative's request and documents that were filed in support of the
8 Cooperative's request for abandonment of the electrical facilities. This included the
9 application that provided narratives outlining requirements in the General Order dated July
10 9, 2008 that outlines the requirements of a utility to abandon electric facilities. Along with
11 the narrative outlined in the Cooperatives petition, Staff reviewed the attached exhibits
12 which included copies of correspondence shared with the affected members, an overview
13 map of the separate locations of the Lake Line, an affidavit showing proof of publication
14 in the state and local journals, as well as an affidavit of Mr. Matt Peters, SLECA's general
15 manager. In addition to what was provided in the application, Staff reviewed the direct
16 testimony submitted on February 21, 2025 by SLECA and in support of the petition. This
17 direct testimony included testimonies from Mr. Matthew Peters, Mr. Jason Guy, Mr. Scotti
18 Henry, Mr. Steven Portero, Mr. Tim Allen, and Mr. Tommy Boudreaux. Mr. Peters is the
19 General Manager of SLECA. Mr. Jason Guy is the engineering consultant working for
20 Royal Engineering that assisted SLECA and FEMA with the rebuild project associated
21 with the Lake Line Mr. Tim Allen is the General Manager of an affected property owner
22 and land owner. Mr. Scottie Henry, Steven Portero, and Mr. Tommy Boudreaux are all
23 current members of SLECA. In addition to what was filed, Audit Staff reviewed annual

1 reports that have been filed by the Cooperative with the LPSC, responses to formal data
2 requests, annual filings the Cooperative made with the LPSC, and the existing tariff of the
3 Cooperative.

4
5 **Q. DID YOU ASSIST IN THE PREPARATION OF THE INFORMAL AND FORMAL**
6 **DATA REQUESTS ISSUED TO SLECA?**

7 A. Yes.

8
9 **Q. WHAT DID THE COOPERATIVE REQUEST IN ITS APPLICATION?**

10 A. SLECA petitioned for the approval of abandonment of certain electric facilities located in
11 Terrebonne and Lafourche Parishes. SLECA contends that the electric facilities were
12 destroyed as a result of the 2021 hurricane season and that the cost to restore facilities and
13 provide electrical power to these areas would be in the best interests of SLECA and its
14 members. The electric facilities that SLECA is proposing to abandon are bundled into a
15 group called the Lake Line. At one point, the Lake Line served approximately 282 camp
16 meters, but none of those meters have been provided power since the 2021 hurricane
17 season. SLECA also has indicated that all of the damaged infrastructure has since been
18 removed from these areas.

19 **Q. CAN YOU DESCRIBE THE AREA AND FACILITIES THAT SLECA IS**
20 **PROPOSING TO ABANDON?**

21 A. Yes. The facilities that SLECA is proposing to abandon are located in four distinct areas.
22 The first area included in the Lake Lines is the Lake De Cade area. This area consists of
23 approximately 30.8 miles of line segments running along the southern border of Lake De

1 Cade with lines traversing through Bay Long, Bayou de Cade, Raccourci Bay, and Lake
2 Penchant. In addition to the lines themselves, this area would require approximately 489
3 poles and 117 transformers.

4 The second area included in the Lake Lines is the Grand Pass area. This area consists of
5 approximately 8.77 miles of line segments coming from the Falgout Canal Substation and
6 running along the southern border of Mud Lake and ending at the pass between Lake
7 Mechant and Cailliou Lake. In addition to the lines themselves, this area would require
8 approximately 134 poles and 43 transformers.

9 The third area included in the Lake Lines is the Lake Fields area. This area consists of
10 approximately 4.74 miles of lines segments coming from the Landry Substation and
11 running along the eastern border of Lake Fields and to an ending point at Bayou Lafourche.
12 In addition to the lines themselves, this area would require approximately 113 poles and
13 39 transformers.

14 The fourth area included in the Lake Lines is the Four Point area. This area consists of
15 approximately 0.19 miles of line segments coming from the Dulac Substation and south
16 across a navigable water way and ending on Four Point Island. In addition to the lines
17 themselves, this area would require approximately 4 poles and 3 transformers.

18 **Q. WHY IS SLECA PROPOSING TO ABANDON THE AFOREMENTIONED**
19 **FACILITIES?**

20 A. SLECA's reasoning for not wanting to rebuild and abandon the lines is financial. SLECA's
21 request has indicated that the financial impact that rebuilding the lines would have on
22 SLECA as a cooperative and its members would be significant as they would be
23 responsible for 10% of the total rebuild costs for the project as well as 100% of costs not

1 allowed to be reimbursed by the Federal Emergency Management Agency (“FEMA”).
2 This cost at the time of the application was estimated to be approximately \$105 million to
3 rebuild the lines with an additional \$5 million in costs not eligible for reimbursements.
4 SLECA’s share of the cost was projected to be approximately \$15.5 million. The direct
5 testimony submitted in February 2025 from SLECA updated the cost estimate with changes
6 for current market conditions and additional environmental concerns and has increased the
7 total cost of the project to approximately \$129 million with additional expenses to be
8 between \$11 and \$23 million where SLECA’s share would increase from \$15.5 million to
9 approximately \$24.4 to \$35.9 million. SLECA’s assertions in the Request is that the
10 affected members revenue is not sufficient for current maintenance of the lines and would
11 not support the long-term recovery and additional maintenance expenses that would be
12 incurred. Additionally, the debt costs associated with the potential rebuild would be
13 detrimental to all SLECA members who are also recovering from the 2021 hurricane
14 season.

15
16 **Q. DID SLECA PROVIDE RESPONSES TO EACH OF THE REQUIRMENTS AS**
17 **INDICATED BY THE JULY 9, 2008 GENERAL ORDER?**

18 A. Yes. SLECA provided this information in the original application and supported that
19 information with the direct testimony filed in February of 2025. Additionally, Staff sought
20 additional clarifying information through data requests.

21 **Q. DID YOU BELIEVE THAT SLECA HAS MET THE REQUIREMENTS OF THE**
22 **JULY 9, 2008 GENRAL ORDER?**

23 A. Not in its entirety. SLECA provided a great deal of information in the filing, however,
24 Staff believes that the treatment of all of the facilities included in the “Lake Line” as a

1 whole is problematic. These facilities are all located in separate areas. These areas do not
2 border one another and if one of them is not connected it doesn't appear that it would have
3 an impact of provision of service to any of the others. The analysis provided has grouped
4 them into a single option without looking at the economics of replacing individual
5 groupings of what was included. These areas are not all equal in terms of materials and
6 costs associated with them as is evidenced by the descriptions of these assets in the
7 application.

8 **Q. DO YOU DISAGREE WITH SLECA'S ECONOMIC ANALYSIS PROVIDED IN**
9 **SUPPORT OF THIS REQUEST?**

10 A. No. The analysis focuses on significant costs to SLECA and its members, even with 90%
11 of the costs being borne by FEMA for the rebuild. Staff sought clarity through data
12 requests if SLECA had looked at these areas on an individual basis and they had not. Staff
13 generally agrees that the economic impact based on the updated costs submitted in the
14 February 2025 testimony of SLECA is significant. Staff's estimate is that if all SLECA
15 members were to subsidize the cost of the project it would likely impact customers' bills
16 by approximately \$3-\$5 for the next 30 years. This subsidization would be for every
17 SLECA member to assist in paying for less than 2% of the total membership's benefit, and
18 for services that are not considered commercial, residential, or government use. Staff's
19 concern is not that we disagree with the economic analysis provided by SLECA, but that it
20 insufficient as they didn't look at these groupings of assets on an individual basis or cost
21 recovery changes to limit subsidized costs if a rebuild did move forward.

22 **Q. CAN YOU SUMMARIZE YOUR RECOMMENDATIONS?**

1 A. Yes. My recommendation would be that the Commission not grant the abandonment until
2 SLECA has performed a full financial analysis on the costs associated with replacing
3 individual groupings of assets in the Lake De Cade, Grand Pass, Lake Fields, and Four
4 Point areas.

5
6
7 **Q. DO YOU BELIEVE YOUR RECOMMENDATION IS FAIR, REASONABLE, AND**
8 **IN THE PUBLIC INTEREST?**

9 A. Yes, I do.

10
11 **Q. DOES THIS CONCLUDE YOUR TESTIMONY**

12 A. Yes, it does.

LOUISIANA PUBLIC SERVICE COMMISSION

DOCKET NO. U-37394

SOUTH LOUISIANA ELECTRIC COOPERATIVE ASSOCIATION,


EX PARTE.

In re: Petition for Approval of Abandonment of Electric Facilities Located in Terrebonne and Lafourche Parishes pursuant to Commission General Order dated July 9, 2008 (R-30301)


AFFIDAVIT

**STATE OF LOUISIANA
PARISH OF EAST BATON ROUGE**

I, Thomas Broady, Audit Manager with the Louisiana Public Service Commission, being duly sworn, do hereby state that I have prepared and reviewed the above and foregoing Testimony and that the matters contained therein are true and accurate to the best of my knowledge, information, and belief. I do adopt the same as my sworn testimony in this proceeding.


Thomas Broady
Audit Manager
Louisiana Public Service Commission

Sworn and subscribed to before me this 9th day of May 2025.


Justin Bello
Bar Roll No. 35039
My Commission Expires at Death
Staff Attorney
Louisiana Public Service Commission

**Service List for U-37394
as of 5/9/2025**

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Jean-Paul P. Coussan

LPSC Staff Counsel

Braeden Smith, LPSC Staff Attorney

Justin Bello, LPSC Staff Attorney

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Petitioner :

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