

# 2023 Consulting Engineer's Comprehensive Annual Report



## **Lafayette Utilities System and LUS Fiber**

**Consulting Engineer's Comprehensive Annual Report  
Project No. 154323**

**4/30/2023**

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prepared for

**Lafayette Utilities System and LUS Fiber  
Consulting Engineer's Comprehensive Annual Report  
Lafayette, Louisiana  
Project No. 154323**

**Revision Final  
4/30/2023**

prepared by

**Burns & McDonnell Engineering Company, Inc.  
Kansas City, Missouri**

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## LIST OF ABBREVIATIONS

<b><u>Abbreviation</u></b>	<b><u>Term/Phrase/Name</u></b>
°F	Degrees Fahrenheit
A&G	Administrative and General
ACE	Affordable Clean Energy
ACFR	Annual Comprehensive Financial Report
ACSR	Aluminum-conductor steel-reinforced cable
ACTP	Ambassador Caffery Treatment Plant
ADMS	Advanced Distribution Management System
AMI	Advanced Metering Infrastructure
AO	Administrative Order
APPA	American Public Power Association
ARPA	American Rescue Plan Act
AWIA	America’s Water Infrastructure Act
AWWA	American Water Works Association
BOD5	Biological oxygen demand
BA	Balancing Authority
Bond Ordinances	General Bond Ordinance
Bonin	Louis “Doc” Bonin Generation Station
BPA	Blanket Purchase Agreement
Burns & McDonnell	Burns & McDonnell Engineering Company, Inc.
CAIDI	Customer Average Interruption Duration Index
CATV	Cable television
CBRS	Citizens Broadband Radio Service
CCR	Coal Combustion Residuals
CCR	Consumer Confidence Report
CCTV	Closed-circuit television video
CEMS	Continuous emission monitoring system
CFB	Circulating Fluidized Bed
Charter	Home Rule Charter
CIAC	Contribution In Aid of Construction
CIP	Capital Improvement Program
City/Lafayette	City of Lafayette, Louisiana
CMEP	Compliance Monitoring and Enforcement Program
CMOM	Capacity, Management, Operations, and Maintenance Program
CO <sub>2</sub>	Carbon dioxide
Commission Boulevard	Commission Boulevard Water Treatment Plant
CPP	Clean Power Plan
CSAPR	Cross State Air Pollution Rule

<b><u>Abbreviation</u></b>	<b><u>Term/Phrase/Name</u></b>
DA	Deaerator
DBPR	Disinfectants and Disinfection Byproducts Rule
Demin	Demineralized water
DP	Distribution Provider
DSC	Debt service coverage
DSCR	Debt service coverage ratio
DSL	Digital Subscriber Line
DVR	Digital video recorder
EDA	U.S. Department of Commerce's Economic Development
EGU	Electric Generating Unit
ELG	Effluent limitation guidelines
EMMA	Electronic Municipal Market Access
EMS	Energy management system
EPA	Environmental Protection Agency
ERP	Emergency Response Plan
ESP	Electro-static precipitator
ESRI	Environmental Systems Research Institute
ESTP	East Sewage Treatment Plant
Fair Completion Act	The Local Government Fair Completion Act
FC	Fuel Charge
FCC	Federal Communications Commission
FCI	Faulted circuit indicators
FEMA	Federal Emergency Management Agency
FGD	Flue gas desulfurization
FRP	Facility Response Plan
FTTP	Fiber-to-the-premises
FWH	Feed water heater
FY	Fiscal year
GAC	Granular activated carbon
Gbps	Gigabits per second
GE	General Electric
GIS	Geographic information system
Gloria Switch	Gloria Switch Remote Site
GO	Generator Owner
GOHSEP	Governor's Office of Homeland Security and Emergency Preparedness
GPON	Gigabit Passive Optical Network
GSU	Generator step-up
HAA5	Five haloacetic acids
HFC	Hybrid Fiber-Coaxial

<b><u>Abbreviation</u></b>	<b><u>Term/Phrase/Name</u></b>
HP	High pressure
HPBX	Hosted voice
HPC	High pressure combustion
HSE	Hot section exchanges
I&I	Inflow and infiltration
ICAP	Installed capacity
ILOT	In lieu of tax
IRP	Integrated resource plan
ISP	Internet service providers
kV	Kilovolts
LDH	Louisiana Department of Health
lb/hr	Pounds per hour
LCG	Lafayette City-Parish Consolidated Government
LCRR	Lead and Copper Rule Revisions
LDEQ	Louisiana Department of Environmental Quality
LiDAR	Light Detection and Ranging
LP	Low pressure
LPDES	Louisiana Pollutant Discharge Elimination System
LPPA	Lafayette Public Power Authority
LPSC	Louisiana Public Service Commission
LPSC Rules	LPSC Cost Allocation and Affiliate Transaction Rules
LPUA	Louisiana Public Utilities Authority
LRZ	Local Resource Zone
LS	Lift stations
LSL	Lead service line
LTE	Long-term evolution
LUS	Lafayette Utilities System
LUS Fiber	Communications System
Magellan	Magellan Advisors
MAIFI	Momentary Average Interruption Frequency Index
Mbps	Megabits per second
MCL	Maximum contaminant levels
MCR	Maximum continuous rating
MG	Million gallons
MGD	Million gallons per day
MISO	Midcontinent Independent System Operator, Inc.
MRDL	Maximum residual disinfectant level
MRDLG	Maximum residual disinfectant level goal
MSGP	Multi-Sector General Permit



<b><u>Abbreviation</u></b>	<b><u>Term/Phrase/Name</u></b>
MSRB	Municipal Securities Rulemaking Board
MV	Medium voltage
MVA	Megavolt amperes
MW	Megawatts of electricity
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industry Classification System
NERC	North American Electric Reliability Corporation
NERC CIP	NERC Critical Infrastructure Protection
NETP	Northeast Treatment Plant
NOV	Notice of Violation
NO <sub>x</sub>	Nitrous oxide
NSPS	New Source Performance Standards
NTEC	Navajo Transitional Energy Company
NWP	North Water Treatment Plant
O&M	Operations and Maintenance Expense
O&P	Operations and Planning
OLT	Optical Line Terminal
OMS	Outage Monitoring System
ONT	Optical Network Terminal
OSI	Open Systems International, Inc.
Parish	Lafayette Parish
PCCC	Permanently Ceasing Coal Combustion
PFAS	Polyfluoroalkyl substances
PIAL	Property Insurance Association of Louisiana
POMS	Power Outage Monitoring System
PON	Passive Optical Network
POTW	Publicly owned treatment works
PRB	Powder River Basin
PRI	Primary Rate Interface
PSIG	Pounds per square inch gauge
PVC	Polyvinyl chloride
RATA	Relative Testing Accuracy Audit
RCRA	Resource Conservation and Recovery Act
Report	Consulting Engineer's Comprehensive Annual Report
ROP	Rules of Procedure
RRA	Risk and Resilience Assessment
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
SBR	Sequencing batch reactors

<b><u>Abbreviation</u></b>	<b><u>Term/Phrase/Name</u></b>
SCADA	Supervisory control and data acquisition
SEC	Securities and Exchange Commission
SNCR	Selective non-catalytic reduction
SO <sub>2</sub>	Sulfur dioxide
SPC-SPCC	Spill Prevention and Control –Spill Prevention, Control, and Countermeasure
SPRINT	General Electric’s Spray Intercooling system
SSIs	Statistically Significant Increases
SSTP	South Sewage Treatment Plant
STG	Steam turbine generator
SWP	South Water Treatment Plant
SWPA	Southwestern Power Administration
TAS	Turbine Air Systems
TDS	Total dissolved solids
TEA	The Energy Authority
TIER	Times interest earned ratio
TO	Transmission Owner
TOP	Transmission Operator
TP	Transmission Planner
TPL	Transmission planning
TSS	Total suspended solids
TTHM	Total trihalomethanes
UCMR	Unregulated Contaminant Monitoring Rule
UF	Ultra filtration
Utilities System	Lafayette Utilities System Electric, Water, and Wastewater Systems
VoIP	Voice over Internet Protocol
VSV	Variable stator vane
VFD	Variable Frequency Drive
WWTP	Wastewater treatment plant
XGS-PON	10 Gigabit Symmetrical Passive Optical Network

## EXECUTIVE SUMMARY

### Introduction

The Lafayette Utilities System (“LUS”) Electric, Water, and Wastewater Systems (collectively the “Utilities System”) General Bond Ordinance and Communications System (also referred to as “LUS Fiber”) General Bond Ordinance (collectively, the “Bond Ordinances”) set forth specific duties and responsibilities of the Consulting Engineer, which include advising LUS on its appointment of a Chief Operating Officer, providing continuous engineering counsel to the Lafayette City-Parish Consolidated Government (Lafayette Consolidated Government or “LCG”) in connection with operations of the Utilities System and Communications System, advising on rate revisions, and preparing an annual comprehensive report (specifically, this Consulting Engineer’s Comprehensive Annual Report or “Report”) on the operations of LUS and LUS Fiber after the close of each fiscal year (“FY”).

LCG retained Burns & McDonnell Engineering Company, Inc. (“Burns & McDonnell”) as the LUS and LUS Fiber Consulting Engineer in January 2021. The analyses and investigations completed by Burns & McDonnell in the performance of its due diligence review and assessments of LUS and LUS Fiber are similar to prior reviews. Therefore, the organization, content, conclusions, and recommendations contained within this Report are similar to previous reports. LCG operates on a fiscal year, beginning November 1 and ending on October 31 of the following year. Unless otherwise stated, all data in this Report is presented on a FY basis.

In preparation of this Report, Burns & McDonnell relied upon information provided by LUS, LUS Fiber, LCG, and Cleco Corporate Holdings (“Cleco”). Consulting engineers from Burns & McDonnell conducted site visits to LUS’s and LUS Fiber’s system assets and conducted onsite and virtual interviews with LUS, LUS Fiber, and Cleco management in February 2023.

### Bond Ordinance Requirements

LUS, LUS Fiber, and Lafayette Public Power Authority (“LPPA”) have bond ordinance requirements which are described in more detail in Section 2 of this Report. As of October 31, 2022, the City was paying debt service on outstanding bonds for LUS (Series 2017, 2019, 2021), LUS Fiber (Series 2015 and Series 2021), and LPPA (Series 2015 and 2021). The Series 2012 Bonds were all recently refunded with the Series 2021 Bonds in FY 2022. This Report addresses several covenants and continuing disclosures included in the Bond Ordinances including, but not limited to, the condition of the assets, operation of the

system, accounting and financial compliance, and financial performance of LUS and LUS Fiber.

Continuing disclosures are included in Sections 8 through 12 of this Report.

### **Utilities System Overall Performance**

LUS continued to experience customer growth across all three utility systems in FY 2022 with total customer count growth of approximately one percent. LUS use per customer has remained relatively consistent over the last few years.

LUS experienced a 20 percent increase in total system revenues in FY 2022, which was primarily due to a 26 percent increase in electric revenues. Electric revenue increases were driven by higher wholesale market energy and fuel costs which are a direct pass-through to electric customers. Water total operating revenues increased by nearly 4 percent, while wastewater revenues increased 2 percent. The increase in total revenues was due to small increases in use per customer, modest increases in total customers, and a much higher fuel charge for electric customers. No rate changes occurred in FY 2022.

LUS FY 2022 total revenues and total expenses were both higher than originally budgeted. Higher revenues were offset by higher operating expenses including higher power supply expenses. Water and wastewater operating expenses were lower than originally budgeted but LUS did experience higher levels of inflation in many categories as expected. Normal capital spending was lower than budgeted, however LUS major capital projects continued to draw down cash reserves.

LUS's financial performance remained relatively strong in FY 2022. LUS continued to maintain a strong debt service coverage ("DSC") ratio and had sufficient cash to fund its operating and capital expenditures. LUS completed a rate study in FY 2022 which proposed a series of rate increases for the electric, water, and wastewater utilities. The approved rate increases will allow LUS to continue to fund operating and capital requirements over the next five years and fund new debt for several upcoming projects in its capital improvements program ("CIP").

### **Communications System Overall Performance**

Since 2017, the Communications System's number of accounts increased at a compound annual rate of █ percent in 2022. At the current customer levels, the Communications System generates sufficient revenues to meet operating and maintenance expenses, debt service, capital improvements, inter-utility loan payments, imputed taxes, and all other financial obligations. The Communications System's operating expenses are holding steady while revenue continues to grow. Further, LUS Fiber's profit margin is sufficient to allow the Communications System to spend approximately █ per year on continued network expansion.

The Communications System's cash flow reserves are sufficient to cover all remaining liabilities related to the 2018 to 2019 attest audit, and revenue trends suggest LUS Fiber will continue to generate positive cash flow beyond 2022, when bond payments will grow from \$9.5 million per year in 2022 to \$10.5 million per year in 2026.

Over the past three years, the COVID-19 pandemic has continued to accelerate the cord-cutting trend (both in the Lafayette market and nationwide), leading to higher-than-expected churn of video subscribers. However, growth in the Communications System's internet subscribers and migration of existing customers to higher bandwidth tiers has more than made up for shrinking video revenue.

As of the writing of this Report, LUS Fiber has achieved a residential internet take-rate (i.e., the percentage of eligible premises that subscribe to service) in line or greater than in more rural areas with what other fiber-to-the-premises operators (both municipally owned and private) have achieved in other markets with a capable cable competitor. Increased demand for upload capacity—which is a competitive advantage of the Communications System's fiber technology—may help fuel continued growth.

From a technical standpoint, the network has sufficient excess network capacity to support numerous additional lit and/or dark fiber customers. And given that most of the Communications System's costs are fixed and do not vary when new customers are added, revenues associated with customer growth above current levels likely will further improve the system's financial performance.

In FY 2021, LUS Fiber was also awarded a \$3.1 million grant from the U.S. Department of Commerce's Economic Development Administration ("EDA") to fund additional network expansion in Lafayette, St. Martin, and Iberia Parishes. LUS Fiber continues to pursue additional grant funding and is currently awaiting the results of several submitted grant applications that will substantially increase their available capital for increased network growth.

### **Utilities System Director**

In February 2022, after a nationwide recruiting search led by Preng & Associates, Lafayette Mayor-President Josh Guillory appointed Jeffrey Stewart as the permanent Utilities Director. Mr. Stewart has over 21 years of experience at LUS and has recently been serving as the Engineering and Power Supply Manager. Mr. Stewart has a Bachelor of Science in Electrical Engineering from Louisiana State University and is a registered Professional Engineer in Louisiana. He has served in a variety of roles over his tenure at LUS as described later in this report.

## Communications System Director

In March 2021, after a nationwide recruiting search led by Linked Executive Search, Lafayette Mayor-President Josh Guillory appointed Ryan Meche, who was serving in the role of Engineer III with LUS Fiber, as LUS Fiber's permanent Director. Mr. Meche graduated from the University of Louisiana at Lafayette with a Bachelor of Science in Electrical Engineering and is a registered Professional Engineer in Louisiana. Mr. Meche has been an employee of LUS for 18 years.

## Utilities System Observations and Recommendations

Based on the information and assumptions relied upon, as included within this Report, the general observations and recommendations for the Utilities System are presented below.

- Based on physical observations of the system and review of records, LUS is maintaining the properties in a manner consistent with utility practices.
- LCG, LUS, and LPPA have an efficient management structure in place to maintain the utility property and maintain adequate accounting and financial records for each of the three utility systems.
- LUS prepares budgets and has budgetary control measures that have enabled the utility to maintain strong financials over the last five years. Revenues were sufficient to meet all financial obligations including debt payment, operating expenses, ILOT payments, and capital funding requirements. LUS has maintained competitive utility service rates while exceeding its minimum 1.0 DSC ratio.
- LUS has been deploying the necessary capital for the repair, replacement, and expansion of the utility systems. Based on Burns & McDonnell's review of the historical and projected capital improvement plan, LUS is making necessary repairs, renewals, replacements, extensions, betterments, and improvements of each of the utility systems.
- For each of the utility systems, LUS is striving to maintain competitive salaries to recruit and retain talented engineers, managers, operators, technicians, and financial staff. The managers and staff in place within LUS appear to be well organized and committed to successfully running the utilities.

## Electric Utility System

Based on the information and assumptions relied upon, as included within this Report, the general observations and recommendations for the Electric Utility System are presented below.

- Based on visual inspection of facilities, records audit, and interviews of LUS staff, the LUS distribution and transmission system is in good condition, maintained properly and in accordance with industry practices.

- LUS is proactive and strategic in its cyclical inspection, maintenance, and replacement of equipment.
- The LUS transmission and distribution planning and construction practices are proactive and aligned with a focus on reliability, resiliency, and efficient operation of the system.
- The LUS distribution system consistently outperforms regional and national averages for system reliability and availability, which reflects its intentional and proactive maintenance, planning, and construction practices.
- Revenues were sufficient to meet all financial obligations including operating expenses, LUS and LPPA debt service, capital improvements, ILOT payments, and required reserves. LUS's electric system operating, expense, debt, revenue, and related ratios reflect a financially stable and healthy utility that is currently offering competitive, lower than market average rates.
- LUS completed a rate study in FY 2022 and the proposed rate plan was approved. The rate increases will generate revenues that allow LUS to continue to maintain its financial performance. The first of the approved electric rate increases will be effective November 1, 2023.
- The electric system revenue recovery structure, like most electric utilities, is misaligned with how costs are incurred. LUS recovers nearly 85 percent of its revenues through variable charges when approximately 50 percent of its costs are fixed. This creates a systemic problem when energy usage per customer is declining, but customer growth is increasing. The approved electric rates will gradually increase the customer charge for Residential customers over the next few years to better recover fixed costs. Commercial customers will see increases in both the customer charge and monthly demand charge.
- LUS is preparing to issue new bonds in FY 2023 to support various electric, water, and wastewater projects. The bond funding anticipated is reasonable and appropriate to fund these projects and the forecasted revenues represented in the continuing disclosure financial projections are expected to be able to fund the new debt service associated with the new bonds.
- The Utilities System CIP has been sufficient to sustain and improve the integrity and reliability of the system.
- LUS completed an IRP in FY 2020. The IRP had several power supply initiatives for LUS to consider which included the retirement of Rodemacher Unit 2 in 2028, the construction of a new LUS owned simple cycle gas turbine power plant at the existing Doc Bonin site in 2028, and the addition of utility scale solar which would be procured through power purchase agreements. LUS is in the process of finalizing its power supply plan and is continuing to evaluate and develop each of these initiatives. LUS is working to finalize its plans regarding the new simple cycle gas turbine power plant in FY

2023 and has begun transmission planning studies with MISO for the new facility.

- LUS has been experiencing some issues with coal delivery and supply due to market constraints. LUS has implemented a coal conservation strategy to mitigate energy market risk. LUS is continuing to monitor delivery schedules and will adjust operations accordingly to continue to mitigate wholesale energy cost fluctuations.
- LUS performed well in FY 2022. LUS's performance on the four reported indices is consistent or significantly better than typical national median performance reported by both regional and national benchmarks. LUS has performed well in NERC CIP audits, NERC 693 operational audits, and Louisiana Department of Environmental Quality ("LDEQ") environmental inspections.
- LUS continues to make upgrades across its transmission system and distribution system to improve resiliency and redundancy. Major capital projects include upgrades to the Peck Substation and a new transmission line between the Peck Substation and the Northeast Substation which will relieve loading on Pont Des Mouton and Peck stations as well as serve as another path for power to flow from the 230kV system to the 69kV system adding resiliency and redundancy.
- LUS has recently completed the installation of a new outage management system ("OMS") for the electric utility. LUS expects that the OMS will further improve reliability and resiliency of the distribution system and will enable LUS to restore customer service more quickly during storms and outages.
- The organizational structure and management of the Electric System engineering and operations areas appears to be strong based on observations, interviews, organizational structures, and manpower within each department.
- As other utilities have experienced, the recruitment and retention of quality resources presents challenges. LUS has indicated that it is working to internally develop quality resources through training programs to retain employees, across multiple departments, and specifically addressing electric lineman and customer service positions. The Electric System management team is continuing to work with local schools to hire and retain strong talent that appreciates the benefits provided by a more stable municipal utility business when compared to the oil and gas business of the gulf coast.

## **Water Utility System**

Based on the information and assumptions relied upon, as included within this Report, the general observations and recommendations for the Water Utility System are presented below.

- Based on visual inspection of facilities, review of records, and interviews of LUS staff, the LUS water



treatment facilities are in good condition, maintained properly and in accordance with industry practices.

- The organizational structure and management of the water system engineering and operations areas appears to be strong based on initial observations, interviews, organizational structures, and manpower within each department.
- LUS completed a rate study in FY 2022 and the proposed rate plan was approved. The adopted rate increases are expected to generate revenues that will allow LUS to continue to maintain its financial performance. New water rates were put into place effective November 1, 2022.
- LUS is preparing to issue new bonds in FY 2023 to support various electric, water, and wastewater projects. The bond funding anticipated is reasonable and appropriate to fund these projects and the forecasted revenues represented in the continuing disclosure financial projections are expected to be able to fund the new debt service associated with the new bonds.
- The Water Sector Program was created in 2021 by the State of Louisiana to provide grant funding for repairs, improvements and consolidation of community water and sewer systems around the state. \$450 million of the American Rescue Plan Act (“ARPA”) state Fiscal Recovery Funds were allocated for the program in 2022. LUS submitted applications to the program in late 2021. In February 2022 LUS was notified that it was awarded approximately \$4.67 million in grant funding for one (1) water project as a part of Round 1 of the program.
- Except for FY 2022, retail sales of water have been decreasing over the last 5 years. However, retail sales reductions have been partially offset by wholesale sales increases, with wholesale sales representing 28 to 30 percent of total sales over the last five years. LUS coordinates closely with its wholesale customers regarding growth for planning purposes and should continue to do so.
- LUS has begun preparing for operational changes brought about by the Lead and Copper Rule Revisions (“LCRR”), specifically in developing a lead service line (“LSL”) inventory to support development of an LSL Replacement Plan and revisions to the lead and copper sampling. The EPA mandated the effective date of the LCRR to be December 16, 2021, requiring all systems with any LSLs to prepare and submit to its State regulatory agency the LSL inventory, along with an LSL Replacement Plan and publicly accessible inventory by October 16, 2024.
- Overall unaccounted for water (i.e., losses) on a percentage basis have increased over the last five years. With relatively steady water production and a general decline in water sales, unaccounted for water has increased from 7.4 percent in 2016 to 12.5 percent in 2020, 12.6 percent in 2021, and 12.7 percent in 2022. In response to this trend, a comprehensive report on water loss in the LUS

distribution system was prepared by Water Company of America and results suggest that WCA's project has enabled LUS to monetize a significant amount of previously unaccounted for water. Using the Increased Water Revenue gathered in 2022 and converting dollar billed into gallons, WCA has made a rough estimation that it resolved an amount of 31,600,000 gallons of water for LUS in FY 2022. Furthermore, the snapshot evaluation of December 2022 indicates that the monetized recovery of unaccounted for water continues to increase, with a recovery of 4 million gallons in December alone. Additionally, LUS conducted an internal audit of LUS and interdepartmental water usage and has refined its existing departmental procedures. LUS has identified and is taking corrective action to resolve water loss.

- For both the South Water Treatment Plant (“SWP”) and North Water Treatment Plant (“NWP”), additional ground storage has been considered, as each have a single tank that is unable to be taken out of service for maintenance. The five-year capital improvement program has identified budgets for these improvements. A project at the SWP to install a new 1.75-M gallon GST is planned for 2024 and a project for the NWP is planned for 2026.
- For both the South Water Treatment Plant and North Water Treatment Plant, LUS could consider implementing additional safety measures for chlorine gas cylinders in the event of a pressurized discharge. Potential safety measures could include using containment vessels for in-use cylinders or a scrubber system to ensure that a chlorine gas leak is safely contained. Currently, there are no provisions to contain a pressurized leak other than on-call services by the chlorine gas supplier.
- Both the South Water Treatment Plant and North Water Treatment Plant lack the ability to provide full backup power with existing generators. LUS could consider installing additional emergency power to meet the full power load requirement of the plant during an outage. A project to add backup power for the NWP is identified in 2024 per the LUS five-year capital improvement program.
- The 16-inch diameter finished water pipeline that conveys water out of the North Water Treatment Plant to the distribution system presents a hydraulic bottleneck and restricts the amount of finished water able to leave through that line likely due to calcium carbonate scale accumulation. LUS staff have reported increasing frequency of pressure loss events (i.e., less than 20 psi) in this service area, despite proximity to the NWP high service pumps and the North Park Elevated Tower. LUS could consider performing a system-pressure study with focus on the north service area and developing a program to replace the lines in this area. Timing of line replacements near the North Water Treatment Plant could be performed concurrently with future road replacement project(s) in the area.
- LUS could consider using a product of at least 70 percent orthophosphate (and 30 percent

polyphosphate) as opposed to the currently used polyphosphate to provide corrosion control for the distribution system.

- LUS has considered a new project for improvements to disinfection and treatment at Gloria Switch Remote Site. This project would switch the sodium hypochlorite solution to chlorine gas for disinfection and replace the existing Greensand media with Greensand Plus media. This will allow LUS to discontinue feeding permanganate and allow the site to simultaneously backwash filters and produce treated water at full treatment capacity. In future expansion, LUS could consider installation of additional greensand filters, increase production by running both wells through filters and improvements to backup generators.
- LUS last completed a Water Master Plan in 2001. Due to development that has occurred since then, LUS should consider an update its master plan to project future growth and associated water flow rates; assess existing and future water system capacity needs; and identify long-term capital improvements required for future development, system expansion, and condition-related improvements. The results of that assessment could be used to further develop capital improvement planning to address critical assets over a long-term period, with targeted strategies to address high-priority items. This effort could include planning for renewal and replacement of aging infrastructure over its anticipated service life. LUS has initiated efforts to kickoff a Water Master Plan.

## **Wastewater Utility System**

Based on the information and assumptions relied upon, as included within this Report, the general observations and recommendations for the Wastewater Utility System are presented below.

- Based on visual inspection of facilities, review of records, and interviews of LUS staff, the LUS wastewater treatment facilities are in good condition, maintained properly and in accordance with industry practices.
- LUS staff have indicated that 2022 was a relatively dry year with less wet weather events compared to previous years. This is believed to have impacted the amount of wastewater flow treated by LUS in 2022, which was down 20 percent from 2021.
- Fewer sanitary sewer overflows occurred in 2022 compared to previous years. It is expected that the decrease can be attributed partially to reduced rainfall in 2022; however, LUS efforts to clean and rehabilitate its sanitary sewer system as part of its Administrative Order (“AO”) are likely also contributing to the reduced number of sanitary sewer overflows.
- The organizational structure and management of the wastewater system engineering and operations

areas appears to be strong based on initial observations, interviews, organizational structures, and manpower within each department.

- LUS completed a rate study in FY 2022 and the proposed rate plan was approved. The adopted rate increases, which became effective November 1, 2022, are anticipated to generate revenues that allow LUS to continue to maintain its financial performance.
- The Water Sector Program was created in 2021 by the State of Louisiana to provide grant funding for repairs, improvements and consolidation of community water and sewer systems around the state. \$300 million from the American Rescue Plan Act was provided to the program. LUS submitted applications to the program in late 2021. In January 2022, LUS was notified that it was awarded a total of approximately \$4.83 million in grant funding for three (3) wastewater projects as part of Round 1 of the program. LUS was notified in December 2022 that it was awarded a total of approximately \$6.61 million in grant funding for additional wastewater projects as part of Round 2 of the program.
- LUS is preparing to issue new bonds in FY 2023 to support various electric, water, and wastewater projects. The bond funding anticipated is reasonable and appropriate to fund these projects and the forecasted revenues represented in the continuing disclosure financial projections are expected to be able to fund the new debt service associated with the new bonds.
- LUS currently has agreements for access to areas totaling more than the area physically required to contain all produced biosolids. The additional area under lease is necessary because the land-use agreements require LUS to accommodate farming activities, which reduces the availability of these spaces. LUS may consider evaluating new, or restructured, land-use agreements to provide better availability of land or flexibility for the application of biosolids to potentially reduce costs.
- LUS could consider making improvements at its wastewater treatment plants (“WWTP”) to allow for production of Class A biosolids. This transition could provide additional flexibility for biosolids disposal, which could help limit the reported challenges with the availability of land application sites.
- LUS could consider evaluating a mechanical dewatering process at the Northeast Treatment Plant (“NETP”) to remove excess water prior to lime stabilization. This WWTP generates biosolids at approximately 2 to 3 percent solids by weight, and the other three WWTPs produce biosolids at approximately 22 to 27 percent solids by weight after processing with mechanical equipment. This could also alleviate some challenges with the frequency of land application. This initiative may be a lower priority item given that recent improvements at the South Sewage Treatment Plant (“SSTP”) provide capacity for liquid sludge from the NETP to be hauled to the SSTP for dewatering.

- Due to regional contaminant loading to the Vermillion River, the Louisiana Department of Environmental Quality (“LDEQ”) has imposed a hold on new and additional contaminant loading to the river. Simultaneously, population growth and development within the LUS service area has increased, and therefore wastewater flows to the LUS WWTPs have also increased. As a confluence of these factors, LUS should consider a treatment process evaluation of the four WWTPs be completed to identify the risks that LUS faces with respect to meeting LPDES loading limits and improvements which may reduce LUS loading to the river. The evaluation should specifically consider long-term capacity needs of the LUS wastewater utility and future permit limits, including consideration of nutrient reduction requirements.
- LUS is well organized and structured in its approach to implementing its Capacity, Management, Operations, and Maintenance (“CMOM”) program and addressing the requirements of the AO. LUS has leveraged its in-house staff and contractor resources to complete work efficiently. It is important that cleaning, inspection, and rehabilitation of the wastewater collection system be continued to comply with the requirements of the AO. The rate of such work needs to meet the required 10 percent per year. LUS exceeded this requirement in 2020, 2021, and 2022. LUS initiated sewer and manhole repair work for the defects discovered during the first year of cleaning and inspection and is ahead of the compliance schedule for repairs stipulated in the AO.
- LUS is still in the first third of the total compliance period for addressing the sewer cleaning and inspection requirements under the AO. Accordingly, the total cost of compliance is still difficult to determine with a high level of confidence, especially considering the current economic environment. LUS should closely track and monitor costs incurred to-date and use that data to consider a range of scenarios that can be used to inform long-term decision making.
- The CMOM program implemented in response to the AO has established a framework for programmatic proactive maintenance of LUS’s collection system assets. Proactive maintenance can result in extended asset life and potentially reduce the likelihood and duration of unexpected downtime or failures. As part of its efforts to implement its CMOM program, LUS could consider implementing a risk-based approach to evaluating the condition and selecting rehabilitation methods for its wastewater system assets considering the likelihood and failure and consequence of failure of the assets. The results of that assessment could be used to further develop capital improvement planning to address critical assets over a long-term period, with targeted strategies to address high-priority items. This effort could include planning for renewal and replacement of aging infrastructure over its anticipated service life.
- LUS last completed a Wastewater Master Plan in 2010. Due to development that has occurred since

then and expected limitations to treatment plant capacity, LUS should consider an update its master plan to project future growth and associated wastewater flow rates; assess existing and future wastewater system capacity needs; and identify long-term capital improvements required for future development, system expansion, condition-related improvements, and future regulatory requirements. The master plan could also specifically evaluate opportunities to reduce the occurrence of sanitary sewer overflows. LUS has initiated efforts to begin a Wastewater Master Plan.

## **Communications System Observations and Recommendations**

Based on the information and assumptions relied upon, as included within this Report, the general observations and recommendations for the Communications System are presented below.

- Based on visual inspection of facilities, records audit, and interviews of LUS Fiber staff, the LUS Fiber communication network is in good condition, maintained properly and in accordance with industry practices.
- At the current customer levels, the Communications System generates sufficient revenues to meet operating and maintenance expenses, debt service, capital improvements, inter-utility loan payments, imputed taxes, and all other financial obligations, with a sufficient profit margin to allow the Communications System to spend approximately [REDACTED] per year on continued network expansion baring any additional funds from outstanding grant applications.
- LUS Fiber operates in a competitive market with many private company competitors. LUS Fiber is currently performing an organizational and compensation review analysis to assess its position in the telecommunication market. The results of this study could assist LUS Fiber in establishing benchmarks for organizational structure and compensation packages to maintain its ability to retain and recruit experienced, talented employees.
- To further address recruiting talented employees, LUS Fiber is also establishing a pipeline of quality candidates through relationships with educational institutions and internships.
- LUS Fiber continues seeking alternative funding (e.g., grants) outside of the bond market and has several active applications for both state and federal grant funding.
- LUS Fiber launched a new service line based on a fixed wireless citizens broadband radio service (“CBRS”).
- LUS Fiber should continue to pursue federal and state grant opportunities and local partnerships to extend the network to underserved surrounding areas. A portion of LUS Fiber’s future revenue growth is based on its ability to expand into nearby unserved and underserved areas. LUS Fiber has developed a strategy to take advantage of upcoming federal and state broadband infrastructure grant

opportunities to expand its territory and further grow its customer base.

- LUS Fiber should continue to improve its service catalogue, especially in the enterprise sector. A potential revenue opportunity lies in using its excess network capacity to serve additional enterprise customers.
- LUS Fiber has vacancies in its current management structure that it is actively looking to fill with qualified and experienced candidates. Based on these future hires, LUS Fiber will continue reevaluate the current business structure and is considering realignment and/or reassignment of certain components of the business to better position the company moving forward.

### **Revenue Bond History and Ratings**

LUS, LUS Fiber, and LPPA have issued and successfully paid its bond holders for over 70 years. A summary of the outstanding bonds at the end of FY 2022 are presented in Table ES-1. The Series 2012 Bonds were all refunded at the beginning of FY 2022 in November 2021 with the Series 2021 Bonds. The Series 2021 Bonds were only used to refund the existing 2012 Bonds. The Series 2021 Bonds have the same terms but with lower interest rates.

**Table ES-1: LUS, LPPA, and LUS Fiber Outstanding Bond Summary**

Entity	Date Issued	Authorized Amount	Application of Proceeds
LUS	2017	\$59,465,000	Majority refunding of 2010 Bonds
LUS	2019	\$58,065,000	Additions, extensions, and improvements to the Utilities System.
LPPA	2015	\$29,035,000	Refunded \$28,325,000 million of the 2007 Bonds
LUS Fiber	2015	\$91,600,000	Refunded \$96,855,000 of the Series 2007 Bonds
LUS	2021	\$78,415,000	Advanced refunding of the 2012 Bonds
LPPA	2021	\$38,755,000	Advanced refunding of the 2012 Bonds. 2012 Bonds were used for the Installation of MATS equipment, SNCR, and other improvements to Rodemacher Unit 2
LUS Fiber	2021	\$14,140,000	Advanced refunding of the 2012 Bonds. 2012 Bonds were used for Improvements to the Communications System to provide retail telephone, CATV, and Internet service city residents

Source: LUS

The most recent bond ratings for debt issuances are included in Table ES-2. The rating agencies typically review LUS and the City's credit rating with each debt issue. If the City or LUS has not recently issued debt (e.g. within a two-year period) the agencies will perform a review and surveillance of the City and LUS's performance to update their credit ratings. The most recent bond rating date for S&P was October 28, 2022, while Moody's last affirmation date was October 13, 2021.



**Table ES-2: Recent Bond Ratings**

Bond Type	S&P Date of Rating or Affirmation	S&P Rating	Moody's Date of Rating or Affirmation	Moody's Rating
LUS: Utilities Revenue Bonds 2021	10/28/2022	AA-	10/13/2021	A1
LPPA: Electric Revenue Refunding Bonds 2021	10/28/2022	AA-	10/13/2021	A1
Communications System: Revenue Refunding Bonds 2021	10/28/2022	A+	10/13/2021	A2
LUS: Utilities Revenue Bonds 2019	10/28/2021	AA-	10/13/2021	A1
LPPA: Electric Revenue Refunding Bonds 2015	10/28/2022	AA-	10/13/2021	A1
Communications System: Revenue Refunding Bonds 2015	10/28/2022	A+	10/13/2021	A2

Source: LUS, Moody's, S&amp;P

## 1.0 SCOPE OF REVIEW

### 1.1 Introduction

The Lafayette Consolidated Government (“LCG,” “City,” or “City of Lafayette”) retained Burns & McDonnell Engineering Company (“Burns & McDonnell”) as its Consulting Engineer. LCG operates two departments, Lafayette Utilities System (“LUS”) and its communications system known as LUS Fiber.

The Lafayette Utilities System (“LUS”) Electric, Water, and Wastewater Systems (collectively the “Utilities System”) General Bond Ordinance, and Communications System (also referred to as “LUS Fiber”) General Bond Ordinance (collectively, the “Bond Ordinances”) set forth specific duties and responsibilities of the Consulting Engineer, which include advising LUS on its appointment of a Chief Operating Officer, providing continuous engineering counsel to the Lafayette City-Parish Consolidated Government (Lafayette Consolidated Government or “LCG”) in connection with operations of the Utilities System and Communications System, advising on rate revisions, and preparing an annual comprehensive report (specifically, this Consulting Engineer’s Comprehensive Annual Report or “Report”) on the operations of LUS and LUS Fiber after the close of each fiscal year (“FY”).

This section of the Report describes the responsibilities of the Consulting Engineer with respect to the development of a Comprehensive Annual Report for the Utilities System and Communications System. The analyses and investigations completed by Burns & McDonnell in the performance of its due diligence review and assessments of LUS and LUS Fiber are similar to prior reviews conducted by other firms. Therefore, the organization, content, conclusions, and recommendations contained within this Report are similar to previous reports. LCG operates on a fiscal year, beginning November 1 and ending on October 31 of the following year. Unless otherwise stated, all data in this Report is presented on an FY basis.

### 1.2 Requirements of Bond Ordinances

Utilities System and Communications System outstanding bonds, presented in Table ES-1, are governed by nearly identical Bond Ordinances. The Utilities System is governed by Article VII-Covenants of the Issuer of the Utilities System General Bond Ordinance. The Communications System is governed by Article VIII-General Covenants of the Issuer of the Communications System General Bond Ordinance. The Consulting Engineer is governed by Article VIII-Consulting Engineer of the Utilities System General Bond Ordinance and Article IX-Consulting Engineer of the Communications System General Bond Ordinance. These articles are pertinent to the content of this Report. A summary of each article is described in the following subsections of this report.

### 1.2.1 Lafayette Utilities System – Article VII

LUS must comply with Article VII of the Utilities System General Bond Ordinance which lists 12 covenants. The 12 covenants that LUS is required to meet are listed below.

- Section 7.1 – Operation Covenant where, among other things, the Issuer (LUS) agrees to operate the Utilities System in a businesslike manner.
- Section 7.2 – Maintenance of Utilities System, Disposition where, among other things, the Issuer agrees to maintain the Utilities System and all parts thereof in good condition and will operate the same in an efficient and economical manner.
- Section 7.3 – No Competitive Facilities, the Issuer shall not hereafter construct, acquire, or operate any plants, structures, facilities, or properties which will provide like services of the utility system in the Issuer and the areas currently served by the respective systems in competition with and not as part of the Utilities System unless such construction, acquisition, or operation, in the judgement of the Issuer, does not materially impair the ability of the Issuer to comply with Section 5.1.
- Section 7.4 – Obligation to Connect Sewerage Users where, among other things, the Issuer agrees to require every owner, tenant, or occupant of each lot or parcel of land to connect with the Utilities system and to cease to use any other method for the disposal of sewage, sewage water, or other polluting matter.
- Section 7.5 – No Free Service where, among other things, the Issuer will not permit free water, electricity, or sewage service to be supplied by the Utilities System.
- Section 7.6 – Operating Budget where, among other things, before the first day of each FY the Governing Body shall prepare, approve, and adopt in the manner prescribed by law ... a detailed budget of the Revenues, Bond Service Requirement, and Cost of Operations and Maintenance (“O&M”) for the next succeeding FY.
- Section 7.7 – Rate Covenant where, among other things, the Issuer will fix, charge, and collect such rates, rentals, fees, and charges for the use of and for the services and products provided by the Utilities System. The Issuer shall maintain a 1.0 debt service coverage ratio (“DSCR”).
- Section 7.8 – Books and Records where, among other things, the Issuer shall keep separately identifiable financial books, records, accounts, and data concerning the operation of the Utilities System.
- Section 7.9 – Reports and Annual Audits where, among other things, the Issuer shall require that an annual audit of the accounts and records with respect to the Utilities System be completed as soon as reasonably practicable at the end of the FY by a qualified independent certified public accountant.
- Section 7.10 – Insurance and Condemnation Awards where, among other things, the Issuer shall

carry adequate fire, windstorm, explosion, and other hazard insurance on the components of the Utilities System. The Issuer may, upon appropriate authorization by its Governing Body, self-insure against such risks on a sound actuarial basis.

- Section 7.11 – Enforcement of Collections where, among other things, the Issuer will diligently enforce and collect the fees, rates, rentals, and other charges for the use of the products, services, and facilities of the Utilities System.
- Section 7.12 – Additions to Utilities System where, among other things, the Issuer may add to the Utilities System any facilities or equipment purchased, acquired, or constructed for the purpose of improving or renovating any element of the then-existing Utilities System.

### **1.2.2 Lafayette Utilities System – Article VIII**

Article VIII of the Utilities System General Bond Ordinance lists three requirements of the Consulting Engineer. These requirements are listed below.

- Section 8.1 – Consulting Engineer, where the Issuer shall retain a Consulting Engineer for the purpose of providing the Issuer immediate and continuous counsel and advice regarding the Utilities System. It shall be the further duty of the Consulting Engineer to advise the Issuer in its appointment of a Chief Operating Officer of the Utilities System and the Issuer agrees that it will not appoint anyone as Chief Operating Officer that has not been approved by the Consulting Engineer.
- Section 8.2 – Comprehensive Annual Report, where the Consulting Engineer shall prepare within 180 days after the close of each FY a comprehensive report... upon the operations of the Communications System and the Utilities System during the preceding year, the maintenance of the properties, the efficiency of the management of the property, the proper and adequate keeping of books of account and record, the adherence to budget and budgetary control provisions, the adherence to all the provisions of the Ordinance, and all other things having a bearing upon the efficient and profitable operations of the Communications System and the Utilities System, and shall include whatever criticism of any phase of the operation of the Communications System and the Utilities System the Consulting Engineer may deem proper, and such recommendation as to changes in operation and the making of repairs, renewals, replacements, extensions, betterments, and improvements as the Consulting Engineer may deem proper including recommended changes in organization, pay scales, and risk management practices. Copies of such report shall be placed on file with the Chief Operating Officer and shall be open to inspection by any Owners of any of the Bonds. Such report shall also contain the Consulting Engineer's recommendations as to personnel practices and policy and its analysis of the ability of the Utilities System to function in the present and forecasted environments.

- Section 8.3 – Recommendation as to Rate Revision, where it shall further be the duty of the Consulting Engineer to advise the Issuer as to any revision of rates and charges, and the Issuer agrees to make no downward revision in its rates and charges for services (except fuel adjustment charges), which are not approved by the Consulting Engineer.

### **1.2.3 LUS Fiber – Article VIII**

Article VIII of the Communications System General Bond Ordinance lists nine covenants of the Issuer. These covenants are listed below.

- Section 8.1 – Operation Covenant where, among other things, the Issuer agrees to operate the Communications System and Utilities System in a businesslike manner.
- Section 8.2 – Maintenance of Communications System, Disposition where, among other things, the Issuer agrees to maintain the Communications System and Utilities System and all parts thereof in good condition and will operate the same in an efficient and economical manner.
- Section 8.3 – Operating Budget where, among other things, before the first day of each FY the Governing Body shall prepare, approve, and adopt in the manner prescribed by law... a detailed budget of the Revenues, Bond Service Requirement, and Cost of O&M for the next succeeding FY.
- Section 8.4 – Rate Covenant where, among other things, the Issuer will fix, charge, and collect such rates, rentals, fees, and charges for the use of and for the services and products provided by the Communications System. The Issuer shall maintain a 1.0 DSCR. Should there be a Credit Event, the Issuer will fix, charge, and collect such rates, rentals, fees, and charges for the use of and for the services and products provided by the Utilities System to provide sufficient revenues to pay the Communications System debt service.
- Section 8.5 – Books and Records where, among other things, the Issuer shall keep separately identifiable financial books, records, accounts, and data concerning the operation of the Communications System.
- Section 8.6 – Reports and Annual Audits where, among other things, the Issuer shall require that an annual audit of the accounts and records with respect to the Communications System and Utilities System be completed as soon as reasonably practicable at the end of the FY by a qualified independent certified public accountant.
- Section 8.7 – Insurance and Condemnation Awards where, among other things, the Issuer shall carry adequate fire, windstorm, explosion, and other hazard insurance on the components of the Communications System and Utilities System. The Issuer may, upon appropriate authorization by its Governing Body, self-insure against such risks on a sound actuarial basis.

- Section 8.8 – Enforcement of Collections where, among other things, the Issuer will diligently enforce and collect the fees, rates, rentals, and other charges for the use of the products, services, and facilities of the Communications System and Utilities System.
- Section 8.9 – No Free Service where, among other things, the Issuer will not permit free service to be supplied by the Communications System and Utilities System.

#### **1.2.4 LUS Fiber – Article IX**

Article IX of the Communications System General Bond Ordinance lists two requirements of the Consulting Engineer which are listed below.

- Section 9.1 – Consulting Engineer. The Issuer shall retain a Consulting Engineer for the purpose of providing the Issuer immediate and continuous counsel and advice regarding the Communications System and the Utilities System.
- Section 9.2 – Comprehensive Annual Report, where the Consulting Engineer shall prepare within 180 days after the close of each FY a comprehensive report... upon the operations of the Communications System and the Utilities System during the preceding year, the maintenance of the properties, the efficiency of the management of the property, the proper and adequate keeping of books of account and record, the adherence to budget and budgetary control provisions, the adherence to all the provisions of the Ordinance, and all other things having a bearing upon the efficient and profitable operations of the Communications System and the Utilities System and the Utilities System the Consulting Engineer may deem proper, and such recommendation as to changes in operation and the making of repairs, renewals, replacements, extensions, betterments, and improvements as the Consulting Engineer may deem proper including recommended changes in organization, pay scales, and risk management practices. Copies of such report shall be placed on file with the Chief Operating Officer and shall be open to inspection by any Owners of any of the Bonds. Such report shall also contain the Consulting Engineer’s recommendations as to personnel practices and policy and his analysis of the ability of the Utilities System to function in the present and forecasted environments and shall include whatever criticism of any phase of the operation of the Communications System.

### **1.3 Purpose of the Report**

The purpose of the Report is to fulfill the Utilities System General Bond Ordinance Article VIII and the Communications System General Bond Ordinance Article IX as described above and to comply with Electronic Municipal Market Access (“EMMA”) reporting requirements. EMMA is a resource for investors and is operated by the Municipal Securities Rulemaking Board (“MSRB”). The MSRB is a primary regulator of municipal markets. The MSRB establishes rules that securities firms, banks, and

municipal advisors must follow when engaging in municipal securities transactions and advising investors and state and local governments. Section 8 – Continuing Disclosures, with Section 9 – Continuing Disclosures-Utilities System, Section 10 – Continuing Disclosures-Lafayette Public Power Authority (“LPPA”), Section 11 – Continuing Disclosures- Communications System, and Section 12 – Financial and Statistical Data meet the EMMA reporting requirement.

## 1.4 Report Organization

Outstanding debt obligations are supported by two separate revenue pledges. The electric, water, and wastewater utility revenues of the Utilities System are pledged to meet debt service obligations associated with the Utilities System Series 2012, 2017, 2019, and 2021 Bonds. Communications System revenues are pledged to meet debt service obligations associated with the Communications System Series 2012, 2015, and 2021 Bonds. The Utilities System, Communications System, and LPPA Series 2012 Bonds were refunded with the Series 2021 Bonds in FY 2022 on November 18, 2021. Given these two distinct pledges, the Report has been organized as presented below.

- Section 1 – Scope of Review, as presented within this section.
- Section 2 – Governance, Organization, Management, and Revenue Pledge describes the organizational structure and management team of LUS, which oversees the operation of the Utilities System and Communications System, including the governance and shared services provided by LCG.
- Section 3 – Utilities System provides an overview of the combined electric, water, and wastewater operations that comprise the Utilities System, including historical financial performance.
- Section 4 – Electric System provides an in-depth review of Electric System operations, system condition, rate comparisons, performance benchmarking, and financial performance and contribution to the Utilities System revenue pledge.
- Section 5 – Water System provides an in-depth review of Water System operations, system condition, rate comparisons, and financial performance and contribution to the Utilities System revenue pledge.
- Section 6 – Wastewater System provides an in-depth review of Wastewater System operations, system condition, rate comparisons, and financial performance and contribution to the Utilities System revenue pledge.
- Section 7 – Communications System provides an in-depth review of the LUS Fiber Internet, telephone, and cables businesses including an assessment of market share, service offerings, price competitiveness, and financial performance in support of the Communications System revenue pledge.

- Section 8 – Continuing Disclosure section providing an overview of EMMA and the required continuing disclosures.
- Section 9 – Continuing Disclosure section presenting updated financial information similar to that presented in official statements of outstanding bond issues for the Utilities System.
- Section 10 - Continuing Disclosure section presenting updated financial information similar to that presented in official statements of outstanding bond issues for LPPA.
- Section 11 - Continuing Disclosure section presenting updated financial information similar to that presented in official statements of outstanding bond issues for the Communications System.
- Section 12 - Continuing Disclosure section presenting relevant financial and statistical information.

### **1.5 Statement of Limitations**

Burns & McDonnell performs or provides business, technology, engineering, and consulting services. Burns & McDonnell does not provide legal, accounting, or tax advice. The reader is responsible for obtaining independent advice concerning these matters. That advice should be considered by reader, as it may affect the content, opinions, advice, or guidance given by Burns & McDonnell. Further, Burns & McDonnell has no obligation and has made no undertaking to update these materials after the date hereof, notwithstanding that such information may become outdated or inaccurate. These materials serve only as the focus for consideration or discussion; they are incomplete without the accompanying oral commentary or explanation and may not be relied on as a stand-alone document.

The information, analysis, and opinions contained in this material are based on publicly available sources, secondary market research, and financial or operational information, or otherwise information provided by or through Burns & McDonnell clients whom have represented to Burns & McDonnell they have received appropriate permissions to provide to Burns & McDonnell, and as directed by such clients, that Burns & McDonnell is to rely on such client provided information as current, accurate, and complete. Burns & McDonnell has not conducted complete or exhaustive research, or independently verified any such information utilized herein and makes no representation or warranty, express or implied, that such information is current, accurate or complete. Projected data and conclusions contained herein are based (unless sourced otherwise) on the information described above and are the opinions of Burns & McDonnell which should not be construed as definitive forecasts and are not guaranteed.

Current and future conditions may vary greatly from those utilized or assumed by Burns & McDonnell has no control over weather; cost and availability of labor, material, and equipment; labor productivity; energy or commodity pricing; demand or usage; population demographics; market conditions; changes in technology; and other economic or political factors affecting such estimates, analyses, and



recommendations. Burns & McDonnell does not have any duty to update or supplement any information in this document. To the fullest extent permitted by law, Burns & McDonnell shall have no liability whatsoever to any reader or any other third party, and any third party hereby waives and releases any rights and claims it may have at any time against Burns & McDonnell Engineering Company, Inc., and any Burns & McDonnell affiliated company, with regard to this material, including but not limited to the accuracy or completeness thereof.

## 2.0 GOVERNANCE, ORGANIZATION, AND MANAGEMENT

### 2.1 Governance

The Lafayette Parish (the “Parish”) electorate and the City of Lafayette, Louisiana, (“City” or “Lafayette”) adopted the Home Rule Charter (“Charter”) to consolidate the City and Parish governmental functions as of 1996. The Charter defined the LCG departmental structure. LCG manages and operates the Utilities System and Communications System through its departmental structure. The Utilities Department is responsible for the Utilities System while the Communications Department is responsible for the Communications System management and operations. Other LCG departments perform certain functions to and provide support for LUS operations, such as the Chief Administrative Officer, which includes human resources, the Office of Finance and Management, which includes accounting, budget management, purchasing and property management, and risk management and group insurance, and the Legal Department. The City owns the Utilities System and the Communications System assets. LCG operates on a FY beginning November 1 and ending on October 31 of the following year.

LCG is currently governed by a Mayor-President and City-Parish Council members that are elected by the Parish and the City to four-year terms of office. The Lafayette City Council consists of five members who are serving as the governing authority for the City and the Lafayette Parish Council consists of five members who are serving as the governing authority for the Parish. The City Council and the Parish Council, jointly, serve as the governing authority for LCG. The Mayor-President leads LCG along with the City Council and Parish Council. The City Council is the governing authority for LUS, LPPA, and LUS Fiber. The Mayor-President appoints the Director of Utilities and Communications, with such appointment for the Director of Utilities subject to ratification by the City Council. Certain provisions provided by LCG to the City and Parish are shared such as finance, accounting, administration, human resources, legal, and insurance. The Mayor-President and Chief Administrative Officer supervise the administration of departments, offices, and agencies of LCG. Certain departments of LCG are involved in day-to-day support of the management of LUS. The current members of the City-Parish Council are presented in Table 2-1.

**Table 2-1: City-Parish Council Members**

<u>City Council</u>	<u>Parish Council</u>
Pat Lewis	Bryan Tabor
Andy Naquin	Kevin Naquin
Liz Hebert	Joshua Carlson
Nanette Cook	John J. Guilbeau
Glenn Lazard	Abraham Rubin, Jr.

The City Council is the governing authority of LPPA. LPPA is a political subdivision of the State of Louisiana and was created in 1976 for the purpose of financing electric generation facilities to provide power to the City’s electric system. LPPA provides the output of these generating facilities to LCG through a wholesale power sales agreement. The only generating facilities owned by LPPA include Rodemacher Unit 2 which is described in more detail in the Electric Utility Section of this Report.

The City is the owner of the Electric System (including generation, transmission, and distribution facilities), the Water System (including supply, treatment, distribution, and storage facilities), and the Wastewater System (including wastewater collection and treatment facilities) (collectively, the Utilities System), as well as the Communications System. Upon consolidation of the City and Parish governing authorities into LCG, it was specifically recognized that the Charter should accommodate for the governing of LUS, which is a City utility system. The Electric Utility, Water System, and Wastewater System are financed by the Utilities System revenue bonds.

The Communications System offers an array of services in the competitive wholesale and retail markets including fiber leases, wholesale broadband, and retail customer services. The Communications System offered a new streaming service, connecTV, in 2019. In the retail market, the Communications System offers the “triple play” of services. The “triple play” is a common term in the industry that refers to cable television (“CATV”), telephone, and Internet services. Additional internet content streaming services are now offered as well. The backbone of the system includes a 191-mile fiber backbone with direct connections to national, major Tier 1 broadband providers. The retail portion of the Communications System includes over 800 miles of overhead and underground fiber lines along City streets, along with associated equipment. The system also consists of a major headend facility, including satellite dishes and electronics, along with backup power and connection to at least three long haul connections with major Internet carriers. The Communication System consists of a separate Communications Services Enterprise

Fund with a separate and distinct set of accounts, funds, and bond pledges. The Communication System is financed by the Communication System revenue bonds.

## **2.2 Operating and Capital Budgeting**

The budgeting process begins in early April of each year with each LCG department preparing and submitting their proposed operating and capital budgets. Many departments begin working on their own budgets prior to April. By the end of July, the administration of LCG presents a proposed budget to the City-Parish Council for consideration. The City-Parish Council then holds a series of budget review meetings where changes may be considered to the proposed budget. Per the Charter requirements, the budget must be presented to the City-Parish Council at least 90 days prior to the beginning of each FY and adopted no later than the second to last regular meeting of the FY. A final budget is typically adopted in late September.

The operating portion of the budget contains projections of revenues and expenses. Each division within LUS and LUS Fiber estimates their expenses for the upcoming FY and submits their estimates to LUS and LUS Fiber management. LUS and LUS Fiber management then compile the projections for each division and submit the document to LCG. Each year, the Utilities System and Communications System develop a five-year capital improvement program (CIP). The CIP is reviewed, updated, and budgeted annually. These budgets are normally finalized after the completion of this Report. Forecasts of revenues, expenses, and capital contained within the continuing disclosures within this report are based on previous budgets and projections which are subject to change during the budgeting process.

## **2.3 Insurance**

The Risk Management Division within the Department of Finance is the insurance company for LCG. The function of the Risk Management Division is to protect City resources by minimizing risks and stabilizing insurance costs in an economical manner that preserves assets and protects against accidents or loss. The LCG Insurance Company provides coverage in the following areas: Group Health/Life, Property & Casualty Claims, Safety/Loss Control, and City-Parish-Nurse Wellness.

The Group Health/Life Section is self-insured. LCG has a flex funded plan for life insurance. LCG also has Flexible Spending Accounts and retirement preparation.

The Property & Casualty Claims section is self-insured for all lines of coverage including auto and general liability, error and omissions, and property and is outsourced to a third-party administrator. Workers' compensation is also outsourced to a third-party administrator.

The Safety/Loss Control section identifies potential risks to LCG employees and makes recommendations on eliminating or decreasing these risks. This section reviews all job-related injuries and vehicle accidents, facilitates safety meetings, conducts job site inspections, and inspects LCG property.

The Communications System has its own insurance policy related to auto liability and workers' compensation. According to the LCG Risk and Insurance Manager, Ms. Suzanne Siner, LCG is in compliance with Governmental Accounting Standards Board 10: Reporting for Risk Financing and Related Issues for public entities. Table 2-2 shows five years of historical insurance-related expenditures and recoveries from the Risk Management Fund for the Utilities System and Communications System. In the case that another party caused the accident or injury, the Recovery shown in Table 2-2 represents money received from the responsible party.

**Table 2-2: Utilities System and Communications System Insurance Transactions**

	2018	2019	2020	2021	2022
<b>Utilities System</b>					
Payments	\$591,520	\$803,662	\$791,194	\$1,441,621	\$1,342,636
Recovery	21,322	222,171	211,855	355,819	200,642
Net Transactions	\$570,199	\$581,491	\$579,339	\$1,085,802	\$1,141,994
<b>Communications System</b>					
Payments	\$14,299	\$1,193	\$160	\$1,193	\$2,635
Recovery	1,051	0	0	0	0
Net Transactions	\$13,248	\$1,193	\$160	\$1,193	\$2,635

Source: LUS

## 2.4 Legal

### 2.4.1 LCG and Payment in Lieu of Tax

In June 2016, a class action lawsuit was filed against LCG, which challenged the validity of LCG collecting payments in lieu of tax ("ILOT") from LUS. More specifically, this suit alleges that the City wrongfully collected ILOT payments from LUS of over \$400 million dollars since 1976. LUS makes an ILOT payment to the City annually, which is a common industry practice for municipal owned utilities. Plaintiffs claim these payments were a disguised ad valorem tax assessed upon customers of LUS in violation of Louisiana Law. LCG and LUS have denied all the allegations and maintain these claims are wholly without merit. The ILOT suit was dismissed by the trial court, and the dismissal was affirmed on appeal on December 30, 2020. Plaintiffs have filed for writs with the Louisiana Supreme Court, and LCG/LUS has filed an opposition. If the Court rejects the writ application, a decision may be forthcoming shortly; if they grant the writ application, they may decide the matter at this time, or call it up for briefing and oral argument, which would likely take 6 to 9 months.

## **2.4.2 Northeast Electrical Substation**

Presently, there are four lawsuits for expropriation of permanent utilities servitudes pending in the 15th Judicial District Court. Each of these expropriation suits was brought to acquire a 15-foot permanent utilities servitude required for the Northeast Electrical Substation and Transmission/Distribution Systems and Necessary Utilities Project. LUS filed an additional suit to expropriate the necessary servitude from one party. LUS is likely to be successful in acquiring the needed servitudes in this suit and will be liable only for the fair market value of the servitude acquired.

## **2.5 Emergency Events and Reimbursements**

Local governments like LUS, and certain types of non-profit organizations, are eligible to receive reimbursements for natural disasters such as hurricanes, flooding, tornadoes, and other events. LUS is eligible to receive reimbursement from the Federal Emergency Management Agency (“FEMA”) and the Louisiana State Governor’s Office of Homeland Security and Emergency Preparedness (“GOHSEP”). When a natural disaster occurs, LUS organizes, performs, and pays for the prompt restoration of utility service and clean up. Often, this includes hiring and paying contractors. After the event, LUS submits receipts and invoices to FEMA for reimbursement. The GOHSEP acts as the auditor and approves expenses eligible for reimbursement. Those natural disasters for which LUS has recently experienced and is awaiting reimbursement from FEMA and GOHSEP are described in the following subsections.

### **2.5.1 Hurricane Gustav, 2008**

Hurricane Gustav made landfall September 1, 2008, near Cocodrie, Louisiana (located southwest of the City). Lafayette Parish sustained major damage as a result of the strong winds and rainfall associated with the storm. Approximately 40 percent of the retail electric customers of LUS lost power during the storm; however, all services were restored within a 72-hour time frame. When Hurricane Gustav hit, LUS hired a contractor, J.W. Didado, to assist with the utility restoration and clean-up. LUS paid J.W. Didado approximately \$1 million. Other utilities also paid J.W. Didado at the same time, and because of anomalies in the reimbursement documentation, GOHSEP conducted an in-depth analysis. GOHSEP, through their auditing process, filed an audit report on March 9, 2016, stating that approximately \$660,000 of the expenses of LUS are eligible for reimbursement. The report states that certain expenses were ineligible costs (mobilization, demobilization, and standby time) and overbilled labor and equipment. LUS is continuing to cooperate with GOSHEP/FEMA. The report recommended that LUS should implement a method to identify the use of contractors by multiple sub grantees during the same time periods. LUS recorded a deferred debit on the balance sheet of \$1,868,215. As of October 31, 2022, LUS is awaiting reimbursement of \$377,022. Additionally, the Communications System has a receivable

of \$77,779 on the balance sheet as of FY 2022.

### **2.5.2 Flooding of 2016**

In August 2016, southern Louisiana experienced major flooding, which impacted the Utilities and Communications Systems operations. The Water, Wastewater, and Communications Systems experienced only minor disruptions in service and minimal damage to system infrastructure. The Communications System did not experience any major outages. The Water System experienced flooding at the South Water Plant (“SWP”) due to flood water rising past the elevation of the wells’ sanitary seals. The SWP was shut down for a brief period so that testing could determine if the well water was affected by flood waters. Testing showed that the water was safe, and the Water System was able to meet demand even under the flood conditions. However, this event prompted many repairs and rehabilitation efforts at the plant. Updates implemented at the SWP include FEMA recommended steel shipping doors to prevent water entering filter gallery, building rehabilitation, and roof repair. LUS recorded a deferred debit on the balance sheet of \$630,364. The claim is currently being processed by GOHSEP. During 2019, LUS was reimbursed \$497,611 however no additional reimbursement was made in 2020, 2021, or 2022. As of October 31, 2022, LUS is awaiting reimbursement of \$54,270.

### **2.5.3 Hurricane Barry, 2019**

Approximately 5,000 homes were affected by Hurricane Barry. Within two days, LUS was back to normal operations. LUS recorded a deferred debit on the balance sheet of \$1,031,267. The claim is currently being processed by GOHSEP. During 2021, LUS was reimbursed \$526,469. As of October 31, 2022, LUS is still awaiting reimbursement of \$324,794.24. The Communications System experienced no major outages as part of Hurricane Barry. However, there were repairs needed of several access cables to restore service to several hundred customers in addition to power supply failures. Communications System returned to normal operation within three days. As of October 31, 2022, Communications System has been reimbursed and is no longer awaiting reimbursement based on records provided.

### **2.5.4 Hurricane Laura, 2020**

Hurricane Laura hit on August 27, 2020, near Cameron, LA as a Category 4 storm. During the event, LUS had nearly 15,000 customers impacted and restored service in approximately one and one-half days. The total damage caused by Laura was approximately \$2.50 million with \$1.99 million in expenses incurred by LUS and LUS Fiber in FY 2020. The majority of the damages caused by the storm were on the electric system, however some costs were borne by water, wastewater and fiber. As of October 31, 2022, LUS is awaiting reimbursement of \$2,221,227.

### **2.5.5 Hurricane Delta, 2020**

On October 9, 2020, Hurricane Delta made landfall as a Category 2 storm near Creole, LA. Lafayette Parish sustained major damage as a result of strong winds and heavy rainfall affecting almost 70 percent of LUS customers. LUS customers' services were restored within three and one-half days by 400+ LUS employees and the assistance of over 300 mutual aid partners and contractors. The majority of the damages caused by the storm were on the electric and fiber systems with minor issues in water and wastewater. Hurricane Delta caused approximately \$7.1 million in restoration expenses for LUS and LUS Fiber with \$4.2 million incurred in FY 2020. LUS and LUS Fiber were processing additional invoices and compiling data for FEMA submission in FY 2021. As of October 31, 2022, LUS and LUS Fiber were awaiting reimbursement of \$5,192,900. At the end of FY 2022, there was a receivable of \$748,282 on the balance sheet for the Communications System.

### **2.5.6 Winter Storm, 2021**

In February of 2021, the entire central U.S., including the City of Lafayette, experienced a significant winter storm resulting in abnormally low temperatures. The winter storm did not result in major damage to the system however the central U.S., including LUS, experienced abnormally high market power costs. LUS's generating units were online during the storm providing a hedge against extreme increases in power cost for LUS's electric utility. While LUS's power supply was well insulated compared to many utilities, the wholesale cost of power during February was higher than normal and was recovered through the fuel cost rate rider.

### **2.5.7 Hurricane Ida, 2021**

On August 29, 2021, Hurricane Ida made landfall as a Category 4 storm near Port Fourchon, LA (approximately 60 miles SE of Houma). The Coastal Weather Research Center indicated Lafayette, LA was directly in the predicted path, as of August 27<sup>th</sup>, creating an immediate threat to the health and safety of the general public and requiring emergency response and protective measures. LUS activated its Major Storm Emergency Procedures Plan which includes relocation to the Cajundome for LUS storm teams and mutual aid partners utilized in the preparation, response and restoration efforts. As of October 31, 2022, LUS is awaiting reimbursement of \$1,385,227.

## **2.6 Service Territory**

LUS provides electric, water, and wastewater utility service to customers primarily within the City limits. LUS also services some electric, water, and wastewater customers outside the City limits but within the Parish limits. As of October 31, 2022, LUS served 70,865 electric accounts, 58,302 water accounts, and 46,792 wastewater accounts.



LCG has franchise agreements and street lighting agreements with the City of Broussard and the City of Youngsville for electric service. LUS provides street lighting service to both cities and provides services to new residential and commercial developments within these cities.

LUS serves retail water customers inside and outside the City limits while providing wholesale water for other parish water distribution companies which are described in more detail later in this report.

LUS serves wastewater customers inside and outside the City limits. In addition, LUS serves localized (e.g., residential subdivision) packaged wastewater treatment systems.

The Communications System services are generally offered within the City limits, but have expanded to new subdivisions outside the City. At the end of October 2022, the Communications System served approximately ■ wholesale accounts and over ■ retail accounts with CATV, telephone, Internet, or some combination of the three. The Communications System continues to show notable positive growth each year. The Communications System attained franchise status in November 2017 throughout the Parish and offers communications service to the City of Broussard, City of Youngsville, City of Carencro, and unincorporated areas in the Parish. The Communications System is continuing to build out targeted areas within the St. Martin and Iberia parishes. These buildouts have been funded by previously awarded grants to build out the Communications System to serve new unserved and underserved areas in neighboring Parishes.

## **2.7 Management and Organization**

The Utilities System is a department of LCG and is managed and operated in accordance with the Charter and provisions of the current Utilities System General Bond Ordinance. The “Flow of Funds” set forth in the General Bond Ordinance specifies how to treat revenues and related margins resulting from LUS operations. Available margins, once O&M expenses have been paid, are first required to meet debt service and reserve fund obligations, then a formula is applied to determine amounts for capital improvements and replacements funding, and the payment amount to the City’s General Fund as ILOT. The Lafayette Public Utilities Authority (“LPUA”) historically approved LUS budgets and issued debt as approved by the Mayor-President and City-Parish Council. Beginning in January 2020, the City Council assumed LPUA’s responsibilities with respect to the Utilities System, in addition to approval of rates.

The Communications System is a department of LCG and is managed and operated in accordance with the Charter and provisions of the current Communications System General Bond Ordinance. The “Flow of Funds” set forth in the General Bond Ordinance specifies how to treat revenues and related margins

resulting from Communications System operations. Available margins, once O&M expenses were paid, are first required to meet debt service and reserve fund obligations, then a formula is applied to determine amounts for capital improvements and replacements funding, and the Imputed taxes. Historically LPUA approved the Communications System budgets, and issued debt as approved by the Mayor-President and City-Parish Council. Beginning in January 2020, the City Council assumed LPUA's responsibilities with respect to the Communications System.

The Utilities Director and Communication System Director are both appointed by the Mayor-President with the Director of Utilities appointment subject to ratification by the City Council. The Consulting Engineer advises the LUS in its appointment of a Chief Operating Officer of the Utilities System, per the ordinance requirements, and fulfilled this role in FY 2021 as LUS evaluated candidates and selected Jeffrey Stewart for the position in early FY 2022.

### **2.7.1 LUS Organizational Structure**

The Utilities System has eight functional areas reporting to the Utilities Director. These functional areas include Support Services, Customer Service, Environmental Compliance, Power Production, Electric Operations, Water Operations, Wastewater Operations, and Engineering.

LUS is managed by the Utilities Director. The Utilities Director is responsible for the management and operations of the LUS electric utility, water utility, and wastewater utility. More specifically, the Utilities Director oversees and manages electric production and distribution, water production, treatment, and distribution, wastewater collection and treatment, utility engineering services, supervision of construction work for LUS, maintaining utility equipment in cooperation with the central garage, reading, billing, and collection of all utility meters, and other such activities as may be directed by the Mayor-President as necessary or incidental to the operation of LUS.

The Interim Utilities Director during FY 2021 was Mr. Lowell Duhon. Mr. Duhon graduated from the University of Louisiana at Lafayette with a Bachelor of Science and Master of Business Administration. Prior to serving as the Interim Utilities Director, Mr. Duhon was the Chief Administrative Officer of LCG. Prior to LCG, Mr. Duhon had experience as a Financial Consultant. Mr. Duhon served in this interim role since October 2019 and fulfilled this role until LUS and LCG selected the permanent Utilities Director, Jeffrey Stewart, in February 2022. Mr. Stewart graduated from the Louisiana State University with a B.S. in Electrical Engineering and has served as Utilities Director since February 2022. He has been employed by LUS for over 21 years and served as Engineering & Power Supply Manager prior to his appointment as Director. Mr. Stewart serves on the Board of Directors of the Louisiana Energy &

Power Authority on behalf of the City of Lafayette and is a registered Professional Engineer in the state of Louisiana.

Division managers reporting to the Utilities Director are presented below along with their credentials.

- Karen Hoyt- Engineering & Power Supply Manager: Ms. Hoyt has over 15 years of experience at LUS and has been serving as Engineering & Power Supply Manager since May 2022. Ms. Hoyt holds a Bachelor of Science degree in Electrical Engineering and a Master of Business Administration degree and is a registered Professional Engineer in the state of Louisiana. In this position, Ms. Hoyt is responsible for the supervision of all day-to-day engineering activities including Civil Engineering, Power Marketing, System Engineering and Substation Engineering, Network Engineering, Environmental Compliance associated with power generation and North American Electric Reliability Corporation (“NERC”) compliance.
- Alison Alleman – Customer & Support Services Manager: Ms. Alleman has over 22 years of experience at LUS and served as the Customer & Support Services Manager throughout FY2022. She holds a Bachelor of Science in Finance degree and a Master of Business Administration degree from the University of Louisiana at Lafayette. She is responsible for various support and customer service functions within the Utilities Department including financial monitoring and planning, rates, revenue assurance, employee development, meter services, utility conservation, customer service, business support services, and administration support services.
- Tracy Mouton – Environmental Compliance Manager: Ms. Mouton has worked in the environmental field with the Utilities System for 29 years, serving as the Environmental Compliance Manager since July 2016. Her education includes a Bachelor of Science in Biology with a minor in chemistry from Jackson State University in Jackson, Mississippi. She also has a Master of Business Administration degree and is a Registered Environmental Manager. Ms. Mouton is responsible for ensuring environmental compliance of all LUS business operations associated with water and wastewater operations.
- Gregory A. Labbé – Electric Operations Manager: Mr. Labbé has worked with LUS for 37 years and held several positions in the Electric Operations Section. Mr. Labbé is responsible for the day-to-day operation of the electric transmission and distribution system including Transmission and Distribution Operations, Field Operations, Energy Control, Substations and Communication, Facilities Management, and the Warehouse. Mr. Labbé is a graduate of T.H. Harris Technical School in Opelousas, Louisiana.

- Craig Gautreaux – Water and Wastewater Operations Manager: Mr. Gautreaux has 38 years of experience in the civil engineering and wastewater operations industry (5 years with a private consulting firm, and 33 years with the Utilities System). Mr. Gautreaux has a master’s degree in civil engineering and is responsible for the day-to-day operation of the Water and Wastewater Systems including Water Production, Water Distribution Operations, Wastewater Treatment, and Wastewater Collection.

### 2.7.1.1 LUS Staffing

LUS reviews its overall staffing requirements annually and budgets overall staffing level in its annual budgetary process to continue to provide reliable and cost-effective services to customers. The LUS staffing levels by department have been relatively stable over the last several years and appear reasonable for the size and complexity of the organization. At the end of 2022 there were several vacancies across the organization with some departments having more vacancies than others, such as the T&D group. LUS is working to fill those positions and has recently hired four additional linemen with plans to bring in two additional Linemen II over the coming year. The personnel tables by department are contained in the LCG 2022 Budget and the LCG 2023 Budget. Table 2-3 presents the number of employees by department at the end of FY 2022 as well as the budgeted number of employees in FY 2022 and FY 2023.

**Table 2-3: LUS Number of Personnel by Department**

	Personnel		
	October 31, 2022	2022 Budget	2023 Budget
Director's Office	2	2	2
Support Services	26	27	28
Customer Service	28	31	31
Environmental Compliance	18	18	18
Power Production	29	35	35
Electric Operations	86	94	97
Water Operations	61	69	68
Wastewater Operations	84	97	97
Engineering	78	81	81
<b>Total Utilities System</b>	<b>412</b>	<b>454</b>	<b>457</b>

Source: 2022 Budget, 2023 Budget, LUS Org Chart

### 2.7.2 LUS Fiber Organizational Structure

At the end of March 2021, Lafayette Mayor-President Josh Guillory named Ryan Meche as LUS Fiber’s new Director. Mr. Meche graduated from the University of Louisiana at Lafayette with a Bachelor of Science in Electrical Engineering and is a registered Professional Engineer in Louisiana. Mr. Meche has been an employee of LUS for 18 years.

Since November 1, 2018, the Communications Director has been responsible for the Communications System operations and management. Communications System employees and facilities are organized separately from Utilities System operations; however, several services such as accounting, and reporting functions are shared among the Communications System and Utilities System. In accordance with the requirement to maintain separate Utilities System and Communications System funds, all costs associated with these services are accounted for separately.

The Communications System employs approximately █ employees, reporting to 5 functional areas: Administration and Support, Operations, Warehouse, Business Support Services, and Engineering. Division managers report to Ryan Meche, the Communications System Director. Mr. Meche graduated from the University of Louisiana at Lafayette with a Bachelor of Science in Electrical Engineering and is a registered Professional Engineer in Louisiana. Mr. Meche has been an employee of LUS for 18 years. He is responsible for overseeing all matters regarding the Communications System.

**2.7.2.1 LUS Fiber Staffing**

The staffing table below reflects the fact that the Business Support Services division took over direct management of █ customer service personnel in FY 2021. In the past, these positions were included in the LUS manning table, and LUS Fiber covered the cost of these positions through the Administrative and General expense line item in LUS Fiber’s budget, in accordance with LCG’s cost allocation plan. These positions were not included as LUS Fiber staffing counts in the previous years’ projected budget, creating the appearance of staffing level above target levels. The Communications System is currently evaluating its staffing requirements in each functional area, and when needed utilizing contractors to support its existing staff.

**Table 2-4: LUS Fiber Number of Personnel by Department**

	Personnel		
	October 31, 2022	2022 Budget	2023 Budget
Administration & Support	█	█	█
Operations	█	█	█
Warehouse	█	█	█
Business & Customer Support Services	█	█	█
Engineering	█	█	█
<b>Total Communications System</b>	█	█	█

Source: 2022 Budget, 2023 Budget, LUS Org Chart

**2.8 Employee Compensation Review**

LUS and LUS Fiber annually administer employee performance reviews and salary planning. Salary adjustments take effect on November 1 of each year, with changes realized during the first full pay period of the new FY. Compensation parameters are associated with the job titles and job descriptions, which

specify skill and responsibility levels of various employees throughout LUS and LUS Fiber. Like previous years, Burns & McDonnell conducted a review of compensation for various job descriptions within LUS and LUS Fiber. The review conducted for this CER update did not take into consideration other key benefits included in an overall compensation package such as job stability, sick leave benefits, and retirement benefits which can often overcome the differences between for-profit and not-for-profit entities competing for the same talent. The positions benchmarked are listed below.

- Electric Utility
  - Chief Electrical Engineer
  - Electrical Engineer III
  - Power Plant Technician
- Water and Wastewater Utility
  - Water/Wastewater Operations Manager
  - Water Plant/Waste Plant Operator
- Communications System
  - Fiber Optics Technicians
  - Programmer Analyst
  - Applications Support Specialist
  - Systems Analyst

LUS is compensating its employees at levels below other employers in the State of Louisiana based on the review completed as part of the CER update. Within the electric, water, and wastewater utilities, the median regional salaries compared reasonably well with each LUS classification with most positions having a compensation rate within 10 to 20 percent of the regional median. Some of the difference in compensation between Lafayette and state averages could be attributed to the lower cost of living when compared to other larger cities in Louisiana such as New Orleans. Based on feedback from LUS, hiring and retaining electric linemen has been a challenge. However, LUS is working with regional schools to train and hire new staff.

LUS Fiber retained Magellan Advisors in FY 2022 for an overall compensation study and is currently assessing the impact of the study. Within the compensation study for LUS Fiber all positions were reviewed. Due to the competitive nature within the ISP industry, LUS Fiber must provide competitive compensation to retain key employees and attract quality resources. The goal of the compensation study was to evaluate all positions and provide potential compensation adjustments for positions to maintain or enhance LUS Fiber's ability to retain and recruit talented resources. LUS Fiber is continuing to consider

key management and leadership positions needed for growth. Based on which position can be filled, an organizational realignment is being planned but has yet to be finalized at the time of this report.

Based on the review completed within the CER update, LUS Fiber is compensating its employees at below average market rates and is actively working with the City of Lafayette's administration to increase salaries more commensurate with market rates. LUS Fiber continues examining its salaries in comparison to other regional telecommunication providers so that it can continue to hire and retain well qualified analysts, technicians, and support specialists.

### 3.0 UTILITIES SYSTEM FINANCIAL REVIEW

#### 3.1 System Description

LUS operates Electric, Water, and Wastewater Systems. The Electric System operates power generation, transmission, distribution, and customer assets. The Water System includes raw water production and treatment plants, distribution system, and customer assets. The Wastewater System includes sewage treatment plants, collection piping, and customer assets. This section of the Report provides a summary of the historical financial condition of LUS through the end of FY 2022.

#### 3.2 Customers

LUS serves customers both within the City limits and outside the City. The Water system has wholesale agreements with several cities that are described later in this report. The Electric system has franchise agreements with the City of Broussard and City of Youngsville which allow LUS to provide service in those cities. The historical number of customers served by each utility is provided in Table 3-1. LUS has experienced modest growth over the last five years.

**Table 3-1: Historical Utility Customers**

Year	Electric	Water	Wastewater	Total
2018	67,243	56,564	45,019	168,826
2019	68,495	58,316	45,623	172,434
2020	69,364	57,412	46,133	172,909
2021	70,096	57,891	46,681	174,668
2022	70,865	58,302	46,792	175,960

Source: LUS Financial and Operating Statements

#### 3.3 Historical Revenues

LUS generates revenues primarily from the sale of the utility services it provides. The electric utility represents approximately 80 percent of the revenues and costs of LUS while the water and wastewater utilities represent the remaining 20 percent. The historical revenues have been relatively stable for all three utilities over the last five years. Only the electric utility experienced a noticeable reduction in FY 2020 due to the COVID-19 Pandemic, however it should be noted that the revenue reduction was combined with a commensurate reduction in fuel and purchased power expenses. Revenues rebounded to historical levels in FY 2021. The electric utility experienced a large revenue increase in FY 2022 due to a 60% year over year increase in fuel revenue. The historical revenues by utility are presented in Table 3-2 and include revenues from base rates, fuel charges, interest income, and other miscellaneous revenues.



**Table 3-2: Historical Operating and Other Revenues**

Year	Electric Revenues	Water Revenues	Wastewater Revenues	Total Revenues
2018	\$180,955,690	\$21,736,544	\$32,379,226	\$235,071,461
2019	\$179,965,886	\$21,369,475	\$32,038,772	\$233,374,132
2020	\$166,467,519	\$21,696,556	\$31,122,710	\$219,286,785
2021	\$179,851,903	\$21,904,303	\$31,768,322	\$233,524,527
2022	\$226,464,202	\$22,964,907	\$32,248,544	\$281,677,652

Source: LUS Financial and Operating Statements

### 3.4 Debt Service Coverage

LUS currently has several outstanding bonds that were issued for the purposes of making improvements and expansions to the three utility systems. LUS has a minimum DSC ratio of 1.0 as required by the Bond Ordinances and has continued to adequately maintain its DSC over the last five years. LUS has been making payments on the Series 2021 Bonds, Series 2019 Bonds, Series 2017 Bonds, Series 2012 Bonds, and Series 2010 Bonds. The Series 2010 Bonds were fully redeemed by the Series 2017 Bonds on November 1, 2020. The Series 2012 Bonds were refunded with the Series 2021 Bonds in FY 2022 on November 1, 2021. Table 3-3 presents the historical debt service coverage ratio for LUS.

**Table 3-3: Historical Debt Service Coverage**

Year	Operating Revenues	Operating Expenses	Net Available Revenues	Debt Service	Debt Service Coverage Ratio
2018	\$235,071,461	\$164,165,246	\$70,906,215	\$21,427,905	3.3
2019	\$233,374,132	\$152,839,402	\$80,534,731	\$22,732,925	3.5
2020	\$219,286,785	\$143,498,541	\$75,788,244	\$25,374,000	3.0
2021	\$233,524,527	\$162,712,354	\$70,812,174	\$25,095,600	2.8
2022	\$281,677,652	\$203,610,408	\$78,067,244	\$23,741,091	3.3

Source: LUS Financial and Operating Statements

### 3.5 Rate Adjustments

The current rates for LUS are presented in the LCG Code of Ordinances, Article III – Rates and Charges, Division 1. The electric, water, and wastewater utilities each have their own tariffs for each customer class and are comprised of both fixed charges and variable charges. Rates are adjusted through rates studies that are conducted every few years with rate recommendations approved by the City Council. The fuel charge within the electric utility is adjusted monthly based on the cost of fuel and purchased power and the Utility Director monitors and manages the fuel charge on a month-to-month basis to adequately recover eligible costs. The previous recent rate study was completed in 2016. The study demonstrated that the utility rates would have been insufficient to recover the three utilities' costs. Therefore, each utility

required a series of rate increases to be implemented over several years. As demonstrated by the historical DSC analysis, the rate increases have provided the required revenues to be in compliance with Bond Covenants, maintain adequate cash balances, and fund the capital and operating costs of the utility. The utility recently completed a rate study for the electric, water, and wastewater utilities in FY 2022. Approved rate increases included 3 percent annual increases to electric in FY 2024 and FY 2025, 8 percent annual increases for water for FY 2023 to FY 2025, and 9.5 percent annual increases for wastewater from FY 2023 to FY 2025. The historical approved total rate revenue adjustments by utility are presented in Table 3-4.

**Table 3-4: LUS Historical Rate Adjustments**

	2018	2019	2020	2021	2022
Electric Retail: Base Rate	6.0%	0.0%	0.0%	0.0%	0.0%
Water Retail	7.2%	0.0%	0.0%	0.0%	0.0%
Wastewater Retail	5.7%	0.0%	0.0%	0.0%	0.0%

### 3.6 Operating and Capital Budgets

LUS prepares and submits the proposed operating and capital budget to LCG annually for approval. The operating section of the budget includes projections of revenues and expenses for the upcoming FY. The operating projections for the upcoming FY are finalized subsequent to the completion of this Report.

The CIP is included within the FY 2023 Budget and is presented in Table 3-5 as provided by LUS to Burns & McDonnell. The total forecasted CIP over the next five years is largely concentrated in FY 2023 and FY 2024. Forecasted CIP is anticipated to be funded through both retained earnings and the issuance of new bonds in FY 2023. Additional details on the nature of the projects within the CIP are provided later within this Report for each utility.

**Table 3-5: LUS 2023 Budget Projected Capital Improvement Plan**

<b>Electric</b>	2023	2024	2025	2026	2027	Total
Acquisitions	\$300,000	\$400,000	\$0	\$0	\$0	\$700,000
Production	\$1,490,000	\$2,330,000	\$930,000	\$155,000	\$155,000	\$5,060,000
Distribution	\$2,045,000	\$1,735,000	\$1,635,000	\$985,000	\$985,000	\$7,385,000
Substation	\$4,000,000	\$1,025,000	\$5,175,000	\$675,000	\$675,000	\$11,550,000
Transmission	\$5,885,000	\$3,410,000	\$10,000	\$10,000	\$10,000	\$9,325,000
General Plant	\$10,105,000	\$1,310,000	\$1,760,000	\$610,000	\$260,000	\$14,045,000
<b>Total Electric</b>	<b>\$23,825,000</b>	<b>\$10,210,000</b>	<b>\$9,510,000</b>	<b>\$2,435,000</b>	<b>\$2,085,000</b>	<b>\$48,065,000</b>
<b>Water</b>						
Production	\$560,000	\$2,480,000	\$1,430,000	\$3,530,000	\$2,230,000	\$10,230,000
Distribution	\$5,360,000	\$6,060,000	\$3,210,000	\$985,000	\$1,660,000	\$17,275,000
<b>Total Water</b>	<b>\$5,920,000</b>	<b>\$8,540,000</b>	<b>\$4,640,000</b>	<b>\$4,515,000</b>	<b>\$3,890,000</b>	<b>\$27,505,000</b>
<b>Wastewater</b>						
Treatment	\$6,860,000	\$360,000	\$3,560,000	\$20,610,000	\$7,310,000	\$38,700,000
Collection	\$7,125,000	\$6,665,000	\$5,415,000	\$4,315,000	\$4,415,000	\$27,935,000
<b>Total Wastewater</b>	<b>\$13,985,000</b>	<b>\$7,025,000</b>	<b>\$8,975,000</b>	<b>\$24,925,000</b>	<b>\$11,725,000</b>	<b>\$66,635,000</b>
<b>Total Capital Program</b>	<b>\$43,730,000</b>	<b>\$25,775,000</b>	<b>\$23,125,000</b>	<b>\$31,875,000</b>	<b>\$17,700,000</b>	<b>\$142,205,000</b>

Source: LUS

### 3.7 LUS System Budget and Actual Performance

As part of this Report, Burns & McDonnell compared the LUS FY 2022 budgets to the FY 2022 actual results. This section presents the results of the LUS budget and actual accounts for FY 2022. The categories presented are similar to those in the FY 2022 Budget and may be slightly different than others found within the Report. LUS performed slightly better than expected during FY 2022 as demonstrated in Table 3-6.

**Table 3-6: LUS Comparison of FY 2022 Budget and Actual Results**

	2022 Actual (millions)	2022 Adopted Budget (millions)	Difference (millions)	Difference (%)
<b>Operating Revenues</b>				
Electric Retail Sales	\$101	\$102	(\$1)	-1.0%
Electric Retail Fuel Adj.	\$122	\$71	\$51	71.8%
Electric Wholesale Sales	\$0	\$0	(\$0)	-4.0%
Water Sales	\$22	\$23	(\$1)	-4.0%
Wastewater Sales	\$31	\$32	(\$1)	-1.7%
Interest Income	\$2	\$0	\$2	2066.0%
Miscellaneous Other	\$4	\$5	(\$1)	-27.0%
<b>Total Operating Revenue</b>	<b>\$282</b>	<b>\$233</b>	<b>\$49</b>	<b>21.0%</b>
<b>Operating Expenses</b>				
Purchased Power LPPA	\$57	\$55	\$2	4.4%
Purchased Power Other	\$15	\$4	\$11	266.6%
Purchased Power MISO	\$122	\$63	\$59	93.3%
Purchased Power MISO Sales	(\$77)	(\$44)	(\$33)	75.1%
Production Fuel	\$15	\$6	\$9	162.5%
Other O&M	\$72	\$80	(\$9)	-10.8%
ILOT	\$24	\$24	\$0	0.4%
<b>Total Operating Expenses</b>	<b>\$228</b>	<b>\$188</b>	<b>\$40</b>	<b>21.2%</b>
<b>Other Income (Expenses)</b>				
Normal Capital & Spec Equip	(\$8)	(\$14)	\$6	-43.6%
Principal from Internal Loans	\$1	\$2	(\$1)	-49.6%
Interest from Internal Loans	\$1	\$1	\$0	14.9%
Interest on Long Term Debt	(\$10)	(\$10)	(\$1)	5.7%
Principal on Long Term Debt	(\$12)	(\$15)	\$3	-19.1%
<b>Total Other</b>	<b>(\$29)</b>	<b>(\$37)</b>	<b>\$8</b>	<b>-21.3%</b>
<b>Cash Available for Capital</b>	<b>\$25</b>	<b>\$8</b>	<b>\$17</b>	<b>216.4%</b>

Source: LUS Financial and Operating Statements

The electric utility experienced electric sales volumes and revenues that were in line with expectations; however, wholesale power and energy costs and production fuel costs were higher than expected. The overall non-power costs were lower than budgeted which helped to offset higher wholesale power and energy costs. The water and wastewater utilities' revenues and expenses were both lower than budgeted. The actual normal capital and special equipment spending was lower than the adopted budget which helped to provide cash available for capital.

### 3.8 LUS Shared Services

Shared services for LUS are provided by the Customer Service & Support Service divisions. These divisions provide financial planning, rates, meter services, customer service, administration and business support services for all three of LUS's utilities. The cost of these services is assigned and shared across the Electric, Water, and Wastewater Systems in the establishment of rates and charges. The customer

service staff has experienced turnover that is typical within the industry and LUS worked with Civil Service to implement an apprenticeship program to increase employee retention in FY 2022. The Support Services division is a smaller group and has experienced lower turnover.

### 3.9 Payment In Lieu of Tax

LUS makes an annual ILOT payment to the City. ILOT payments by municipally owned utilities are commonly used by local governments across the country to collect taxes and/or franchise fees that would be collected if an investor-owned utility were operating the utility franchises within the city. The LUS ILOT calculation provides for an ILOT payment of up to 12 percent of the Receipts Fund. The non-fuel revenues are the gross receipts less fuel costs and other miscellaneous items. To be eligible to make the ILOT payment, LUS must first pass an ILOT Test. The purpose of the test is to ensure that LUS has sufficient cash to meet capital obligations. If cash available after debt service, less 7.5 percent of the non-fuel revenues, is greater than 12 percent of the Receipts Fund, LUS passes the test and makes the ILOT payment to the City. Should LUS fail the ILOT Test, LUS pays an amount equal to the amount of cash available after debt service, less 7.5 percent of the non-fuel revenues. The American Public Power Association (“APPA”) benchmarks ILOT as a percentage of revenue across the country as well as the West South Central Region, as defined by APPA, in which LUS is located. The median ILOT for this region is 11.9 percent while LUS has paid an average ILOT rate of 10.3 percent over the last 5 years as presented in Table 3-7.

**Table 3-7: LUS Historical ILOT Payments**

	2018	2019	2020	2021	2022
ILOT Paid <sup>(1)</sup>	\$23,708,786	\$25,051,002	\$24,679,711	\$24,056,012	\$24,185,667
Total Operating Revenues	\$235,071,461	\$233,374,132	\$219,286,785	\$233,524,527	\$281,677,652
ILOT as a percent of Revenues	10.1%	10.7%	11.3%	10.3%	8.6%

Source: LUS Financial and Operating Statements

(1) Represents ILOT paid for the Utilities System including electric, water, and wastewater systems.

### 3.10 Accounting and Financial Statements

LUS accounting responsibilities are managed and performed by LCG, including the selection of accounting software and related financial reporting. LCG prepares monthly Financial and Operating Statements for LUS which are also provided to the Engineer of Record monthly. These statements include a balance sheet, income statement, revenues and expenses, and other detailed operating statistics. The final audited financial statements contained in the Annual Comprehensive Financial Report (“ACFR”) Statements are typically not available until April of the following fiscal year which is when this Consulting Engineer’s Report is also completed. The detailed data contained within this Report is based upon the monthly Financial and Operating Statements provided to the Engineer of Record and may vary

from the tables in the ACFR. Based on information contained in previous ACFRs and CERs the differences are generally not material.

### 3.10.1 Balance Sheet

The historical balance sheet for LUS is presented in Table 3-8. LUS assets have continued to grow as the utility systems each continue to grow to serve new customers. Bond funds increased considerably in 2019 as result of the 2019 Series Bonds and have begun to reduce as projects are completed. Retained earnings have grown steadily over the last few years while the debt to equity ratio has slightly improved over the last three years.

**Table 3-8: LUS Historical Balance Sheet**

<b>Total Assets</b>	2018	2019	2020	2021	2022
Utility Plant	\$ 565,059,332	\$ 561,320,749	\$ 561,005,523	\$ 572,808,275	\$ 602,789,299
Bond and Special Funds	132,262,607	213,449,976	216,710,984	193,456,237	160,416,624
Current Assets	8,780,394	10,183,720	9,110,701	10,212,476	12,058,722
Accounts Receivable	28,439,772	28,657,295	28,520,766	31,448,617	36,374,216
Reserve for Uncollectible Accounts	(1,090,028)	(941,530)	(799,310)	(1,069,077)	(1,784,508)
Notes Receivable	26,529,343	25,686,227	24,706,574	23,098,960	22,097,147
Inventories	9,097,936	9,444,953	10,671,253	11,440,176	13,894,280
Deferred Debits	22,227,147	23,962,998	23,542,330	26,685,847	25,180,077
<b>Total Assets</b>	<b>\$ 791,306,504</b>	<b>\$ 871,764,388</b>	<b>\$ 873,468,821</b>	<b>\$ 868,081,511</b>	<b>\$ 871,025,857</b>
<b>Total Liabilities &amp; Equity</b>					
Long Term Debt	\$ 184,110,000	\$ 229,805,000	\$ 215,615,000	\$ 201,055,000	\$ 185,430,000
Current Liabilities	24,900,222	27,266,441	33,950,669	31,236,972	33,580,410
Long Term Liabilities	62,946,218	73,987,500	66,914,126	65,145,626	58,531,149
Retained Earnings	519,350,063	540,705,447	556,989,025	570,643,914	593,484,298
<b>Total Liabilities &amp; Fund Equity</b>	<b>\$ 791,306,504</b>	<b>\$ 871,764,388</b>	<b>\$ 873,468,821</b>	<b>\$ 868,081,511</b>	<b>\$ 871,025,857</b>

Source: LUS Financial and Operating Statements

### 3.10.2 Fund Balances

Article V of the LUS General Bond Ordinance dictates the funds and accounts of LUS and defines the 'Flow of Funds.' Article V creates several funds which are presented in Table 3-9. The flow of funds proceeds in the following order: Receipts Fund, Operating Fund, Sinking Fund, Reserve Fund, and Capital Additions Fund. Funds may be created as new bonds are issued. Table 3-9 summarizes the beginning balance, receipts, disbursements, and ending balances of the required funds cash balances. First, 7.5 percent of non-fuel revenues are transferred to capital costs of LUS. Then 12 percent of total deposits in the Receipts Fund are transferred to the General Fund of the Issuer. Then funds are used to pay amounts due on Subordinated indebtedness with remaining funds used for other purposes under the General Ordinances.

**Table 3-9: LUS Fund Balances as of October 31, 2022 (\$1,000)**

	Receipts Fund		Operating Fund		Bond & Interest Fund		Capital Additions		Bond Reserve Fund		2019 Bond Construction Fund		Total
Beginning Balance	\$ 2,185	\$ 8,015	\$ -	\$ 112,617	\$ 17,328	\$ 54,753						\$ 194,898	
Receipts	296,227	265,786	23,882	48,420	297	204						634,816	
Disbursements	294,336	265,779	23,882	51,476	2,925	27,857						666,255	
Ending Balance	\$ 4,076	\$ 8,022	\$ -	\$ 109,561	\$ 14,700	\$ 27,100						\$ 163,459	

Source: LUS Financial and Operating Statements

### 3.10.3 Income Statement

The LUS Income statement is presented in Table 3-10. Over the last five years LUS net operating revenues after depreciation have fluctuated between \$43.5 million and \$50.7 million. System growth and several rates increases that were implemented in 2017 and 2018 have helped to maintain strong financial conditions. In FY 2020, LUS experienced a reduction in overall revenues which was largely driven by lower electric sales and electric revenues. The reduction was offset by a corresponding reduction in operating expenses which helped to maintain net operating revenues during FY 2020. Both revenues and expenses rebounded in FY 2021 as LUS came out of the Covid 19 Pandemic and returned to normal revenue and expense levels. However, overall net operating revenues were lower and when combined with reductions in both other income and expenses LUS realized an overall decline in net income compared to FY 2020. FY 2022 saw a large increase in both operating revenue and expenses driven largely from increases in wholesale fuel and power costs.

**Table 3-10: Historical Income Statement**

	2018	2019	2020	2021	2022
Operating Revenues	\$ 232,203,121	\$ 228,678,339	\$ 216,381,978	\$ 232,504,512	\$ 279,622,064
Operating Expenses	164,165,246	152,839,402	143,498,541	162,712,354	203,610,408
Net Operating Revenues	\$ 68,037,875	\$ 75,838,938	\$ 72,883,437	\$ 69,792,158	\$ 76,011,656
Depreciation	24,555,286	25,130,355	25,189,698	24,589,046	25,244,789
Net Operating Revenues after Depreciation	\$ 43,482,589	\$ 50,708,583	\$ 47,693,738	\$ 45,203,113	\$ 50,766,867
<b>Other Income</b>					
Interest Income	\$ 2,868,340	\$ 4,695,793	\$ 2,904,807	\$ 1,020,016	\$ 2,055,588
Unrealized Gain/Loss on Invs	(46,380)	399,671	(139,572)	(128,924)	(1,471,006)
Amortization of Debt Premium	3,544,254	3,639,998	3,769,742	3,555,219	2,018,191
Water Tapping Fees	72,240	56,760	61,540	71,460	63,520
Communications Lease Income	0	0	11,379	0	7,906
Contributions in Aid of Construction	304,557	0	140,856	0	150,700
Misc. Non Operating Revenue	4,188,986	3,141,166	3,633,306	2,412,390	4,330,862
Total Other Income	\$ 10,931,997	\$ 11,933,388	\$ 10,382,059	\$ 6,930,161	\$ 7,155,761
<b>Other Expenses</b>					
Loss on Disposition of Property	398,883	309,767	290,397	507,437	255,880
Interest Expense	9,622,905	10,362,925	11,184,000	10,535,600	7,416,091
Amortizations	2,304,183	2,187,756	1,986,896	1,801,118	827,581
Interest on Customer Deposits	4,307	5,331	1,834	1,897	1,927
Tax Collections/Non Operating	0	0	0	0	0
Misc Non Operating Expense	2,844,559	3,369,807	3,649,380	1,576,322	2,408,295
Total Other Expenses	\$ 15,174,837	\$ 16,235,585	\$ 17,112,507	\$ 14,422,373	\$ 10,909,774
Net Income Before in Lieu of Tax	39,239,748	46,406,385	40,963,291	37,710,900	47,012,854
ILOT	23,708,786	25,051,002	24,679,711	24,056,012	24,185,667
Net Income	\$ 15,530,962	\$ 21,355,383	\$ 16,283,580	\$ 13,654,888	\$ 22,827,187

Source: LUS Financial and Operating Statements

### 3.10.4 Cash Flow Statement

The LUS historical cash flows are presented in

Table 3-11. LUS, like many other municipals, is primarily focused on net cash flows and cash balances and traditionally set rates based on meeting cash targets including, but not limited to, debt service coverage. Except for FY 2020 and FY 2021, LUS has realized a steady increase in its change in cash due to operations and ILOT. The lower change in cash due to operations in FY 2020 is attributed to the same factors discussed in the net income statement section of this Report.



**Table 3-11: LUS Historical Cash Flows**

	2018	2019	2020	2021	2022	Five-Year Total
Operating Revenues	\$ 232,203,121	\$ 228,678,339	\$ 216,381,978	\$ 232,504,512	\$ 279,622,064	\$ 1,189,390,014
Operating Expenses	164,165,246	152,839,402	143,498,541	162,712,354	203,610,408	826,825,950
Net Operating Revenues	\$ 68,037,875	\$ 75,838,938	\$ 72,883,437	\$ 69,792,158	\$ 76,011,656	\$ 362,564,064
Debt Service	21,427,905	22,732,925	25,374,000	25,095,600	23,741,091	118,371,521
Balance After Debt Service	\$ 46,609,970	\$ 53,106,013	\$ 47,509,437	\$ 44,696,558	\$ 52,270,565	\$ 244,192,542
Less Normal Capital & Special Equipment	5,032,337	6,979,931	11,144,716	11,994,962	12,584,942	47,736,888
Less ILOT	23,708,786	25,051,002	24,679,711	24,056,012	24,185,667	121,681,178
Change in Cash due to Operations and ILOT	\$ 17,868,847	\$ 21,075,080	\$ 11,685,010	\$ 8,645,584	\$ 15,499,955	\$ 74,774,476

Source: LUS Financial and Operating Statements

## 4.0 ELECTRIC UTILITY SYSTEM

### 4.1 Electric Utility Summary

The City owns and operates an Electric System providing reliable power to approximately 71,000 retail customers. LUS operates power generation, transmission, substation, distribution, and customer facilities within and outside its service territory. Table 4-1 presents the historical Electric System retail sales, wholesale sales, and wholesale purchases over the last five years.

**Table 4-1: Electric System Historical Retail and Wholesale Sales**

Year	Retail Sales (MWh)	Wholesale Sales (MWh)	MISO Market Sales (MWh)	MISO Market Purchases (MWh)
2018	2,031,847	0	1,153,292	2,108,460
2019	2,004,310	0	1,132,482	2,036,411
2020	1,917,040	0	736,830	1,987,674
2021	1,959,364	0	1,088,904	2,009,920
2022	1,981,782	0	1,136,926	2,032,346

Source: LUS Financial and Operating Statements

LUS has been a full market participant as a Local Balancing Authority and Transmission Owner within the Midcontinent Independent System Operator, Inc. (“MISO”) since 2013. Participation in the MISO market requires a buy-all/sell-all type of transaction for energy. LUS purchases all its energy requirements to serve its load from the MISO market. Correspondingly, MISO dispatches the LUS generation units, and all the generation is sold into the MISO market. The MISO Market Purchases represent purchases from the MISO market to serve LUS retail load. As presented in Table 4-2, retail sales by class as of October 31, 2022, indicate that residential and commercial customers represent approximately 90 percent of Electric System sales. The LUS commercial customer base is diverse, with no single customer representing more than 2 percent of LUS electric retail revenues.

**Table 4-2: Electric System Customer Class Statistics as of October 31, 2022**

	Number of Customers	Percent of Total	Sales (kWh)	Percent of Total
Residential	57,724	81.5%	833,990,827	42.1%
Residential - Outside the City	1,050	1.5%	17,529,660	0.9%
Commercial without Demand-Small	8,236	11.6%	191,876,695	9.7%
Commercial Small and Large - Outside the City	183	0.3%	16,100,033	0.8%
Commercial with Demand - Large	1,219	1.7%	735,279,860	37.1%
Private Security Lighting	1,754	2.5%	8,210,073	0.4%
Street Lighting	2	0.0%	16,826,527	0.8%
Schools and Churches	407	0.6%	56,668,456	2.9%
Municipal-General Fund	5	0.0%	571,911	0.0%
University of Louisiana - Lafayette	102	0.1%	67,968,956	3.4%
Interdepartmental	185	0.3%	36,758,989	1.9%
<b>Total</b>	<b>70,865</b>	<b>100.0%</b>	<b>1,981,781,987</b>	<b>100.0%</b>

Source: LUS Financial and Operating Statements

## 4.2 Power Supply Summary

LUS provides energy and capacity to its customers through owned resources and power supply contracts. The total peak demand for LUS was approximately 456 megawatts (“MW”) in 2021 and is expected to grow to 500 MW by 2036 based on load forecasts conducted within a recent integrated resource plan (“IRP”). LUS is forecasted to experience long-term load growth around two tenths of a percent, which is consistent with other utilities’ load forecasts in the region. LUS owns and operates two power generation facilities in Lafayette: T.J. Labbe and Hargis-Hebert. Both facilities have two natural gas-fired combustion turbines to provide capacity and energy. These four natural gas-fired combustion turbines are interconnected to the transmission system within the City of Lafayette. In addition to the power plants which LUS owns, LUS also has several power purchase agreements in place to provide capacity and energy to meet its load. Through the LPPA, Lafayette owns 50 percent of Rodemacher Unit 2, which is a coal-fired unit with a capacity of approximately 500MW located near Boyce, Louisiana. Rodemacher Unit 2 is operated by Cleco Corporate Holdings, LLC as part of the Brame Energy Center. Table 4-3 presents the approximate installed capacity (“ICAP”) for the power supply resources owned by LUS.

**Table 4-3: LUS Power Supply Resources (Net Capacity)**

LUS Power Plants		
Unit	Fuel	Installed Capacity (ICAP, MW)
Hargis-Hebert 1	Natural Gas	47
Hargis-Hebert 2	Natural Gas	47
TJ Labbe 1	Natural Gas	48
TJ Labbe 2	Natural Gas	47
LUS Power Purchase Agreements		
Unit	Fuel	Installed Capacity (ICAP, MW)
Lafayette Public Power Authority (LPPA) Rodemacher Unit 2	Coal	246
Southwest Power Administration	Hydro	18
TEA	Capacity only	62.5

As illustrated by the list above, LUS has a diverse power supply portfolio consisting of coal, natural gas, and hydroelectric resources. The Southwest Power Administration contract consists of hydroelectric resources and is expected to operate until 2033.

Within the recent IRP conducted in 2019-2020, the long-term operation of Rodemacher Unit 2 was specifically evaluated due to the ongoing environmental regulations which impact coal-fired units, as well as the associated economics. Within the IRP evaluation, long-term operation of Rodemacher Unit 2 utilizing coal as a fuel was higher cost compared to other power supply alternatives. As such, LUS has expressed a desire to potentially retire Rodemacher Unit 2 from coal-fired operation at the end of 2027. However, Rodemacher Unit 2 is co-owned between multiple utilities. No firm retirement date has been set by the co-owners. If the co-owners elect to retire Rodemacher Unit 2, LUS will need to replace the capacity and energy from Rodemacher Unit 2 when retired with new power supply resources. LUS is working towards finalizing its plans for new gas fired generation capacity in anticipation of replacing Rodemacher Unit 2 in 2027.

In addition to the plants above, LUS has two retired power plant facilities consisting of the Louis “Doc” Bonin Generation Station (“Bonin”) (the site of the LUS operations center) and the Curtis Rodemacher Generation Station. Both plants were retired as they became economically obsolete. The Bonin facility was retired in 2017 and has gone through various decommissioning and demolition efforts. The Bonin facility had four fuel oil tanks located on-site that have been demolished, removed, and remediated. LUS has removed the cooling towers, specifically the cooling tower for Unit 3 to provide additional space for electrical switchyard/substation expansions. The remediation and demolition have been completed for some of the cooling tower equipment. The only structures that remain are the concrete basins which are at, or below, grade in addition to the underground supply and return piping and the associated pumps, motors, and motor control centers that are to be removed in future phases of the demolition project.

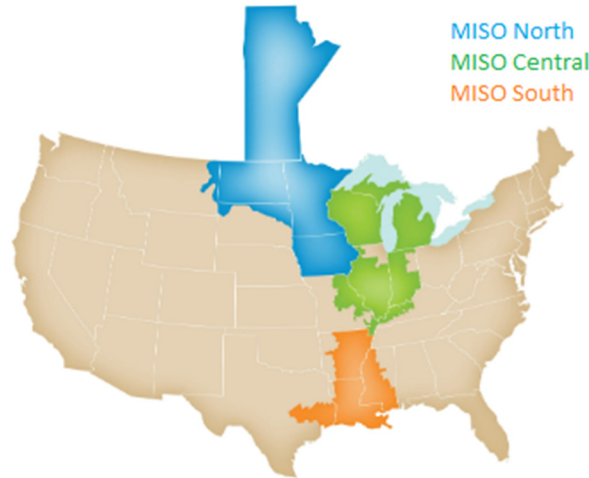
The Curtis Rodemacher facility is a retired natural gas-fired steam plant. The plant was retired in 1993 from power generation. The facility was retired-in-place and LUS continues to monitor the facility and address issues as they arise associated with lead-based paint, asbestos, and other maintenance requirements. The Rodemacher facility is adjacent to the Pinhook substation. LUS continues to evaluate potential opportunities for repurposing the facility for LUS uses.

#### **4.2.1 MISO Wholesale Market**

The power grid, consisting of power generation and transmission lines, is operated by independent system operators across many areas of the country. Within the central part of the country, MISO is the system operator. MISO is charged with the reliable operation of the grid. MISO initiated its integrated marketplace on April 1, 2005. On December 18, 2013, LUS officially joined MISO, along with several other utilities which formed the MISO South region and was integrated into MISO’s transmission system. MISO is separated into three areas: North, Central, and South. LUS operates in the MISO South region.

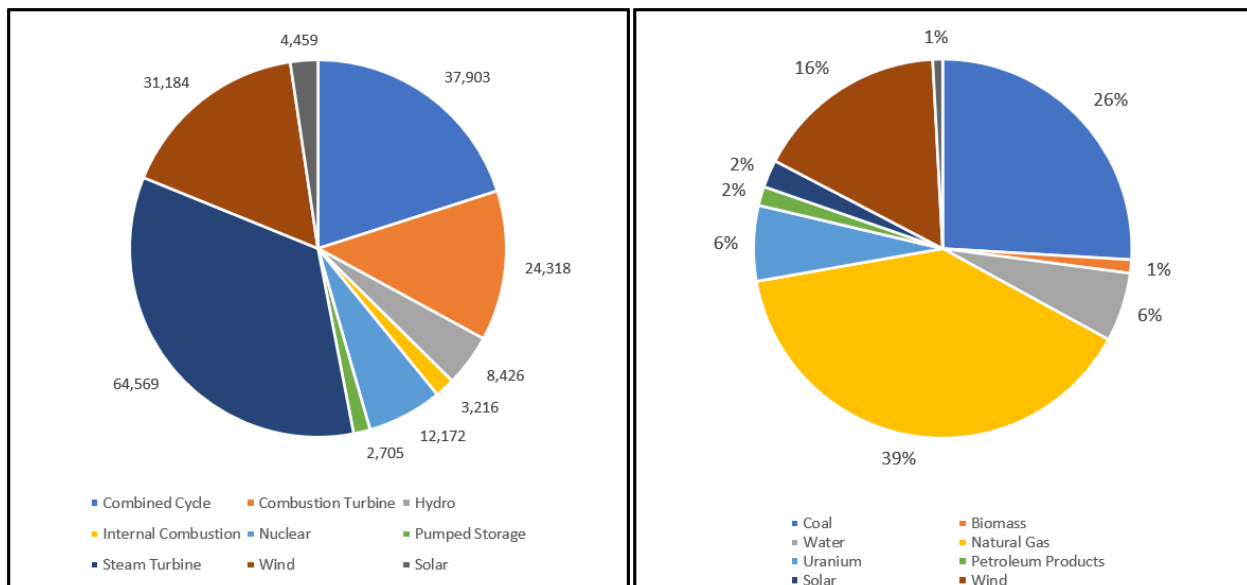
The MISO market is made up of numerous utilities operating in 15 states and the Canadian province of Manitoba as illustrated in Figure 4-1.

**Figure 4-1: MISO Market Area**



MISO has a wide range of capacity and energy resources including fossil fuel, renewable, and nuclear generation. The capacity and energy mix of resources within MISO for 2022 is presented in Figure 4-2.

**Figure 4-2: MISO 2022 Summer Capacity (MW) and Generation (%) by Fuel Type**



MISO South is more heavily based on natural gas resources compared to the other two MISO regions, which rely more heavily on coal-fired resources. MISO North has the most extensive wind generation within the MISO footprint.

Utilities typically acquire all their energy from the market and sell energy from their resources into the market when it is accepted for dispatch, rather than self-scheduling resources. LUS has retained The Energy Authority (“TEA”) as its power and fuel marketer. TEA is registered as the market participant for LUS. TEA has the responsibility to assist LUS in developing a strategy for procuring and selling energy within the MISO market.

To provide sufficient capacity near load centers, MISO is divided into ten Local Resource Zones (“LRZ”), as presented in Figure 4-3 below. A utility must obtain enough capacity within its LRZ to meet MISO’s requirements. LUS is in LRZ 9.

**Figure 4-3: MISO Load Resource Zones<sup>1</sup>**



Wholesale energy prices in MISO have continued to increase since their lows in 2020. The MISO market load costs experienced abnormally high energy prices in February 2021 because of Winter Storm Yuri and sustained high summer gas prices. In 2022, wholesale natural gas and MISO load costs continued to remain high due to international conflicts in Europe which resulted in a tightening of natural gas supply globally which increased energy prices across the United States. As discussed above, LUS dispatches its power generating facility into the MISO market. Table 4-4 presents the historical electric generation for each plant. In 2022, LUS’s gas fired power plants realized a large increase in their annual production due to increased market energy prices across MISO.

<sup>1</sup> MISO, *2020/2021 Planning Resource Auction (PRA) Results*, April 2020, <https://cdn.misoenergy.org/2020-2021%20PRA%20Results442333.pdf>

**Table 4-4: Electric Generation by Plant (MWh)**

	2018	2019	2020	2021	2022
T.J. Labbe	17,974	13,755	17,976	21,691	81,920
Hargis Hebert	22,928	22,934	21,807	31,081	74,840
Rodemacher Unit 2	1,062,984	1,045,878	656,054	994,006	935,616
Total Generation	1,103,886	1,082,567	695,837	1,046,778	1,092,376

## 4.2.2 T.J. Labbe Plant

### 4.2.2.1 Plant Description

The T.J. Labbé Plant began commercial operation in 2005 and consists of two General Electric (“GE”) simple cycle LM6000 PC aeroderivative combustion turbines. The turbines each have a nominal net output of 48 MW each. The turbines utilize GE’s Spray Intercooling (“SPRINT”) system. The SPRINT system works by spraying atomized water directly into the air stream in the compressor stages to cool the air and increase the mass flow through the turbine, thereby increasing the electrical output of the generator. The combustion turbines also utilize water injection to control nitrous oxides (“NO<sub>x</sub>”) emissions.

The combustion turbines use natural gas as the fuel source, which is supplied by the TransCanada interconnect pipeline. T.J. Labbé has three 50 percent gas compressors on site, but they are not used as gas supply pressure to the site is sufficient to run the combustion turbines without compression.

To improve combustion turbine performance during warmer weather conditions, each unit is also equipped with an inlet chiller system. A Turbine Air Systems (“TAS”) chiller system provides chilled water to coils in the inlet filter house to cool inlet air entering the turbine, thereby increasing the mass flow through the turbine, and increasing power output. The chiller can cool the inlet air down to 48°F for optimum performance up to an ambient temperature of 90°F.

The exhaust stacks are equipped with continuous emission monitoring system (“CEMS”) to ensure that the turbines comply with emissions limits.

The facility is equipped with a 600-kW emergency generator that provides black start capability.

### 4.2.2.2 Performance and Statistics

The LM6000 is a proven machine with years of operating experience. The first LM6000 turbine was installed in 1992 and the 1,200 units installed world-wide have logged over 39 million operating hours. The LM6000 PC can start and reach based load within 10 minutes. The turbines also have the capability of ramping at 50 MW/min. The flexible operating profile makes these combustion turbines ideal units to

service peak demand loads. Table 4-5 and Table 4-6 present the historical operating statistics for the last five years for T.J. Labbé.

**Table 4-5: Unit 1 Historical Operating Statistics**

Generation Statistics	2018	2019	2020	2021	2022	5-year Average
Gross Generation (MWh)	12,084	8,848	9,377	12,159	43,706	17,235
Net Generation (MWh)	11,494	8,128	8,779	11,574	42,925	16,580
Average Heat Rate (Btu/kWh) <sup>(Note 1)</sup>	10,702	13,425	13,563	12,979	11,250	12,384
Unit Capacity Factor (%)	2.6%	2.2%	2.4%	4.2%	14.8%	5.2%
Unit Service Factor (%)	5.6%	4.5%	4.7%	5.1%	14.5%	6.9%
Unit Starts	51	73	63	69	144	80
Availability Factor (%)	87.1%	92.6%	93.9%	91.4%	90.3%	91.1%
Forced Outage Rate (%)	1.5%	0.0%	0.2%	0.0%	2.0%	0.7%

Note 1: Average Heat Rate is for the entire T.J. Labbé plant and not specific to Unit 1.

**Table 4-6: Unit 2 Historical Operating Statistics**

Generation Statistics	2018	2019	2020	2021	2022	5-year Average
Gross Generation (MWh)	8,143	8,586	9,634	12,242	43,748	16,470
Net Generation (MWh)	6,749	7,079	8,082	10,806	40,232	14,590
Average Heat Rate (Btu/kWh) <sup>(Note 1)</sup>	10,702	13,425	13,563	12,979	11,250	12,384
Unit Capacity Factor (%)	1.9%	2.2%	2.3%	4.6%	15.7%	5.3%
Unit Service Factor (%)	5.0%	4.3%	4.8%	5.5%	10.1%	5.9%
Unit Starts	45	72	70	70	110	73
Availability Factor (%)	59.9%	93.2%	97.6%	95.4%	91.9%	87.6%
Forced Outage Rate (%)	86.8%	0.0%	0.0%	1.0%	0.2%	17.6%

Note 1: Average Heat Rate is for the entire T.J. Labbé plant and not specific to Unit 2.

The historical performance data from T.J. Labbé are in line with typical industry benchmarks for similar type units. Overall, the reliability and availability of the units is considered very good. During FY 2022 the plant operated much more than previous years primarily due to high energy market costs in MISO. T.J. Labbe performed very well during 2022 and continued to be financially beneficial and reliable for LUS's power costs.



### **4.2.2.3 Recent and Planned Upgrades and Maintenance**

LUS has chosen to perform the major maintenance inspections more frequently than the original recommendation by GE due to feedback from other LM6000 owners in the industry. Plant personnel indicated that the combustion turbines undergo a borescope inspection twice a year, once in Spring and once in Fall. It is also documented that units will receive a borescope inspection if there is a trip where the cause is not readily known. Hot section exchanges (“HSE”) are scheduled every 15,000 hours instead of the original recommendation of 25,000 hours. The major overhauls are scheduled every 30,000 hours instead of the original recommendation of 50,000 hours. Variable stator vane (“VSV”) bushings are changed every 10,000 hours instead of the original recommendation of 12,500 hours. High pressure combustion (“HPC”) stage 1 blades are changed every 15,000 hours and the HPC stage 3-5 blades are changed every 1,000 starts. Although the more frequent major maintenance activities result in a higher O&M cost for the facilities, the low number of operating hours per year for each of the units means that each unit has only undergone one HSE to date and no major overhauls have been completed.

LUS has also continued to perform regular maintenance on the balance of plant equipment at T.J. Labbé. This includes eddy current testing for chiller condenser tubes, stack inspections, chiller coil installation, and painting the VBV duct.

Additional recent and planned 2023 projects at the plant include generator inspections, chiller coil replacement, instrument air compressor replacement, instrument air dryer replacement, HMI computer and security server upgrade, and the construction of a small office building.

#### **4.2.2.3.1 T.J. Labbé Unit 1**

In 2022, the Unit 1 combustion turbine underwent a borescope inspection in the Spring and in the Fall. The Spring and Fall borescope inspections were conducted by GE. At the time of the Spring inspection, Unit 1 had experienced 1,149 fired starts and 21,681 fired hours. At the time of the Fall inspection, Unit 1 had experienced 1,220 fired starts and 22,715 fired hours. During each borescope inspection, the inlet/compressor, combustion, turbine, and exhaust sections were evaluated. All sections were considered serviceable, and no major concerns were noted.

The Unit 1 combustion turbine received a hot section exchange inspection in 2013. At the time of the inspection, the unit had experienced 17,520 fired hours and 548 fired starts. During the inspection, the HPT rotor assembly, and the stage 1 and 2 nozzle assemblies were replaced. The combustor has no visual defects detected. The combustor for Unit 1 was previously replaced in 2011 when the unit was at 16,784 fired hours and 477 fired starts.

The unit has not yet received a major overhaul given its limited operating hours. The first major overhaul is planned for 30,000 hours.

#### **4.2.2.3.2 T.J. Labbé Unit 2**

In 2022, the Unit 2 combustion turbine underwent a borescope inspection in the Spring and in the Fall. The Spring borescope inspection was conducted by TransCanada Turbines and the Fall borescope inspection was conducted by TransCanada Turbines. At the time of the Spring inspection, Unit 2 had experienced 1,220 fired starts and 15,229 fired hours. At the time of the Fall inspection, Unit 2 had experienced 1,298 fired starts and 16,245 fired hours. During each borescope inspection, the inlet/compressor, combustion, turbine, and exhaust sections were evaluated. All sections were considered serviceable, and no major concerns were noted.

Unit 2 combustion turbine also received a hot section exchange inspection in 2015. At the time of the inspection, the unit had experienced 12,475 fired hours and 729 fired starts. During the inspection, the engine was shipped to Houston to receive a hot section replacement. The combustion chamber, the HPT rotor, and the stage 1 and 2 nozzle assemblies were also replaced. A new VBV expansion joint was installed.

The turbine was sent to a GE facility to undergo improvements to the air oil seals in Spring 2017. The unit has not yet received a major overhaul given its limited operating hours. The first major overhaul is planned for 30,000 hours.

#### **4.2.2.4 Fuel Supply**

Natural gas is delivered to T.J. Labbé at pressures in the range of 675 psig plus or minus 20 psig. As such, the three 50 percent natural gas compressors at Labbe are not needed and have been permanently bypassed and decommissioned in Spring 2017. The natural gas is delivered through a fuel gas strainer, gas flow meter, a primary and secondary shut off valve, a fuel gas manifold, and goes to the fuel nozzles.

Natural gas from the TransCanada pipeline is procured on behalf of LUS by The Energy Authority (TEA) who also bids the units in as MISO market participants. The quantity and price of gas is determined daily based on day-ahead nominations. T.J. Labbé does not have firm gas supply.

#### **4.2.2.5 Water Supply**

Water treatment at each site consists of chemical treatment, granular activated carbon (“GAC”) pre-filtration, cartridge filtration, reverse osmosis, and mixed bed demineralizer systems. The water treatment

system is used to meet the facilities' 143 gpm makeup water requirement for lost system water due to chiller cooling towers, water injection for NO<sub>x</sub> control, and for the SPRINT system.

City water supply is delivered under pressure to the inlet of the pre-filtration skid. Prior to entering the filtration system, the feed water supply is dosed with sodium meta bi-sulfite to remove chlorine. The GAC filter removes organic matter and any residual chlorine from the feed water supply prior to its use in the reverse osmosis system. The reverse osmosis system removes most of the dissolved solids from the feed water by using a high-pressure pump to force water through a membrane that removes contaminants. Each reverse osmosis train consists of two passes. The second pass outlet is tied to a mixed bed demineralizer which removes the remaining dissolved solids and silica from the feed water. The demineralized ("demin") water is stored in a 180,000-gallon storage tank at each site. Each site contracts with a third party to regenerate the mixed bed and carbon filters.

Additionally, T.J. Labbé has wastewater discharge restrictions, so there is a wastewater storage tank on site that manages the discharge.

#### **4.2.2.6 Plant Transmission Delivery**

Power at T.J. Labbé is generated by two 72 megavolt amperes ("MVA"), 13.8 kilovolts ("kV") turbine generators. Each generator sends electricity to a generator step-up ("GSU") transformer via cable bus systems. The GSUs at T.J. Labbé step the 13.8 kV power up to 230 kV. Each of the turbine generators also send electrical power to auxiliary transformers that drop the voltage down to 4.16 kV. The 4.16 kV from the auxiliary transformers is sent to the medium voltage ("MV") switchgear where it is relayed to the station service transformers and the chiller system. The station service transformers further step down the voltage from 4.16 kV to 480 V for station auxiliaries such as fans, pumps, and motors.

#### **4.2.2.7 Plant Staffing and Operations**

The facility is staffed 24 hours per day, 7 days a week, but can also be started and monitored remotely at the Hargis-Hébert facility.

#### **4.2.2.8 Environmental Permits and Compliance**

The Labbé plant holds current air permits for Title V and Acid Rain, as shown in Table 4-7. The facility's current Title V and Acid Rain permits expire on August 23, 2023. Per the Title V regulations, a renewal application must be submitted no less than six (6) months before the existing Title V permit expires. LUS submitted the Title V and Acid Rain Permit Renewal Application package for Labbé in June of 2022, with additional information provided in November of 2022. The Acid Rain permit requires quarterly reports on emissions of NO<sub>x</sub>, sulfur dioxide ("SO<sub>2</sub>"), and carbon dioxide ("CO<sub>2</sub>"). NO<sub>x</sub> from the turbines

is measured by CEMS with annual CEMS Relative Accuracy Testing Audit (“RATA”) testing. The turbines are classified as “gas-fired” under Acid Rain since fuel oil combustion is less than 10 percent of the annual capacity. However, the turbines may exceed this 10 percent threshold and become classified as “oil-fired.” Additional monitoring would be required as “oil-fired” units. However, the units do not currently have the ability to operate using fuel oil.

The Title V permit includes limits that make the facility a minor source for the Prevention of Significant Deterioration (“PSD”) program by limiting emissions of CO and NO<sub>x</sub>. The facility is a minor source of HAPs. The two turbines can burn natural gas, and the one black start generator burns fuel oil. The permit allows the facility to operate as a peaking plant, meaning that while actual emissions are low, the permit allows for significant operation as needed as long as the ton per year limits are not exceeded. The current Title V permit sets CO emissions to 239.11 tpy and NO<sub>x</sub> emissions to 241.37 tpy, while the application package for the renewal requested a change in emissions limits to 237.56 tpy for CO and 241.37 tpy for NO<sub>x</sub>. The emissions inventory for the site is due in April of the following year. As such, actual emissions data is not currently available for the Labbé site at the time of this preparation of this report. Emissions reported here are the finalized emissions submitted for 2021 to the Emissions Reporting and Inventory Center (ERIC) site. Actual emissions for 2021 were less than 13 tons NO<sub>x</sub>. The Title V permit allows fuel oil operation even though the turbines are not capable of burning fuel oil without a physical modification.

As presented in Table 4-8, Labbé holds sufficient allowances for its 2021 emissions under the Cross State Air Pollution Rule (“CSAPR”) for the May to September ozone season, based on previous years’ operation. A separate CSAPR permit is not required.

No excess emission events occurred in 2022 and no Notice of Violations (“NOVs”) were issued. All required quarterly, semi-annual, and annual reports were submitted.

**Table 4-7: T. J. Labbé Air Permits**

Permit Description	Permit Number	Issue Date	Expiration Date	Renewal Application Deadline	Renewal Application Submittal Date
Title V Operating Permit	1520-00128-V4	August 23, 2018	August 23, 2023	February 23, 2023	June 7, 2022
Acid Rain Permit	1520-00128-IV3	August 23, 2018	August 23, 2023	February 23, 2023	June 7, 2022

Source: LUS

**Table 4-8: T. J. Labbé Emission Allowances**

NO <sub>x</sub> Allowances Held at the Start of 2022 (tons)	2021 Ozone Season NO <sub>x</sub> Emissions (tons)	SO <sub>2</sub> Allowances Held at the Start of 2022
80	5	1,250

Source: LUS

### 4.2.3 Hargis-Hebert Plant

#### 4.2.3.1 Plant Description

Hargis-Hébert began commercial operation in 2006 and is nearly identical to T.J. Labbé. Hargis-Hebert consists of two GE simple cycle LM6000 PC aeroderivative combustion turbines. The turbines each have a nominal net output of 48 MW each. The turbines utilize GE's SPRINT system for increased power output and water injection to control NO<sub>x</sub> emissions.

The combustion turbines use natural gas as the fuel source, which is supplied by the Gulf South pipeline. Gas supply pressure to the site is sufficient to run the combustion turbines without compression.

To improve combustion turbine performance during warmer weather conditions, each unit is also equipped with an inlet chiller system. A TAS chiller system is capable of cooling the inlet air down to 48°F for optimum performance up to an ambient temperature of 90°F.

The exhaust stacks are equipped with CEMS to ensure that the turbines comply with emissions limits.

The facility is equipped with a 600-kW emergency generator that provides black start capability.

#### 4.2.3.2 Performance and Statistics

Table 4-9 and Table 4-10 present the historical operating statistics for the last five years for Hargis-Hebert.

**Table 4-9: Unit 1 Historical Operating Statistics**

Generation Statistics	2018	2019	2020	2021	2022	5-year Average
Gross Generation (MWh)	12,613	14,088	12,876	17,772	41,833	19,837
Net Generation (MWh)	11,822	13,494	12,301	17,039	40,992	19,130
Average Heat Rate (Btu/kWh) <small>(Note 1)</small>	11,354	11,956	13,438	12,312	11,094	12,031
Unit Capacity Factor (%)	3.0%	3.7%	3.2%	5.8%	13.5%	5.8%
Unit Service Factor (%)	7.8%	6.5%	5.9%	6.3%	13.7%	8.1%
Unit Starts	51	63	94	89	152	90
Availability Factor (%)	94.5%	90.7%	94.0%	93.2%	92.0%	92.9%
Forced Outage Rate (%)	1.8%	0.3%	0.0%	0%	3.4%	1.1%

*Note 1: Average Heat Rate is for the entire Hargis-Hebert plant and not specific to Unit 1.*

**Table 4-10: Unit 2 Historical Operating Statistics**

Generation Statistics	2018	2019	2020	2021	2022	5-year Average
Gross Generation (MWh)	12,429	12,571	9,008	15,619	39,231	17,771
Net Generation (MWh)	10,906	11,000	7,638	14,058	36,037	15,928
Average Heat Rate (Btu/kWh) <small>(Note 1)</small>	11,354	11,956	13,438	12,312	11,094	12,031
Unit Capacity Factor (%)	2.9%	3.5%	2.4%	5.4%	13.4%	5.5%
Unit Service Factor (%)	7.6%	6.7%	4.6%	5.1%	12.5%	7.3%
Unit Starts	50	88	55	91	141	85
Availability Factor (%)	94.3%	87.6%	91.6%	93.5%	92.0%	91.8%
Forced Outage Rate (%)	0.0%	0.0%	0.0%	0%	12.6%	2.5%

*Note 1: Average Heat Rate is for the entire Hargis-Hebert plant and not specific to Unit 2.*

The historical performance data from Hargis-Hebert are in line with anticipated values that Burns & McDonnell has observed in the industry. Overall, the reliability and availability of the units are considered to be good. During FY 2022 the plant operated much more than previous years primarily due to high market energy costs in MISO. Unit 2 saw an increase in the forced outage rate in FY 2022 however overall unit availability remained high. The plant performed very well during FY 2022 and proved to be financially beneficial and reliable for LUS's power costs.

### **4.2.3.3 Recent and Planned Upgrades and Maintenance**

LUS has chosen to perform the major maintenance inspections more frequently than recommended by GE due to feedback from other LM6000 owners in the industry. Inspection schedules are the same as for T.J. Labbé. Normal spring and fall borescopes were completed in FY 2022.

LUS has also continued to perform regular maintenance on the balance of plant equipment at Hargis-Hebert. This includes chiller building rehabs, stack inspections, and replacement of all canister filters.

Additional recent and planned projects at the plant include upgrades and minor repairs. These projects include painting the chiller building floor, replacing the exhaust expansion joint, painting the filter house roof, replacing the instrument air compressor, and replacing the instrument air dryer.

#### **4.2.3.3.1 Hargis-Hebert Unit 1**

Unit 1 received borescope inspections in the spring and fall of FY 2022. In Spring of 2022, the Unit 1 combustion turbine underwent a borescope inspection conducted by TransCanada Turbines. At the time of the inspection, Unit 1 had experienced 1,427 fired starts and 18,953 fired hours. In Fall of 2022, the Unit 1 combustion turbine underwent a borescope inspection conducted by TransCanada Turbines. At the time of the inspection, Unit 1 had experienced 1,523 fired starts and 20,035 fired hours. During the borescope inspection, the inlet/compressor, combustion, turbine, and exhaust sections were evaluated. All sections were considered serviceable, and no major concerns were noted.

The Unit 1 combustion turbine also received a hot section exchange inspection in 2013. At the time of the inspection, the unit had experienced 14,917 fired hours and 870 fired starts. During the inspection, the hot section was replaced except for the combustion chamber.

The unit has not yet received a major overhaul given its limited operating hours. The first major overhaul is planned for 30,000 hours.

#### **4.2.3.3.2 Hargis-Hebert Unit 2**

Unit 2 received borescope inspections in the spring and fall of FY 2022. In Spring of 2022, the Unit 2 combustion turbine underwent a borescope inspection conducted by TransCanada. At the time of the inspection, Unit 2 had experienced 1,387 fired starts and 19,548 fired hours. In Fall of 2022, the Unit 2 combustion turbine underwent a borescope inspection conducted by TransCanada. At the time of the inspection, Unit 2 had experienced 1,474 fired starts and 20,555 fired hours. During the borescope inspection, the inlet/compressor, combustion, turbine, and exhaust sections were evaluated. All sections were considered serviceable, and no major concerns were noted.

In 2012, Unit 2 received a hot section exchange performed by GE. At the time of the inspection, Unit 2 had experienced 14,680 operating hours and an unreported number of starts. The whole hot section was overhauled for the inspection. Repairs were made to the gaskets and oil pumps, and the unit was returned to good operating condition.

The unit has not yet received a major overhaul given its limited operating hours. The first major overhaul is planned for 30,000 hours.

#### **4.2.3.4 Fuel Supply**

Natural gas is delivered to Hargis-Hebert at pressures in the range of 675 psig plus or minus 20 psig. Hargis-Hebert does not have compressors, but the plant does have dew point heaters. The natural gas is delivered through a fuel gas strainer, gas flow meter, a primary and secondary shut off valve, a fuel gas manifold, and goes to the fuel nozzles.

Natural gas from the Gulf South pipeline is procured on behalf of LUS by TEA who also bids the units in as MISO market participants. The quantity and price of gas is determined daily based on day-ahead nominations. Hargis-Hebert does not have firm gas supply.

#### **4.2.3.5 Plant Transmission Delivery**

Power is generated by two 72 MVA, 13.8 kV turbine generators. Each generator sends electricity to a GSU transformer via cable bus systems. The GSUs at Hargis-Hebert step the 13.8 kV power up to 69 kV. Each of the turbine generators also send electrical power to auxiliary transformers that drop the voltage down to 4.16 kV. The 4.16 kV from the auxiliary transformers is sent to the MV switchgear where it is relayed to the station service transformers and the chiller system. The station service transformers further step down the voltage from 4.16 kV to 480 V for station auxiliaries such as fans, pumps, and motors.

#### **4.2.3.6 Water Supply**

Water treatment at each site consists of chemical treatment, GAC pre-filtration, cartridge filtration, reverse osmosis, and mixed bed demineralizer systems. The water treatment system is used to meet the facilities' 143 gpm makeup water requirement for lost system water due to cooling towers, water injection for NO<sub>x</sub> control and for the SPRINT system.

At each site, the city water supply is delivered under pressure to the inlet of the pre-filtration skid. Prior to entering the filtration system, the feed water supply is dosed with sodium meta bisulfite to remove chlorine. The GAC filter removes organic matter and any residual chlorine from the feed water supply prior to its use in the reverse osmosis system. The reverse osmosis system removes most of the dissolved



solids from the feed water by using a high-pressure pump to force water through a membrane that removes contaminants behind. Each reverse osmosis train consists of two passes. The second pass outlet is tied to a mixed bed demineralizer which removes the remaining dissolved solids and silica from the feed water. The demineralized water is stored in a 180,000-gallon storage tank. Each site contracts with a third party to regenerate the mixed bed and carbon filters. Due to low water pressures, the City has recently added a well near the Hargis-Hebert site that is untreated. The location of the well causes a higher percentage of untreated water to be supplied to Hargis-Hebert and the conductivity of the water is too high for the reverse osmosis system. Hargis-Hebert has recently installed carbon filters and Greensand filters to manage conductivity.

#### **4.2.3.7 Plant Staffing and Operations**

The facility is staffed 24 hours per day, 7 days a week, but can also be started and monitored remotely at the T.J. Labbe facility.

#### **4.2.3.8 Environmental Permits**

The Hargis-Hebert plant holds current air permits for Title V and Acid Rain, as shown in Table 4-11. The facility's current Title V and Acid Rain permits expire on August 17, 2023. Per the Title V regulations, a renewal application must be submitted no less than six (6) months before the existing Title V permit expires. LUS submitted the Title V and Acid Rain Permit Renewal Application package for Hargis-Hebert in June of 2022, with additional information provided in January of 2023. The Acid Rain permit requires quarterly reports on emissions of NO<sub>x</sub>, SO<sub>2</sub>, and CO<sub>2</sub>. NO<sub>x</sub> from the turbines is measured by CEMS with annual CEMS RATA testing. The turbines are classified as "gas-fired" under Acid Rain since fuel oil combustion is less than 10 percent of the annual capacity. However, the turbines may exceed this 10 percent threshold and become classified as "oil-fired." Additional monitoring would be required as "oil-fired" units. However, the units do not currently have the ability to operate using fuel oil.

The Title V permit includes limits that make the facility a minor source for the PSD program by limiting emissions of CO and NO<sub>x</sub>. The facility is a minor source of HAPs. The two turbines can burn natural gas, and the one black start generator burns fuel oil. The permit allows the facility to operate as a peaking plant, meaning that while actual emissions are low, the permit allows for significant operation as needed as long as the ton per year limits are not exceeded. The current Title V permit sets CO emissions to 239.11 tpy and NO<sub>x</sub> emissions to 241.37 tpy, while the application package requested a change in emission limits to 248.07 tpy of COC and 242.11 tpy of NO<sub>x</sub>. These updated values requested utilize the 2021 emissions testing that occurred on the U-1 and U-2 turbines in the emissions calculations. The emissions inventory for the site is due in April of the following year. As such, actual emissions data is not

currently available for the Hargis-Hebert site at the time of preparing this report. Emissions reported here are the finalized emissions submitted for 2021 to the Emissions Reporting and Inventory Center (ERIC) site. Actual emissions for 2021 were less than 17 tons NO<sub>x</sub>. The Title V permit allows fuel oil operation even though the turbines are not capable of burning fuel oil without a physical modification.

As shown in Table 4-12, Hargis-Hebert holds sufficient allowances for its 2022 emissions under the CSAPR for the May to September ozone season, based on previous years' operation. A separate CSAPR permit is not required.

No excess emission event or deviations occurred in 2022 and no NOV's were issued. All required quarterly, semi-annual, and annual reports were submitted as required.

**Table 4-11: Hargis-Hebert Air Permits**

Permit Description	Permit Number	Issue Date	Expiration Date	Renewal Application Deadline	Renewal Application Submittal Date
Title V Operating Permit	1520-00128-V4	August 17, 2018	August 17, 2023	February 17, 2023	June 7, 2022
Acid Rain Permit	1520-00131-IV3	August 17, 2018	August 17, 2023	February 17, 2023	June 7, 2022

Source: LUS

**Table 4-12: Hargis-Hebert NO<sub>x</sub> Emission Allocations**

NO <sub>x</sub> Allowances Held at the Start of 2022 (tons)	2021 Ozone Season NO <sub>x</sub> Emissions (tons)	SO <sub>2</sub> Allowances Held at the Start of 2022
73	6	1,311

Source: LUS

## 4.2.4 Rodemacher Unit 2

### 4.2.4.1 Plant Description

Rodemacher Unit 2 is a coal-fired steam electric generating unit located at the Brame Energy Center in Lena, Louisiana with an output of approximately 523MW (gross). Rodemacher Unit 2 entered commercial operation in 1982 and is jointly owned by LPPA (50 percent), Cleco (30 percent), and LEPA (20 percent). LPPA's ownership share of Rodemacher Unit 2 is 261.5 MW of capacity and the related energy output. Rodemacher Unit 2 is operated by Cleco, but each owner dispatches their share of the total capacity. Each owner self-schedules Rodemacher Unit 2 at minimum load and then economically

dispatches the remaining capacity into the MISO market. LPPA has a power sales contract with the City of Lafayette in which the City agrees to purchase all of LPPA's share of the capacity and energy produced by Rodemacher Unit 2.

The Joint Ownership Agreement defines the LPPA's authority regarding decision making and operation of Rodemacher Unit 2. Cleco is required to provide relevant information to the Joint Owners regarding finances, operations, and future decisions. The Joint Owners require more than 50 percent ownership approval for any major changes regarding operations or finances. LPPA's 50 percent ownership stake provides the authority to reject major changes or request further analysis. This reduces the risk of the other owners could make changes that would adversely impact LPPA. The Joint Owners Agreement is effective through June 30, 2032.

Rodemacher Unit 2 generates electric power using a pulverized coal-fired, natural circulation, reheat boiler manufactured by Foster Wheeler. The boiler has a maximum continuous rating ("MCR") of 3,800,000 pounds per hour ("lb/hr") of steam at the superheater outlet pressure of 2,620 pounds per square inch gauge ("psig") and temperature of 1,005 degrees Fahrenheit ("°F"). The reheater is designed for an operating temperature of 1,005°F. The coal arrives on site via rail with rotary dump cars. Coal is prepared for the boiler by five roller wheel coal mills.

The boiler has a balanced draft furnace with combustion air being supplied by two 50-percent forced draft fans. The boiler was initially designed to burn various types of coal and natural gas, but primarily burns Powder River Basin ("PRB") coal and starts up on natural gas. Rodemacher Unit 2 has one motor driven startup boiler feed pump capable of allowing the unit to achieve approximately 330 MW and one 100 percent capacity turbine driven boiler feed pump capable of operating between minimum load and full load. Feedwater and condensate are heated to economizer inlet conditions utilizing four low pressure ("LP") feed water heaters ("FWHs"), a deaerator ("DA"), and two high pressure ("HP") feedwater heaters. Rodemacher Unit 2 also utilizes a GE steam turbine generator ("STG"), which is a four casing, single reheat, tandem compound, four flow condensing unit. The generators are rated at 496 MVA. Cooling water for the Unit is circulated through a two-shell single pass condenser. Cooling water for the steam turbine condenser and closed cooling water system is supplied by Lake Rodemacher. Lake Rodemacher is a man-made lake built specifically for Brame Energy Center.

For emissions controls, Rodemacher Unit 2 utilizes a selective non-catalytic reduction ("SNCR") system with urea injection for NO<sub>x</sub> reduction and an electro-static precipitator ("ESP") for 99.5 percent removal of fly ash. Rodemacher Unit 2 also uses a dry sorbent injection system for acid gas control and added a

fabric filter baghouse for additional particulate emissions controls to comply with EPA Mercury and Air Toxic Standards (“MATS”) requirements.

#### 4.2.4.2 Performance and Statistics

Table 4-13 summarizes the historical operating statistics for the last five years for Rodemacher Unit 2.

**Table 4-13: Rodemacher Unit 2 Historical Operating Statistics**

Generation Statistics	2018	2019	2020	2021	2022	5-year Average
Gross Generation (MWh)	2,555,929	2,532,781	1,614,522	2,480,497	2,247,810	2,286,308
Net Generation (MWh)	2,278,751	2,269,151	1,392,344	2,243,695	2,014,148	2,039,618
Average Heat Rate (Btu/kWh)	11,385	11,085	12,284	11,461	11,431	11,529
Unit Capacity Factor (%)	52.7%	52.6%	32.1%	51.7%	46.4%	47.1%
Availability Factor (%)	89.5%	90.1%	69.7%	75.6%	77.4%	80.5%
Forced Outage Rate (%)	3.2%	2.4%	5.7%	5.1%	0.4%	3.4%

Source: LPPA Manager’s Monthly Reports

Rodemacher Unit 2 has been a relatively reliable unit with an average Forced Outage Rate of 3.4 percent over the last five years. In 2022, the forced outage rate was much lower than previous years, but the capacity factor for the unit was lower. While market energy prices and fuel costs were much higher throughout 2022, which would have otherwise resulted in higher levels of production, the unit capacity factor remained low due to persistent coal availability and delivery challenges throughout most of FY 2022. Rail transportation was constrained through most of FY 2022 and is expected to continue into FY 2023. The Rodemacher Unit 2 coal inventory reached multi-year lows towards the end of the FY 2022 summer season however LPPA rebuilt the inventory throughout the fall months in advance of the winter to hedge against potential high market energy pricing in the winter months.

#### 4.2.4.3 Recent and Planned Upgrades and Maintenance

A major steam turbine inspection is scheduled every six years, which is in line with industry standards. Rodemacher Unit 2 underwent a major steam turbine overhaul in the fall of 2020. This included maintenance activities associated with the main turbine valves, inspection of turbine components, and replacing a row of LP turbine blades. The total outage duration was 102 days. Turbine valve inspections

and a turbine chemical cleaning is planned for the spring 2024 outage.

Rodemacher Unit 2 has continued to monitor and maintain the boiler tubes and duct work. The last boiler chemical clean was in 2016 and the next one is scheduled for the Spring 2023 outage. Tube samples are taken annually to determine when chemical cleaning is needed. The drum is inspected annually, and no major issues have been found.

During 2022, the Joint Owners completed various maintenance and repairs to Rodemacher Unit 2 including replacing a coal conduit, replacing condenser water boxes, upgrading 69 kV switchgear relays, replacing boiler area sump pumps, replacing service water strainers, upgrading freeze protection in some areas of the plant, replacing conveyor belting on the D conveyor, upgrading baghouse controls, and making upgrades to the coal handling equipment controls. Many of these projects were shown to Burns & McDonnell during the site visit in February 2023.

The Joint Owners have approved and are planning to complete a number of maintenance and repair projects to Rodemacher Unit 2 including replacing the belting on conveyor C, replacement of bottom ash controls, replacement of a coal conduit, minor upgrades to the PA lube oil skid, installation of a mill door opening system, replacing the station air compressors, replacement of a small emergency generator, additional replacements of condenser water boxes, and the replacement of a service water strainer. Many of these small projects will be completed in the spring or fall outages.

Other than the \$2 million baghouse bag and cage replacement planned for FY 2023, no other major maintenance activities are currently planned for the next several years.

#### **4.2.4.4 Fuel Supply and Ash Handling**

The Joint Owners purchase coal from Arch Coal Sales, Inc., Navajo Transitional Energy Company (“NTEC”), and Peabody COALSALES, LLC. In November 2021, the owners entered into another coal contract with Coal Network, LLC. The coal is sourced from the Powder River Basin in Wyoming. LPPA owns two unit-trains for rail transportation to the facility. The existing contracts allow the coal to either be rejected or allow for a price adjustment if the heat content is too low or the sulfur content is too high. The bottom ash and fly ash from Rodemacher Unit 2 is removed from site by truck and sold for beneficial reuse by Charrah, Inc. The Joint Owners have an agreement with Charrah through 2025.

#### **4.2.4.5 Plant Transmission Delivery**

Rodemacher Unit 2 sends electric power from the switch station via five transmission lines, all of which operate at 230kV. The transmission lines service Clarence, Leesville, Rapides, Sherwood, and St. Landry. LUS has had a firm transmission agreement for the plant since it was commissioned. LUS decided to

terminate the firm transmission agreement with Cleco. After the end of the contract, LUS realized an increase in network integrated transmission service (“NITS”) cost. The total annual net savings to LUS from the reduction in Cleco transmission charges and increased NITS charges is over \$6 million per year.

#### **4.2.4.6 Water Supply**

Water is supplied from Lake Rodemacher. The water is pretreated with ultra-filtration (“UF”) and then sent through a RO and a demineralizer. There are two 250,000-gallon aluminum tanks that hold the demineralized water. Hydrazine and phosphate are used to treat boiler water in the drum. The lake is self-contained and is not subject to Clean Water Act, Section 316(b) requirements.

#### **4.2.4.7 Plant Staffing and Operations**

Cleco provides maintenance and operations staffing for Rodemacher Unit 2. The unit is staffed 24 hours a day, 7 days a week.

#### **4.2.4.8 Future Decommissioning and Conversion**

Rodemacher Unit 2 would require significant modifications by 2027 to comply with CCR and effluent limitation guidelines (ELG) rules and continue to operate utilizing coal. Due to the cost associated with these modifications, the Joint Owners have decided that prior to the required compliance date, Rodemacher Unit 2 will stop utilizing coal in the future. The Joint Owners are still evaluating whether Rodemacher Unit 2 should be retired or converted to burn natural gas. Either alternative is expected to be a major expenditure, and LUS would be responsible for 50 percent of the total cost. LUS is already planning to spend approximately \$12 million for pond closure cost before the end of FY 2027 and has already incurred \$2 million in costs for that project in FY 2022.

#### **4.2.4.9 Environmental Permits and Compliance**

##### **4.2.4.9.1 EPA Clean Air Act Greenhouse Gas Regulation**

On January 19, 2021, the United States Court of Appeals for the District of Columbia Circuit vacated the Trump Administration’s Affordable Clean Energy (“ACE”) Rule, which had in turn replaced the Clean Power Plan (“CPP”) of the Obama Administration. The Biden Administration is expected to start fresh in implementing its own climate change agenda. The EPA is undertaking a new rulemaking to establish emission guidelines for existing fossil fuel-fired electric generating units (EGUs) under CAA 111(d). The EPA anticipates issuing a proposed rule in the spring of 2023 and promulgating a final rule by Summer of 2024. However, no rule is currently published in the Federal Register for this action.

#### **4.2.4.9.2 EPA “Good Neighbor Rule” and the 2015 Ozone NAAQS**

When the 2015 Ozone NAAQS was promulgated, 26 states had to submit a State Implementation Plan (SIP) outlining how the state would meet the applicable requirements of the rule. Louisiana was one of these states and had until October 1, 2018 to submit the SIP for the new rule. Louisiana submitted a SIP on November 13, 2019 for the 2015 Ozone NAAQS. The EPA officially disapproved Louisiana’s SIP (along with 18 other states) in early 2023.

In late February of 2022, the EPA administrator signed a proposed Federal Implementation Plan (FIP) that impacts 26 states, including Louisiana. The FIP was established in order to prevent transportation of ozone and ozone precursors from the identified 26 states from contributing to problems attaining and maintaining the 2015 ozone NAAQS in states downwind. By reducing these downwind impacts, these states would meet their “Good Neighbor” obligations for the 2015 ozone NAAQS. Similar to other transport rules, the rule would establish an allowance-based ozone season trading program with NO<sub>x</sub> emissions budgets for fossil fuel power generation sources in 25 states, and NO<sub>x</sub> emissions limitations for industrial sources in 23 states.

The actual impacts of the “Good Neighbor Rule” on generating facilities in Louisiana are still being determined. The proposed Good Neighbor Plan was published in the Federal Register in April of 2022, with a public comment period lasting until June 21, 2022. The EPA began the process of revising administrative deadlines under seven allowance trading programs for NO<sub>x</sub> and SO<sub>x</sub> as a part of the Plan published in April of 2022. A finalized rule was released in late March 2023 and LUS and Burns & McDonnell are still evaluating how this will impact the Plants.

#### 4.2.4.9.3 Environmental Permits and Compliance

Table 4-14 summarizes the key environmental permits for Rodemacher Unit 2.

**Table 4-14: Rodemacher Unit 2 Key Permits**

Permit Description	Permit Number	Regulatory Authority <sup>1</sup>	Expiration Date	Renewal Application Deadline
Title V Operating Permit	2360-00030-V4	LDEQ	February 20, 2024	August 20, 2023
Acid Rain Permit	2360-00030-IV5	EPA	February 20, 2024	August 20, 2023
LPDES Permit <sup>2</sup>	LA0008036	LDEQ	September 30, 2019	Submitted March 13, 2019, Numerous addenda 2020-2023
Solid Waste Standard Type I Permit (metal cleaning waste pond, bottom ash pond, and fly ash pond)	P-0005R1	LDEQ	November 18, 2026	Must renew every 10 years.
Solid Waste Standard Type I (coal sedimentation pond)	P-0062R1	LDEQ	November 18, 2026	Must review every 10 years.
Radioactive Material License	LA-3719-L01	LDEQ	May 31, 2023	30 calendar days prior to expiration
Spill Prevention and Control - Spill Prevention, Control, and Countermeasure ("SPC-SPCC") Plan	N/A	EPA	Last revised July 2021	Plan review must be completed every 5 years.
Hazardous Waste Generator ("RCRA") <sup>3</sup>	LAD071941611	EPA	N/A	N/A

Source: LUS

<sup>1</sup> LDEQ = Louisiana Department of Environmental Quality, EPA = U.S. Environmental Protection Agency

<sup>2</sup> Facility operating under existing Louisiana Pollutant Discharge Elimination System (LPDES) permit (administratively continued)

<sup>3</sup> RCRA = Resource Conservation and Recovery Act

#### 4.2.4.9.4 National Ambient Air Quality Standards

The Clean Air Act requires EPA to set National Ambient Air Quality Standards ("NAAQS") for pollutants that are common in outdoor air, considered harmful to public health and the environment.

Rapides Parish is currently designated as attainment for all criteria pollutants; however, the Parish to the south (Evangeline) is non-attainment for SO<sub>2</sub>. EPA updates the NAAQS every five years. The PM<sub>2.5</sub>



NAAQS has been subject of current scientific inquiry in the past several years. On January 6, 2023, the EPA announced a proposed decision to lower the annual PM<sub>2.5</sub> NAAQS from its current level (set at 12.0 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ )) to a value between 9.0  $\mu\text{g}/\text{m}^3$  and 10.0  $\mu\text{g}/\text{m}^3$ . A lowering of the PM<sub>2.5</sub> NAAQS would likely create new non-attainment areas in Louisiana and could affect the operation of any coal-fired boiler.

#### **4.2.4.9.5 Air Emissions and Opacity Limitations**

Unit 2 operates utilizing coal, natural gas, and number 6 fuel oil to generate up to 523 MW (gross). Emissions are controlled by activated carbon injection, dry sorbent injection, fabric filter baghouse, and a selective non-catalytic reduction control device.

SO<sub>2</sub> and NO<sub>2</sub> emissions are covered in the Acid Rain permit. Emissions are lower than the limits, as presented in Table 4-15 and Table 4-16. The SO<sub>2</sub> limit was lowered to comply with the Regional Haze Rule State Implementation Plan. Emissions controls were added to comply with CSAPR and MATS. The SNCR has been installed and is used during the ozone season (May 1 to September 30). Rodemacher received 995 tons for the NO<sub>x</sub> ozone season allocations in 2020. For 2021, 2022, and 2023 Rodemacher 2 will only receive 875 NO<sub>x</sub> ozone season allocations. LUS will monitor the run hours during the ozone season to stay below the allocations issued to LPPA. LPPA should have approximately 24 allowances in the bank prior to allowance distribution of 2022.

The final CSAPR changes were signed March 15, 2021, which encourage plants to increase use of NO<sub>x</sub> controls by turning them on more often and/or using more reagent to achieve a lower NO<sub>x</sub> rate when they are operating. Rodemacher 2 will likely need to increase use of the SNCR to decrease emissions.

No excess emission event occurred in 2022 and no NOV's were issued. The facility did experience odor complaints on: September 1, September 20, and October 12, 2022 when an old ash pond was being cleaned and material was being hauled to a landfill. Air quality inspectors from the Kisatchie Central Regional Office were deployed onsite on October 18, 2022 to investigate the complaints. Faint odors were observed between the complainant residences and the facility, but no detectable readings were observed with the monitor. Several readings were observed with the odor monitor onsite near the ash pond during this investigation. The facility began mitigation activities on October 20, 2022. No violations were found as a part of these odor complaints. All required quarterly, semi-annual, and annual reports were submitted. No deviations were reported for 2022.

**Table 4-15: LPPA Rodemacher Unit 2 SO<sub>2</sub> Emissions**

Year	Annual Average (lb/MMBtu)	Permit Limit (lb/MMBtu)	Total Annual (tpy)	Annual Allocation (tpy)
2018	0.33	1.2	4,726	18,212
2019	0.24	0.3	3,040	18,212
2020	0.24	0.3	1,649	18,212
2021	0.25	0.3	1,520	18,212
2022	0.24	0.3	1,678	18,212

Source: LUS

**Table 4-16: LPPA Rodemacher Unit 2 NO<sub>2</sub> Emissions**

Year	Annual Average (lb/MMBtu)	Permit Limit (lb/MMBtu)	Total Annual (tpy)	Ozone Season (tpy)
2018	0.22	0.46	3,268	1,488
2019	0.22	0.46	2,706	1,033
2020	0.18	0.46	1,257	699
2021	0.21	0.46	1,180	659.39
2022	0.20	0.46	1,360	376.05

Source: LUS

#### 4.2.4.9.6 Allocations

Brame Energy Center held sufficient allowances for its emissions, as shown in Table 4-17.

**Table 4-17: Rodemacher Unit 2 Emission Allocations (LUS Portion Only)**

2022 NO <sub>x</sub> Allowances Allocated (tons)	2022 Ozone Season NO <sub>x</sub> Emissions (tons)	2022 SO <sub>2</sub> Allowances Allocated (tons)	2022 SO <sub>2</sub> Emissions (Tons)
437.5	379.05	9,106	1,678

Source: LUS

#### 4.2.4.9.7 Cooling Water Supply and 316(b) Regulation

Cooling tower and boiler makeup water is pumped from a screened water intake structure at Lake Rodemacher. Rainfall and storm water runoff provides makeup to Lake Rodemacher for water lost to evaporation. As determined by LDEQ, Lake Rodemacher is not subject to Section 316(b) of the Clean Water Act because it was constructed to support power generation operations and is not considered “waters of the State.”

#### 4.2.4.9.8 Wastewater Discharge Permit

LPDES Permit No. LA0008036 authorizes the discharge of operational wastewaters and storm water from the Brame Energy Center to surface waters of the State. It also establishes monitoring, reporting, and

recordkeeping requirements for wastewater and storm water discharges, including effluent limitations specific to wastewater types and outfall locations. Although the LPDES Permit expired on September 30, 2019, a timely renewal application was submitted on March 13, 2019, and the conditions of the expired permit are administratively continued until the effective date of a new permit, as governed by LAC 33:IX.2321. Cleco responded to information requests from LDEQ in March, May, and July 2021 to support development of the new draft LPDES Permit.

On June 29, 2021, LDEQ provided Cleco with a working draft of the proposed LPDES Permit for Cleco's technical review. Cleco's consultant, CK Associates, responded on July 8, 2021, stating that the preliminary draft permit has significant changes from the expired LPDES Permit that require revision, as detailed on the Worksheet for Technical Review provided by LDEQ. CK Associates further responded on July 14 and 19, 2021 with additional information to address opposition to proposed new pH monitoring at internal Outfalls 801 and 901, which were added to demonstrate compliance with EPA's Effluent Limitation Guidelines.

Between 2021 and 2023, Cleco submitted additional addenda to the LPDES Permit renewal application, submitted on March 13, 2019. On July 22, 2021, an addendum to update the long-term average total lead concentrations to be used in the water screening model was submitted in which Cleco conducted three additional sampling and analysis events for total lead at Outfall 001, and the results were non-detect at the Minimum Quantification Level for total lead ( $<2 \mu\text{g/L}$ ). On February 9, 2022, Cleco submitted two permit application addenda: in the first, data for whole effluent toxicity (WET) testing and a priority pollutant scan from the 001 discharge location (although the outfall was not actually discharging) to demonstrate that a toxicant was not present and the proposed Outfalls 01A and 01B added to the preliminary draft permit were not necessary. In the second submittal on February 9, 2022, Cleco noted that the more stringent copper limits included in the preliminary draft permit were derived using low flow and total suspended solids (TSS) values for the receiving stream that would not occur during discharge, since Outfall 001 only discharged during high rainfall events. Cleco also responded to LDEQ's questions on January 17, 2023, explaining that Unit 3 was a circulating fluidized bed (CFB) and did not generate bottom ash.

Based on review of the EPA ECHO and LDEQ online systems, Rodemacher 2 has no outstanding NOV's, or material compliance issues associated with the LPDES Permit.

The EPA ECHO database indicated there were no effluent limit exceedances recorded.

#### 4.2.4.9.9 Wastewater Effluent Limitation Guidelines

When a 2009 study found the ELGs, established in 1982, to be ineffective to address metals and other pollutants discharged from steam electric power generating facilities, the EPA finalized new ELGs (40 CFR 423) on September 30, 2015, which focused on wastewater streams generated by coal-fired steam electric plants: flue gas desulfurization (FGD), fly ash, bottom ash, flue gas mercury control, and gasification of fuels including coal and petroleum coke. In September 2017, the compliance dates for FGD wastewater and bottom ash transport water ELGs were postponed for two years to allow EPA additional time to review and reconsider the rule for these two effluent streams. However, November 1, 2018, compliance date for fly ash transport water and flue gas mercury control wastewater remained in effect. Cleco indicated that the ELGs for these two wastewater streams are met with existing plant equipment and procedures.

In November 2019, the EPA issued the 2019 Proposed Revision to the Steam Electric Effluent Guidelines for FGD wastewater and bottom ash transport water, which changed the technology basis for treatment of these effluent streams, revised the voluntary incentives program for FGD wastewater, and added subcategories for high-low facilities, low utilization boilers, and boilers retiring by 2028. The 2019 revision established a December 31, 2023, compliance deadline for bottom ash transport water and a December 31, 2025, compliance deadline for FGD wastewater. These proposed revisions were finalized as the 2020 Steam Electric Reconsideration Rule, were published in the Federal Register on October 13, 2020, and became effective on December 14, 2020.

On January 8, 2021, Cleco submitted responses to LDEQ's request for additional information, including a copy of Rodemacher Unit 2's Notice of Planned Participation per 40 CFR 423.19(f) to permanently cease combustion of coal by December 31, 2028. As communicated to LDEQ, Cleco plans to permanently cease coal-fired operation of Rodemacher Unit 2, the only unit at the facility that discharges bottom ash transport water, by the third quarter of 2027 in order to achieve complete closure of the associated CCR impoundments prior to the October 17, 2028, CCR Part A deadline. Therefore, the facility would be classified as an Electric Generating Unit ("EGU") Permanently Ceasing Coal Combustion ("PCCC") by December 31, 2028.

In 2021, upon review of the 2020 Steam Electric Reconsideration Rule and finding opportunities for improvement, the EPA initiated a supplemental rulemaking to strengthen certain discharge limits in the Steam Electric Power Generating category (40 CFR Part 423). On March 8, 2023, the EPA released a pre-publication version of its proposed rule; public comment on the proposed rule will be open for 60 days after publication in the *Federal Register*. The current regulations—both the 2015 and 2020 rules—will be

implemented and enforced while this supplemental rulemaking is in development. Among other requirements, the pre-publication ELGs include additional requirements to make data available to the public through a website. Data must be posted with 30 days of submittal to the regulatory agency and includes requirements for combustion residual leachate monitoring for 18 analytes.

LDEQ has previously communicated to Cleco that the final 2020 ELGs will be implemented in the renewed LPDES Permit. However, there is currently no due date to finalize the 2023 ELGs.

#### **4.2.4.9.10 Coal Combustion Residuals – EPA Compliance**

On December 19, 2014, the EPA finalized the Coal Combustion Residuals (“CCR”) Rule, and it was published in the Federal Register (40 CFR 257) on April 17, 2015, and became effective on October 14, 2015. Rodemacher Unit 2 has two surface impoundments (Fly Ash Pond and Bottom Ash Pond) subject to the CCR Rule. Because the final CCR Rule classifies coal ash as solid waste rather than hazardous waste, Rodemacher Unit 2 continues to market and sell most of its fly ash and bottom ash for beneficial use. Although the CCR Rule redefined beneficial use, it does not affect beneficial use applications that were initiated before October 2015.

The CCR Rule also establishes minimum criteria for CCR landfills, CCR surface impoundments, and all lateral expansions of CCR units, including location restrictions, liner design criteria, structural integrity requirements, operating criteria, groundwater monitoring and corrective action requirements, closure and post-closure care requirements, and recordkeeping and notification requirements. CCR surface impoundments that do not receive CCR after the effective date of the rule, but still contain water, are still subject to applicable regulatory requirements.

The final CCR Rule required the owner or operator of an existing CCR surface impoundment to document, no later than October 17, 2016, whether the impoundment was constructed to meet the liner requirements included in 40 CFR 257.71. To comply with this requirement, Cleco obtained certification from a qualified professional engineer (Providence Engineering and Environmental Group LLC) attesting that both the Fly Ash Pond and the Bottom Ash Pond meet the requirements of the final CCR Rule.

On December 2, 2020, Cleco notified LDEQ of its intent to comply with the site-specific alternative to initiation of closure due to permanent cessation of a coal-fired boiler by a certain date for the Bottom Ash Pond at the Brame Energy Center, pursuant to 40 CFR § 257.106(i)(18). In accordance with 40 CFR § 257.103(f)(2), Cleco submitted a demonstration seeking to qualify for these alternative closure requirements to the EPA on November 12, 2020. A revised demonstration was submitted to the EPA on

November 25, 2020. The EPA made notification on January 11, 2022, that the demonstration met the completeness requirement and that it would continue evaluating the request for approval.

Additionally, a CCR Groundwater Monitoring Program, including a network of five upgradient and four downgradient monitoring wells, was established to verify the integrity of the pond liners, as required by 40 CFR 257.91 of the CCR Rule. The 2021 Annual Groundwater Monitoring Report was completed in January 2022, which indicates that no confirmed Statistically Significant Increases (“SSIs”) were observed in downgradient/compliance wells.

Annual inspections of the Fly Ash Pond and Bottom Ash Pond were conducted in December 2021 by Providence Engineering and Environmental Group LLC. The Fly Ash Pond inspection found the reservoir to be in satisfactory condition, and no corrective actions were required. The Bottom Ash Pond inspection report states that the reservoir and slopes are in satisfactory condition, and no corrective actions were required. Annual inspections and maintenance will continue until pond closure is complete.

Additionally, Cleco submitted the following documents in 2021 to the EPA for the Bottom Ash Pond and Fly Ash Pond in accordance with the CCR Rule: Annual Fugitive Dust Report, Hazard Potential Assessment, Safety Factor Assessment, Structural Stability Assessment, and Inflow Design Flood Control Plan.

#### **4.2.4.9.11 Coal Combustion Residuals – LDEQ Compliance**

In conformance with the Louisiana Solid Waste Regulations (LAC 33:VII), Cleco developed a Closure Plan for both the Fly Ash Pond and Bottom Ash Pond (Type 1 Surface Impoundments), both dated October 2016. A Revised Closure Plan for the Fly Ash Pond was submitted to the LDEQ for review in September 2021. The revised plan includes an update to the final closure methodology for the Fly Ash Pond to comply with the Federal CCR Rule. Cleco intends to complete the closure activities in 2024 and plans to convert the area to a non-CCR landfill as part of the existing landfill onsite. LDEQ performed a technical review of the Revised Closure Plan and provided comments on February 1, 2022, regarding items not considered in conformance with the applicable sections of LAC 33:VII.

On June 15, 2021, Cleco provided notice to LDEQ of the installation of a temporary ash storage and dewatering area. A concrete-lined temporary ash storage area was constructed in late 2021 near the northwest levee of the Bottom Ash Pond to temporarily store and handle fly ash, abrasives, sodium carbonate (tank bottoms), neutralized waste/fly ash, and spent activated carbon/Trona. These are materials that would normally have been sent to the Fly Ash Pond. The material stored in the temporary storage area are dry upon placement, and contact storm water is collected in an engineered sump, pumped to the

Bottom Ash Pond, and eventually discharged in accordance with the LPDES Permit. The temporary storage area is only used during plant outages and is not designed to permanently dispose of any solid waste. Vacuum trucks can unload on this temporary storage pad, and when there is enough ash accumulated to justify a trip to the offsite landfill, or the precipitator maintenance activities are complete, the plant will load the material into a standard haul truck.

In accordance with Rodemacher's Solid Waste Standard Permit Type 1 (P-0005RI), Cleco is also required to submit semi-annual groundwater monitoring results for the Metal Cleaning Waste Pond, Bottom Ash Pond, and Fly Ash Pond. The Brame Energy Center is split into two groundwater monitoring systems: the "ash ponds" on the eastern side of the site and the "metal ponds" on the western side. Twenty-one groundwater monitoring wells are located adjacent to the solid waste permitted facilities. The results of the May 2021 sampling event were submitted in the First Half 2021 Groundwater Monitoring Report to the LDEQ in August 2021. The results of the October 2021 sampling event were submitted in the Second Half 2021 Groundwater Monitoring Report to the LDEQ in January 2022.

Additionally, LDEQ provided comments on Cleco's 2021 Groundwater Assessment Work Plan on September 21, 2021.

#### **4.2.4.9.12 Oil Storage and Spill Prevention**

The SPC-SPCC Plan for the Brame Energy Center was written in accordance with State and Federal regulations, including Title 33, Part IX Chapter 9 of the Louisiana Administrative Code (LAC 33:IX.Chapter 9) and 40 CFR 112. The State Spill Prevention and Control (SPC) regulation establishes requirements for contingency planning and implementation of operating procedures, and best management practices to prevent and control the discharge of pollutants resulting from spill events. The Federal SPCC regulation establishes operating procedures, best management practices, equipment, and other requirements to prevent the discharge of oil from non-transportation-related onshore and offshore facilities. The combined SPC-SPCC Plan must be reviewed at least every five years and was most recently revised in July 2021. Brame Energy Center responded to 0 reportable oil spills in 2022.

The Facility Response Plan (FRP) regulation (40 CFR 112.20) applies to those facilities that may reasonably be expected to cause substantial harm to the environment by discharging oil. The FRP for the Brame Energy Center addresses 40 CFR 112.20.f.1.ii (i.e., those facilities whose total oil storage capacity is greater than or equal to 1 million gallons). LPPA has no ownership interest in, nor liability for, the fuel oil storage tanks on the Brame Energy Center site.

## 4.2.5 Retired Sites of Bonin and Rodemacher

The Bonin site is retired from electric generation and is the location of the LUS operations center. The Bonin plant still has the existing switchyard and gas transmission line to the site. LUS is currently considering using the Bonin site for future gas-fired generation; however, no final decisions have been made by LUS. Curtis Rodemacher was retired in June 2000 and ongoing site monitoring includes periodic inspections, with asbestos abatement and lead paint removal, as required.

### 4.2.5.1 Environmental Compliance

The Acid Rain and Title V permits for the Doc Bonin facility were withdrawn in February 2017. The facility had three EGUs. Unit 1 last operated on June 22, 2011, and was put into cold storage on June 1, 2013. Unit 2 last operated on July 5, 2013, and was put into cold storage on June 29, 2014; Unit 3 last operated on August 27, 2013, and was put into cold storage on June 29, 2014. When Bonin was put into cold storage, the CSAPR allowances were transferred to Labbé and Hargis-Hebert. Then the EPA recalled Bonin's CSAPR 2021 – 2024 NO<sub>x</sub> allowances when it implemented Group 3 of the CSAPR NO<sub>x</sub> Ozone season. However, since Bonin's account was empty, LUS had to re-transfer allowances back to Bonin. These allowances were transferred before the July 13, 2021 deadline and LUS met the Group 2 recall requirement. In 2016, MISO agreed to the retirement of Bonin since Units 2 and 3 were not needed for reliability.

LUS submitted a Request for Termination of its LPDES Permit (No. LA0005711), which authorized the discharge of operational wastewaters and storm water from the Doc Bonin facility, on May 5, 2019. In response, LDEQ issued a letter on August 16, 2019, stating that the LPDES Permit had been allowed to expire, and the permit number was removed from the LDEQ system. Prior to LPDES Permit termination, LUS applied for permit authorization under LDEQ's Storm Water Multi-Sector General Permit ("MSGP") for continued coverage of storm water discharged from the Doc Bonin site. The MSGP (No. LAR05Q054) was authorized on April 24, 2019, and reissued on October 27, 2021.

The Doc Bonin site is no longer required to adhere to regulated materials storage and spill response requirements from the EPA and LDEQ, as fuel oil tanks and other regulated materials storage vessels have been removed from the site. Contaminated soil from historic fuel oil storage has also been removed.

On December 21, 2017, EPA published approval of the Louisiana State Implementation Plan for Regional Haze in the Federal Register. The effective date of the SIP was January 22, 2018. The Plan's requirements for Rodemacher II have been complied with by using existing equipment and participation in the Cross State Air Pollution Rule program. Since the deadline for compliance, Rodemacher II has been operating



in compliance with the SIP which addressed the first planning period. In 2020, LDEQ began addressing writing a SIP for the second planning period which must be submitted to EPA for approval by July 31, 2021. LDEQ did not request information pertaining to Rodemacher II in its analysis to determine which sources should evaluate reasonable progress controls.

#### **4.2.6 Hydroelectric Purchased Power**

LUS has a PPA in place with the Southwestern Power Administration (“SWPA”). The power purchase agreement provides LUS with 22,320 MWh of energy supply from hydroelectric power generation. The power purchase agreement is through May 31, 2033. As one of four Power Marketing Administrations in the United States, Southwestern markets hydroelectric power in Arkansas, Kansas, Louisiana, Missouri, Oklahoma, and Texas from 24 U.S. Army Corps of Engineers multipurpose dams.<sup>2</sup>

#### **4.2.7 Power Purchase Agreements**

LUS did not have any other power purchase agreements other than hydroelectric agreement described previously in FY 2022. LUS is currently working on negotiating a solar PPA.

#### **4.2.8 Capacity Contracts**

As a MISO participant, LUS is required to procure sufficient capacity to meet its load requirements. This capacity can be procured through owned resources or power purchase contracts. In order to meet its resource adequacy (i.e., capacity) requirements, LUS has been purchasing short-term capacity contracts. Below provides a summary of LUS recent and current capacity contracts.

- NRG: June 2021 through May 2022 for 68MW
- TEA: June 2022 through May 2023 for 12.5MW
- TEA: June 2022 through May 2023 for 50MW

### **4.3 Transmission and Distribution**

The LUS electric system consists of approximately 47 miles of transmission lines (69 kV and above), 1,028 miles of distribution lines (13.8 kV) and a few hundred miles of secondary and street light lines (600V and below). The transmission and distribution lines are connected by 15 substations which are further described in the following sections.

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<sup>2</sup> <https://www.swpa.gov/>

### **4.3.1 Transmission System Description**

The transmission lines operate at three voltage classes: 230 kV, 138 kV, and 69 kV, on a variety of structure types and configurations, but most commonly steel or wood mono poles, with the former being the most common new construction practice. The 230 kV feeds the Pont Des Mouton, Mall, Flanders, Beadle, and Elks distribution substations. It also connects the generation at T.J. Labbe Plant and ties to Cleco (at Pont Des Mouton and T.J. Labbe Plant substations), and Entergy (at T.J. Labbe Plant substations). The 138 kV is limited to at or near Doc Bonin Plant and Flanders substations and serves primarily to create additional ties to Cleco, at Flanders substation, and Entergy, at Doc Bonin Plant substation. 69 kV is LUS's most common transmission voltage, as it serves the Warehouse, Luke, St George, Gilman, Peck, Guilbeau, Perard, Sewer, Pinhook, La Neuville, and Elks substations as well as the Hargis-Hebert Plant.

### **4.3.2 Substations Description**

LUS's typical substation configuration includes a single bus, looped transmission configuration with provisions for up to two 69/13.8 kV or 230/13.8 kV transformers, each serving up to four 13.8 kV circuits, normally configured. Both the transmission system and distribution circuits are typically protected by breakers within each substation. All substations other than La Neuville have two transformers. The LUS system has a total of 86 distribution circuits as of October 31, 2022.

### **4.3.3 Distribution System Description**

The 1,038 miles of distribution lines include approximately 482 miles of overhead and 556 miles of underground primary. The overhead lines are typically constructed with single wood pole (creosote-treated, yellow pine) construction, 336 aluminum-conductor steel-reinforced cable ("ACSR") or similar backbone conductor, and normally open ties to other, neighboring circuits. The underground distribution lines (primary and secondary) consist of jacketed cable in polyvinyl chloride ("PVC") conduit.

### **4.3.4 Inspections & Maintenance**

LUS has several cyclical inspection programs, focused on specific types/categories of equipment, as a part of its proactive maintenance practices. Table 4-18 outlines key transmission, substation, and distribution inspection and maintenance programs and their associated cycle durations.

**Table 4-18: Maintenance and Inspection Programs**

Asset Class	Program	Cycle (years)
Transmission	Pole inspections*	8
	Breaker maintenance	5
	Tree trimming / vegetation management (69 kV)	1+
	Tree trimming / vegetation management (230 kV)	1
Substation	General maintenance (transformers)	5
	Relay maintenance (microprocessor)	5
	LTC maintenance (transformers)	3
	Relay maintenance (electromechanical)	2
	Oil testing / sampling (transformers)	1
Distribution	Pole inspections*	8
	Major underground equipment inspection	8
	Tree trimming / vegetation management	4
	Capacitor testing	1
	Cable partial discharge testing	as needed

\*Includes grounding/ohm testing

LUS's inspection and maintenance cycles are consistent with industry and regional best practices.

Generally, maintenance work is performed by LUS crews, promoting system awareness and knowledge while new construction work is typically performed by contract crews. Much of the inspection work is executed by contractors as well, such as Osmose for pole inspections and Doble for transformer testing.

### 4.3.5 System Planning and Studies

LUS Staff perform annual planning assessments on both the transmission and distribution systems to assess system capacity, adequacy, and reliability.

#### 4.3.5.1 Transmission Planning Studies

The transmission assessments are completed in accordance with applicable NERC standards such as NERC TPL-001-4 and in collaboration with MISO staff. The results of the 2019 NERC TPL-001-4 showed no performance criteria violations after existing mitigation plans for Planning Events P1 through P7 or for any Extreme Events. The study found that six LUS non-BES breakers did not have adequate interrupting capability and therefore needed replacement. The study also found that generation capacity at the retired Bonin site during a contingency can reduce loading on some nearby system elements. Overall, the LUS study results were consistent with MISO findings and continued compliance with NERC transmission planning ("TPL") standards.

#### 4.3.5.2 Distribution Planning Studies & Practices

LUS utilizes a model export process from its Environmental Systems Research Institute ("ESRI") geographic information system ("GIS") to the Easton CYME Power Engineering Software to facilitate load flow, short circuit, and protection coordination studies on its distribution system. Its distribution planners regularly update these models with current system topology and load levels to test system

adequacy, reliability and to scope system improvement projects. LUS performs a robust annual contingency analysis to verify the system capability to serve N-1 contingency scenarios of:

- Loss of a substation transformer
- Loss of a distribution feeder
- Loss of a distribution substation

In the event of these contingencies, the system must allow for operator or crew reconfiguration while maintaining equipment operating limits and power quality limits. This practice is well aligned with LUS expectations for system reliability, availability, and operability.

#### **4.3.6 Maintenance & System Improvement Projects**

In 2022, as a part of cyclical inspections and maintenance, LUS 1) replaced 4 transmission poles and 108 distribution poles that failed Osmose inspections in 2021, 2) upgraded transformer and bus relaying at Doc Bonin and T.J. Labbe switchyard, and 3) contracted for the inspection and rehabilitation of its 230 kV steel transmission structures that had deterioration.

To improve operations, safety, and reliability, LUS completed the following projects in 2022:

- Reconfigured La Neuville feeders to separate their backfeeds by extending feeder 8551 to an open point of 8552.
- Improved protection setting on La Neuville tie point reclosers by adding ground trips while maintaining coordination.
- Reconductored 15,260 feet of copper overhead conductor.
- Deployed Tripsavers to replace fused taps in areas to improve reliability.
- Identified and replaced 39 rotten poles (in addition to osmose replacements) and reconductored a related 29,935' of OH conductor.
- Replaced 5 old oil breakers with new SF6 breakers throughout the system.
- Completed other miscellaneous SCADA and relay upgrades throughout the system to improve performance.

LUS maintains little to no backlog of inspection and maintenance related replacements and prioritizes these projects as they occur.

### 4.3.7 Planned Maintenance & System Improvement Projects

The following projects are planned in the near term to serve new load, continue ongoing maintenance, or target worst performing feeders:

- The new Moss substation will be installed that will connect the existing 69kV transmission line from Gilman to Peck, and the existing 230kV station Pont Des Mouton. The project will include a new substation and two new transmission lines.
- Line relaying upgrades at Pinhook station.
- NERC compliance mandated relaying upgrades at the Doc Bonin Switchyard for bus differential relaying.
- Add SCADA controlled switching and sectionalizing scheme to feeders 2052/3052, which were identified as the worst performing feeders.
- Reconductoring feeder 8553 getaway and feeder to increase its load capacity.
- The continuation of feeder relaying upgrades.
- Replace aged wooden 230 kV structures from Beadle to Elk with monopole steel structures.
- Upgrading the Bonin 69kV switchyard to better facilitate interconnection of the existing 138kV to the 69kV system which serves the majority of LUS's load.
- Adding a new transmission line from Pont Des Mouton to Moss Substation and from Moss Substation into the Gilman-Peck line. This will add an additional tie point from the 230kV system into the 69kV system and remove the dependence on the Doc Bonin switchyard.

### 4.3.8 Operations and Related Performance

The dispatch and operations groups were fully staffed in 2022, and up to date with required training for compliance with the NERC PER standards. LUS has certified internal staff facilitating NERC compliance and certification for the group.

#### 4.3.8.1 OMS Upgrades

In 2021, LUS began upgrading its Outage Management System (“OMS”), by Open Systems International, Inc. (“OSI”). The previous systems were aging and restricting the responsiveness and coordination between the dispatch and operations groups. The new OMS will increase the speed and efficiency of operations and dispatch functions, enable better reporting for management and stakeholder awareness, and result in an expanded and combined dispatch group. The new OMS project was recently completed and is currently operational.

### 4.3.9 Reliability

In FY 2022, LUS did not experience any major weather events. Excluding the major event days, which is the prevailing industry practice for comparisons between utilities, the LUS system consistently outperforms regional and national averages for system reliability and availability, reflecting its established, intentional, and proactive maintenance, planning, and construction practices. Table 4-19 details the annual reliability performance of the LUS system over the last five years, for each of the four major reporting categories (System Average Interruption Duration Index (“SAIDI”), System Average Interruption Frequency Index (“SAIFI”), Customer Average Interruption Duration Index (“CAIDI”), and Momentary Average Interruption Frequency Index (“MAIFI”). The table includes national and regional municipal utility averages for reference.

**Table 4-19: LUS Electric System Reliability Metrics**

Year	SAIDI	SAIFI	CAIDI	MAIFI
2018	31.9	0.72	44.2	0.83
2019	39.7	0.74	53.6	0.57
2020	26.6	0.65	40.8	0.70
2021	21.2	0.66	32.4	0.29
2022	24.9	0.80	31.1	0.24
National Median (1)	42.3	0.69	71.3	N/A
Regional Average (2)	93.6	1.17	62.9	N/A

1. Averages for 2018 triennial, American Public Power Association “Evaluation of Data Submitted in APPA’s 2018 Distribution System Reliability and Operations Survey”, Michael Hyland Alex Hofmann, Tyler Doyle and Ji Yoon Lee, July 2019.

2. APPA Region 4 (OK, AR, TX, LA) results for 2018 survey, American Public Power Association “Evaluation of Data Submitted in APPA’s 2018 Distribution System Reliability and Operations Survey”.

LUS has several initiatives that support a continued focus on system reliability. Related to the upgrades described in Section 4.3.8.1, System Operations has plans to further utilize its Outage Monitoring System (“OMS”) and enable its operators by allowing manual operator control of feeder reclosers for contingency switching. Longer term these operations will be automatically executed quickly and without operator intervention. These advances and continued expansion of communicating faulted circuit indicators (“FCI”) and capacitor banks will enable near-term Advanced Distribution Management System (“ADMS”) capabilities. LUS annually targets the top five worst performing feeders for detailed analysis and investment to improve reliability.

### 4.3.10 System Security

A detailed evaluation of the Utilities System security measures is beyond the intent of this Report. However, LUS facilities have physical security in place such as fencing, automatic gates, security checkpoints, keypads, etc. LUS security practices include employee and contractor background checks,

routine training, and standard entry procedures for all electric facilities. There were no major modifications to the physical security systems in FY 2022.

#### 4.4 Historical Capital Improvement Program

LUS uses a capital work order system to track capital expenses. The historical capital presented in Table 4-20 reflects investment in infrastructure funded by the Series 2019 Bonds and retained earnings. The Series 2019 Bonds are available to support various capital projects including fuel supply improvements, chiller coil replacement, breaker replacements, substation improvements, switchyard improvements, and street lighting upgrade.

**Table 4-20: Electric System Historical CIP**

	2018	2019	2020	2021	2022
Normal Capital & Special Equipment	\$2,136,589	\$3,468,467	\$7,142,480	\$7,425,039	\$7,671,062
Series 2019 Bonds	0	241,628	3,123,162	3,904,433	8,208,536
Retained Earnings	5,752,782	4,331,810	4,026,770	4,234,336	8,008,371
Total Electric Capital	\$7,889,370	\$8,041,906	\$14,292,412	\$15,563,809	\$23,887,969

Source: LUS Financial and Operating Statements and Utilities Status of Work Orders Report

#### 4.5 Regulatory Compliance

The North America Electric Reliability Corporation (NERC) is a regulatory authority whose mission is to assure the reliability and security of the grid in North America. NERC develops and enforces reliability and security standards of the bulk power system. NERC is the Electric Reliability Organization (ERO) for North America, subject to oversight by the Federal Energy Regulatory Commission (FERC). In pursuant to Section 2015 of the Federal Power Act, NERC has delegated authority to six regional entities across North America with the responsibilities for reliability and security of the electric grid. In the southeast and central region of the United States the Regional Entity is SERC Reliability Corporation (SERC). SERC was assigned as LUS's regional compliance enforcement authority as of December 2, 2017. Prior to SERC, Southwest Power Pool was LUS's Regional Entity. The reliability standards are enforceable requirements that fall into one of fourteen categories. Depending on an entity, the assigned registration will often determine which standards are applicable to their facility. Standards are audited by the regional entity to ensure compliance.

LUS, also known as LAFA, remains registered with NERC as a Balancing Authority, Transmission Operator, Transmission Owner, Transmission Planner, Generator Operator, Generator Owner and Distribution Provider. LAFA has delegation agreements with MISO through Coordinated Functional Registration or Joint Registration Organizations Agreement. LAFA has a formal program for internal compliance, supported by management.

The formation of LAFA's NERC Compliance Section under the Engineering Department was established to meet the continuing evolution of in-scope regulatory standards and to provide oversight and assistance to Subject Matter Experts. LAFA's NERC Compliance consists of a full-time NERC Analyst, and Electric Reliability & Environmental Compliance Administrator, and several Subject Matter Experts within various departments.

Lafayette Utilities System will undergo two separate audits every three years. The Critical Infrastructure Protection (NERC CIP) Audit and an Operation and Planning (O&P) 693 Compliance Audit. The NERC CIP Standards consists of standards and requirements covering the security of electronic perimeters and the protection of critical cyber assets, as well as personnel and training, security management, and disaster recovery planning. The Electric System's most recent NERC CIP audit was performed on November 29 through December 1, 2022-with zero areas of concern or recommendations. SERC Reliability Corporation conducted an Operations and Planning off-site audit from May 18, 2020 through September 10, 2020 , in which there were zero areas of concern and recommendations. SERC also conducted a recertification review of LUS as a balancing authority and transmission operator due to the installation of a new EMS beginning on July 10. A virtual onsite was conducted by SERC on December 1 through December 2, 2020. NERC confirmed the certification of BA and TOP on January 12, 2021 by the certification review team and determined that LUS does not require a new certification. LUS is in compliance with all applicable NERC CIP and Operations and Planning ("O&P") 693 standards.

#### **4.6 Contracts and Agreements**

LUS maintains many contracts and agreements important to its day-to-day utility operations. Among the day-to-day operations contracts are agreements relating to maintenance of key equipment, testing services, customer acquisitions, and certain analysis functions. Table 4-21 provides a summary of the key contracts that are in place for LPPA and LCG.



**Table 4-21: Electric System LPPA and LCG Key Contracts and Agreements**

Contracts & Agreements Between	Date Signed/Renewed	Termination Date	Provisions
<b>LPPA Contracts</b>			
LPPA – Cleco, LEPA	November 15, 1982	June 30, 2032 or end of useful life	Joint ownership of Rodemacher Unit 2
LCG – LPPA	May 1, 1997	August 31, 2047 or when bonds were paid	Purchase of power from LPPA's 50 percent share in Rodemacher Unit 2
LPPA – Peabody	November 7, 2007	60 days' written notice	Purchase of coal for Rodemacher Unit 2
LPPA – Arch Coal Sales, Inc.	August 4, 2009	Upon 30 days' notice	Purchase of coal for Rodemacher Unit 2
LPPA - Navajo Transitional Energy Company, LLC	December 11, 2002	Upon 180 days' notice	Purchase of coal for Rodemacher Unit 2
LPPA - Coal Network, LLC	November 11, 2021	60 days' written notice	Purchase of coal for Rodemacher Unit 2
LPPA – Cleco – LEPA – Charah Inc	March 1, 2015	February 29, 2020; may be renewed for 1- or 5-year period	Sale of byproducts (ash) for reuse
<b>MISO Related Contracts</b>			
LCG – Other Transmission	January 4, 2013	Coincides with MISO Owners Agreement	Supplemental Agreement between Transmission Facilities Owners and MISO regarding Independent System Operator (ISO) services and
LCG – Other Transmission Facilities Owners	February 4, 2013	30 years from the earliest Effective Date for any signatory, thereafter 5-year	Transmission Owner Agreement for LUS in MISO
LCG – MISO	February 4, 2013	Coincides with MISO Owners Agreement	Agency Agreement for Open Access Transmission Service
LCG – MISO	August 1, 2013	Upon 30-day notice	Agreement to procure satellite phone link
LCG – MISO	September 25, 2013	2 years from Effective Date, thereafter 1-year terms	Modeling, Data, and Analysis reliability standards compliance obligations primarily related to NERC requirements
LCG – Other Transmission Facilities Owners	December 10, 2013	5 years from Effective Date, thereafter 1-year term	Settlement Agreement between Transmission Owners and MISO on Filing Rights
LCG – Midwest ISO Transmission Owners	January 25, 2018	Withdrawal from MISO	Cost sharing for attorneys and consultants related to MISO.
LCG – MISO Interconnection Request	21-Oct-22	Withdrawal from MISO	Agreement to interconnect Doc Bonin 69kV.
<b>TEA and Fuel Contracts</b>			
LCG – TEA	June 1, 2013	Upon 6-months' notice, but not prior to 48 months after the Effective Date	Power and Fuel Marketing
TEA – Centerpointe	March 28, 2019	June 30, 2021 with 1 year extension option renewed annually	Supply of natural gas for Hargis Hébert Plant
TEA – Centerpointe	July 15, 2019	June 30, 2020 with 2 year extension option	Supply of natural gas for T. J. Labbé Plant and Doc Bonin Plant sites
<b>Capacity, Energy and Renewable Contracts</b>			
LCG – SPA	June 1, 2018	May 31, 2033	Purchase of hydroelectric power
LCG - TEA	June 1, 2021	May 31, 2022	68 MW of capacity from June 2021 – May 2022
LCG - TEA	June 1, 2022	May 31, 2023	12.5 MW of capacity from June 2022 - May 2023
LCG - TEA	June 1, 2022	May 31, 2023	50 MW of capacity from June 2022 - May 2023
<b>Transmission Related Contracts</b>			
City – Louisiana Generating (Cajun Electric)	May 23, 1983	Upon 3-year notice	Interchange agreement for electric transmission
City – Entergy Louisiana	October 6, 1988	Upon 18-month notice	Interchange agreement for electric transmission
LCG – Entergy Gulf States	June 22, 2012	June 21, 2032; year to year thereafter	Interconnection agreement for delivery of power
<b>Miscellaneous Contracts</b>			
LCG – SLEMCO	September 10, 2004	September 10, 2019	Contract expired. Negotiations ongoing.
LCG – TransCanada	January 18, 2019	January 18, 2024	CTG Maintenance Services.
LCG – City of Broussard	December 18, 2015	December 17, 2038	Franchise Agreement
LCG – City of Broussard	December 18, 2015	December 17, 2038	Streetlighting Agreement
LCG – City of Youngsville	July 7, 2017	November 30, 2026	Franchise Agreement
LCG – City of Youngsville	July 7, 2017	November 30, 2026	Streetlighting Agreement
LCG – Stuller	July 27, 2021	July 27, 2023	Electric Service agreement extended for two years

Source: LUS, LPPA, LCG

## 4.7 Utility Benchmarking

LUS compares favorably with its regional and national peers when benchmarking electric rates and financial performance. The following sections benchmark LUS's electric rates and financial performance.

### 4.7.1 Utility Rates Benchmark

LUS's residential and commercial electric rates have consistently been among the lowest in the region and continued to follow that trend into FY 2022. The following tables compare the average residential and commercial electric rates in the region as of October 31, 2022. Table 4-22 presents LUS and its regional peers' average electric rate based on a usage of 1,000 kWh per month. Table 4-23 presents the LUS commercial rate benchmark based on S&P Global data through 2021. While the fuel portion of the rate changes on a monthly basis based on LUS's cost of fuel and purchased power, the non-fuel rates have not been adjusted since FY 2018. LUS's Residential and Commercial average rates will increase on November 1, 2023, once the new approved rates are in place.

**Table 4-22: Electric System Residential Rate Comparison**

Utility	Average Rate (\$/kWh)
New Orleans – Cleco	\$0.12142
New Orleans - Entergy	\$0.12142
Shreveport – SWEPCO	\$0.11426
New Iberia - Cleco	\$0.14182
Alexandria	\$0.12674
Baton Rouge – Entergy	\$0.12544
Lake Charles – Entergy	\$0.12562
LUS	\$0.11531

Source: LUS

**Table 4-23: Electric System Commercial Rate Comparison**

Utility	Average Rate (\$/kWh)
New Iberia – Cleco	\$0.11567
Alexandria	\$0.09347
Shreveport – SWEPCO	\$0.10418
New Orleans – Entergy New Orleans	\$0.10034
Baton Rouge – Entergy Louisiana	\$0.10153
Lake Charles – Entergy Louisiana	\$0.10153
LUS	\$0.08527

Source: S&P Global Retail Average Retail Rate Summary for Louisiana

### 4.7.2 Financial and Operating Statistics Benchmark

LUS benchmarks itself against other national and regional municipal electric utilities. Table 4-24 presents selected financial and operational ratios for LUS's electric utility with other national and regional utilities.

The data is based on APPA Financial and Operating Ratios of Public Power Utilities and the 2021 Data was published in February 2023. The APPA report contains data based on regions of the U.S. and the number of electric customers served by the utility. LUS was benchmarked against other Southwest regional utilities since Louisiana falls within the southwest region. The majority of LUS’s operating ratios are within an acceptable range of both national and regional benchmarks. LUS’s revenue per kWh is greater than the benchmarks due to the recent fuel rate increases in FY 2022. The financial ratios including debt to total assets, current ratio, times interest earned ratio (“TIER”), and DSC have all remained within an acceptable range. DSC increased in FY 2022 as interest expense declined due to the refunding of the Series 2012 Bonds with the Series 2021 Bonds. LUS’s uncollectable accounts per revenue dollar has been relatively stable over the last 4 years. The system load factor has always been lower than national and regional averages due to a higher proportionate share of Residential customers to commercial customers as expected.

**Table 4-24: Benchmarked Electric Utility Operating Ratios**

Statistic	U.S. 50,000 - 100,000 Customers		LUS	LUS	LUS	LUS
	National	Southwest U.S.				
	2021	2021	2019	2020	2021	2022
Revenue per kWh – All Retail Customers	\$0.107	\$0.092	\$0.087	\$0.085	\$0.090	\$0.112
Debt to Total Assets	0.367	0.399	0.380	0.362	0.343	0.318
Operating Ratio (Electric specific)	0.760	0.812	0.663	0.673	0.718	0.742
Current Ratio	3.96	2.84	2.37	1.84	2.07	2.10
Times Interest Earned	3.70	2.74	8.49	7.34	7.31	12.00
Debt Service Coverage	3.73	2.26	3.65	3.15	2.97	3.67
Net Income per Revenue Dollar (\$)	\$0.0800	\$0.0790	\$0.1140	\$0.0856	\$0.0674	\$0.0940
Uncollectible Accounts per Revenue Dollar (\$)	\$0.0013	\$0.0017	\$0.0052	\$0.0048	\$0.0059	\$0.0079
Total O&M Expense per kWh Sold	\$0.0890	\$0.0760	\$0.0596	\$0.0584	\$0.0659	\$0.0848
System Load Factor	57.0%	57.2%	51.4%	51.3%	50.4%	50.3%

### 4.8 Historical Financial Performance

The LUS electric utility has maintained strong financial performance over the last five years. The electric utility is responsible for nearly 80 percent of the total LUS utility revenues, so strong performance is important for the overall financial health of LUS. The electric system has provided sufficient debt service coverage over the last five years for the Series 2010 Bonds, Series 2012 Bonds, Series 2017 Bonds, Series 2019 Bonds, and Series 2021 Bonds. The Series 2010 Bonds were fully redeemed as of November 1, 2020. The Series 2012 Bonds were fully repaid with funds from the Series 2021 Bonds in FY 2022. The historical operating revenues, expenses, and debt service coverage calculations are presented in Table 4-25. Operating revenues include interest income and miscellaneous income. Operating expenses do not include ILOT, normal capital spend and special equipment costs, and other miscellaneous expenses.

**Table 4-25: Electric System Historical Debt Service Coverage**

Year	Operating Revenues	Operating Expenses	Net Revenues		Debt Service Coverage Ratio
			Available for Debt Service	Debt Service	
2018	\$180,955,690	\$131,167,858	\$49,787,833	\$16,337,720	3.0
2019	\$179,965,886	\$119,400,682	\$60,565,203	\$16,615,466	3.6
2020	\$166,467,519	\$112,044,248	\$54,423,272	\$17,255,061	3.2
2021	\$179,851,903	\$129,086,775	\$50,765,128	\$17,101,771	3.0
2022	\$226,464,202	\$168,003,708	\$58,460,493	\$15,950,735	3.7

Source: LUS Financial and Operating Statements

#### 4.8.1 Rate Structures

LUS's electric utility rates include customer charges, demand charges, and energy charges like many other electric utilities. The electric rates are reviewed periodically with the most recent rate study completed in FY 2022. The rate classes include residential, commercial, industrial, schools and churches, a university special contract rate, street lighting rates, and private area lighting. The residential class and small commercial class rates do not currently have demand charges while the other classes do.

Each rate class includes a fuel charge rider which recovers the variable cost of fuel and purchased power from customers monthly. Schedule Fuel Charge (FC) protects LUS from financial risk of unforeseen and volatile fluctuations in the wholesale power market which LUS operates. All operating expenses associated with environmental compliance, fuel, and purchased power are included in the FC and passed directly to customers in their monthly bills. More specifically, the FC recovers the net cost of MISO market purchases and sales, wholesale transmission costs, LPPA fuel costs, LPPA rail car debt, LPPA MATS debt, LPPA MATS O&M, LPPA reagents, LUS power plant fuel costs, hydro purchased power costs, and TEA power marketing costs.

The current electric rates, which were based on the results of the rate study completed in FY 2016, are presented in Table 4-26. The base electric rates (i.e. non-FC rates) have not changed since FY 2018. LUS periodically performs rate studies so that rates continue to generate revenues that are sufficient to recover its operating expenses and pay its outstanding debt obligations. LUS recently completed a rate study in FY 2022 and new electric rates will be implemented in FY 2024. The overall rate increases to the base rates that were approved in FY 2022 are 3 percent in FY 2024 and 3 percent in FY 2025.

**Table 4-26: Electric System Rate Schedules**

Rate Class	Serves	Effective Date	Customer Charge (\$/month)	Demand Charge (\$/kW-month)	Non-Fuel Energy Charge (\$/kWh)
R-1	Residential	Nov-17	\$8.00	\$0.00	\$0.04764
R-1-0	Residential Non-City	Nov-17	\$8.80	\$0.00	\$0.05240
C-1	Small Commercial	Nov-17	\$10.00	\$0.00	\$0.06176
C-2	Large Commercial	Nov-17	\$50.00	\$8.50	\$0.02098
SC-1	Schools and Churches	Nov-17	\$10.00	\$0.00	\$0.05220

Source: LUS Rate Tariffs

### 4.8.2 Revenue Analysis

As described in the rates section of this Report, LUS generates revenues from base rates and the FC rider. The FC is adjusted as required to recover LUS's fuel and purchased power cost as defined in the ordinances and described previously. Table 4-27 presents the historical base rate and FC revenue over the last five years. Base rate revenues have steadily increased due to increased sales and base rate increases implemented in FY 2017 and FY 2018. The FC revenues have fluctuated with wholesale market prices and fuel costs along with increases in energy sales. In FY 2022, the wholesale power market prices increased considerably which increased the FC rate and FC revenues. A modest increase in overall retail sales resulted in an increase in overall base rate revenues and FC revenues.

**Table 4-27: Historical Base Rate and Fuel Charge Revenues**

	2018	2019	2020	2021	2022
<u>Revenues</u>					
Retail Sales- Base Rate	\$102,886,777	\$100,836,993	\$97,878,860	\$99,763,119	\$100,740,765
Retail Sales- Fuel Clause	72,872,661	73,101,002	65,117,850	76,344,759	121,702,909
Total	\$175,759,439	\$173,937,995	\$162,996,710	\$176,107,877	\$222,443,673
<u>Energy Sales</u>					
Retail Sales (kWh)	2,031,847,230	2,004,309,990	1,917,039,526	1,959,363,937	1,981,781,987
<u>Revenue per kWh</u>					
Retail Sales- Base Rate	\$0.0506	\$0.0503	\$0.0511	\$0.0509	\$0.0508
Retail Sales- Fuel Clause	\$0.0359	\$0.0365	\$0.0340	\$0.0390	\$0.0614
Total	\$0.0865	\$0.0868	\$0.0850	\$0.0899	\$0.1122

Source: LUS Financial and Operating Statements

### 4.8.3 Revenue Statistics

As described previously, LUS provides service through multiple rate schedules which are updated periodically. LUS has experienced customer growth between FY 2017 and FY2022. The energy usage per customer has been steady over the last five years. FY 2022 experienced a continued increase in use per customer in the Commercial rate classes and schools as Lafayette continued to come out of the COVID-19 pandemic. Table 4-28 presents the historical base rate revenues and sales in total and per customer by classification.

**Table 4-28: Historical Base Rate Revenue Statistics**

	2018	2019	2020	2021	2022
<b>Revenues (non Fuel)</b>					
Residential	\$45,868,752	\$44,867,081	\$45,249,322	\$46,119,410	\$46,261,889
Commercial	48,685,466	47,517,635	44,934,325	45,393,897	46,018,132
Schools & Churches	5,308,787	5,210,732	4,638,383	5,000,613	5,219,828
Other	3,023,773	3,241,545	3,056,830	3,249,199	3,240,916
<b>Total</b>	<b>\$102,886,777</b>	<b>\$100,836,993</b>	<b>\$97,878,860</b>	<b>\$99,763,119</b>	<b>\$100,740,765</b>
<b>Number of Customers</b>					
Residential	55,535	56,769	57,412	58,109	58,774
Commercial	9,285	9,285	9,484	9,521	9,637
Schools & Churches	518	527	541	536	509
Other	1,905	1,915	1,926	1,931	1,945
<b>Total</b>	<b>67,243</b>	<b>68,495</b>	<b>69,364</b>	<b>70,096</b>	<b>70,865</b>
<b>Revenue per Customer</b>					
Residential	\$826	\$790	\$788	\$794	\$787
Commercial	5,243	5,118	4,738	4,768	4,775
Schools & Churches	10,250	9,891	8,567	9,337	10,255
Other	1,587	1,692	1,587	1,683	1,666
<b>Total (\$/customer)</b>	<b>1,530</b>	<b>1,472</b>	<b>1,411</b>	<b>1,423</b>	<b>1,422</b>
<b>Sales (kWh)</b>					
Residential	845,855,856	830,153,367	829,390,383	848,819,679	851,520,487
Commercial	1,000,509,799	988,791,647	917,385,965	927,340,664	943,256,588
Schools & Churches	127,870,744	126,428,653	111,587,567	120,588,372	124,637,412
Other	57,610,831	58,936,323	58,675,611	62,615,222	62,367,500
<b>Total</b>	<b>2,031,847,230</b>	<b>2,004,309,990</b>	<b>1,917,039,526</b>	<b>1,959,363,937</b>	<b>1,981,781,987</b>
<b>Sales (kWh) per Customer</b>					
Residential	15,231	14,623	14,446	14,607	14,488
Commercial	107,753	106,498	96,728	97,400	97,875
Schools & Churches	246,894	239,978	206,103	225,153	244,867
Other	30,246	30,771	30,460	32,433	32,060
<b>Total</b>	<b>30,216</b>	<b>29,262</b>	<b>27,638</b>	<b>27,953</b>	<b>27,965</b>
<b>Revenue per kWh</b>					
Residential	\$0.0542	\$0.0540	\$0.0546	\$0.0543	\$0.0543
Commercial	0.0487	0.0481	0.0490	0.0490	0.0488
Schools & Churches	0.0415	0.0412	0.0416	0.0415	0.0419
Other	0.0525	0.0550	0.0521	0.0519	0.0520
<b>Total</b>	<b>\$0.0506</b>	<b>\$0.0503</b>	<b>\$0.0511</b>	<b>\$0.0509</b>	<b>\$0.0508</b>

Source: LUS Financial and Operating Statements

#### 4.8.4 Expense Analysis

LUS's electric utility incurs both variable and fixed operating expenses. Variable expenses generally fluctuate with how much power is generated, delivered, and used while fixed operating expenses do not. Variable operating expenses include fuel, LPPA fuel, and wholesale purchased power and sales. Fixed operating expenses that do not change with the amount of energy consumed include power production labor and maintenance, distribution labor and maintenance, customer service and sales expense, and administrative and general expenses. Table 4-29 presents the historical operating expenses for LUS's

electric utility system. In FY 2022, the MISO wholesale market prices increased considerably which resulted in higher purchased power costs, higher generation fuel consumption and generation sales. In 2022, natural gas and MISO energy costs increased due to international conflicts in Europe which resulted in a tightening of natural gas supply globally which increased energy prices across the United States and for LUS. Fixed production costs, other than some LPPA generation projects, have been relatively stable which has helped to keep rates low. Transmission costs saw a steep decline in FY 2022 due to the expiration of major transmission contracts. Customer and distribution costs both increased primarily due to inflationary pressures similar to other utilities across the United States.

**Table 4-29: Historical Fixed and Variable Expenses**

<b>Variable Expenses</b>	2018	2019	2020	2021	2022
Fuel Cost - LUS	\$3,020,362	\$2,369,957	\$1,945,110	\$6,515,336	\$14,763,071
Purchased Power Other	3,637,576	15,569,793	18,203,665	4,976,460	15,428,496
Purchased Power LPPA Fuel	29,566,005	27,808,739	19,288,183	27,019,447	35,240,650
Purchased Power MISO	67,855,286	46,658,114	32,103,265	74,496,875	121,965,100
Purchased Power MISO Sales	(36,621,122)	(32,525,010)	(15,696,107)	(45,782,212)	(77,278,285)
Production - Variable	\$67,458,107	\$59,881,593	\$55,844,116	\$67,225,906	\$110,119,032
<b>Fixed Expenses</b>					
Production - Fixed	\$26,998,804	\$24,491,422	\$21,809,812	\$28,027,921	\$26,333,693
Transmission	9,275,422	8,612,596	8,438,158	7,103,445	2,408,749
Distribution	12,143,206	11,837,879	10,990,219	11,109,141	11,906,957
Customer	2,828,513	2,690,275	2,742,846	3,406,175	4,363,821
A&G	12,463,806	11,886,918	12,219,098	12,214,185	12,871,455
Total Fixed	\$63,709,751	\$59,519,089	\$56,200,132	\$61,860,869	\$57,884,676
Total Fixed & Variable	\$131,167,858	\$119,400,682	\$112,044,248	\$129,086,775	\$168,003,708
Percent Variable	51%	50%	50%	52%	66%
Percent Fixed	49%	50%	50%	48%	34%

Source: LUS Financial and Operating Statements

#### 4.8.5 Recovery of Costs

Fixed and variable costs are recovered through retail demand rates, energy rates, and customer charges billed to customers. Commercial and Residential customers are both billed customer charges to recover customer related fixed costs. Residential and Small Commercial customers are billed energy charges to recover both fixed costs and variable utility costs. Large commercial customers are billed demand charge to recover fixed demand costs and energy charges to recover energy related costs. Approximately 50 percent of LUS's costs are fixed, however only 15 percent of its revenues are recovered through fixed charges. Utilities across the U.S. are gradually moving towards rate structures that recover more from higher customer charges and demand charges. LUS is working towards modernizing its rate structure with the changes that will be implemented in FY 2024 because of the recently completed rate study. Additionally, LUS recently implemented a pilot time of use (TOU) rate offering which will be offered to customers who can shift their use to low-cost time periods and save on their bills.

## 4.9 Findings and Recommendations

Based on the analysis described herein, Burns & McDonnell provides the following observations:

- Based on visual inspection of facilities, records audit, and interviews of LUS staff, the LUS distribution and transmission system is in good condition, maintained properly and in accordance with industry practices.
- LUS is proactive and strategic in its cyclical inspection, maintenance, and replacement of equipment.
- The LUS transmission and distribution planning and construction practices are proactive and aligned with a focus on reliability, resiliency, and efficient operation of the system.
- The LUS distribution system consistently outperforms regional and national averages for system reliability and availability, which reflects its intentional and proactive maintenance, planning, and construction practices.
- LUS revenues were sufficient to meet all financial obligations including operating expenses, LUS and LPPA debt service, capital improvements, ILOT payments, and required reserves. LUS's system operating, expense, debt, revenue, and related ratios reflect a financially stable and healthy utility that is currently offering competitive, lower than market average rates.
- LUS completed a rate study in FY 2022 and the proposed rate plan was approved. The rate increases will generate revenues that allow LUS to continue to maintain its financial performance. The first of the approved electric rate increases will be effective November 1, 2023.
- The electric system revenue recovery structure, like most electric utilities, is misaligned with how costs are incurred. LUS recovers nearly 85 percent of its revenues through variable charges when approximately 50 percent of its costs are fixed. This creates a systemic problem when energy usage per customer is declining, but customer growth is increasing. The approved electric rates will gradually increase the customer charge for Residential customers over the next few years to better recover fixed costs. Commercial customers will see increases in both the customer charge and monthly demand charge.
- LUS is planning to issue new bonds in FY 2023 to support various electric, water, and wastewater projects. The bond funding anticipated is reasonable and appropriate to fund these projects and the forecasted revenues represented in the continuing disclosure financial projections are expected to be able to fund the new debt service associated with the new bonds.
- The Utilities System CIP has been sufficient to sustain and improve the integrity and reliability of the system.
- LUS completed an IRP in FY 2020. The IRP had several power supply initiatives for LUS to consider



which included the retirement of Rodemacher Unit 2 in 2028, the construction of a new LUS owned simple cycle gas turbine power plant at the existing Doc Bonin site in 2028, and the addition of utility scale solar which would be procured through power purchase agreements. LUS is in the process of finalizing its power supply plan and is continuing to evaluate and develop each of these initiatives. LUS is working to finalize its plans regarding the new simple cycle gas turbine power plant in FY 2023 and has begun transmission planning studies with MISO for the new facility.

- LUS has been experiencing some issues with coal delivery and supply due to market constraints. LUS has implemented a coal conservation strategy to mitigate energy market risk. LUS is continuing to monitor delivery schedules and will adjust operations accordingly to continue to mitigate wholesale energy cost fluctuations.
- LUS has performed well in FY 2022. LUS's performance on the four reported indices is consistent or significantly better than typical national median performance reported by both regional and national benchmarks. LUS has performed well in NERC CIP audits, NERC 693 operational audits, and LDEQ environmental inspections.
- LUS continues to make upgrades across its transmission system and distribution system to improve resiliency and redundancy. Major capital projects include upgrades to the Peck Substation and a new transmission line between the Peck Substation and the Northeast Substation which will relieve loading on Pont Des Mouton and Peck stations as well as serve as another path for power to flow from the 230kV system to the 69kV system adding resiliency and redundancy.
- LUS has recently completed the installation of a new outage management system (OMS) for the electric utility. LUS expects that the OMS will further improve reliability and resiliency of the distribution system and will enable LUS to restore customer service more quickly during storms and outages.
- The organizational structure and management of the Electric System engineering and operations areas appears to be strong based on initial observations, interviews, organizational structures, and manpower within each department.
- As other utilities have experienced, the recruitment and retention of quality resources presents challenges. LUS has indicated that it is working to internally develop quality resources through training programs to retain employees, across multiple departments, and specifically addressing electric lineman and customer service positions. The Electric System management team is continuing to work with local schools to hire and retain strong talent that appreciate the benefits provided by a more stable municipal utility business when compared to the oil and gas business of the gulf coast.

## 5.0 WATER UTILITY SYSTEM

### 5.1 Water Utility Summary

LUS provides potable water supply, water treatment, transmission, and distribution of finished potable water. Raw water supply is obtained from the Chicot aquifer. Key water infrastructure includes four water treatment facilities, 19 ground water wells, elevated and ground treated-water storage, and 1,166 miles of distribution mains.

LUS performs all water metering and customer service. In 2022, LUS provided water service to 58,302 meters representing residential, commercial, industrial, and wholesale customers. Water System total sales increased by 3.1 percent in 2022; with retail water sales increasing 2.5 percent, while wholesale water sales increased 4.4 percent. Historical Water System volume sales are presented in Table 5-1.

**Table 5-1: Historical Retail and Wholesale Sales Volumes**

FY	Retail Sales (1,000 gallons)	Wholesale Sales (1,000 gallons)	Total Sales (1,000 gallons)
2018	5,363,552	2,256,911	7,620,462
2019	5,148,605	2,171,928	7,320,533
2020	5,075,882	2,191,571	7,267,453
2021	5,063,766	2,322,023	7,385,789
2022	5,190,827	2,424,469	7,615,297

Source: LUS Financial and Operating Statements

### 5.2 Water Supply Summary

Nineteen groundwater wells within the Chicot aquifer provide water supply to four water treatment facilities: South Water Treatment Plant (“SWP”); North Water Treatment Plant (“NWP”); Commission Boulevard Water Treatment Plant (“Commission Boulevard”); and Gloria Switch Remote Site (“Gloria Switch”), as summarized in Table 5-2. The Chicot aquifer is the sole source of supply for LUS, and groundwater produced is generally of high quality and characterized by the USGS as having a “very hard” level of hardness. Treatment processes employed by LUS are discussed in Section 5.3.

**Table 5-2: Summary of Well Capacity**

Well No.	Capacity (MGD)	Well No.	Capacity (MGD)
South Water Treatment Plant		North Water Treatment Plant	
1	2.59	7	2.88
2	2.59	9	2.88
3	2.59	12	2.81
4	2.59	14	3.03
5	2.59	16	2.95
6	4.04	19	2.88
7	4.04	21	2.88
		22	2.88
Total Production Capacity	21.0	Total Production Capacity	23.2
Firm Production Capacity <sup>1</sup>	17.0	Firm Production Capacity <sup>1</sup>	20.2
Commission Boulevard Water Treatment Plant		Gloria Switch Remote Site	
23	1.44	24	1.44
25	2.16	26	2.31
Total Production Capacity	3.60	Total Production Capacity	3.75
Firm Production Capacity <sup>1</sup>	1.44	Firm Production Capacity <sup>1</sup>	1.44

[1] Firm capacity assumes the largest well is out of service.

### 5.2.1 Aquifer System

The Chicot aquifer system underlies approximately 9,950 square miles of southwestern Louisiana and provides approximately 800 million gallons per day (“MGD”) of freshwater for municipal, commercial, industrial, and agricultural uses through approximately 2,300 groundwater wells. The 2021 Triennial Report (LDEQ, 2021) evaluated water quality samples in 16 wells within the Chicot aquifer (one of which is owned by LUS) from ten parishes between February 2020 and May 2020. Field and analytical sampling results indicate no EPA maximum contaminant levels (“MCLs”) were exceeded and that the water produced from the Chicot aquifer is of good quality when considering short-term or long-term health risk guidelines. The data also show that the water produced from the Chicot aquifer is hard and exceeded secondary MCLs for pH, iron, and total dissolved solids (“TDS”). Secondary MCLs are not enforceable by the EPA and are aesthetic in nature. Treatment processes are employed by LUS to address several of these secondary MCLs as described in Section 5.3.

EPA has designated the Chicot aquifer as a sole-sourced aquifer, meaning it supplies at least 50 percent of the drinking water for its service area and there are no reasonably available alternate supplies should the aquifer become contaminated<sup>3</sup>.

### 5.2.2 Well Completions

LUS's deep wells are each equipped with a line shaft vertical turbine pump with a surface-mounted motor. LUS reported that an independent contractor inspects wells once per year and cleaning/rehabilitation is performed as required to maintain well pumping capacity.

### 5.3 Water Treatment and Production

Four facilities provide treatment and/or disinfection of raw groundwater prior to supplying the distribution system for public consumption. Treatment facility capacities and major processes are described in the following sections and summarized in Table 5-3.

**Table 5-3: Water Treatment Processes and Capacity**

Water Treatment Facility	Primary Treatment Processes	Treatment Capacity (MGD)
South Water Treatment Plant	Lime Softening Coagulation and Filtration Disinfection Stabilization	23.0
North Water Treatment Plant	Lime Softening Coagulation and Filtration Disinfection Stabilization	20.8
Commission Boulevard Water Treatment Plant	Biofiltration Iron and Manganese Removal Disinfection Stabilization	4.0
Gloria Switch Remote Site	Iron and Manganese Removal Disinfection Stabilization	3.8
Total Treatment Capacity		51.6
Highest Recorded Production		34.8

Source of data: LUS

<sup>3</sup>[https://www.deq.louisiana.gov/assets/docs/Water/Triennial\\_reports/ASSET2018\\_2021Triennials/10ChicotAquiferSummary21FINAL.pdf](https://www.deq.louisiana.gov/assets/docs/Water/Triennial_reports/ASSET2018_2021Triennials/10ChicotAquiferSummary21FINAL.pdf)

Additionally, LUS publishes a 5-year capital improvement program that has projected improvements for the water treatment and production components of the water utility. These improvements include modification and upgrades of old treatment units and buildings, adding an additional ground storage tank and improving pipe gallery at the NWP, changing filter media at the NWP and SWP, ground storage tank painting and rehabilitation, adding emergency backup power, and electrical rehabilitation.

**Table 5-4: Water Treatment and Production Projected CIP**

	2023	2024	2025	2026	2027	Total
Water Treatment and Production Total	\$560,000	\$2,480,000	\$1,430,000	\$3,530,000	\$2,230,000	\$10,230,000

Source of data: LUS Five-Year Capital Improvement Program (Utilities System)

### 5.3.1 South Water Treatment Plant

Groundwater produced by water supply wells (Well 1 through Well 7) is combined at the head of the SWP located at 810 W. Broussard Road where raw water is softened, clarified, filtered, disinfected, and stabilized for the distribution system. The SWP was built in the 1980s and in 1990 production capacity was expanded by addition of a third treatment unit (rated for approximately 8 MGD), additional filtration, and a second finished water clear well and high service pump station. The current treatment capacity of 23 MGD exceeds the total well production dedicated to this facility by 2 MGD.

Each of the three (3) clarifiers receive hydrated lime and alum in the mixing zone. Settled effluent from the basins is gravity fed to one of the eight filters. The current filter media is proposed to be replaced with a new filter media containing gravel, sand, and anthracite. The filter underdrains are determined to be in good condition according to the condition assessment by Leopold. Filtered water is temporarily stored in one of two hydraulically connected finished water clear wells (50-thousand-gallon and 225-thousand-gallon capacity) and is then pumped into the distribution system. Disinfection at the SWP is provided by chlorine gas.

The chlorine gas system is supplied by pressurized 1-ton cylinders of chlorine gas. The system primarily operates under a vacuum condition as an engineered-safety provision in the event of a leak. The chemical supplier of chlorine gas also provides a service to safely contain leaking equipment when called for this service. However, there is no means to safely contain a chlorine gas leak in the event of a pressurized discharge. It is suggested that LUS further evaluate using containment vessels for active cylinders or a scrubber system.

Polyphosphate (sodium hexametaphosphate) is then added for sequestration of contaminants (i.e., stabilization) linked to aesthetic issues. It is suggested that LUS consider changing the phosphate

chemical used to provide corrosion control in the distribution system. A pure (i.e., neat) orthophosphate product or a blend of at least 70 percent orthophosphate could provide benefit to corrosion control and sequestration.

Waste streams including clarifier blowdown, backwash, and filter-to-waste are temporarily stored in a backwash recycle tank where decant water is pumped back to the head of the treatment units. Settled solids are pumped from the backwash recycle tank to a settling tank for further thickening. Thickened treatment residuals are hauled and land-applied at local farmland. It was discovered that the lime product used at both the NWP and SWP contained a high degree of grit, which was impacting performance of solids thickeners and lime feed equipment. LUS has changed lime product and has observed improved performance in lime feed and solids thickeners.

A new 1.25-M gallon ground storage tank and two (2) high service pumps will be installed on the site adjacent to the facility as a part of a new project. As a part of infrastructure improvement, a concrete cover will be installed in the maintenance building to enhance the structural integrity and electronic panels will be moved to a covered storage for protection from extreme weather.

Emergency power is provided to the site by a combination of diesel-powered pump motors, a portable generator, and a stationary generator. The stationary generator is not capable of providing full power loads to the site in an emergency outage, and the portable generator is only capable of providing power to wells or high service pumps not connected to the generator. Only Well 3 and Well 4 are connected to the main stationary generator. LUS could consider additional emergency power be added to the SWP to meet the full power load requirement of the plant during an outage.

### **5.3.2 North Water Treatment Plant**

Groundwater produced by water supply wells (Well 7 through Well 22) is combined at the head of the NWP located at 200 N Buchanan Street in Lafayette where it is treated utilizing processes similar to the SWP. The NWP was built in 1929 and expanded and/or improved several times since then. The current treatment capacity is 20.8 MGD compared to the 20.2 MGD firm capacity of the wells feeding raw water to this facility.

Five (5) softening basins receive hydrated lime and alum in the mixing zone and settled effluent is gravity fed to the fifteen (15) filters. Filtered water is temporarily stored in one of three (2) finished water clear wells or an on-site 3.0-M gallon ground storage tank and/or three (3) 300,000-gallon ground storage tanks and pumped into the distribution system. Disinfection at the NWP is also provided by chlorine gas.

Treatment plant waste streams at the NWP are handled similarly to the SWP and residuals are similarly land applied.

The chlorine gas system is supplied by pressurized 1-ton cylinders of chlorine gas. The chlorination system primarily operates under a vacuum condition as an engineered-safety provision in the event of a leak. The chemical supplier of chlorine gas also provides a service to safely contain leaking equipment on an as-needed basis. However, there is no means to safely contain a chlorine gas leak in the event of a pressurized discharge. It is suggested that LUS further evaluate using containment vessels for active cylinders or a scrubber system. LUS staff reported that chlorine residuals leaving the WTPs are below expected values during high-demand periods in both summer and winter weather. It is suggested that LUS evaluate modifying the chlorinators for larger output capacity prior to the next high-demand event. In addition, LUS may consider modifying the chlorine gas feed manifold to allow for additional in-service cylinders to supplement gas feed.

Similar to the SWP, polyphosphate (sodium hexametaphosphate) is added for sequestration of contaminants linked to aesthetic issues. It is suggested that LUS consider changing the phosphate chemical used to provide corrosion control in the distribution system. A pure (i.e., neat) orthophosphate product or a blend of at least 70 percent orthophosphate could provide benefit to corrosion control and sequestration.

Emergency power is provided by an on-site emergency diesel generator capable of powering approximately one fourth of the full plant power demand. LUS could consider increasing the capacity of the backup generator to better manage potential power failures.

The 16-inch diameter finished water pipeline that conveys water out of the NWP to the distribution system presents a hydraulic bottleneck and limits LUS's ability to utilize the full production capacity of the plant. LUS personnel have noted that due to scale build-up within the pipes leaving the NWP there have been instances of line breakages and pressure issues. It is suggested that an identification and replacement program targeting service lines and main lines be implemented in this area.

### **5.3.3 Commission Boulevard Water Treatment Plant**

Groundwater produced by water supply wells (Well 23 and Well 25) is disinfected with chlorine gas and dosed with polyphosphate (tetra potassium pyrophosphate) at the Commission Boulevard Water Treatment Plant (located 204 Commission Boulevard) prior to entering the distribution system. Groundwater pumped at this location contains elevated levels of ammonia which is treated and removed by a biological process. The conversion of this site into a biological active filtration plant was part of a

recent expansion and upgrade. The improvements to the site include biological filtration, Greensand filters (for removal of iron and manganese similar to the Gloria Switch Remote Site), and switching to chlorine gas rather than sodium hypochlorite for disinfection. As a redundancy to the existing biofilters to allow for removal and maintenance of units while providing additional treatment capacity, ion-exchange has been considered to be installed in the future. Similar to the SWP and NWP, it is suggested that LUS consider changing the phosphate chemical used to provide corrosion control in the distribution system. A pure (i.e., neat) orthophosphate product or a blend of at least 70 percent orthophosphate could be considered.

A new 1.0-M gallon tank was installed on the site for redundancy, which supplies water to the newly installed two high service pumps with 2,000 GPM capacity each. Variable frequency drives (VFDs) were added to the pumps to regulate the water pressure between 60 to 70 psi as demand fluctuates and the tank level changes. To better manage potential power failure, a new system was installed to the emergency power system and can provide the full plant power demand.

#### **5.3.4 Gloria Switch Remote Site**

Groundwater produced by water supply wells (Well 24 and Well 26) is treated and disinfected at the Gloria Switch Remote Site located at 1708 W Gloria Switch Road, Carencro, Louisiana. Groundwater is dosed with sodium hypochlorite and permanganate for oxidation upstream of Greensand filtration for iron and manganese removal. Polyphosphate (tetra potassium pyrophosphate) is added for sequestration of contaminants linked to aesthetic issues and additional sodium hypochlorite provides disinfection residual. Similar to the other sites, it is suggested that LUS consider changing the phosphate chemical used to provide corrosion control in the distribution system. A pure (i.e., neat) orthophosphate product or a blend of at least 70 percent orthophosphate could be considered.

A new project for improvements to the disinfection and treatment at Gloria Switch site is being considered by LUS. Currently, the six (6) Greensand filters must all be in-service to meet the treatment capacity of the Gloria Switch Remote Site, and there is no means to backwash and produce water simultaneously. The project would replace the existing Greensand media with Greensand Plus media and chlorine will be added as gas rather than sodium hypochlorite upstream of filters. These changes would allow LUS to discontinue feeding permanganate, and it is expected that the site will be able to simultaneously backwash filters and produce treated water.

A 0.75-M gallon ground storage tank is located on site adjacent to the facility and provides supply to the high service pump station. Emergency power is provided by an on-site emergency diesel generator



capable of providing the full plant power demand as only one well runs through the filters at a time currently. However, with the installation of new filter media and future expansion, the site will be able to run both the wells through the filters and LUS should consider adding backup generator power to provide emergency power to both wells.

The six (6) Greensand filters must all be in-service to meet the treatment capacity of the Gloria Switch Remote Site. It is suggested that additional Greensand filters be added in the future, providing redundancy to allow for removal and maintenance of units while providing additional treatment capacity. Due to the multiple treatment processes of pre-chlorination and Greensand filtration performing the same function of iron and manganese removal, reevaluation of the pre-chlorination process is suggested to determine if one of the redundant processes can be removed.

#### 5.4 Water Distribution and Storage

Water main materials primarily consist of ductile iron, polyethylene, PVC, asbestos cement, and cast iron. There are 212 sample stations located throughout the distribution system. Distribution system assets including main lines, valves, and hydrants are summarized in Table 5-5.

**Table 5-5: Water Distribution System Assets**

Asset	2018	2019	2020	2021	2022
Miles of Main Lines	1,170	1,145	1,153	1,159	1,169
Number of Valves	23,607	23,755	24,112	24,361	24,746
Number of Hydrants	6,616	6,685	6,614	6,811	6,872

During 2022, approximately 9.4 miles of new water mains were installed in the City of Lafayette and 1.7 miles of new mains in the North Water District.

Water is stored in numerous ground storage or elevated storage tanks located at the treatment plant sites and throughout the distribution system, as summarized in Table 5-6.

**Table 5-6: Water Storage Facilities**

Location	Storage Type	Storage Volume (MG)
<b>Treatment Facilities</b>		
South Water Treatment Plant	Ground Storage – Concrete Clearwell	0.225
	Ground Storage – Concrete Clearwell	0.5
	Ground Storage – Concrete Tank	2.0
	Total Storage	2.725

Location	Storage Type	Storage Volume (MG)
North Water Treatment Plant	Ground Storage – Concrete Tank	0.3
	Ground Storage – Concrete Tank	0.3
	Ground Storage – Concrete Tank	0.3
	Ground Storage – Steel Tank	3.0
	Ground Storage – Concrete Clearwell	0.025
	Ground Storage – Concrete Clearwell	0.35
Total Storage		4.275
Commission Boulevard Plant	Ground Storage Concrete Tank	1.0
Gloria Switch Remote Site	Ground Storage – Concrete Tank	0.75
Distribution System		
Fabacher	Ground Storage – Concrete Tank	2.0
Bertrand	Elevated Multi-Column	0.3
Walker Road	Elevated Multi-Column	1.0
Guilbeau	Elevated Multi-Column	1.0
South Park	Elevated Composite	1.0
North Park	Elevated Composite	1.0
Total Storage		6.3
Total System Storage		15.05

Source of data: LUS

LUS staff indicated that additional ground storage is required at the SWP and NWP. The existing 2.0-M gallon tank at the SWP and the 3.0 M-gallon ground storage tank at the NWP, are operated 24 hours per day, so neither can be removed from service for repairs or maintenance to be performed. LUS is considering a project to expand storage capacity at the SWP, adding a new 1.25 MGD ground storage tank and two (2) high service pumps. These pumps will have maximum capacity of pumping 3,000 GPM at 190 ft head with VFDs to regulate the water pressure between 82 to 90 psi as demand fluctuates.

The 2.0-million gallon ground storage tank at the Fabacher location has an adjacent high service pump station with a sodium hypochlorite storage and dosing system. A 1,000-gallon sodium hypochlorite tank was replaced with a 100-gallon tank because boosting the chlorine residual at this location is rarely needed. LUS staff noted that the two 3.6 MGD single-speed high service pumps provide too much pressure, which could be alleviated with the addition of VFDs. Only three pumps in the entire water distribution inventory utilize VFDs as depicted by Table 5-7, below. Adding VFD's will improve

operational flexibility, alleviate surge and over-pressurization of service mains, and may improve efficiency.

**Table 5-7: High Service Pump Stations and Pump Types**

Location	Pump No.	Flow @ Head	Pump Type
South Water Treatment Plant	1	3000 @ 190'	Vertical Turbine w/ VFD
	2	3000 @ 190'	Vertical Turbine
	3	3000 @ 190'	Vertical Turbine
	4	1000 @ 200'	Vertical Turbine
	5	Number Reserved for Future Pump	--
	6	3000 @ 190'	Vertical Turbine w/ VFD
	7	3000 @ 190'	Vertical Turbine
	8	3000 @ 190'	Vertical Turbine
	9	3000 @ 190'	Vertical Turbine
	10	Number Reserved for Future Pump	--
	11*	3000 @ 190'	Vertical Turbine w/ VFD
	12*	3000 @ 190'	Vertical Turbine w/ VFD
	<b>TOTAL</b>	<b>40.32 MGD</b>	
North Water Treatment Plant	1	2500 @ 180'	Vertical Turbine w/ VFD
	2	2500 @ 180'	Vertical Turbine
	3	2500 @ 180'	Vertical Turbine
	4	2200 @ 180'	Vertical Turbine
	5	1800 @ 180'	Vertical Turbine
	6	2000 @ 180'	Vertical Turbine
	7	2000 @ 180'	Vertical Turbine
	8	2000 @ 180'	Vertical Turbine
	9	3000 @ 180'	Vertical Turbine
	10	3000 @ 180'	Vertical Turbine
	12**	--	Vertical Turbine
	<b>TOTAL</b>	<b>34.42 MGD</b>	
Commission Boulevard Water Treatment Plant	1*	2000 @ 196'	Vertical Turbine w/ VFD
	2*	2000 @ 196'	Vertical Turbine w/ VFD
	<b>TOTAL</b>	<b>5.76 MGD</b>	
Gloria Switch Remote Site	1***	1000 @ 190'	Vertical Turbine
	2***	1000 @ 190'	Vertical Turbine
	<b>TOTAL</b>	<b>2.88 MGD</b>	

Source of data: LUS

\* Pump is expected to be commissioned in 2023

\*\* Demolished in 1993

\*\*\* Capacity and head unconfirmed

Additionally, LUS published a 5-year capital improvement program for water distribution and storage components of the water utility system. These improvements include water main upgrades and replacements, water main relocations, storage tank painting, and valve installations.

**Table 5-8: Water Distribution and Storage Projected CIP**

	2023	2024	2025	2026	2027	Total
Water Distribution and Storage Total	\$5,360,000	\$6,060,000	\$3,210,000	\$985,000	\$1,660,000	\$17,275,000

Source of data: LUS Five-Year Capital Improvement Program (Utilities System)

#### 5.4.1 Water Metering

In late 2022, LUS experienced failures with its existing Advanced Metering Infrastructure (AMI) equipment. LUS's AMI system is a smart metering system with communication gear, which was installed in 2012. The existing communications modules experienced failures and the manufacturer was unable to provide support for the units without full replacement. The module failures have resulted in LUS performing manual meter readings for approximately 10,000 water meters, some of which have not been communicating measurements for approximately two years.

Due to the criticality of reliable metering, LUS is replacing all existing AMI with new modules from a different manufacturer with a replacement goal of 300 meters per week. LUS has budgeted AMI replacement projects of \$5M in 2023 and \$5M in 2024.

#### 5.4.2 Operations and Related Performance

Gross water production in 2022 was 8,756 million gallons ("MG") or an average of 23.99 MGD. Unaccounted for water is calculated by subtracting the total water sales from the total water distributed. This represents the volume of water lost in the distribution system. These losses can be attributed to physical losses (i.e., pipe or tank leakage) or non-physical losses (i.e., under-billed or un-billed volume). In 2022, unaccounted for water was 12.72 percent which is approximately the same level as 2020. Unaccounted for water has increased significantly over the past 5 years. In response to this trend, a comprehensive report on water loss in the LUS distribution system is prepared by Water Company of America ("WCA"). The report is intended to enable LUS to monetize a significant amount of previously unaccounted for water. Using the Increased Water Revenue gathered in 2022, and converting dollars billed into gallons, WCA has made a rough estimation that it resolved an amount of 31,600,000 gallons of water for LUS in FY 2022. Furthermore, the snapshot evaluation of December 2022 indicates that the monetized recovery of unaccounted for water continues to increase, with a recovery of 4 million gallons

in that month alone.

**Table 5-9: Production and Unaccounted for Volumes**

Item	2018	2019	2020	2021	2022
Total Water Produced (1,000 Gal)	8,430,630	8,272,102	8,340,279	8,481,925	8,756,647
Plant Use (1,000 Gal)	31,200	31,200	31,200	31,200	31,200
Total Water Distributed (1,000 Gal)	8,399,430	8,240,902	8,309,079	8,450,725	8,725,447
Total Water Sales (1,000 Gal)	7,620,462	7,320,533	7,267,453	7,385,789	7,615,297
Not Accounted for (1,000 Gal)	778,968	920,369	1,041,626	1,064,936	1,110,150
Unaccounted for Water	9.3%	11.2%	12.5%	12.6%	12.7%

Source of data: LUS Financial and Operating Statements

Distribution system hydrant testing occurs twice per year as required by the Property Insurance Association of Louisiana (“PIAL”) and is necessary to maintain the utility’s Class II PIAL fire rating. In previous reports, it was noted that distribution system flushing was required to meet the Louisiana Department of Health and Hospitals Emergency Rule governing the minimum disinfectant residual of 0.5 mg/L chlorine in the distribution system was an attributing factor to the rise in unaccounted for water. The improvements at Commission Boulevard are expected to reduce the frequency of maintenance flushing for water quality control. Discussions with LUS staff indicate that automatic line flushing at 10 to 12 locations of the distribution system is also necessary to mitigate water quality concerns. Flushing is performed at night and is controlled with automatic timers.

#### **5.4.2.1 System Pressure Issues in North Service Area**

LUS staff have reported increasing frequency of pressure loss (i.e., less than 20 psi) in the north part of the LUS service area, despite proximity to the NWP high service pumps and the North Park Elevated Tower. As discussed in previous Reports, the water mains leaving the NWP are likely subject to restricted flow due to calcium carbonate scale accumulation. It is suggested that a system-pressure study with focus on the north service area be performed as part of any future water master plan efforts.

#### **5.4.3 Winter Storms**

Extreme weather conditions and freezing events have been an increasing trend in recent years. Winter Storm Uri occurred in 2021, and another event occurred in December 2022. The LUS water treatment facilities were able to continuously treat and produce water for customers in such events, but low

pressures (i.e., lower than 20 psi) were observed in the distribution system and a boil notice was issued as a precaution for consumer safety. The pressure drop was largely attributed to distribution piping constraints and customers opening their faucets to avoid bursting pipes.

#### 5.4.4 Hurricane Inspections

LUS was not directly impacted by any hurricanes in 2022 and therefore no hurricane inspections were performed.

### 5.5 Historical Capital Improvement Program

LUS tracks capital expenses through its capital work order system. Historical capital improvements program expenditures presented in Table 5-10 reflect investments in infrastructure funded by the Series 2019 Bonds and retained earnings. Major capital improvements in 2022 included upgrades to the treatment plants and distribution system.

**Table 5-10: Historical Capital Improvement Program**

	2018	2019	2020	2021	2022
Normal Capital & Special Equipment	\$ 1,630,841	\$ 1,526,170	\$ 2,382,861	\$ 2,601,696	\$ 3,143,487
Series 2019 Bonds	0	0	1,003,625	3,136,326	10,830,713
Retained Earnings	791,664	786,874	633,431	1,781,914	2,514,014
<b>Total Water Capital</b>	<b>\$ 2,422,504</b>	<b>\$ 2,313,045</b>	<b>\$ 4,019,917</b>	<b>\$ 7,519,937</b>	<b>\$ 16,488,214</b>

Source of data: LUS Financial and Operating Statements and Utilities Status of Work Orders Report

#### 5.5.1 ARPA Funding

In FY 2022, LUS was awarded multiple grants through the Louisiana Water Sector program totaling over \$9.5 million. Funds are from the American Rescue Plan Act (ARPA) and will be used for water and wastewater improvements projects. The allocated state grants will fund the projects described below:

- A new backup power generation system will be installed at the North Water Treatment Plant, allowing the plant to run at full capacity during systemwide power outages.
- Rehabilitation of treatment units at the North Water Treatment Plant.
- Chlorine gas feed improvements will be made at the North Water Treatment Plant site along with the replacement of nearby water mains.
- A secondary ground storage tank, two (2) high service pumps and a new media filter for water filtration will be constructed at the South Water Treatment Plant.
- Electrical rehabilitation and backup power generation for Wells 6 and 7 at the South Water Treatment Plant.

- Chlorine gas feed system and greensand filter media improvements will be made at the Gloria Switch Remote Site.
- Replace and upgrade small old deteriorated galvanized water main lines in the distribution system.
- Install pressure monitors in the distribution system.

## 5.6 Environmental and Regulatory Compliance

The following sections provide an overview of environmental and regulatory compliance associated with the water system. Environmental compliance for the water system is provided by LUS Environmental and Compliance staff including sample collection, analysis, and reporting.

### 5.6.1 Water Quality

The EPA requires water utilities to perform specific annual water quality sampling and summarize results in an annual Consumer Confidence Report which is then made available to the public<sup>4</sup>. The most recent Consumer Confidence Report available is for the 2021 calendar year. LUS expects to publish the 2022 Consumer Confidence Report in Summer of 2023. The 2021 water quality report indicates no MCL exceedances were observed in the 2021 calendar year. A Louisiana Drinking Water Watch search was performed and indicates there were no water system deficiencies found, as presented in Table 5-11.

**Table 5-11: Drinking Water System Violations**

Type	Category	Analysis	Compliance Period
No violations occurred during this CER reporting period	NA	NA	NA

Source of data: LUS Water Quality Report 2021

Triennial lead and copper sampling was performed by LUS in 2019 and was not required in the 2020 or 2021 calendar year. For reference, the 2019 lead and copper sampling results are provided in Table 5-12. There are zero sites that reported lead or copper concentrations above EPA Designated Action Levels. Section 5.6.3 discusses recent revisions to the Lead and Copper Rule.

<sup>4</sup> The 2021 Consumer Confidence Report can be found at <https://www.lus.org/water-quality>.

**Table 5-12: 2022 Triennial Lead and Copper Sampling**

Constituent	Major Source in Drinking Water	EPA Designated Action Level (requires treatment) at 90 <sup>th</sup> Percentile	LUS Results at 90 <sup>th</sup> Percentile Testing
Lead	Corrosion of household plumbing systems; Erosion of natural deposits	15 ppb	0 ppb
Copper	Corrosion of household plumbing systems	1.3 ppm	0 ppm

Source of data: 2022 Triennial Lead and Copper Sampling

The EPA Stage 2 Disinfectants and Disinfection Byproducts Rule (“DBPRs”) requires sampling of regulated contaminants including total trihalomethanes (“TTHM”) and five haloacetic acids (“HAA5”). The LDH collects samples for TTHM and HAA5 at six points within the distribution system monitoring and these are analyzed by a third-party laboratory. Results of the DBPR sampling are summarized below. No TTHM or HAA5 samples exceeded the respective MCL or MCLG.

**Table 5-13: Disinfection Byproducts Monitored in Distribution System**

DBP	Typical Source	Maximum Contaminant Level (MCL)	Maximum Contaminant Level Goal (MCLG)	Locational Running Annual Average (LRAA)	Range	Location
Haloacetic Acids (HAA5)	By-product of drinking water chlorination	60 ppb	0 ppb	3 ppb	< RL - 4.1 ppb	Ambassador Caffery & W. Congress
				4 ppb	1.9 - 5 ppb	Gloria Switch Rd. & Arbor
				3 ppb	1.5 - 4.4 ppb	Kaliste Saloom & E. Broussard
				4 ppb	2.3 - 5.1 ppb	Thomas Nolan & Brigante
				2 ppb	< RL - 3.4 ppb	Vennard & Valley View
				2 ppb	< RL - 3.3 ppb	Walker & Doc Bonin
Total Trihalomethanes (TTHM)	By-product of drinking water chlorination	80 ppb	0 ppb	10 ppb	8 - 10.6 ppb	Ambassador Caffery & W. Congress
				9 ppb	7.2 - 9.8 ppb	Gloria Switch Rd. & Arbor



DBP	Typical Source	Maximum Contaminant Level (MCL)	Maximum Contaminant Level Goal (MCLG)	Locational Running Annual Average (LRAA)	Range	Location
				12 ppb	8.5 - 11.1 ppb	Kaliste Saloom & E. Broussard
				16 ppb	13.2 - 19.6 ppb	Thomas Nolan & Brigante
				8 ppb	7.1 - 8.2 ppb	Vennard & Valley View
				7 ppb	6.0 - 8.0 ppb	Walker & Doc Bonin

Source of data: LUS Water Quality Report 2021

RL: Range Limit

ppb: Parts Per Billion

Each of LUS’s treatment facilities uses chlorine gas as a disinfectant to control microbes within the distribution system, except for Gloria Switch Remote Site which currently uses sodium hypochlorite but will convert to chlorine gas after the conclusion of an improvements project. The minimum allowable free chlorine concentration in the distribution system, set by Louisiana Department of Health (“LDH”), is 0.5 ppm and the maximum residual disinfectant level (“MRDL”) and maximum residual disinfectant level goal (“MRDLG”) are both 4 ppm. A summary of chlorine in the distribution system is included in Table 5-14.

**Table 5-14: Distribution System Disinfectant**

Disinfectant	Typical Source	MRDL	MRDLG	Highest RRA	LUS Range
Chlorine	Water additive to control microbes	4 ppm	4 ppm	1.58 ppm	0.53-2.38 ppm

Source of data: LUS Water Quality Report 2021

Drinking water in the distribution system is also sampled and analyzed for microbes. The results of the microbiological sampling are summarized in Table 5-15.

**Table 5-15: Microbiologicals Monitored in Distribution System**

Microbiologicals	Typical Source	Maximum Contaminant Level (MCL)	Maximum Contaminant Level Goal (MCLG)	Result
None Detected	NA	NA	NA	NA

Source of data: LUS Water Quality Report 2021

Raw groundwater was also sampled and analyzed for barium, fluoride, combined radium (-226 and -228) and gross beta particle activity. The results of the sampling are summarized in Table 5-16.

**Table 5-16: Constituents Monitored Before Treatment**

Constituent	Major Source in Drinking Water	Maximum Contaminant Level (MCL)	Maximum Contaminant Level Goal (MCLG)	LUS Max	LUS Range
Arsenic	Erosion of natural deposits; runoff from orchards; runoff from glass and electronics production wastes	10 ppb	0 ppb	1.7 ppb	<RL-1.7 ppb
Barium	Discharge of drilling wastes, discharge of metal refineries, erosion of natural deposits	2 ppm	2 ppm	0.22 ppm	<RL-0.22 ppm
Fluoride	Erosion of natural deposits; discharge from fertilizer and aluminum factories	4 ppm	4 ppm	0.2 ppm	0.2 ppm
Combined Radium (-226 & -228)	Erosion of natural deposits	5 pCi/L	0 pCi/L	1.651 pCi/L	<RL - 1.651pCi/L
Gross Alpha Particle Activity	Erosion of natural deposits	15 pCi/L	0 pCi/L	3.27 pCi/L	<RL-3.27 pCi/L
Gross Beta Particle Activity	Decay of natural and man-made deposits	50 pCi/L	0 pCi/L	1.84 pCi/L	<RL- 1.84pCi/L

Source of data: LUS Water Quality Report 2021

Every five years, the EPA updates the contaminants to be monitored by public water systems under the Unregulated Contaminant Monitoring Rule (“UCMR”). The final rule of UCMR5 was published December 27, 2021 and includes sampling and analysis for 29 per- and polyfluoroalkyl substances (“PFAS”) and one metal: lithium. EPA anticipates UCMR5 sampling from 2023 to 2025, posting the first set of preliminary UCMR 5 results in mid-2023 and expects to update the results approximately quarterly thereafter. According to LUS, they will begin collecting UCMR5 samples by late 2024.

### 5.6.2 America’s Water Infrastructure Act of 2018

The America’s Water Infrastructure Act (“AWIA”) of 2018, Section 2013 required that all water systems perform a Risk and Resilience Assessment (“RRA”) and update the water system’s Emergency Response Plan (“ERP”). LUS was required to certify completion of an RRA and ERP Update by March 31, 2020, and September 30, 2020, respectively. LUS reported that these services were performed by Neel Schaffer and that EPA certifications were submitted by LUS prior to the regulatory deadlines. These documents must be updated and submitted to EPA on a 5-year cycle. The next RRA and ERP update is due by March 31, 2025, and September 30, 2025, respectively.

### **5.6.3 Lead and Copper Rule Revisions**

The EPA issued the final Lead and Copper Rule Revisions (“LCRR”) on January 15, 2021, aimed to better protect children at schools and childcare facilities against lead exposure through drinking water. The LCRR represents the first major update to the Lead and Copper Rule in 30 years and requires water utilities to prepare and maintain lead service line inventories, requires modifications to lead and copper sample locations and protocols, and, if triggered, perform, and implement corrosion control studies and/or lead service line replacement.

The EPA mandated the effective date of the LCRR to be December 16, 2021, requiring all systems with any LSLs to prepare and submit to its State regulatory agency the LSL inventory, along with an LSL Replacement Plan and publicly accessible inventory by October 16, 2024. According to the 2022 Triennial Lead and Copper Sampling Report, lead and copper has not been detected in LUS’s source water and records do not indicate any lead and copper for 90<sup>th</sup> percentile values in the distribution system. In addition to the triennial lead and copper sampling, LUS has begun preparing for operational changes brought about by the LCRR, specifically in developing an LSL inventory to support development of an LSL Replacement Plan and revisions to the lead and copper sampling.

### **5.6.4 Louisiana Pollutant Discharge Elimination System Permits**

The water system maintains four LPDES permits as described in the following sections.

#### **5.6.4.1 North Water Treatment Plant LPDES Permit**

LPDES Permit LAG380057 permits for the discharge of clarifier sludge and/or clarifier blowdown at Outfall 004. The permit is effective as of December 17, 2020, and expires five (5) years from the effective start date.

#### **5.6.4.2 South Water Treatment Plant LPDES Permit**

LPDES Permit LA0079278 permits for the discharge of storm water or process flows at five storm water outfalls. The permit is effective as of June 1, 2020, and expires five (5) years from the effective start date.

#### **5.6.4.3 North Booster Well Treatment and Storage Facility**

LPDES Permit LAG380096 permits for the discharge of storm water or process flows to outfalls at the North Booster Well Treatment and Storage Facility located at Gloria Switch Road. The permit is effective as of December 17, 2020, and expires five (5) years from the effective start date.

#### **5.6.4.4 Commission Boulevard Water Treatment Plant**

LPDES Permit LAG380171 permits for the discharge of filter backwash water at Outfall 002. The permit is effective as of October 12, 2022, and expires three (3) years from the effective start date.

#### **5.6.5 Spill Prevention Control and Countermeasures Plan**

SPCC plans are required to comply with state and federal regulations if facilities are proximate to U.S. waters. Compliance is required by facilities which are subject to spills of oils, fuels, or other controlled substances and have a storage capacity of more than 1,320 gallons at a single facility. SPCC Plans are required at the North Water Treatment Plant and the South Water Treatment Plant and were prepared for each facility in 2006. Each water treatment plant SPCC Plan was last reviewed for substantial changes in May 2017. SPCC Plans must be reviewed every five (5) years or upon significant change in oil storage or if a spill incident occurs. According to LUS, no significant changes were made in 2022.

### **5.7 Contracts and Agreements**

LUS owns, operates, and maintains a regional Water System that serves customers both inside and outside its City limits. Services are provided on a retail and wholesale basis outside the City, including seven wholesale customers governed by six contracts. Wholesale customers are comprised of two water districts and five neighboring water systems or cities including:

- Waterworks District North (retail and wholesale)
- Waterworks District South
- The City of Scott
- The City of Broussard
- Milton Water System
- The City of Youngsville
- The City of Carencro (emergency supply only; not a typical wholesale customer)

LCG also provides billing services on behalf of Waterworks District North to its retail customers. Both the North and South Waterworks Districts constructed their own additions and extensions following LUS construction standards. In addition to its wholesale contracts, LCG has a contract to provide emergency back-up water service to the City of Carencro. This agreement was signed in 1980 and has no expiration.

Wholesale customers represented 31.8 percent of total water sales volume and 32.6 percent of the total water sales revenue in 2022, respectively. While both wholesale water sales volume and revenues have

increased recently, wholesale revenues have increased more due to wholesale rate increases. Table 5-17 and Table 5-18 summarize the historical wholesale water volume sales and revenues by customer.

**Table 5-17: Wholesale Water Sales by Customer (1,000 gallons)**

Customer	2018	2019	2020	2021	2022
City of Scott	339,037	365,611	332,496	347,494	355,242
City of Broussard	297,294	332,037	219,374	246,489	274,427
City of Youngsville	406,563	367,097	449,303	464,766	514,235
Milton Water System	234,024	240,071	246,763	252,743	257,228
Waterworks District North	442,492	324,787	376,549	442,626	450,704
Waterworks District North - Wholesale	222,101	227,818	213,567	215,592	214,695
Waterworks District South	315,399	314,507	353,520	352,314	357,939
<b>Total Wholesale Water Sales</b>	<b>2,256,911</b>	<b>2,171,928</b>	<b>2,191,571</b>	<b>2,322,023</b>	<b>2,424,469</b>
<b>Total Water Sales (Wholesale and Retail)</b>	<b>7,620,462</b>	<b>7,320,533</b>	<b>7,267,453</b>	<b>7,385,789</b>	<b>7,615,297</b>
<b>Percent of Total Sales from Wholesale</b>	<b>29.6%</b>	<b>29.7%</b>	<b>30.2%</b>	<b>31.4%</b>	<b>31.8%</b>

Source: LUS Financial and Operating Statements

**Table 5-18: Wholesale Water Revenues by Customer**

Customer	2018	2019	2020	2021	2022
City of Scott	\$988,418	\$997,561	\$909,160	\$961,493	\$1,015,039
City of Broussard	760,203	879,643	590,437	675,657	794,178
City of Youngsville	1,033,306	934,361	1,240,640	1,265,506	1,483,373
Milton Water System	601,330	602,054	675,946	693,552	746,419
Waterworks District North	1,265,202	944,243	1,394,202	1,809,916	1,662,278
Waterworks District North - Wholesale	574,238	588,692	571,651	588,080	628,268
Waterworks District South	815,558	815,953	973,644	962,614	1,030,402
<b>Total Wholesale Water Revenues</b>	<b>\$6,038,256</b>	<b>\$5,762,507</b>	<b>\$6,355,680</b>	<b>\$6,956,818</b>	<b>\$7,359,956</b>
<b>Total Water Sales (Retail &amp; Wholesale)</b>	<b>\$21,220,243</b>	<b>\$20,524,232</b>	<b>\$21,144,642</b>	<b>\$21,710,500</b>	<b>\$22,574,345</b>
<b>Percent of Total Sales from Wholesale</b>	<b>28.5%</b>	<b>28.1%</b>	<b>30.1%</b>	<b>32.0%</b>	<b>32.6%</b>

Source: LUS Financial and Operating Statements

A summary of wholesale contract terms is presented in Table 5-19. No amendments have been made to the duration of wholesale contract terms since 2019.

**Table 5-19: Wholesale Water Contract Terms**

Customer	Contract Date	Term in Years	Termination Date
Water District North – Full Service – Phase 1, 2, 3, 4 (NE area, NW area, Scott area)	October 17, 2002	30	October 17, 2032
Waterworks District North – Wholesale	October 17, 2002	30	October 17, 2032
City of Scott	May 28, 1997	41	May 31, 2038
City of Broussard	March 5, 1998	40	July 31, 2038
Milton Water System	April 28, 1997	40	April 28, 2037
City of Youngsville	December 24, 1998	40	December 24, 2038
Waterworks District South	October 13, 1995	40	October 12, 2035
City of Carencro <sup>(1)</sup>	March 28, 1980	N/A	None

Source: LUS

- (1) Letter Agreement with the City of Carencro on an emergency back-up basis. The rate charged will be the same as the current City of Scott rate. As per information received from LUS's Water System, LUS supplied water to the City of Carencro under this letter agreement fewer than five times.

Although no changes have been made regarding contract termination dates, a handful of amendments have been made to the terms of the contracts and to the wholesale systems themselves. In 2022, LUS agreed to use Contribution in Aid of Construction (CIAC) funds to pay for a new wholesale master meter for the Milton Water System. The new master meter will help LUS more accurately supply the requested volumes to the Milton water system.

In 2022, the City of Broussard amended service areas covered by the wholesale water agreement and entered into a temporary water supply contract with LUS while the Broussard main water line is relocated due to an I-49 interstate expansion project.

Lastly in 2022, Water District North and LUS amended their wholesale agreement terms relating to the districts administration of sewer service, including billing and collections, for LUS water customers receiving sewer service within the districts service area. Water District North has also agreed for LUS to install additional fire hydrants into the Water District North system. LUS will own and maintain the fire hydrants in the water districts distribution system.

## 5.8 Utility Benchmarking

### 5.8.1 Utility Rates

LUS's residential and commercial water rates have historically been among the lowest in the state and surrounding region. Table 5-20 and Table 5-21 provide a regional comparison of effective water rates for residential and commercial customers, respectively.

**Table 5-20: Residential Rate Comparison**

Utility	Average (\$/1,000 gallons) <sup>(1)</sup>
LUS	\$ 2.64
Alexandria	\$ 3.19
Lake Charles	\$ 3.81
Shreveport	\$ 3.77
Baton Rouge	\$ 4.45
New Iberia	\$ 5.56
New Orleans	\$ 9.79

Source: LUS. Rates as of October 2022.

(1) Assumes monthly water consumption of 7,000 gallons.

**Table 5-21: Commercial Rate Comparison**

Utility	Average (\$/1,000 gallons) <sup>(1)</sup>
LUS	\$ 3.23
Alexandria	\$ 3.27
Shreveport	\$ 4.28
Lake Charles	\$ 4.55
Baton Rouge	\$ 4.91
New Iberia	\$ 5.56
New Orleans	\$ 9.77

Source: LUS. Rates as of October 2022.

(1) Assumes monthly water consumption of 30,000 gallons.

LUS completed a rate study in 2016 which indicated the need to increase Water System rates to adequately cover its costs. Retail rates were increased 7.4 percent effective November 1, 2016, and 7.2 percent effective November 1, 2017. Retail rates have remained unchanged since then. LUS recently

finalized a water rate study in the summer of FY 2022. LUS City Council approved a rate increase plan which included 8 percent annual rate increases in FY 2023, FY 2024, and FY 2025.

Wholesale rates are evaluated every other year through a cost-of-service study. The cost of service study for wholesale water rates was completed in 2022 and resulted in a 5 percent wholesale rate increase in 2022 and 3 percent wholesale increase in 2023.

### **5.8.2 Financial and Operating Statistics**

The American Water Works Association (“AWWA”) annually publishes benchmarking data across a variety of performance indicators for water and wastewater utilities. The *2022 AWWA Utility Benchmarking: Performance Management for Water and Wastewater* was released in early 2023, compiling various financial and operating ratios from 2021. For this analysis, specific ratios were obtained from the AWWA report representing national and regional medians. The AWWA defines national metrics as water utilities in both the United States and Canada, hereafter referred to as “National.” Ratios are also available by region and by number of water customers served. The U.S. South region was used, which includes Louisiana and is hereafter referred to as “Regional.” Further, ratios are available specifically for water utilities, wastewater utilities, and combined water and wastewater utilities. Where possible, comparisons have been made to water utility ratios. However, some LUS balance sheet information is available only for the combined Electric, Water and Wastewater Utilities System, hereafter referred to as “Combined.” The AWWA “Combined” benchmarking data only includes water and wastewater utilities.

LUS’s operating ratio benchmark results are presented in Table 5-22. LUS’s water operational costs are lower than the National and Regional medians. LUS’s combined debt ratio is lower than the Regional median, but higher than the National median. The operating ratio is higher, on a combined basis, than the National and Regional medians. However, the AWWA combined utilities median includes water, wastewater, and storm water, while LUS includes water, wastewater and electric. LUS’s cash reserves are lower than the National and Regional medians. Debt service coverage for LUS is higher than both the National and Regional medians on both a water-only and combined basis.



**Table 5-22: Benchmarked Water Utility Operating Ratios**

Statistics	Basis	National <sup>(1)</sup>	Regional	LUS	
		2021	2021	2021	2022
Operational Costs per MG	Water	\$2,751	\$2,679	\$1,631	\$1,713
Debt to Total Assets (Debt Ratio)	Combined	0.31	0.48	0.34	0.32
Operating Ratio (O&M cost/ Operating revenue)	Water	0.71	0.48	0.64	0.66
Operating Ratio (O&M cost/ Operating revenue)	Combined	0.54	0.49	0.71	0.74
Cash Reserve Days <sup>(2)</sup>	Combined	682	416	51	61
Debt Service Coverage	Water	2.22	2.78	3.66	3.65
Debt Service Coverage	Combined	2.46	2.06	2.82	3.29

Source: AWWA and LUS

(1) National AWWA benchmarks for water and combined water and wastewater utilities with 50,001 to 100,000 customers to align with the Water System customers served.

(2) LUS results based on total O&M for Electric, Water, and Wastewater Systems less fuel and purchased power expenses.

## 5.9 Historical Financial Performance

Table 5-23 presents historical debt service and the associated DSCR. Historical Water System debt service as shown below includes a portion of the Series 2010 bonds, Series 2012 Bonds, Series 2017 Bonds, Series 2019 Bonds, and Series 2021 Bonds. The Series 2010 Bonds were fully redeemed by the proceeds of the Series 2017 Bonds on November 1, 2020. The Series 2012 Bonds were fully redeemed by the proceeds of the Series 2021 Bonds on November 1, 2021. In each year since 2018, the DSCR exceeded the minimum coverage requirement of 1.0 required by the Bond Ordinances.

**Table 5-23: Historical Financial Performance**

Fiscal Year	Operating Revenues <sup>(1)</sup>	Operating Expenses <sup>(2)</sup>	Net Revenues Available for Debt Service		Debt Service Coverage Ratio
			Debt Service	Debt Service <sup>(3)</sup>	
2018	21,736,544	14,260,225	7,476,319	1,726,379	4.33
2019	21,369,475	14,227,206	7,142,269	1,899,168	3.76
2020	21,696,556	13,159,106	8,537,450	2,276,675	3.75
2021	21,904,303	13,833,990	8,070,313	2,207,678	3.66
2022	22,964,907	15,000,437	7,964,470	2,182,638	3.65

Source: LUS Financial and Operating Statements

(1) Operating Revenues include interest income and other miscellaneous income.

(2) Operating Expenses include O&M and other expenses such as customer service and A&G costs. Operating Expenses do not include ILOT, normal capital and special equipment, and other miscellaneous expenses.

(3) Debt Service was prepared on a cash basis for this table and includes a portion of the Series 2010 Bonds, Series 2012 Bonds, Series 2017 Bonds, Series 2019 Bonds, and Series 2021 Bonds. The Series 2010 Bonds were fully redeemed by the Series 2017 Bonds on November 1, 2020. The Series 2012 Bonds were fully refunded with the Series 2021 Bonds on November 1, 2021.

### 5.9.1 Rate Structures

The Water System provides service to retail and wholesale customers. Wholesale customers are outside the City limits and are served on a contract basis. Retail customers are served both inside and outside the City limits. Water System customer classes include residential, commercial, schools and churches, and special contract customers for bulk water. The Water System rate structure for retail customers includes a customer charge that varies based on the meter size, and a commodity charge that is based on usage in thousand gallons. The commodity charge for Residential customers includes a uniform rate per thousand gallons in the winter period (December through March) and an inclining block rate structure in the summer period (April through November). Table 5-24 presents the retail rate schedule for LUS in FY 2022. New rates were adopted by LUS in FY 2022 and they were put in place on November 1, 2022.

**Table 5-24: Retail Rate Schedules**

Rate Class	Serves	Effective Date	Meter Size (inches)	Customer Charge (\$/month)	Winter Commodity Rate (\$/1,000 gallons)	Summer Commodity Rate Tier 1 (\$/1,000 gallons)	Summer Commodity Rate Tier 2 (\$/1,000 gallons)	Monthly Commodity Rate (\$/1,000 gallons)
W-1	Residential	Nov-17	0.75	\$5.55	\$1.70	\$1.70	\$2.70	NA
			1.00	\$9.25	\$1.70	\$1.70	\$2.70	NA
			1.50	\$18.50	\$1.70	\$1.70	\$2.70	NA
			2.00	\$29.60	\$1.70	\$1.70	\$2.70	NA
			3.00	\$55.50	\$1.70	\$1.70	\$2.70	NA
			4.00	\$92.50	\$1.70	\$1.70	\$2.70	NA
			6.00	\$185.00	\$1.70	\$1.70	\$2.70	NA
			8.00	\$296.00	\$1.70	\$1.70	\$2.70	NA
W-1-O	Residential Non-City	Nov-17	0.75	\$11.10	\$3.40	\$3.40	\$5.40	NA
			1.00	\$18.50	\$3.40	\$3.40	\$5.40	NA
			1.50	\$37.00	\$3.40	\$3.40	\$5.40	NA
			2.00	\$59.20	\$3.40	\$3.40	\$5.40	NA
W-2	Commercial	Nov-17	0.75	\$5.55	NA	NA	NA	\$1.95
			1.00	\$9.25	NA	NA	NA	\$1.95
			1.50	\$18.50	NA	NA	NA	\$1.95
			2.00	\$29.60	NA	NA	NA	\$1.95
			3.00	\$55.50	NA	NA	NA	\$1.95
			4.00	\$92.50	NA	NA	NA	\$1.95
			6.00	\$185.00	NA	NA	NA	\$1.95
			8.00	\$296.00	NA	NA	NA	\$1.95
W-2-O	Commercial Non-City	Nov-17	0.75	\$11.10	NA	NA	NA	\$3.90
			1.00	\$18.50	NA	NA	NA	\$3.90
			1.50	\$37.00	NA	NA	NA	\$3.90
			2.00	\$59.20	NA	NA	NA	\$3.90

### 5.9.2 Revenue Analysis

Table 5-25 presents the Water System revenues. The total retail revenues increased by 6.9 percent in 2018 due primarily to rate increases. The revenues decreased by 2.7 percent in 2019 due to lower sales. In 2020, total retail revenues increased 0.8 percent, with higher Residential sales and revenues largely offset by lower sales and revenues from non-residential classes, a dynamic influenced heavily by the onset of

the COVID-19 pandemic. In 2021 revenues swung in the opposite direction with a 1.3 percent decrease in retail revenues. The decline in retail revenues was more than offset by increases in wholesale revenues in 2021. The revenues increased by 3.7 percent in FY 2022 due to sales growth in all classes.

**Table 5-25: Retail Revenues by Class**

	2018	2019	2020	2021	2022
<b>Revenues</b>					
Residential	\$8,410,699	\$8,181,849	\$8,515,274	\$8,278,311	\$8,567,430
Commercial	5,543,239	5,464,127	5,355,309	5,387,432	5,528,945
Schools & Churches	632,392	534,520	473,545	495,568	541,104
Other	234,910	244,873	200,216	197,356	250,899
<b>Total</b>	<b>\$14,821,240</b>	<b>\$14,425,369</b>	<b>\$14,544,345</b>	<b>\$14,358,667</b>	<b>\$14,888,377</b>
<b>Number of Customers</b>					
Residential	42,929	44,633	43,627	44,033	44,340
Commercial	6,671	6,899	6,824	6,857	6,893
Schools & Churches	312	317	317	322	324
Other	283	281	285	287	290
<b>Total</b>	<b>50,195</b>	<b>52,130</b>	<b>51,054</b>	<b>51,498</b>	<b>51,846</b>
<b>Revenue per Customer</b>					
Residential	\$196	\$183	\$195	\$188	\$193
Commercial	831	792	785	786	802
Schools & Churches	2,028	1,685	1,494	1,539	1,671
Other	831	871	702	687	866
<b>Total</b>	<b>\$295</b>	<b>\$277</b>	<b>\$285</b>	<b>\$279</b>	<b>\$287</b>
<b>Sales (1000 gallons)</b>					
Residential	2,735,228	2,561,224	2,681,717	2,616,072	2,669,588
Commercial	2,243,690	2,237,397	2,130,776	2,176,190	2,198,059
Schools & Churches	289,301	248,388	187,246	198,768	223,420
Other	95,333	101,596	76,143	72,736	99,760
<b>Total</b>	<b>5,363,552</b>	<b>5,148,605</b>	<b>5,075,882</b>	<b>5,063,766</b>	<b>5,190,827</b>
<b>Sales (1000 gallons) per Customer</b>					
Residential	64	57	61	59	60
Commercial	336	324	312	317	319
Schools & Churches	928	783	591	617	690
Other	337	361	267	253	344
<b>Total</b>	<b>107</b>	<b>99</b>	<b>99</b>	<b>98</b>	<b>100</b>
<b>Revenue per 1000 gallon</b>					
Residential	3.07	3.19	3.18	3.16	3.21
Commercial	2.47	2.44	2.51	2.48	2.52
Schools & Churches	2.19	2.15	2.53	2.49	2.42
Other	2.46	2.41	2.63	2.71	2.52
<b>Total</b>	<b>2.76</b>	<b>2.80</b>	<b>2.87</b>	<b>2.84</b>	<b>2.87</b>

Source: LUS Financial and Operating Statements

### 5.9.3 Expense Analysis

Table 5-26 shows historical water operating expenses, distinguished between fixed and variable costs. Variable operating expenses within Power & Pumping include purchased power costs, while variable operating expenses within Purification include chemical costs. Fixed operating expenses include Source of Supply, a portion of Power & Pumping and Purification, Distribution, Customer Service, and Administrative and General (“A&G”) expenses. Historically, variable expenses average between 21 and 24 percent of total expenses. In FY 2022, both fixed and variable expenses increased in multiple categories. Variable expenses increases were primarily due to large increases in both chemicals and power cost increases. Fixed expense increases in FY 2022 were primarily attributed to inflationary pressures in personnel and capital expenses like utilities across the United States.

**Table 5-26: Historical and Variable Expense Summary**

	2018	2019	2020	2021	2022
<b>Variable Expenses</b>					
Power & Pumping	\$464,538	\$461,845	\$465,557	\$514,181	\$658,324
Purification	2,587,531	2,675,900	2,372,173	2,371,988	2,872,063
Total Variable Expenses	\$3,052,070	\$3,137,745	\$2,837,730	\$2,886,168	\$3,530,386
<b>Fixed Expenses</b>					
Source of Supply	\$175,620	\$183,896	\$179,867	\$198,013	\$237,188
Power & Pumping	296,324	303,191	274,159	299,671	420,183
Purification	1,971,597	1,871,480	1,716,917	1,862,694	1,674,674
Distribution	2,884,033	2,889,727	2,098,086	2,174,002	2,053,244
Customer	1,219,158	1,172,251	1,295,339	1,446,359	1,736,861
A&G	4,661,424	4,668,916	4,757,007	4,967,083	5,347,900
Total Fixed Expenses	\$11,208,155	\$11,089,461	\$10,321,376	\$10,947,822	\$11,470,051
Total Fixed & Variable	\$14,260,225	\$14,227,206	\$13,159,106	\$13,833,990	\$15,000,437
Percent Variable	21%	22%	22%	21%	24%
Percent Fixed	79%	78%	78%	79%	76%

Source: LUS Financial and Operating Statements

### 5.9.4 Recovery of Costs

Water system retail sales are affected by weather, economic conditions, and perhaps most notably in 2020 and 2021, the COVID-19 pandemic. Volatility of water demand caused by these dynamics can impact the stability of revenues. As presented in Table 5-26, expenses are largely fixed and are generally not as susceptible to weather or economic variances. However, as LUS has come out of the COVID-19 pandemic and realized many of the same inflationary pressures as utilities across the United States, both its fixed and variable expenses increased considerably as compared to the low expenses incurred in FY 2020. Regardless of the underlying cause, the predominately fixed-cost nature of the Water System cost structure and the highly variable nature of its revenue stream can put pressure on utility cash flows when

demand is disrupted. The mismatch between a high fixed cost structure and a high variable cost revenue stream is a common challenge in the water utility industry.

## 5.10 Observations and Recommendations

Based on the analysis described herein, Burns & McDonnell presents the following observations and recommendations.

- Based on visual inspection of facilities, review of records, and interviews of LUS staff, the LUS water treatment facilities are in good condition, maintained properly and in accordance with industry practices.
- The organizational structure and management of the water system engineering and operations areas appears to be strong based on initial observations, interviews, organizational structures, and manpower within each department.
- LUS completed a rate study in FY 2022 and the proposed rate plan was approved. The adopted rate increases are expected to generate revenues that will allow LUS to continue to maintain its financial performance. New water rates were put into place effective November 1, 2022.
- LUS is planning to issue new bonds in FY 2023 to support various electric, water, and wastewater projects. The bond funding anticipated is reasonable and appropriate to fund these projects and the forecasted revenues represented in the continuing disclosure financial projections are expected to be able to fund the new debt service associated with the new bonds.
- The Water Sector Program was created in 2021 by the State of Louisiana to provide grant funding for repairs, improvements and consolidation of community water and sewer systems around the state. \$450 million of the ARPA state Fiscal Recovery Funds were allocated for the program in 2022. LUS submitted applications to the program in late 2021. In February 2022 LUS was notified that it was awarded approximately \$4.67 million in grant funding for eleven (11) water activities/projects as a part of Round 1 of the program.
- Except for FY 2022, retail sales of water have been decreasing over the last 5 years. However, retail sales reductions have been partially offset by wholesale sales increases, with wholesale sales representing 28 to 30 percent of total sales over the last five years. LUS coordinates closely with its wholesale customers regarding growth for planning purposes and should continue to do so.
- LUS has begun preparing for operational changes brought about by the LCRR, specifically in developing a lead service line (“LSL”) inventory to support development of an LSL Replacement Plan and revisions to the lead and copper sampling. The EPA mandated the effective date of the

LCRR to be December 16, 2021, requiring all systems with any LSLs to prepare and submit to its State regulatory agency the LSL inventory, along with an LSL Replacement Plan and publicly accessible inventory by October 16, 2024.

- Overall unaccounted for water (i.e., losses) on a percentage basis have increased over the last five years. With relatively steady water production and a general decline in water sales, unaccounted for water has increased from 7.4 percent in 2016 to 12.5 percent in 2020, 12.6 percent in 2021, and 12.7 percent in 2022. In response to this trend, a comprehensive report on water loss in the LUS distribution system was prepared by Water Company of America and results suggest that WCA's project has enabled LUS to monetize a significant amount of previously unaccounted for water. Using the Increased Water Revenue gathered in 2022 and converting dollar billed into gallons, WCA has made a rough estimation that it resolved an amount of 31,600,000 gallons of water for LUS in FY 2022. Furthermore, the snapshot evaluation of December 2022 indicates that the monetized recovery of unaccounted for water continues to increase, with a recovery of 4 million gallons in December alone. Additionally, LUS conducted an internal audit of LUS and interdepartmental water usage and has refined its existing departmental procedures. LUS has identified and is taking corrective action to resolve water loss.
- For both the SWP and NWP, additional ground storage has been considered. The five-year capital improvement program has identified budgets for these improvements. A project at the SWP to install a new 1.75-M gallon GST is planned for 2024 and a project for the NWP is planned for 2026.
- For both the South Water Treatment Plant and North Water Treatment Plant, LUS could consider implementing additional safety measures for chlorine gas cylinders in the event of a pressurized discharge. Potential safety measures could include using containment vessels for in-use cylinders or a scrubber system to ensure that a chlorine gas leak is safely contained. Currently, there are no provisions to contain a pressurized leak other than on-call services by the chlorine gas supplier.
- Both the South Water Treatment Plant and North Water Treatment Plant lack the ability to provide full backup power with existing generators. LUS could consider installing additional emergency power to meet the full power load requirement of the plant during an outage. A project to add backup power for the NWP is identified in 2024 per the LUS five-year capital improvement program.
- The 16-inch diameter finished water pipeline that conveys water out of the North Water Treatment Plant to the distribution system presents a hydraulic bottleneck and restricts the amount of finished water able to leave through that line likely due to calcium carbonate scale accumulation. LUS staff have reported increasing frequency of pressure loss events (i.e., less than 20 psi) in this service area,

despite proximity to the NWP high service pumps and the North Park Elevated Tower. LUS could consider performing a system-pressure study with focus on the north service area and developing a program to replace the lines in this area. Timing of line replacements near the North Water Treatment Plant could be performed concurrently with future road replacement project(s) in the area.

- LUS could consider using a product of at least 70 percent orthophosphate (and 30 percent polyphosphate) as opposed to the currently used polyphosphate to provide corrosion control for the distribution system.
- LUS has considered a new project for improvements to disinfection and treatment at Gloria Switch Remote Site. This project would switch the sodium hypochlorite solution to chlorine gas for disinfection and replace the existing Greensand media with Greensand Plus media. This will allow LUS to discontinue feeding permanganate and allow the site to simultaneously backwash filters and produce treated water at full treatment capacity. In future expansion, LUS could consider installation of additional greensand filters, increase production by running both wells through filters and improvements to backup generators.
- LUS last completed a Water Master Plan in 2001. Due to development that has occurred since then, LUS should consider an update its master plan to project future growth and associated water flow rates; assess existing and future water system capacity needs; and identify long-term capital improvements required for future development, system expansion, and condition-related improvements. The results of that assessment could be used to further develop capital improvement planning to address critical assets over a long-term period, with targeted strategies to address high-priority items. This effort could include planning for renewal and replacement of aging infrastructure over its anticipated service life. LUS has initiated efforts to kick off a Water Master Plan.

## 6.0 WASTEWATER UTILITY SYSTEM

### 6.1 Wastewater Utility Summary

LUS provided wastewater conveyance, treatment, and sludge management and disposal services to 46,792 retail customers in 2022. Key infrastructure includes 701.4 miles of sanitary sewer mains, 195 lift stations, four wastewater treatment plants, and sludge management and disposal facilities. The total combined permitted treatment capacity of the four plants is 18.5 MGD, while the total combined flow holding capacity at the four plants is 38.5 M gallons. LUS is also responsible for operating and maintaining approximately 26 small package wastewater treatment plants that primarily serve subdivisions and rural areas into the main LUS Wastewater System. Twenty-one (21) of the small package wastewater treatment plants have their own discharge permit.

Wastewater system collected flow decreased in 2022 by 20 percent compared to 2021 flows. Historical Wastewater System collected flows are shown in Table 6-1.

**Table 6-1: Wastewater System Historical Retail Collection**

Fiscal Year	(1000 gallons) (1)(2)
2018	5,326,815
2019	5,746,278
2020	5,498,088
2021	6,328,515
2022	5,043,306

Source: LUS Financial and Operating Statements

(1) The Wastewater System does not provide wholesale service.

(2) Retail Collection is not associated with the gallons used for billing wastewater customers.

### 6.2 Wastewater Treatment

LUS owns and operates four wastewater treatment plants (“WWTPs”): the South Sewage Treatment Plant (“SSTP”), the East Sewage Treatment Plant (“ESTP”), the Ambassador Caffery Treatment Plant (“ACTP”), and the Northeast Treatment Plant (“NETP”). The combined average day treated flowrate for these WWTPs in 2022 was 13.8 MGD and the total permitted capacity is 18.5 MGD as summarized in Table 6-2.



**Table 6-2: Wastewater Treatment and Storage Summary**

Facility	2022 Average Flow (MGD)	Permitted Capacity (MGD)	Wet-Weather Storage Capacity (MG)
South Sewage Treatment Plant	4.9	7.0	3.5
East Sewage Treatment Plant	2.7	4.0	3.0
Ambassador Caffery Treatment Plant	5.2	6.0 <sup>(1)</sup>	7.0
Northeast Treatment Plant	1.0	1.5	10.0
<b>Total</b>	<b>13.8</b>	<b>18.5</b>	<b>23.5</b>

Source: LUS

<sup>1</sup> Permitted capacity is 6.0 MGD; however, plant treatment capacity is 9.25 MGD.

The LUS wastewater system is a separate sanitary sewer system, consisting of an interconnected network of piping and lift stations that conveys sewage to the City’s WWTPs. LUS staff have indicated the majority of wastewater treated at the WWTPs is domestic wastewater, with relatively little industrial wastewater flows. During wet weather events with large amounts of precipitation, the WWTPs may be undersized to completely treat peak flows associated with storm water and groundwater, known as inflow and infiltration (I&I), that enters the sanitary sewer system through cross connections with storm water sources or cracks in pipes or manholes. Influent flow exceeding the WWTPs peak design flow capacity is diverted to on-site wet weather basins. Wastewater diverted to the wet weather basins is stored and treated by the WWTPs when wet weather flows subside. Wet weather flows are generally treated as if they are typical sewage. Influent flow exceeding the capacity of the on-site wet weather basins may be bypassed around biological treatment processes but is disinfected prior to discharge to the Bayou St. Claire and Vermillion River, but this occurs very rarely only during an extreme weather event.

Since wastewater treatment uses microorganisms for removal of organics, a portion of the biomass waste or sludge streams must be continuously removed from the WWTPs. Final disposal of biosolids (i.e., dewatered sludge from the WWTPs) is accomplished by land application at several farms in the Lafayette area. Three of the WWTPs use mechanical dewatering devices to further concentrate the solids (to approximately 22 to 27 percent solids by weight) and reduce the total volume of biosolids to be land-applied. The NETP does not use mechanical dewatering and hauls liquid sludge to the SSTEP for additional treatment and dewatering.

The Louisiana Department of Environmental Quality (LDEQ) has limited discharge loading into the Vermillion River. As such, treatment of wastewater needs to be performed to levels that reduce the 5-day carbonaceous biological oxygen demand (“BOD5”), total suspended solids (“TSS”), and ammonia in the effluent streams of the WWTPs, in accordance with each facility’s LPDES permit.

The projected capital improvement program for wastewater treatment from 2023 to 2027 is summarized in Table 6-3. Specific projects indicated in the program include headworks rehabilitation at ACTP and NETP; clarifier rehabilitation at NETP; digester rehabilitation at ESTP and SSTP; a digester tank at ACTP; installation of a sludge drying facility at ESTP; modifications to the plant discharge at NETP; flow meters; expansion of NETP for additional capacity; odor control rehab at the NETP, rotating screen replacement at ACTP and SSTP; pond cleaning at the NETP; a Sewer System Master Plan; PLC replacements; a sludge holding tank at NETP; and digester rehab at the ACTP. A major project to install sludge handling equipment and new aerobic digesters at the SSTP was substantially completed in 2022. Future phases, including flow handling and odor control improvements, are planned from 2023 to 2025. In addition to these specific projects, LUS has established annual allocations for various treatment projects and property purchases.

**Table 6-3: Wastewater Treatment Projected CIP**

	2023	2024	2025	2026	2027	Total
Wastewater Treatment Total	\$6,860,000	\$360,000	\$3,560,000	\$20,610,000	\$7,310,000	\$38,700,000

Source of data: LUS Five-Year Capital Improvement Program (Utilities System)

### 6.2.1 South Sewage Treatment Plant

The SSTP treated an average flowrate of 4.1 MGD in 2022 and is permitted to treat up to 7 MGD. The SSTP headworks currently receives wastewater from the on-site main pump station and the primary force main from the Acacia Lift Station across the Vermillion River. All influent flows pass through rotary drum screens and vortex grit removal processes to separate large debris and sediment from the water to improve treatability. Grit and screenings are conveyed to dumpsters for offsite disposal. After pretreatment, the SSTP flow splits between two treatment trains: the East Side train and the West Side train. Each train uses activated sludge (i.e., a mixture of microbial organisms and sewage which are oxygenated for nutrient removal) followed by circular clarifier basins and chain-and-flights final clarifiers. Treated water is then disinfected with chlorine, and finally dechlorinated prior to discharge to the Vermillion River. The SSTP has an odor control system installed at the plant. It is currently not functioning, but LUS did not report any significant complaints or concerns related to odor. During wet weather events, the SSTP is configured to segregate influent flow into an on-site 3.5 M gallon wet weather storage basin.

The sludge goes through aerobic digestion (i.e., biological digestion of nutrients in the presence of both free and bound oxygen) to further breakdown organic content. Digested sludge is then dewatered by a belt filter press. The solids from the belt filter press are then land applied, and the liquid removed is sent back to the plant headworks.

LUS is implementing a major effort to increase treatment capacity at the SSTP in phases. A recently completed sludge processing building with new belt filter presses and new aerobic digesters were observed during the February 2023 site visit. LUS is developing a project to expand liquid treatment capacity under a subsequent phase. Wastewater currently processed at the ACTP will be transferred to the SSTP through a recently constructed force main from the Old Maurice Lift Station and treated at the SSTP by new sequenced batch reactors (SBRs) to be constructed in the future when funding allows. In addition to the liquid treatment expansion, planned capital improvements at the SSTP include:

- Odor control
- Replacement of rotating drum screens
- Aerobic digester rehabilitation
- Conference room

### **6.2.2 East Sewage Treatment Plant**

The ESTP receives waste flows along the I-49 corridor area of Lafayette and has a permitted capacity of 4 MGD. In 2022, the average treated flow was 2.7 MGD. Wastewater flows into the ESTP dry pit area via gravity and is pumped from the dry pit to the plant headworks. Treatment at the ESTP consists of rotary drum screens and diffused air grit removal for pretreatment, followed by primary clarifiers, oxidation ditches, final clarifiers, chlorine disinfection, and dechlorination. An odor control system is utilized throughout the facility. Sodium hypochlorite is used for disinfection. Treated effluent is stored in an on-site tank for non-potable uses or discharged to the Vermillion River. During wet weather events, the ESTP is configured to segregate influent flow into an on-site 3.0 M gallon wet weather storage basin via dedicated wet weather pumps.

The sludge goes through a thickening process followed by anaerobic digestion to further breakdown organic content to a Class B biosolid. The floating lid on one of the anaerobic digesters was replaced in 2020; however, the lid on the other anaerobic digester also needs to be repaired. Following digestion, digested sludge is dewatered by a belt filter press. The solids from the belt filter press are then land applied, and the removed liquid is sent back to the plant headworks. A segment of land at the Vermillion Conference Center, adjacent to the ESTP, was previously purchased by LUS. LUS envisions utilizing the property to relocate existing structures when a major expansion of I-49 is implemented. The timing of the I-49 expansion is unknown at this time. Additional capital improvements planned at the ESTP include:

- Odor control rehabilitation
- Anaerobic digester rehabilitation

- Installation of a new sludge dryer

### 6.2.3 Ambassador Caffery Treatment Plant

The ACTP treated an average flow rate of 5.2 MGD in 2022 and is permitted to treat up to 6 MGD (the design capacity of this plant is 9.25 MGD). Wastewater flows into the ACTP through a gravity-fed dry pit area which is then pumped from the dry pit to the plant headworks, or through a collection of force mains which pump directly to the plant headworks. Pretreatment at the ACTP consists of rotary drum screens and vortex grit removal. Flow is then split to two different aerobic treatment processes, sequencing batch reactors (SBRs) and oxidation ditches, followed by final clarifiers, chlorine disinfection, and dechlorination. A new odor control system was recently installed. During wet weather events, the ACTP is configured to segregate influent flow into an on-site 7 M gallon wet weather storage basin.

Sludge is treated through anaerobic digestion to further breakdown organic content in the sludge. Digested sludge is then dewatered by a spiral screw press, which is aided by addition of a polymer. The solids from the screw press are then land applied, and the liquid stream is sent back to the plant headworks. Planned capital improvements at the ACTP include:

- Anaerobic digester tank rehab/improvements
- Rotating drum screen replacement
- Headworks rehabilitation

### 6.2.4 Northeast Treatment Plant

The NETP treated an average flow rate of 1.0 MGD in 2022, which is slightly less than the permitted capacity of 1.5 MGD. Wastewater flows into the NETP headworks through a collection of local force mains. Pretreatment at the NETP consists of stepping screens and bypass screens and a vortex grit removal chamber. Flow is aerobically treated in oxidation ditches, followed by final clarifiers, chlorine disinfection, and dechlorination using sulfur dioxide. During wet weather events, the NETP is configured to segregate influent flow into an on-site 10-million gallon wet weather earthen storage basin (pond).

The sludge can be mixed with lime via a paddle wheel mixer to produce a homogenized mixture of stabilized sludge to produce Class B biosolids. Addition of lime increases the pH to effectively kill pathogens and microorganisms, in addition to providing some loss of moisture content. The stabilized lime mixture can then be land-applied. Sludge can also be hauled to the SSTP for additional treatment and dewatering without receiving lime stabilization.

During the February 2023 site visit, a new force main was observed to be operational. The new force main conveys wastewater from the Brown Park Lift Station. The step screen was observed to be out of service. LUS staff reported that both final clarifiers must be operational to maintain the plant's capacity and meet LPDES permit discharge limits. This limits the staff's ability to complete maintenance activities due to needing to keep both clarifiers in service. Planned capital improvements at the NETP include:

- Installation of additional stabilized sludge holding tank
- Rehabilitation of piping at headworks and clarifiers
- Plant expansion
- Pond cleaning
- Rerouting the discharge pipe to the Vermillion River

### 6.3 Wastewater Collection

As described previously, the LUS wastewater system is a separate sanitary sewer system conveying domestic and industrial sewage. Surface runoff is conveyed through a separate system. The topography of the service area is relatively flat and spans both sides of the Vermillion River. Due to the topography and geographic boundary of the river, the LUS wastewater collection system uses a significant number of lift stations to maintain hydraulic grade line (i.e., overcome natural drainage patterns due to gravity) via pumping. Approximately 30 percent of lift stations are self-priming style suction lift stations, and the remainder are submersible lift stations of various functionality. In recent years, the increasing number of connections and associated pipe, manholes, and lift stations is due to LUS providing sewer service to an increasing amount of new land development. The wastewater collection system infrastructure is summarized in Table 6-4.

**Table 6-4: Wastewater Collection System Assets**

	2018	2019	2020	2021	2022
Number of Connections	45,436	45,942	46,380	47,032	47,115
Miles of Pipe <sup>1</sup>	673	692	688.4	693.6	701.4
Number of Manholes	12,716	12,868	13,008	13,120	13,235
Number of Lift Stations	188	190	195	198	195

Source of data: LUS data, January 31, 2023

(1) Includes gravity sewers and force mains; does not include service laterals.

Wastewater infrastructure (i.e., gravity pipes, force mains, and pump stations) in the downtown and geographically-central areas of the City are undersized to accommodate the recent land development and population density changes in these parts of the service area. The City has largely ceased new housing development in the downtown area because the infrastructure cannot meet conveyance needs. The design project for a new sewer lift station and 20-inch force main to the SSTEP has been completed. Construction

of the project is pending receipt of grant funding. Although the state government owns some property along the proposed routing, LUS has encountered challenges with acquiring property for the lift station and force main routing. Additionally, installation of SBRs at the SSTP are being considered to handle new and future capacity associated with housing development in the downtown area.

The older, aging, lift stations in the LUS inventory are primarily wet-pit and dry-pit style, with the newer lift stations being submersible style. Improvements to the aging lift stations are being evaluated to convert these to suction-lift style. There are on-going efforts to improve the resiliency of the lift stations by adding quick-connection fittings to the discharge piping, which allow operators to use a portable pump to convey wastewater flows in the event of a power outage. LUS has been upgrading the lift station telemetry (i.e., remote-collection and transmission of data) equipment in recent years. As of the end of 2022, 4 lift stations are equipped with fiber optic, 140 lift stations are equipped with cellular transmission, and 56 lift stations (and the package plants) have Mission auto-dialers.

The projected capital improvement program for wastewater collection from 2023 to 2027 is summarized in Table 6-5. Specific projects indicated in the program include:

- Improvements (rehabilitation or replacement) of the Alice Drive, Beaver Park, Elan, Farrel Road, Locksley, Omega, Regency, Republic, South College, and Thomas Park lift stations.
- Improvements (rehabilitation or replacement) of the Donlon and W. Pon Des Mouton gravity sewers.
- Upgrades to the Consolidated Sewerage District, Kaliste Saloom, Northeast Interceptor, S. Bernard Road, South gravity sewer, Smith Street, and Town Center Parkway sewer to provide additional capacity.
- Improvements (rehabilitation or replacement) of the Elan, Pont Des Mouton, and S. Meyers force mains.
- Construction or procurement of a building to support collection system operation and maintenance activities.

In addition to these specific projects, LUS has established annual allocations for various collection system items, including collection system equipment; I/I elimination; collection system improvements; and upgrades to lift station components (e.g., control panels, equipment, odor control, telemetry). LUS also budgets annual expenditures for sewer system betterments to support proposed developments and sewer easements.

**Table 6-5: Wastewater Collection Projected CIP**

	2023	2024	2025	2026	2027	Total
Wastewater Collection Total	\$7,125,000	\$6,665,000	\$5,415,000	\$4,315,000	\$4,415,000	\$27,935,000

Source of data: LUS Five-Year Capital Improvement Program (Utilities System)

### 6.3.1 Operations and Related Performance

#### 6.3.1.1 COVID-19

In the early stages of the COVID-19 pandemic, LUS modified basic operations of the utility to keep non-essential personnel at home when possible. To the extent possible, operations staff were separated to provide that, in the event of an outbreak, staff would not get infected at the same time. LUS staff reported that operations largely returned to a pre-pandemic “normal” in 2021 and continued in 2022.

#### 6.3.1.2 Capacity, Management, Operations, and Maintenance Program

The EPA performed an audit of LUS’s sanitary sewer system in April 2017 which included the wastewater master plan, flow studies, and a tour of the four wastewater plants and some lift stations. Resulting from the audit, an Administrative Order (“AO”) was issued April 24, 2018 with an effective date of May 4, 2018. A general summary of the requirements included in the AO is presented in Table 6-6.

**Table 6-6: Administrative Order Requirements and Status**

AO Requirement	Description	Status
A	Report information regarding sanitary sewer overflows (SSOs) to LDEQ	Ongoing; included within monthly DMR submittals
B	Remove excess scum and solids from the final clarifier at the South WWTP	Previously Completed
C	Install a fence or signs at the Beaver Park retention pond	Previously Completed
--	Implement multiple utility operation and maintenance (O&M) procedures, programs, and inventories	--
D.1	Standard operating procedure for lift station inspections	Previously Completed
D.2	Training program for staff participating in collection system O&M	Previously Completed
D.3	Critical parts inventory for lift stations and pumps	Previously Completed
D.5	Tracking lift station O&M activities in LUS’s asset management program	Previously Completed
--	Repair deficient lift station items identified during the April 2017 EPA inspection	--
D.4	Alarm and housekeeping items	Previously Completed
D.6	Bypass quick connect at the Greenbriar lift station	Previously Completed
D.7	Condition-related items at the Farrel lift station	Previously Completed
--	Implement Programmatic Initiatives	--

AO Requirement	Description	Status
D.8	Clean all pipes and manholes in a 10-year rotation beginning November 1, 2020, and completed by November 1, 2030	Ongoing (see below)
D.9	Inspect all pipes and manholes in a 10-year rotation beginning November 1, 2020, and completed by November 1, 2030	Ongoing (see below)
D.10	Rehabilitate defective pipes and manholes discovered during the inspection program within 3 years of defect discovery. All rehabilitation must be completed by November 1, 2033.	Ongoing (see below)
E	Develop and implement a Capacity, Management, Operations, and Maintenance Program ("CMOM") Program by May 1, 2020	Ongoing (see below)
F	Submit annual progress reports to EPA	Ongoing; Reports have been submitted for 2020, 2021, and 2022

LUS submitted its CMOM plan to EPA in February 2020 and has been implementing Collection System Management, Collection System Operations, Collection System Maintenance, and Collection System Capacity Evaluation best practices and procedures to address the requirements of the AO. The CMOM portion of the AO required LUS to begin cleaning and inspection activities by November 1, 2018. Since January 1, 2020, a minimum of 10 percent of all pipes must be inspected every year.

LUS uses Sewer Line-Rapid Assessment Tool acoustic technology and CCTV to inspect pipes and manholes. In 2021, approximately 16 percent of pipe inspections were completed by LUS staff with approximately 84 percent completed by outside contractors. LUS staff completed approximately 55 percent of manhole inspections with contractors completing approximately 45 percent. Pipe and manhole cleaning is completed in conjunction with inspection activities. LUS prioritizes repairing manholes and pipes using the Point Repair Priority Scores and Definitions and Manhole Repair Priority Scores that were developed as part of the CMOM plan.

LUS must submit annual progress reports to EPA describing actions taken and progress made in complying with AO requirements. A summary of the percentage of pipe and manholes cleaned and inspected is provided in in Table 6-7.

**Table 6-7: Cleaning and Inspection Progress (% of System)**

	2020	2021	2022
Pipe Inspected	10.5%	11.2%	15.3%
Pipe Cleaned	10.7%	11.2%	15.3%
Manholes Inspected	17.7%	11.4%	17.0%
Manholes Cleaned	Indeterminate <sup>1</sup>	15.8%	15.3%

Source of data: LUS Annual Reports to EPA

(1) 2020 Progress Report does not indicate number of manholes cleaned.



LUS was rehabilitating defective pipes and manholes in a prioritized manner prior to issuance of the AO and is now assigning work orders and tracking them to confirm that rehabilitation is completed within 3 years of discovery. Some point repairs and manholes are completed by LUS staff. In other cases, LUS prepares contract packages for manhole rehabilitation/repair, cured-in-place-pipe (CIPP) rehabilitation, and point repair rehabilitation. LUS reported that a total of 5,180 feet of pipe and 335 manholes were repaired or rehabilitated in 2022.

LUS has been monitoring its budget for inspection, cleaning, and repair and/or rehabilitation to address the requirements of the AO. LUS expenditures in the early years can be used to help confirm forecasts of the total cost associated with the entirety of the program. In 2022, LUS also received clarification from EPA regarding the application of cleaning and inspection in excess of 10 percent from one year to future years.

### 6.3.1.3 Biosolids and Land Application

LUS's biosolids activities are permitted under LDEQ Sewage Sludge and Biosolids Use or Disposal Permit No. LAJ020125. The current permit expired on May 1, 2021. LUS filed for permit renewal in November 2020 and is waiting for LDEQ to issue a revised permit. A draft permit was received from LDEQ in September 2022.

Waste sludge generated at each of the wastewater treatment plants is treated to Class B biosolids standards as defined by 40 CFR Part 503 and dewatered prior to transport to a land application site. Currently, LUS applies biosolids on privately-owned farmland. The right to use such land is secured through land-use agreements which are typically year-to-year leases with a 30-day end-notice.

Due to the nature of land-use agreements, staff cannot always access the sites to apply the biosolids when needed. LUS is required to accommodate farming activities such as crop and livestock rotation, and any needed access during inclement weather. As a result, LUS is required to lease more acreage than is physically necessary for the amount of biosolids produced. A summary of the land leased and used for biosolids application over the past 5 years is presented in Table 6-8.

**Table 6-8: Biosolids Application and Land Use**

	2018 <sup>1</sup>	2019 <sup>1</sup>	2020 <sup>1</sup>	2021 <sup>1</sup>	2022
Total Biosolids Generated (dry tons)	1,563.1	1,796.5	1,803.7	2,062.8	2028.4
Total Biosolids Land Applied (dry tons)	1,514.8	1,790.7	1,803.7	2,062.8	2028.4
Total Acres Leased	607	607	607	607	589
Total Acres Used	243.1	279.5	280.6	320.9	270.5

<sup>1</sup> Source of data: LUS MWPP Reports and LDEQ Annual Sewage Sludge Transporter Reporting Form 7362

The volume of biosolids generated at LUS wastewater facilities increased by approximately 32 percent from 2018 to 2021 but was consistent in 2021 to 2022. Over the same period, LUS has expressed concern regarding the availability of land-application sites due to recent land development.

Additional biosolids processing capacity recently added to the SSTP should provide additional flexibility to manage the volume of biosolids produced by the WWTPs. LUS should consider opportunities to expand the access and availability of land application sites or its options for biosolids disposal. Additional land-use agreements should be considered, as well as purchasing and owning land that could be used to apply biosolids. In addition, improving treatment capability to produce Class A biosolids may allow solids to be landfilled, providing another option for biosolids disposal.

#### 6.4 Historical Capital Improvement Program

LUS tracks capital expenses through its capital work order system. Historical capital improvement program expenditures shown in Table 6-9 reflect investments in infrastructure funded by the Series 2019 Bonds and retained earnings. Major capital projects in 2022 included sludge handling facilities and equipment, pond clearing, force main replacement, and lift station upgrades.

**Table 6-9: Wastewater System Historical CIP**

	2018	2019	2020	2021	2022
<b>Wastewater</b>					
Normal Capital & Special Equipment	\$1,264,908	\$1,985,294	\$1,619,375	\$1,968,227	\$1,770,393
Series 2019 Bonds	0	128,538	174,992	8,084,550	7,787,204
Retained Earnings	6,881,980	5,247,716	4,298,097	4,129,321	4,309,486
<b>Total Wastewater Capital</b>	<b>\$8,146,888</b>	<b>\$7,361,548</b>	<b>\$6,092,464</b>	<b>\$14,182,098</b>	<b>\$13,867,084</b>

Source of data: LUS Financial and Operating Statements and Utilities Status of Work Orders Report

#### 6.5 Environmental and Regulatory Compliance

In accordance with each facility's LPDES permit, LUS is required to file an Annual Municipal Water Pollution Prevention audit report for each operating facility. Sometimes, LUS exceeds the design/permitted flow rating at its wastewater treatment plants. At other times, permitted effluent biological exceedances occur at the WWTPs. The number of months during which the permitted influent flow or effluent discharge limitations of each plant was exceeded over the past five years is summarized in Table 6-10.

**Table 6-10: Total Monthly Occurrences of Design or Permitted Rating Exceedances**

Wastewater Treatment Plant	2018	2019	2020	2021	2022
Permitted Influent Flow Exceedances					
South Sewage	0	0	0	1	1
East Sewage	1	0	0	3	1
Ambassador Caffery	1	6	5	7	1
Northeast	0	0	0	2	0
Permitted Effluent Discharge Limitation Exceedances					
South Sewage	0	0	0	0	0
East Sewage	0	0	0	0	1
Ambassador Caffery	0	0	0	0	0
Northeast	0	0	0	1	2

Source: LUS MWPP Reports

LUS received a variety of correspondence from regulatory agencies in 2022 related to wastewater compliance:

- On January 11, 2022 LUS received a Notice of Corrected Deficiency from LDEQ regarding exceeded permitted limits or discharge at the ACTP, noted during an inspection on November 22, 2021.
- In August 2022, the ESTP was visited by LDEQ and EPA. LDEQ subsequently issued a Field Interview Forms and a Compliance Inspection Report noting a Satisfactory rating with no actionable recommendations. No documentation has been received from EPA.
- On November 2, 2022, LUS was issued a notice of potential Significant Non-Compliance (SNC) by LDEQ due to exceedances of effluent limitations at the NETP which occurred on August 31, 2022. LUS responded on November 10, 2022, with an explanation of the causes of the issue.

LDEQ also requires LUS to report the number of sanitary sewer overflows and bypasses that occur in the Annual Municipal Water Pollution Prevention audit reports. The total number of sanitary sewer overflows and bypasses that occurred at the WWTP or within the collection system basin over the past five years is summarized in Table 6-11. In 2022, sanitary sewer overflows were less than in previous years. LUS believes this was primarily due to less rainfall in 2022.

**Table 6-11: Total Sanitary Sewer Overflows and Bypasses**

Wastewater Treatment Plant	2018	2019	2020	2021	2022
South Sewage	23	39	59	50	21
East Sewage	8	17	13	12	5
Ambassador Caffery	27	31	7	23	3
Northeast	4	0	1	3	5
Total	62	87	80	88	34

Source of data: LUS MWPP Reports

### 6.5.1 Spill Prevention Control and Countermeasures

SPCC plans are required to comply with state and federal regulations if facilities are proximate to U.S. waters. Compliance is required by facilities which are subject to spills of oils, fuels, or other controlled substances and have a storage capacity of more than 1,320 gallons at a single facility. SPCC plans were prepared and implemented in accordance with these regulations for each wastewater treatment facility. SPCC Plans must be reviewed every five (5) years (the last review occurred in 2022) or upon significant change in oil storage or if a spill incident occurs.

### 6.5.2 Wastewater Pretreatment Program

Federal regulation requires that LUS maintain a wastewater pretreatment program that is applicable to certain customers discharging to the LUS collection system, with particular emphasis on industrial users. Industrial users are identified by review of the North American Industry Classification System (“NAICS”) code of the user. The program is overseen and enforced by the LUS Environmental Compliance Division; and was established to accomplish the following objectives:

1. Prevent pollutant discharges which will interfere with operations of publicly owned treatment works (“POTWs”), including the use or disposal of municipal sludge (i.e., biosolids),
2. Prevent pollutant discharges which the POTW is not designed to remove by treatment,
3. Reduce the risk of exposing workers to hazardous chemicals, and
4. Improve opportunities to recycle and reclaim industrial wastewater and sludges.

Significant Industrial User Permits are issued to any customer that discharges an average of 25,000 gallons or more of process wastewater. Five (5) customers have been issued this permit because they either contribute process waste stream that make up 5 percent or more of the average dry-weather hydraulic or organic capacity of the treatment plant or have a reasonable potential for adversely affecting the treatment facility’s operation for violating any pretreatment standard or requirement. A total of seven (7) Categorical Zero Discharge Permits have been issued to customers that do not discharge any process wastewater in accordance with CWA section 307.

LUS must submit an Annual Pretreatment Report to LDEQ as part of the requirements under its LPDES permits. LUS reported zero (0) instances of significant noncompliance by Significant Industrial Users and zero (0) enforcement actions taken in the 2022 Annual Pretreatment Report.

### 6.5.3 Flow and Biological Loading

The wastewater strength to the LUS WWTPs is characterized as primarily domestic wastewater, with relatively little industrial wastewater. LUS operators have indicated that the wastewater influent is consistent between the WWTPs. Influent wastewater characterization generally contains approximately 25 mg/L of total nitrogen, 180-300 mg/L of 5-day carbonaceous BOD<sub>5</sub>, and 30 to 40 mg/L TSS.

Publicly owned treatment works serving the City of Lafayette are subject to regulatory limitations of wastewater discharges to the Vermillion River and Bayou St. Claire. The wastewater discharge limitations are established by the LPDES permit, which has assigned a permit limit and specific discharge loading limits for each of the LUS WWTPs. Although the concentrations (mg/L) limits of each contaminant are consistent between the WWTPs, the loading rate (lbs/day) which accounts for variability in influent flow, varies for each facility. The average monthly discharge limitations are summarized in Table 6-12.

**Table 6-12: Wastewater Treatment Plant Average Monthly Discharge Limitations**

	South	East	Ambassador Caffery	Northeast
LPDES Permit	LA0036374	LA0036382	LA0042561	LA0036391
Permitted Design Flow	7.0 MGD	4.0 MGD	6.0 MGD	1.5 MGD
BOD <sub>5</sub> – May through December	584 lbs/day 10 mg/L	334 lbs/day 10 mg/L	500 lbs/day 10 mg/L	125 lbs/day 10 mg/L
BOD <sub>5</sub> – January through April	1168 lbs/day 20 mg/L	667 lbs/day 20 mg/L	1,000 lbs/day 20 mg/L	250 lbs/day 20 mg/L
Total Ammonia-Nitrogen (as N) May through December	292 lbs/day 5 mg/L	167 lbs/day 5 mg/L	250 lbs/day 5 mg/L	63 lbs/day 5 mg/L
Total Ammonia-Nitrogen (as N) January through April	584 lbs/day 10 mg/L	334 lbs/day 10 mg/L	500 lbs/day 10 mg/L	125 lbs/day 10 mg/L
Total Nitrogen (as N)	Monitoring Only	Monitoring Only	Monitoring Only	Monitoring Only
Cyanide	--	--	--	Monitoring and Reporting Only
TSS – May through December	876 lbs/day 15 mg/L	500 lbs/day 15 mg/L	751 lbs/day 15 mg/L	188 lbs/day 15 mg/L
TSS – January through April	1168 lbs/day 20 mg/L	667 lbs/day 20 mg/L	1,000 lbs/day 20 mg/L	250 lbs/day 20 mg/L
Total Phosphorus (as P)	Monitoring Only	Monitoring Only	Monitoring Only	Monitoring Only

The LDEQ has imposed a hold on new (additional) contaminant loading to the Vermillion River due to agriculture, waste flows from unincorporated areas, and waste flows from publicly owned treatment works. As the City continues to develop and grow, this contaminant loading restriction requires that the lbs/day limit by LDEQ is met by the LUS WWTPs, regardless of influent flow increases.

#### 6.5.4 Winter Storms

LUS staff reported that the wastewater utility was not materially affected by the winter storms that impacted the Lafayette area in February 2021 or December 2022.

### 6.6 Contracts and Agreements

LUS is currently under contract in the Grossie Avenue area for wastewater O&M. This area included a small number of customers served by a separately owned wastewater collection system where the flows from the approximately 50 customers are treated at the ESTP. The 40-year agreement was executed in 1995 and expires August 2035.

### 6.7 Utility Benchmarking

#### 6.7.1 Utility Rates

Residential and commercial wastewater rates implemented by LUS are comparable to and competitive with utilities benchmarked in the state and surrounding region. Table 6-13 and Table 6-14 provide a regional comparison of effective wastewater rates for residential and commercial customers, respectively.

**Table 6-13: Residential Rate Comparison**

Utility	Average (\$/1,000 gallons) <sup>(1)</sup>
Alexandria	\$ 3.86
Lake Charles	\$ 4.58
New Iberia	\$ 5.38
Baton Rouge	\$ 7.15
LUS	\$ 7.13
Shreveport	\$ 11.31
New Orleans	\$ 12.42

Source: LUS. Rates as of October 2022.

(1) Assumes monthly water consumption of 7,000 gallons.

**Table 6-14: Commercial Rate Comparison**

Utility	Average (\$/1,000 gallons) <sup>(1)</sup>
Alexandria	\$ 3.59
Lake Charles	\$ 4.11
Baton Rouge	\$ 6.43
New Iberia	\$ 6.18
LUS	\$ 7.42
New Orleans	\$ 13.18
Shreveport	\$ 10.26

Source: Burns & McDonnell. Rates as of October 2023.  
Assumes monthly water consumption of 30,000 gallons.

LUS completed a rate study in 2016, indicating the need to increase Wastewater System rates to adequately cover its costs. Retail rates were increased 6.1 percent effective November 1, 2016, and 5.7 percent effective November 1, 2017. Burns & McDonnell completed a wastewater rate study in FY 2022 proposing 9.5 percent increases in FY 2023, FY 2024, and FY 2025. The new wastewater rates for FY 2023 were put in service on November 1, 2022.

### 6.7.2 Financial and Operating Statistics

The AWWA annually publishes benchmarking data across a variety of performance indicators for water and wastewater utilities. The *2022 AWWA Utility Benchmarking: Performance Management for Water and Wastewater* was released in early 2023, compiling various financial and operating ratios from 2021. For this analysis, specific ratios were obtained from the AWWA report representing national and regional medians. The AWWA defines national metrics as wastewater utilities in both the United States and Canada, hereafter referred to as “National.” Ratios are also available by region and by number of wastewater customers served. The U.S. South region was used, which includes Louisiana and is hereafter referred to as “Regional.” Further, ratios are available specifically for water utilities, wastewater utilities, and combined water and wastewater utilities. Where possible, comparisons have been made to wastewater utility ratios. However, some LUS balance sheet information is available only for the combined Electric, Water and Wastewater Utilities System, hereafter referred to as “Combined.” The AWWA “Combined” benchmarking data only includes water and wastewater utilities.

The benchmark results are presented in Table 6-15. LUS’s wastewater operational costs are higher than the National median and Regional median. LUS’s combined debt ratio is lower than the Regional median but higher than the National median. The operating ratio is higher on both a wastewater-only and combined basis than either the National or Regional medians. However, the AWWA combined utilities median includes water, wastewater, and storm water, while LUS includes water, wastewater, and electric. LUS’s cash reserves are lower than the National and Regional medians. LUS’s 2022 wastewater debt

service coverage is lower than the Regional and National median while the combined debt service coverage is higher than the Regional median and National median.

**Table 6-15: Benchmarked Wastewater Utility Operating Ratios**

Statistics	Basis	National <sup>(1)</sup>	Regional	LUS	
		2021	2021	2021	2022
Operational Costs per MG	Wastewater	\$4,045	\$2,228	\$3,127	\$4,086
Debt to Total Assets (Debt Ratio)	Combined	0.31	0.48	0.34	0.32
Operating Ratio (O&M cost/ Operating revenue)	Wastewater	0.49	0.49	0.66	0.66
Operating Ratio (O&M cost/ Operating revenue)	Combined	0.54	0.49	0.71	0.74
Cash Reserve Days <sup>(2)</sup>	Combined	682	416	51	61
Debt Service Coverage	Wastewater	2.32	2.36	2.07	2.08
Debt Service Coverage	Combined	2.46	2.06	2.82	3.29

**Source: AWWA and LUS**

- (1) National AWWA benchmarks for water and combined water and wastewater utilities with 50,001 to 100,000 customers to align with the Water System customers served.
- (2) LUS results based on total O&M for Electric, Water, and Wastewater Systems less fuel and purchased power expenses.

## 6.8 Historical Financial Performance

Table 6-16 presents historical debt service and the associated DSCR. Historical Wastewater System debt service as shown below includes a portion of the Series 2012 Bonds, Series 2017 Bonds, Series 2019 Bonds, and Series 2021 Bonds. The Series 2010 Bonds were fully redeemed by the proceeds of the Series 2017 Bonds on November 1, 2020. The Series 2012 Bonds were fully redeemed by the proceeds of the Series 2021 Bonds on November 1, 2021. In each year since 2018, the DSCR exceeded the minimum coverage requirement of 1.0 required by the Bond Ordinances.

**Table 6-16: Historical Financial Performance**

Fiscal Year	Operating Revenues <sup>(1)</sup>	Operating Expenses <sup>(2)</sup>	Net Revenues Available for Debt Service	Debt Service <sup>(3)</sup>	Debt Service Coverage Ratio
2018	\$32,379,226	\$18,737,163	\$13,642,063	\$3,363,806	4.06
2019	\$32,038,772	\$19,211,514	\$12,827,259	\$4,218,291	3.04
2020	\$31,122,710	\$18,295,187	\$12,827,523	\$5,842,264	2.20
2021	\$31,768,322	\$19,791,589	\$11,976,733	\$5,786,152	2.07
2022	\$32,248,544	\$20,606,263	\$11,642,281	\$5,607,718	2.08

Source: LUS Financial and Operating Statements

- (1) Operating Revenues include interest income and other miscellaneous income.
- (2) Operating Expenses include O&M and other expenses such as customer service and A&G costs. Operating Expenses do not include ILOT, normal capital and special equipment, and other miscellaneous expenses.
- (3) Debt service was prepared on a cash basis for this table and includes a portion of the Series 2010 Bonds, Series 2012 Bonds, Series 2017 Bonds, Series 2019 Bonds, and Series 2021 Bonds. The Series 2010 Bonds were fully redeemed by the proceeds of the Series 2017 Bonds on November 1, 2020. The Series 2012 Bonds were fully refunded with the Series 2021 Bonds on November 1, 2021.



### 6.8.1 Rate Structures

The Wastewater System provides service to retail customers both inside and outside the City limits. Wastewater System customer classes for ratemaking purposes include residential and commercial. The Wastewater System rate structure includes a customer charge based on class and a commodity charge applied to billed volume. The determination of billed volume varies by season. During December through March, customers are billed for actual water use. For the remaining months of the year, usage is generally calculated using the average usage of the four preceding winter months (December through March). However, billed volume may not be less than 75 percent of actual water consumption in each of those months. LUS can adjust billed volume as needed. New rates for FY 2023 were implemented on November 1, 2022. The rate schedules in place in FY 2022 are presented in Table 6-17.

**Table 6-17: Rate Schedules**

Rate Class	Serves	Effective Date	Customer Charge (\$/month)	Monthly Volumetric Charge (\$/1,000 gallons)
S-1	Residential	Nov 2017	\$8.60	\$5.90
S-1-O	Residential Non-City	Nov 2017	\$10.30	\$7.10
S-2	Commercial	Nov 2017	\$16.15	\$6.15
S-2-O	Commercial Non-City	Nov 2017	\$24.20	\$7.40

Source: LUS FY 2022 Rate Schedules

### 6.8.2 Revenue Analysis

Table 6-18 presents the Wastewater System retail rate revenues. In total, 2022 revenues increased by 3.0 percent. All classes revenues increased in FY 2022 with large year over year changes in schools, churches, and other wastewater class. Customer counts have increased on average 1.0 percent per year from 2018 to 2022 with minimal change in 2022. Revenue per customer increased overall by 2.8 percent in FY 2022 compared to FY 2021.

**Table 6-18: Retail Revenues by Class**

	2018	2019	2020	2021	2022
<b>Revenues</b>					
Residential	\$17,209,307	\$16,620,065	\$17,069,978	\$16,810,848	\$17,248,790
Commercial	12,073,215	11,804,385	11,552,556	11,934,206	12,202,780
Schools & Churches	1,509,518	1,316,766	1,092,977	1,201,994	1,353,928
Other	185,506	169,456	145,715	172,721	225,672
<b>Total</b>	<b>\$30,977,546</b>	<b>\$29,910,672</b>	<b>\$29,861,226</b>	<b>\$30,119,770</b>	<b>\$31,031,170</b>
<b>Number of Customers</b>					
Residential	39,229	39,791	40,237	40,760	40,815
Commercial	5,402	5,442	5,503	5,523	5,575
Schools & Churches	273	275	282	287	290
Other	116	115	111	111	111
<b>Total</b>	<b>45,019</b>	<b>45,623</b>	<b>46,133</b>	<b>46,681</b>	<b>46,792</b>
<b>Revenue per Customer</b>					
Residential	\$439	\$418	\$424	\$412	\$423
Commercial	2,235	2,169	2,099	2,161	2,189
Schools & Churches	5,528	4,781	3,876	4,184	4,673
Other	1,606	1,479	1,309	1,560	2,025
<b>Total</b>	<b>\$688</b>	<b>\$656</b>	<b>\$647</b>	<b>\$645</b>	<b>\$663</b>
<b>Billed Gallons (1000 gallons)</b>	<b>4,352,076</b>	<b>4,228,975</b>	<b>4,206,457</b>	<b>4,251,473</b>	<b>4,328,376</b>
<b>Billed Gallons (1000 gallons) per Customer</b>	<b>97</b>	<b>93</b>	<b>91</b>	<b>91</b>	<b>93</b>
<b>Revenue per 1000 gallons billed</b>	<b>7.12</b>	<b>7.07</b>	<b>7.10</b>	<b>7.08</b>	<b>7.17</b>

Source: LUS Financial and Operating Statements

### 6.8.3 Expense Analysis

Table 6-19 presents historical wastewater operating expenses, distinguished between fixed and variable costs. Variable operating expenses within Collection include purchased power costs, while variable operating expenses within Treatment include chemical costs. Fixed operating expenses include the remaining portions of Collection and Treatment expenses, plus Customer Service and A&G expenses. Historically, variable expenses average about 9 percent of total expenses, with the remaining 91 percent pertaining to fixed expenses. In FY 2022, both fixed and variable expenses increased in multiple categories. Variable expenses increases were primarily due to large increases in both chemicals and power cost increases. Fixed expense increases in FY 2022 were primarily attributed to inflationary pressures in personnel and capital which were also realized by many utilities across the United States.

**Table 6-19: Historical Fixed and Variable Expense Summary**

	2018	2019	2020	2021	2022
<b>Variable Expenses</b>					
Collection	\$332,139	\$372,159	\$354,468	\$399,174	\$399,976
Treatment	1,334,120	1,249,620	1,163,932	1,225,823	1,688,557
Total Variable Expenses	\$1,666,259	\$1,621,779	\$1,518,400	\$1,624,997	\$2,088,533
<b>Fixed Expenses</b>					
Collection	\$4,390,309	\$4,940,592	\$4,534,054	\$5,098,653	\$4,829,497
Treatment	5,543,161	5,737,501	5,089,896	5,481,952	5,241,381
Customer	1,399,015	1,365,016	1,318,028	1,655,511	2,181,031
A&G	5,738,418	5,546,626	5,834,810	5,930,475	6,265,821
Total Fixed Expenses	\$17,070,904	\$17,589,735	\$16,776,788	\$18,166,592	\$18,517,730
Total Fixed & Variable	\$18,737,163	\$19,211,514	\$18,295,187	\$19,791,589	\$20,606,263
Percent Variable	9%	8%	8%	8%	10%
Percent Fixed	91%	92%	92%	92%	90%

Source: LUS Financial and Operating Statements

#### 6.8.4 Recovery of Costs

Comparable to the Water System, Wastewater System revenues are also affected by weather, economic conditions, and in 2020 and 2021, the COVID-19 pandemic. Volatility of water demand caused by these dynamics can impact the stability of revenues. As shown in Table 6-19, expenses are largely fixed and are generally not as susceptible to weather or economic variances. Regardless of the underlying cause, the predominately fixed-cost nature of the Wastewater System cost structure and the variable nature of its revenue stream can put pressure on utility cash flows when demand is disrupted. The mismatch between a high fixed cost structure and a high variable cost revenue stream is a common challenge in the wastewater utility industry.

#### 6.9 Observations and Recommendations

Based on the analysis described herein, Burns & McDonnell offers the following observations and recommendations.

- Based on visual inspection of facilities, review of records, and interviews of LUS staff, the LUS wastewater treatment facilities are in good condition, maintained properly and in accordance with industry practices.
- LUS staff have indicated that 2022 was a relatively dry year with less wet weather events compared to previous years. This is believed to have impacted the amount of wastewater flow treated by LUS in 2022, which was down 20 percent from 2021.
- Fewer sanitary sewer overflows occurred in 2022 compared to previous years. It is expected that the

decrease can be attributed partially to reduced rainfall in 2022; however, LUS efforts to clean and rehabilitate its sanitary sewer system as part of its AO are likely also contributing to the reduced number of sanitary sewer overflows.

- The organizational structure and management of the wastewater system engineering and operations areas appears to be strong based on initial observations, interviews, organizational structures, and manpower within each department.
- LUS completed a rate study in FY 2022 and the proposed rate plan was approved. The adopted rate increases which were effective starting November 1, 2022 are anticipated to generate revenues that allow LUS to continue to maintain its financial performance.
- The Water Sector Program was created in 2021 by the State of Louisiana to provide grant funding for repairs, improvements and consolidation of community water and sewer systems around the state. \$300 million from the American Rescue Plan Act was provided to the program. LUS submitted applications to the program in late 2021. In January 2022, LUS was notified that it was awarded a total of approximately \$4.83 million in grant funding for three (3) wastewater treatment plant areas (Ambassador – 5 projects, Northeast – 5 projects, and East – 3 projects) as part of Round 1 of the program. LUS was notified in December 2022 that it was awarded a total of approximately \$6.61 million in grant funding for four (4) additional wastewater projects in the South Sewerage Treatment Plant Area as part of Round 2 of the program.
- LUS is planning to issue new bonds in FY 2023 to support various electric, water, and wastewater projects. The bond funding anticipated is reasonable and appropriate to fund these projects and the forecasted revenues represented in the continuing disclosure financial projections are expected to be able to fund the new debt service associated with the new bonds.
- LUS currently has agreements for access to areas totaling more than the area physically required to contain all produced biosolids. The additional area under lease is necessary because the land-use agreements require LUS to accommodate farming activities, which reduces the availability of these spaces. LUS may consider evaluating new, or restructured, land-use agreements to provide better availability of land or flexibility for the application of biosolids to potentially reduce costs.
- LUS could consider making improvements at its WWTPs to allow for production of Class A biosolids. This transition could provide additional flexibility for biosolids disposal, which could help limit the reported challenges with the availability of land application sites.
- LUS could consider evaluating a mechanical dewatering process at the NETP to remove excess water prior to lime stabilization. This WWTP generates biosolids at approximately 2 to 3 percent solids by

weight, and the other three WWTPs produce biosolids at approximately 22 to 27 percent solids by weight after processing with mechanical equipment. This could also alleviate some challenges with the frequency of land application. This initiative may be a lower priority item given that recent improvements at the SSTP provide capacity for liquid sludge from the NETP to be hauled to the SSTP for dewatering.

- Due to regional contaminant loading to the Vermillion River, the LDEQ has imposed a hold on new and additional contaminant loading to the river. Simultaneously, population growth and development within the LUS service area has increased, and therefore wastewater flows to the LUS WWTPs have also increased. As a confluence of these factors, LUS should consider a treatment process evaluation of the four WWTPs be completed to identify the risks that LUS faces with respect to meeting LPDES loading limits and improvements which may reduce LUS loading to the river. The evaluation should specifically consider long-term capacity needs of the LUS wastewater utility and future permit limits, including consideration of nutrient reduction requirements.
- LUS is well organized and structured in its approach to implementing its CMOM program and addressing the requirements of the AO. LUS has leveraged its in-house staff and contractor resources to complete work efficiently. It is important that cleaning, inspection, and rehabilitation of the wastewater collection system be continued to comply with the requirements of the AO. The rate of such work needs to meet the required 10 percent per year. LUS exceeded this requirement in 2020, 2021, and 2022. LUS initiated sewer and manhole repair work for the defects discovered during the first year of cleaning and inspection and is ahead of the compliance schedule for repairs stipulated in the AO.
- LUS is still in the first third of the total compliance period for addressing the sewer cleaning and inspection requirements under the AO. Accordingly, the total cost of compliance is still difficult to determine with a high level of confidence, especially considering the current economic environment. LUS should closely track and monitor costs incurred to date and use that data to consider a range of scenarios that can be used to inform long-term decision making.
- The CMOM program implemented in response to the AO has established a framework for programmatic proactive maintenance of LUS's collection system assets. Proactive maintenance can result in extended asset life and potentially reduce the likelihood and duration of unexpected downtime or failures. As part of its efforts to implement its CMOM program, LUS could consider implementing a risk-based approach to evaluating the condition and selecting rehabilitation methods for its wastewater system assets considering the likelihood and failure and consequence of failure of the assets. The results of that assessment could be used to further develop capital improvement

planning to address critical assets over a long-term period, with targeted strategies to address high-priority items. This effort could include planning for renewal and replacement of aging infrastructure over its anticipated service life.

- LUS last completed a Wastewater Master Plan in 2010. Due to development that has occurred since then and expected limitations to treatment plant capacity, LUS should consider an update its master plan to project future growth and associated wastewater flow rates; assess existing and future wastewater system capacity needs; and identify long-term capital improvements required for future development, system expansion, condition-related improvements, and future regulatory requirements. The master plan could also specifically evaluate opportunities to reduce the occurrence of sanitary sewer overflows. LUS has initiated efforts to begin a Wastewater Master Plan.

## 7.0 COMMUNICATIONS SYSTEM

### 7.1 Communication System Summary

LUS Fiber (“LUS Fiber”) began in 1998 with LUS building fiber to serve the Electric System’s SCADA system, transmission line protection systems, and LUS facilities. Further expansion of the system allowed LUS to offer wholesale communications and data services to governmental and educational facilities, and retail data, telephone, and cable TV services to the public. The first retail customers began receiving service in February 2009.

In preparation for providing retail communications services, LUS Fiber purchased the fiber optic system from the Utilities System in 2007. LUS Fiber utilized internal loans from the Utilities System to fund the purchase of the fiber system assets, startup costs, and operating costs. LUS Fiber does not expect any future loans from the Utilities System. LUS Fiber repayment of the loans will continue through 2033. The repayment of the Utilities System loans is subordinate to the payment of debt service on LUS Fiber bonds.

Taking advantage of low interest rates, LUS Fiber refinanced their bond debt which will provide additional capital to fund network expansion efforts. In 2021, LUS Fiber refunded the City of Lafayette, State of Louisiana Communications System Revenue Refunding Bonds, Series 2021A (Tax-Exempt) and Taxable Communications System Revenue Refunding Bonds, Series 2021B (Federally Taxable) in the principal amount of \$14,400,000. The total LUS Fiber savings from Series 2021 Bond Refunding is \$2.7 million.

LUS Fiber is comprised of a 191-mile fiber backbone system with direct connections to national Tier 1 broadband providers, 190 miles of distribution fiber (15 percent increase from last year), and 606 miles of access fiber (3 percent increase from last year) connecting to individual premise locations. About 40 percent of the infrastructure is on aerial utility poles and 60 percent is underground. LUS Fiber reports that it has constructed on average 1.2 miles of new infrastructure per month in the past year, mostly underground.

The system is a centralized split, fiber-to-the-premises (“FTTP”) architecture, with fiber located throughout the service area. Relative to the copper telephone and cable broadband technologies used by its competitors, LUS Fiber uses a passive optical network (“PON”) technology that is well-suited to all residential and all but the most intensive commercial and institutional uses. For these large enterprise customers, LUS Fiber has customized solutions such as dark fiber and direct connect capabilities. FTTP has many times the theoretical maximum capacity of other technologies and can be scaled to much higher

speeds in the coming years simply by changing modules in the network headend and huts, and by upgrading the network terminal at the home or business.

LUS Fiber cables are installed both on aerial poles and underground, based usually on the location of the other utilities. Where fiber is on aerial poles owned by LUS electric, it is placed in the power space “safety zone” that is restricted to LUS electric, thus taking advantage of the open space above the other communications providers, while safely constructed and managed by individuals qualified to work within high voltages. Where LUS Fiber cables are on poles owned by a different utility, they are currently located in the communication space located below the power space away from the high voltage lines. LUS Fiber staff continue to work with these utilities to allow LUS Fiber to locate their cables in the safety space through joint-use attachment agreements.

Based on a sample drive-through inspection of the system, the aerial infrastructure appears to be well maintained.

### 7.1.1 Backbone Architecture

The headend has [REDACTED] satellite dishes and [REDACTED] tower for of air reception of local TV networks. The tower is currently being decommissioned, and the [REDACTED] satellite dishes are being upgraded from a [REDACTED] dish. These upgrades will enable additional high-definition (HD) television channels for customers. There are two power inputs to the headend building for redundancy. There is also a battery backup to maintain the network until the power can be switched to the secondary power source if an outage interrupts the primary power source. There is also a backup generator that is tested once a week. The equipment in the headend appears to be well maintained, cabling is kept in an orderly fashion.

There are 14 huts connected over backbone fiber to the headend. Eight of the huts can serve up to [REDACTED] [REDACTED] each while the six remaining huts have been upgraded to serve up to [REDACTED]. The remaining eight huts will be upgraded to also be able to serve [REDACTED], and LUS Fiber has planned to complete these updates to the remaining huts by the end of FY 2023. There are two power inputs to each hut for redundancy. There is also a battery backup.

The equipment in the headend and the huts continually undergoes scheduled replacements and upgrades. The core network routers are [REDACTED], located at the headend and hut locations, feeding two separate networks. One network is comprised of [REDACTED] used to sell wholesale and enterprise services. The other network is comprised of [REDACTED] and [REDACTED], used to sell residential and business services. LUS Fiber is in the process of upgrading the backbone ring from [REDACTED] and





LUS Fiber also offers services to both single-tenant and multi-tenant commercial properties. Of the [REDACTED] total business and government passings, LUS Fiber has just over [REDACTED] business customers.

### 7.1.3 Service Offerings

In the retail market, the LUS Fiber offers “triple play” services. “Triple play” is a common term in the industry that refers to cable TV, internet, and telephone services. LUS Fiber provides services to approximately [REDACTED] customers, who can choose to purchase any, or all, of the triple-play services. These services are in competition with regional and national data, and communications providers including Cox Communications, Dish, AT&T, Dish, Kaptel, REACH4, and HughesNet.

The following residential retail services are available to customers:

1. Residential Cable Television / Video Services
  - a. 87 analog, 327 digital channels
  - b. Traditional Video Packages
    - i. Basic Package with 20 channels
    - ii. Expanded Basic with 84 channels
    - iii. Digital Access with 192 digital channels
    - iv. Digital Plus with 278 digital channels
    - v. Digital Hispanic with 283 digital channels, including 7 Spanish-only channels
    - vi. Premium Movie Suites (HBO, Cinemax, Showtime, TMC, Starz & Encore)
  - c. Additional equipment and service options include whole home digital video recorder (“DVR”), video on demand, pay-per-view, and set top boxes.
2. ConneCTV Packages
  - a. ConneCTV Basic with 20 channels
  - b. ConneCTV Expanded with 135 channels
  - c. ConneCTV Plus with 189 channels
  - d. Sports Package with 25 channels
  - e. Hispanic Package with 8 channels
  - f. Premium Movie Suites (HBO, Cinemax, Showtime, TMC, Starz & Encore)
  - g. Premiums Bundle with 40 premium channels
3. Fiber TV Packages
  - a. Basic with 20 channels
  - b. Expanded Basic with 84 channels
  - c. Digital Access with 192 channels

- d. Digital Plus with 278 channels
- e. Digital Hispanic with 283 channels
4. Residential Internet Service
  - a. 3, 60, 100, 150, 300 megabits per second (“Mbps”)
  - b. 1 and 10 gigabit per second (“Gbps”)
  - c. Hub City Wi-Fi – residential Wi-Fi service
  - d. Hub City Wi-Fi Plus – residential Wi-Fi service
5. Residential Telephone Service
  - a. Basic Line – basic digital telephone service line with paid long-distance calling; packages and features are sold separately
  - b. Basic Feature Package – basic calling features
  - c. Premium Feature Package – basic service, plus voicemail and caller identification
  - d. Unlimited Long Distance – offered as a separate service to add to the above services
  - e. International Long Distance – per minute rate depending on the area called

In addition to the residential retail communications services, LUS Fiber offers the following business retail services to customers:

6. Business Internet Service
  - a. 10, 25, 100 Mbps
  - b. 1, 2, 10 Gbps
7. Business Video Service
  - a. 87 analog, 327 digital channels
  - b. Traditional Video Packages (same as residential service offerings)
8. Business Telephone Service
  - a. Business Phone Line- includes anonymous call rejection, automatic callback, automatic recall, busy call forwarding, call blocking, hold, transfers, call waiting, calling name/number delivery/blocking, delayed call forwarding, selective call acceptance, rollover group, selective call forwarding/rejection, speed calling, three-way calling, telephone user interface commands, immediate forwarding, and voicemail.
  - b. Business Phone Line Enhanced- includes incoming call manager, sequential ring, priority call, time of day/day of week routing, individual contact management, call screening and remote office services.
  - c. Hosted voice (“HPBX”)
  - d. Primary Rate Interface (“PRI”)

- e. Conference Calling, Unlimited Long Distance, E-Fax, Auto-Attendant – offered as separate services to add to the above services.

LUS Fiber is the only provider in Lafayette offering 10Gbps broadband internet to residential customers. LUS Fiber continues working with the federal government’s Affordable Connectivity Program (“ACP”) to offer lower cost broadband to qualified households to help mitigate the digital divide.

The sale of internet services exhibits the highest growth for LUS Fiber, while cable TV service and telephone service sales are more variable. Although the number of cable TV and telephone subscribers has remained relatively stable over the last few years, growth has not kept pace with overall customer growth. This year has seen a surge in the use of over-the-top video and voice over Internet Protocol (“VoIP”) telephone services, and LUS Fiber anticipates that the total number of cable TV and telephone subscribers will begin to gradually decline in 2021. It is difficult to directly compare specific cable TV, internet, and telephone service offerings across all competitors in the market as each competitor bundles packages, services, and offerings differently.

#### **7.1.4 Wholesale Contracts**

LUS Fiber has contracts with AT&T and Lumen to connect to the national fiber backbone. LUS Fiber has several wholesale contracts with major carriers, internet service providers (“ISP”), and application service providers, who in turn provide bandwidth, internet, and telephone services on a retail basis to medium and large business customers.

### **7.2 Competition and Benchmarking**

The cable TV and internet services markets within the city are competitive. National telecommunications firms such as Cox Communications, Dish, and AT&T offer services. All three of these companies also have licensed or priority access to wireless spectrum, which may further increase competition for telecommunications services within LUS Fiber’s service territory.

Across most of its service territory, LUS Fiber’s network has significant technical advantages over its competitors’ networks. Increased reliance on videoconferencing platforms during the pandemic has led to growing demand for upload capacity, but the overall capacity limitations of hybrid fiber-coaxial (“HFC”) networks forces Cox to offer service with 10 percent or less of overall bandwidth dedicated to upload. AT&T’s digital subscriber line (“DSL”) network can only provide a similarly asymmetrical service, with even more limited overall capacity. However, AT&T has upgraded its copper plant with fiber in some parts of Lafayette and the surrounding areas, enabling the company to offer symmetrical internet services comparable to LUS Fiber. AT&T has announced plans to continue expanding its fiber network over the

next two years, including in parts of Lafayette, though the extent of its fiber construction plans in the area remains unclear at this time. AT&T's methodology is to prequalify potential customers in an area to determine if they will build out to that area. LUS Fiber continues to strive to be first into an area with a broader service offering and better customer service and pricing.

Current LUS Fiber rates are stable, with increases for cable TV or video generally driven by programming and content costs. LUS Fiber offers comparable and competitively priced cable TV packages as its competitors throughout its service territory. LUS Fiber's internet services are competitively priced and deliver faster download speeds and significantly faster upload speeds than any other provider can offer, except where AT&T's fiber service is available. LUS Fiber also offers customers a unique feature that enables peer-to-peer connections within the city limits with excellent data exchange speeds. Currently competitors do not offer this feature. Telephone service is competitive but difficult to compare directly with competitors due to how services are packaged.

Table 7-2 summarizes and compares LUS Fiber and competitors' internet service offerings within the City. The comparison illustrates LUS Fiber's competitive advantage of faster download and upload speeds available at lower prices than competitors. Lafayette Economic Development Authority also markets these capabilities to businesses the Authority is working to attract.

**Table 7-2: Communications System Competitive Internet Service Offerings**

Provider	Speed (Download/Upload) in Mbps	Monthly Price (Regular/ Non-Promotional)
LUS Fiber-Internet	3/3	██████
LUS Fiber-Internet	60/60	██████
LUS Fiber-Internet	100/100	██████
LUS Fiber-Internet	150/150	██████
LUS Fiber-Internet	300/300	██████
LUS Fiber-Internet	1,000/1,000	██████
LUS Fiber-Internet	10GB/10GB	██████
LUS Fiber-Hub City Wi-Fi	60/60 and Wi-Fi	██████
LUS Fiber-Hub City Wi-Fi	100/100 and Wi-Fi	██████
LUS Fiber-Hub City Wi-Fi	300/300 and Wi-Fi	██████
LUS Fiber-Hub City Wi-Fi	1000/1000 and Wi-Fi	██████
Cox Residential	25/1	\$44.99
Cox Residential	50/3	\$65.99
Cox Residential	150/10	\$83.99
Cox Residential	500/10	\$99.99
Cox Residential	940/35	\$119.99
ATT Fiber (limited availability)	100/100	\$55.00
ATT Fiber	300/300	\$65.00
ATT Fiber	1000/1000	\$80.00

Provider	Speed (Download/Upload) in Mbps	Monthly Price (Regular/ Non-Promotional)
ATT IPBB	10/1	\$55.00
ATT IPBB	5/1	\$55.00
LUS Fiber Business	10/10	██████
LUS Fiber Business	25/25	██████
LUS Fiber Business	50/50	██████
LUS Fiber Business	100/100	██████
LUS Fiber Business	500/500	██████
LUS Fiber Business	1000/1000	██████
LUS Fiber Business	2000/2000	████████
LUS Fiber Business	10000/10000	██████████
Cox Business	50/10	\$94.99
Cox Business	100/20	\$124.99
Cox Business	200/20	\$174.99
ATT Business	8/1	\$80
ATT Business	12/1.5	\$130
ATT Business	50/10	\$200.00
ATT Business	100/20	\$300.00
ATT Fiber Business (limited availability)	300/75	\$180.00
ATT Fiber Business	500/100	\$300
ATT Fiber Business	1000/200	\$500

Source: LUS Fiber

### 7.3 Operations and Related Performance

As a normal course of business, service outages do occur. Since its inception, LUS Fiber has successfully restored service in a timely manner when outages occur. Being able to minimize and quickly restore service is a testament to the capacity of the backbone rings that enable the fiber huts to temporary switch feeder paths when a cut occurs. Successful outage management requires the proactive periodic replacement and upgrade of equipment. Overall, LUS Fiber performance remains highly reliable with limited outages for customers. Customers regularly give LUS Fiber high marks for reliability, contrasting the negative reliability trend of its competitors. There were no major network outages in 2022. There were a few minor outages due to fiber cuts by third party construction crews; these outages were geographically isolated and affected a small percentage of customers.

Customers may pay their bill by mail, phone, online, drop box, or in person. LUS Fiber also accepts automatic bank or credit card payments. LUS Fiber continues to work with BPA Quality Assurance Call Quality Grading to enhance the customers experience. Based on BPA feedback, LUS Fiber has maintained high customer experience quality. LUS Fiber continues to score 95+ satisfaction rating from their customers.

### **7.3.1 Communication Shared Services**

From 2021 on, Communications System employees and facilities were organized separately from Utilities System operations; however, several services (such as accounting) and reporting functions were shared among the Communications System and Utilities System. In accordance with the requirement to maintain separate Utilities System and Communications System funds, all costs associated with these services are accounted for separately. An appropriate portion of shared costs are allocated to the Communications System through LCG's Cost Allocation Plan, in compliance with the "Fair Competition Act."

Prior to November 2020, the LUS Business Support Services division managed the customer service for both the Utilities System and the Communications System. In November, the Communications System took on direct management of LUS Fiber's customer service employees. The Communications System continues to share the same office space and customer service centers as the Utilities System. All customer service costs are allocated between the Utilities System and the Communications System using an appropriate allocation method.

### **7.3.2 Construction and Installation**

LUS Fiber has experienced fiber optic technicians on staff to maintain its existing plant. This crew can do line work, maintenance, splicing, as well as troubleshooting. Major new build projects are done by contract construction company(s). LUS Fiber staff augment the contract crews during major new build projects.

New underground build is mostly directional boring. LUS Fiber has been able to reduce construction costs relative to previous years. It periodically issues new bids for construction companies.

LUS Fiber continues to expand its network organically but is looking for larger expansion based on recent government broadband funding initiatives. LUS Fiber was successful in obtaining inclusion in the state of LA GUMBO program.

The engineering department designs and prepares work prints for new construction projects. Market growth is considered in the design process to efficiently use the resources to accommodate future expansion of the network.

Service installation is currently done by contractors. LUS Fiber has been considering the option of bringing installation in-house and has completed an analysis indicating the costs to be similar. However, in a contractor arrangement the installations can be paid on a per installation basis and can be easily

scaled up and down. It would also be necessary to determine how to structure incentives if installations were brought in-house.

LUS Fiber has put a strong emphasis on more efficient installations for businesses and residential customers decreasing timeframes by over 50 percent and striving for same day installs.

### **7.3.3 Fiber Documentation and Automation**

LUS Fiber uses ESRI ArcGIS Mapping software for mapping its communication network. GIS allows the user to readily locate equipment and track a fiber from the headend to the subscriber's address. This can potentially also be an effective tool to help field technicians perform mobile data collection and editing, find assets and information, and report their real-time locations. LUS Fiber is in the process of migrating from a paper-based approach to an entirely electronic means of work orders, ticketing, and mapping, but staff are still on a learning curve and tools are being developed. Installation and repair technicians each have tablet computers, used for routing and trouble tickets.

The GIS system has comprehensive information on each enclosure and cable in the system. The level of detail is in line with industry standards.

### **7.3.4 Outages and Performance Metrics**

There have been no major network outages since last year's report. There were a few minor outages resulting from fiber cuts due to third party construction crews, that were geographically isolated and affected only a small percentage of customers.

As part of normal operations, LUS Fiber continues to track outages and key metrics (e.g., install timeframes, trouble ticket resolution timeframes, construction cost per foot, etc.). LUS Fiber has a robust disaster recovery plan through use of mutual aid agreements with various other fiber providers and contractors to seamlessly recover from unforeseen events.

### **7.3.5 Environmental Issues**

LUS Fiber has had no environmental issues since the last report. Given the design and operation of LUS Fiber, there are limited environmental compliance issues. Fiber is installed on LUS's overhead electric poles and in underground ducts co-located within the underground electric distribution system, avoiding additional right-of-way requirements or construction and land use related issues.



### **7.3.6 Security and Risk Assessment**

LUS Fiber reports that there have been no significant physical or cyber security issues or changes in security posture since the last report.

## **7.4 Regulatory Structure and Compliance**

LUS Fiber adheres to Louisiana’s Local Government Fair Competition Act (the “Fair Competition Act”). The Fair Competition Act requires, among other provisions, that LUS Fiber must operate in a manner that does not discriminate against competing providers of the same service and it may not grant any undue or unreasonable preference to itself or any private provider of covered services. Further, LUS Fiber may not cross-subsidize its covered services with tax dollars, income from other local government or utility services, below-market rate loans from the local government, or any other means. Under the Fair Competition Act, covered services of LUS Fiber include telecommunications services, advanced services (internet), and cable TV.

Separate from the requirements of the Fair Competition Act and Louisiana Public Service Commission (“LPSC”) Rules, the LPSC has some jurisdiction over the telecommunication rates of LUS Fiber—but it does not have jurisdiction over LUS Fiber’s rates for advanced services (internet) and cable TV.

Pursuant to the Act, LUS Fiber is also subject to certain rules and audit requirements of the LPSC. In particular, pursuant to the Act, the LPSC enacted Cost Allocation and Affiliate Transaction Rules (“LPSC Rules”) and has responsibility and authority for compliance thereof by LUS Fiber. LUS Fiber is required by the LPSC Rules to file a certification with the LPSC on an annual basis, signed under oath, stating that it is complying with the Act and the LPSC Rules. After 2014, LUS Fiber was no longer required to file the annual audit.

### **7.4.1 Attest Audit**

The LPSC Rules require LUS Fiber to have an attest engagement audit performed on an annual basis by an independent certified public accountant. The attest audit expresses an opinion as to whether the LUS Fiber systems, processes, and procedures comply with the Fair Competition Act and the LPSC Rules. LUS Fiber obtains and files such attest audit reports with the LPSC annually for each fiscal year of its operations. In addition, pursuant to the LPSC Rules, the LPSC conducts separate audits of LUS Fiber’s compliance with the LPSC Rules.

### **7.4.2 Federal Communications Commission**

In February 2015, the Federal Communications Commission (“FCC”) ruled and reclassified broadband internet access services under Title II of the Communications Act. The FCC will regulate certain aspects of broadband internet services across the country, in particular the ability of broadband providers (e.g., AT&T/DirecTV, Cox Communications) to slow or block competitors’ services and/or charge fees to content providers to deliver content at faster speeds. This broadband regulation is commonly referred to as “Net Neutrality.” While the FCC ruled on Net Neutrality, the U.S. Telecom Association filed a lawsuit against the FCC challenging the Net Neutrality rule. In June 2016, the US Court of Appeals upheld the FCC’s Net Neutrality rules and the idea that broadband access is a public utility, rather than a luxury.

In November 2017, a newly appointed FCC Commissioner proposed a repeal of Net Neutrality, with the FCC subsequently voting to repeal the legislation. Various states announced they planned to sue the FCC over the decision. In February 2018, the FCC informed Congress of their intention to repeal Net Neutrality, giving Congress 60 days to stop the repeal with the Congressional Review Act. Congress failed to pass the Congressional Review Act and the 2015 Net Neutrality Order was repealed. The FCC Restoring Internet Freedom Order took effect on June 11, 2018.

### **7.4.3 Environmental Compliance**

Given the design and operation of the Communications System, there are limited environmental compliance issues. The Communications System fiber is installed on LUS’s overhead electric poles and in underground ducts co-located within the underground electric distribution system, avoiding additional right-of-way requirements or construction and land use related issues.

### **7.5 Payment In Lieu of Tax and Imputed Tax**

Pursuant to terms of a regulatory settlement, LUS Fiber must calculate and pay an Imputed Tax to the City. The Imputed Tax is equivalent to the payments that it would have to make if it were a privately-owned entity paying applicable state and local sales tax, property tax, franchise tax, and income tax. This Imputed Tax calculation is performed annually and can be paid to either the LUS or the LCG General Fund. As LUS Fiber improves operating margins, LUS Fiber will be able to pay ILOT to the LCG General Fund. Once ILOT payments are made to the LCG General Fund, the corresponding Imputed Tax obligation is reduced on a dollar-by-dollar basis. The ILOT calculation provides for an ILOT payment up to 12 percent of Adjusted Revenues (revenues less the cost of goods sold (COGS)). LUS Fiber has requested to review the COGS criteria themselves. In researching comparative companies, COGS usually includes, for example, cost of items such as items intended for resale, materials, parts used to make a product, direct labor costs, supplies used in either making or selling the product, overhead costs, shipping

or freight, indirect costs like distribution or sales force costs, internet transport costs, etc. All or a portion of the ILOT payment is subject to an ILOT test. The ILOT test ensures that LUS Fiber retains sufficient cash to meet capital obligations. The test requires that the ILOT payment be no greater than 12 percent of Adjusted Revenues, or the cash balance available after the payment of operating expenses and debt service less 7.5 percent of Adjusted Revenues. LUS Fiber tax requirement cannot be less than that required by the Imputed Tax calculation.

On July 21, 2015, the City-Parish Council approved Ordinance No. O-014-2015 that revised the ILOT calculation. This ordinance recognizes that LUS Fiber operates in a competitive environment and the current ILOT calculation is a greater expense than Imputed Tax. With the approval of this ordinance, LUS Fiber is now required to pay an ILOT amount equal to Imputed Taxes. The Imputed Tax payments were made to LUS and the City for years 2016 through 2022 as prescribed in the ordinance. Beginning in 2020, 100 percent of Imputed Tax payments goes to the city. The reduced financial obligation has helped increase cash available for Communications System's capital improvement projects and reserves, thereby reducing pressure to raise rates in the future and helping to maintain a level playing field with competitors.

## 7.6 Operating and Capital Budget

LUS Fiber prepares and submits their proposed operating and capital budget to LCG. The operating portion of the budget contains projections of revenues and expenses for the upcoming fiscal year. The CIP as contained in the 2023 Budget is presented in Table 7-3 and totals \$40. million over the five-year period. LUS Fiber's five-year CIP is reviewed, updated, and budgeted annually. The general life expectancy of incoming connections and distribution (e.g., headend), network, and hut equipment is 5 to 10 years, at which time replacement or upgrade may be warranted. Customer premises equipment has a roughly five-year life expectancy.

**Table 7-3: Projected Capital Improvement Plan**

Project Description	2023	2024	2025	2026	2027	Total
Customer Installations	\$2,136,750	\$2,243,578	\$1,829,280	\$2,095,529	\$2,217,647	\$10,522,784
Customer Premise Equipment	3,166,275	3,324,589	2,318,818	2,134,928	2,164,420	13,109,030
Headend Equipment and Upgrades	350,000	350,000	350,000	350,000	350,000	1,750,000
Hut Equipment and Upgrades	350,000	350,000	350,000	350,000	350,000	1,750,000
Network Equipment and Upgrades	250,000	250,000	250,000	250,000	250,000	1,250,000
Special Equipment	2,400,000	2,400,000	1,873,513	2,021,975	2,020,414	10,715,902
Special Capital	500,000	300,000	300,000	300,000	300,000	1,700,000
<b>Total</b>	<b>\$9,153,025</b>	<b>\$9,218,167</b>	<b>\$7,271,611</b>	<b>\$7,502,432</b>	<b>\$7,652,481</b>	<b>\$40,797,716</b>

Source: LUS Fiber CIP. All projects are shown in 2023 dollars.

The timing of capital projects is continually evaluated based on priority given changing circumstances; therefore, projects identified in the early years of the five-year program reflect a higher degree of certainty. All projects identified in LUS Fiber CIP are expected to be funded with cash available from LUS Fiber operations.

LUS Fiber's revenue performance was aligned with the 2022 and is presented in in Table 7-4. LUS Fiber collected \$46.4 million in operating and miscellaneous revenues in 2022, as compared to the budgeted \$46.9 million. Operating expenses were under budget at \$21.2 million, as compared to the budgeted \$25.6 million. Other Income & Expenses were close to the budgeted amount. Overall, the cash available for capital was above the budgeted amount. LUS Fiber's actual financial performance was close to budget, and it exceeded DSCR requirements and continued to increase its net revenues.

**Table 7-4: Communications System Budget to Actual Performance**

	Actual (millions)	Adopted Budget (millions)	Difference (millions)	Difference (%)
<b>Operating Revenues</b>				
Retail Sales				
Wholesale Sales				
Interest Income				
Miscellaneous Income				
<b>Total Operating Revenue</b>	<b>\$46.4</b>	<b>\$46.9</b>	<b>(\$0.5)</b>	<b>-1.0%</b>
<b>Operating Expenses</b>				
Cost of Production				
Other O&M				
<b>Total Operating Expenses</b>	<b>\$21.2</b>	<b>\$25.6</b>	<b>(\$4.4)</b>	<b>-17.1%</b>
<b>Other Income (Expenses)</b>				
Normal Capital	(\$0.0)	(\$0.1)	\$0.0	-47.6%
Interest on Long Term Debt	(4.8)	(4.1)	(0.7)	18.1%
Principal on Long Term Debt	(4.6)	(6.5)	1.9	-29.0%
Note Payable	(1.7)	(2.4)	0.7	-29.6%
Imputed Tax	(0.5)	(0.9)	0.3	-40.5%
<b>Total Other</b>	<b>(\$11.6)</b>	<b>(\$13.9)</b>	<b>\$2.2</b>	<b>-16.0%</b>
<b>Cash Available for Capital</b>	<b>\$13.5</b>	<b>\$7.4</b>	<b>\$6.1</b>	<b>83.3%</b>

Source: LCG Finance and Accounting

### 7.6.1 Major Capital Investments

LUS Fiber is currently pursuing multiple grant awards within 2023 to expand services and their service area. These are broken down into 2 EDA/IMCAL grants, 4 GUMBO grants, and 1 NTIA grant for a combined total of \$32,724,779. LUS Fiber will also be contributing matching funds in addition to these

potential grant awards through either internal funds or parish contributions. These grants and matching funds are projected to serve new residential and business customers for broadband services. These locations would be located with the Acadia, Evangeline, Iberia, Jennings, and Vermilion parishes. These projects were not yet approved by the City at the time of the preparation of this report.

## **7.7 Accounting and Financial Statements**

The accounting responsibilities for LUS Fiber reside with LCG. LCG prepares monthly Financial and Operating Statements for LUS Fiber. These statements include a balance sheet, income statement, and detailed revenues and expenses. As part of LCG, LUS Fiber follows the same fiscal year with the ending date of October 31. The audit for each fiscal year is generally not available until April of the following year. The detailed financial data included for the Communications System was primarily based on the monthly Financial and Operating Statements that support and align with the audited ACFR. The tables included in this Report may vary slightly from the tables in the ACFR as numbers may be presented in various ways to calculate metrics. Although the numbers may vary, the differences are not material and do not affect the resulting metrics.

### **7.7.1 Balance Sheet**

A comparative balance sheet is presented in Table 7-5. Total Assets have remained steady over the five years primarily due to renewal and replacement of assets. Since 2017, the Retained Earnings increased due to positive net operating income. There was a significant increase in uncollectible accounts in 2019 due to an upgrade of the billing system. During the upgrade, the Communications System fell behind on writing off uncollectible accounts; however, as the upgrade was completed, the write-offs returned to historical levels and declined back towards historical averages.

**Table 7-5: Communications System Historical Balance Sheet**

<b>Total Assets</b>	2018	2019	2020	2021	2022
Communications Plant	\$77,827,044	\$78,200,948	\$76,036,947	\$75,099,598	\$75,003,977
Bonds and Special Accounts	6,014,644	5,920,578	9,946,583	12,807,329	19,854,086
Cash and Cash Equivalent	2,580,711	2,677,170	2,651,089	2,672,725	2,619,177
Accounts Receivable	1,425,507	2,174,550	2,577,723	2,522,031	3,926,107
Reserve for Uncollectible Accounts	(183,659)	(605,788)	(499,419)	(336,588)	(312,323)
Prepayments	448,868	404,315	400,011	325,207	332,589
Inventories	0	0	0	0	0
Deferred Debits	7,252,853	6,864,226	5,852,558	5,492,589	4,987,366
<b>Total Assets</b>	<b>\$95,365,968</b>	<b>\$95,635,998</b>	<b>\$96,965,493</b>	<b>\$98,582,893</b>	<b>\$106,410,978</b>
<b>Total Liabilities &amp; Equity</b>					
Long Term Debt	\$96,785,000	\$92,140,000	\$87,260,000	\$82,135,000	\$75,800,000
Current Liabilities	2,395,408	2,913,130	3,447,363	3,114,140	6,152,377
Long Term Liabilities	39,484,427	37,899,544	36,342,579	34,406,471	32,301,607
Retained Earnings	(43,298,868)	(37,316,675)	(30,084,450)	(21,072,718)	(7,843,006)
<b>Total Liabilities &amp; Fund Equity</b>	<b>\$95,365,968</b>	<b>\$95,635,998</b>	<b>\$96,965,493</b>	<b>\$98,582,893</b>	<b>\$106,410,978</b>

Source: Communications System Financial and Operating Statements

## 7.7.2 Fund Balances

Article V of LUS Fiber General Bond Ordinance dictates LUS Fibers' funds and accounts and how the 'Flow of Funds' works. Article V creates the following accounts: Receipts, Operating, Sinking Fund, and Capital Additions. In addition, funds may be created as new bonds are issued. Table 7-6 summarizes the beginning balance, receipts, disbursements, and ending balances of the required funds as of 2022. The Total Fund Balances increased by \$7.0 million, or 46 percent, in 2022.

**Table 7-6: Communications System Fund Balances as of October 31, 2022 (\$1,000)**

	Receipts	Operating	Debt Service	Retained Earnings Reserve	Capital Additions	Security Deposits	Construction Funds	Total Accounts
Beginning Balance	█	█	█	█	█	█	█	█
Receipts	█	█	█	█	█	█	█	█
Disbursements	█	█	█	█	█	█	█	█
Ending Balance	█	█	█	█	█	█	█	█

Source: LUS Fiber Funds Cash Flow Statement 2021-2022

## 7.7.3 Income Statement

Table 7-7 presents the comparative income statement. The Operating Revenues have increased consistently since 2018 as the Communications System expanded and gained market share, while operating expenses have remained steady. Correspondingly, the Net Operating Revenues have increased 13.7 percent annually over the last five years.

Other Income and Expenses have varied over the years as amortization, fund balances, and interest rates changed. Over the past five years, LUS Fiber has been able to increase its revenue without increasing operating expenses, which has led to a steady increase in net income.

**Table 7-7: Communications System Income Statement**

	2018	2019	2020	2021	2022
Operating Revenues	\$38,265,799	\$40,816,572	\$42,878,636	\$43,948,232	\$45,479,306
Operating Expenses	20,312,983	21,398,164	22,388,190	22,627,854	21,239,635
Net Operating Revenues	\$17,952,816	\$19,418,408	\$20,490,446	\$21,320,378	\$24,239,671
Depreciation	7,369,971	7,901,209	7,736,639	7,172,080	7,085,608
Net Operating Revenues after Depreciation	\$10,582,845	\$11,517,199	\$12,753,807	\$14,148,298	\$17,154,064
<b>Other Income</b>					
Interest Income	\$151,056	\$195,263	\$50,918	(\$1,876)	\$169,438
Unrealized Gain/Loss on Invs	0	481	0	0	(6,990)
Amortization of Debt Premium	1,151,434	1,091,581	1,028,753	962,746	1,024,046
Amortization of Debt Discount	(4,118)	(4,118)	(4,118)	(4,118)	0
Misc. Non Operating Revenue	135,700	90,273	(15,901)	111,442	745,785
Other Operating Gains/Losses	650	687	836	5,878	452
Total Other Income	\$1,434,722	\$1,374,168	\$1,060,489	\$1,074,073	\$1,932,732
<b>Other Expenses</b>					
Amortized Bond Issuance Costs	\$23,352	\$22,138	\$20,864	\$19,525	\$332,524
Amortized Start Up Costs	96,742	96,743	96,742	96,742	96,742
Amortized 2007 Expense	6,786	6,785	6,786	6,786	6,786
Amortized Loss On Refunding	591,404	560,663	528,392	494,490	471,101
Interest on Long Term Debt	5,004,491	4,783,241	4,550,991	4,306,991	3,660,240
Interest on Long Term Debt - LUS Note	883,386	862,204	834,802	802,964	750,716
Interest on Customer Deposits	10	23	21	(905)	56
Extraordinary Charges	0	0	0	0	0
Total Other Expenses	\$6,606,172	\$6,331,797	\$6,038,600	\$5,726,593	\$5,318,166
Net Income Before in Lieu of Tax	\$5,411,395	\$6,559,570	\$7,775,696	\$9,495,778	\$13,768,629
ILOT or Imputed Taxes	542,800	561,239	543,471	484,047	505,989
Net Income	\$4,868,594	\$5,998,331	\$7,232,225	\$9,011,732	\$13,262,640

Source: Communications System Financial and Operating Statements

## 7.7.4 Cash Flow

Cash flow is an important indicator of municipal utility financial health. Municipal utilities typically operate on a Cash Basis. Cash Basis means that non-cash expenses, such as depreciation are excluded from calculations, but other cash expenses, such as principal payments associated with debt service are included. Since municipally owned utilities are primarily concerned with accumulating sufficient cash balances to meet operating expenses, debt service, capital improvements, and other obligations, the financial results are presented in this manner.

Table 7-8 presents the change in cash due to Operations and Imputed Tax or ILOT for the Communications System over the period 2018 through 2022. These numbers indicate current Communications System revenues have improved from year-to-year as new customers were added to the system. Since 2018, the Communications Systems Net Operating Revenues met operating expenses, debt service, ILOT, or Imputed Tax obligation of the utility, and generated positive cash flow. The 5-year cumulative net margin resulted in a gain of approximately \$53.5 million.

**Table 7-8: Communications System Comparative Cash Flow**

	2018	2019	2020	2021	2022	Total
Operating Revenues	\$38,265,799	\$40,816,572	\$42,878,636	\$43,948,232	\$45,479,306	\$211,388,546
Operating Expenses	20,312,983	21,398,164	22,388,190	22,627,854	21,239,635	107,966,826
Net Operating Revenues	\$17,952,816	\$19,418,408	\$20,490,446	\$21,320,378	\$24,239,671	\$103,421,720
Debt Service	\$9,429,491	\$9,428,241	\$9,430,991	\$9,431,991	\$9,540,240	\$47,260,955
Balance After Debt Service	\$8,523,325	\$9,990,167	\$11,059,455	\$11,888,387	\$14,699,431	\$56,160,764
Less ILOT/Imputed Tax	\$542,800	\$561,239	\$543,471	\$484,047	\$505,989	\$2,637,546
Change in Cash due to Operations and ILOT / Imputed Tax	\$7,980,525	\$9,428,928	\$10,515,984	\$11,404,341	\$14,193,442	\$53,523,219

Source: Communications System Financial and Operating Statements

## 7.8 Historical Capital Improvement Program

LUS Fiber uses a capital work order system to track capital expenses. The historical capital presented in Table 7-9 reflects investment in infrastructure funded by the Series 2007 Bonds, Series 2012 Bonds, and retained earnings. The Series 2007 Bonds were issued to build the retail side of the Communications System. The Series 2012 Bonds were issued for customer installations and equipment and various projects. The Series 2012 Bonds were refunded with the Series 2021 Bonds on November 18, 2022.

As mentioned, LUS Fiber attained franchise status in November 2017 to offer communications service outside Lafayette in the City of Broussard, City of Youngsville, and unincorporated areas in the Parish. In 2018, LUS Fiber expanded into Broussard and Youngsville to serve new customers as indicated by the capital spending in 2018. In 2019, LUS Fiber expanded into Carencro. LUS Fiber is continuing to build out targeted areas.

Previously LUS Fiber was awarded a grant to extend service to underserved commercial areas in St. Martin Parish and Iberia Parish. After the extension through the business districts is complete, LUS Fiber will be able to continue to expand its service territory into the residential neighborhoods passed by the new fiber construction.

**Table 7-9: Communications System Historical Capital Improvement Program**

	2018	2019	2020	2021	2022
Series 2012A Bonds	\$13,731	\$2,223	\$0	\$0	\$0
Series 2012 B Bonds	26,213	801	0	0	0
Retained Earnings	8,523,970	7,734,867	5,273,513	5,805,131	6,172,660
Special Equipment	50,465	247,473	54,984	189,772	20,265
Total Capital	\$8,614,379	\$7,985,364	\$5,328,497	\$5,994,903	\$6,192,925

Source: Communications System Status of Construction Work Order Reports



## 7.9 Historical Financial Performance

Since its inception in 2009, the Communications System exhibited steady growth and improved operating margins. The Communications System credit rating from Moody's was increased in 2019 from A3 to A2.

### 7.9.1 Historical Debt Service Coverage

Communications System debt service for years 2017 through 2021 include the Series 2007 Bonds, Series 2012 Bonds, Series 2015 Bonds, and Series 2021 Bonds. The Series 2012 Bonds were refunded with the Series 2021 Bonds in FY 2022 on November 1, 2021, which lowered the Communications System debt service. Table 7-10 presents historical debt service and the associated DSCR. In each year since 2017, the DSCR exceeded the minimum coverage requirement of 1.0 required by the Bond Ordinances.

**Table 7-10: Communications System Historical Debt Service Coverage**

Year	Operating Revenues	Operating Expenses	Net Revenues Available for Debt Service	Debt Service	Debt Service Coverage Ratio
2018	\$38,416,855	\$20,312,983	\$18,103,872	\$9,429,491	1.9
2019	\$41,011,835	\$21,398,164	\$19,613,671	\$9,428,241	2.1
2020	\$42,929,555	\$22,388,190	\$20,541,364	\$9,430,991	2.2
2021	\$43,946,357	\$22,627,854	\$21,318,503	\$9,431,991	2.3
2022	\$45,648,745	\$21,239,635	\$24,409,110	\$9,540,240	2.6

Source: Communications System Financial and Operating Statements

(1) Operating revenues include interest income and other miscellaneous income.

(2) O&M and other expenses include customer service, and A&G costs. Operating expenses do not include ILOT internal loan payments to LUS, and other miscellaneous expenses.

(3) Debt service includes the Series 2007 Bonds, Series 2012 Bonds, and Series 2015 Bonds. The 2012 Series Bonds debt service in years 2012 and 2013 was paid for out of capitalized interest. The 2015 debt service includes \$4.77 million paid into the refunded Series 2007 Bonds escrow account. The Series 2012 Bonds were fully refunded with the Series 2021 Bonds on November 1, 2021.

### 7.9.2 Revenue Analysis

The Communications System's internet revenues have consistently increased over the last five years as the Communications System expanded as shown in Table 7-11. Cable and telephone revenues fluctuate; however, each remained relatively stable over the last five years. Wholesale and other revenues have fluctuated and include dark fiber lease, late fees, miscellaneous revenues, colocation, and other items.

**Table 7-11: Communications System Historical Operating Revenues**

	2018	2019	2020	2021	2022
Cable TV					
Data/Internet					
Telephone					
Wholesale					
Other					
Total Operating Revenues					

Source: Communications System Financial and Operating Statements

### 7.9.3 Expense Analysis

The cost of goods sold (“COGS”) increased from 2018 to 2022 as LUS Fiber added customers as presented in Table 7-12. COGS predominantly consists of programming and content costs associated with service offerings. Even though customer acquisition increased during 2022, due to consumers shifting away from higher cost content video services, the COGS was reduced by █ percent. The Plant Specific Expense averages █ and decreased by █ percent in 2022. The Plant Specific Expense includes vehicles, furniture, electronics, maintenance, repairs, general maintenance, and other plant related items. The Plant Non-specific Expense have averaged approximately █ per year and decreased by █ percent in 2022. The primary cost item in this category is engineering. Customer Operations have averaged █ over the last five years and decreased █ percent in 2022. The administrative costs averaged █ over the past five years and increased by █ percent in 2022.

**Table 7-12: Communications System Historical Operating Expenses**

	2018	2019	2020	2021	2022
Cost of Goods Sold	█	█	█	█	█
Plant Specific Expense	█	█	█	█	█
Plant Non Specific Expense	█	█	█	█	█
Customer Operations	█	█	█	█	█
Administrative	█	█	█	█	█
Other Operating Expenses	█	█	█	█	█
<b>Total Operating Expenses</b>	<b>█</b>	<b>█</b>	<b>█</b>	<b>█</b>	<b>█</b>

Source: Communications System Financial and Operating Statements

### 7.9.4 Credit Event Analysis

LUS Fiber is financially separate from the Utilities System; however, if LUS Fiber fails to transfer to the Paying Agent by the 21st day of the month preceding an interest payment date the amount equal to the debt service on LUS Fiber Bonds falling due on the first day of the following month (a Credit Event), the Utilities System is required to pay such debt service (but only to the extent of such insufficiency) from revenues available for the payment of Subordinated Indebtedness on deposit in the Capital Additions Fund of the Utilities System. Upon the occurrence of a Credit Event, LUS Fiber must proceed to discontinue its provision of services, as soon as reasonably practical, taking into consideration minimizing the interruption of services to existing users of LUS Fiber. Pursuant to the ordinances of the City authorizing the issuance of LUS Fiber Bonds, the rate covenant contained in the Bond Ordinances were incorporated by reference into LUS Fiber Bond Ordinance, and the debt service requirements on any Communications System Bonds are treated as amounts payable with respect to Subordinated Indebtedness of the Utilities System for the purposes of the rate covenant under the Bond Ordinances.

Table 7-13 shows that if a Credit Event had occurred in 2022, the Utilities System DSCR would have exceeded the minimum coverage requirement of 1.0 required by the Bond Ordinances.

**Table 7-13: Credit Event Residual Balance Coverage Calculation**

	<b>2022</b>
Utilities System Net Revenues	\$78,067,244
Less Interest Income from Internal Loans	\$750,716
Utilities System Balance Available for Debt Service	\$77,316,528
Less Utilities System Debt Service (1)	\$23,741,091
Less Capital of 7.5% (2)	\$11,879,131
Utilities System Residual Revenues Available for Communications Debt Service	\$41,696,305
Communications System Debt Service (3)	\$9,540,240
Utilities System Debt Service Coverage Ratio for Communications System Debt	4.4

Source: LUS

(1) Debt service includes the Series 2012 Bonds and Series 2019 Bonds.

(2) The Bond Ordinance requires a minimum amount equal to 7.5% of the Adjusted Revenue deposits into the Receipts Account for the purposes of paying capital costs.

(3) The debt service in FY 2021 represents debt service on the Series 2012 Bonds and Series 2015 Bonds. The Series 2012 Bonds were refunded in FY 2022 with the Series 2021 Bonds.

## 7.10 Observations and Recommendations

Based on the analysis described herein, Burns & McDonnell offers the following observations and recommendations.

- Based on visual inspection of facilities, records audit, and interviews of LUS Fiber staff, the LUS Fiber communication network is in good condition, maintained properly and in accordance with industry practices.
- At the current customer levels, the Communications System generates sufficient revenues to meet operating and maintenance expenses, debt service, capital improvements, inter-utility loan payments, imputed taxes, and all other financial obligations, with a sufficient profit margin to allow the Communications System to spend ██████████ per year on continued network expansion.
- LUS Fiber operates in a competitive market with many private company competitors. LUS Fiber continues to perform an organizational and compensation review analysis to assess its position in the telecommunication market. The results of this study are assisting LUS Fiber to establish benchmarks

for organizational structure and compensation packages to maintain its ability to retain and recruit experienced, talented employees.

- To further address recruiting talented employees, LUS Fiber is also establishing a pipeline of quality candidates through relationships with educational institutions and internships.
- LUS Fiber has been seeking alternative funding (e.g., grants) outside of the bond market and successfully petitioned to be included in the Louisiana GUMBO program.
- LUS Fiber launched a 4<sup>th</sup> service line based on a fixed wireless CBRS service.
- LUS Fiber should continue to pursue federal and state grant opportunities and local partnerships to extend the network to underserved surrounding areas. A portion of LUS Fiber's future revenue growth is based on its ability to expand into nearby underserved areas. LUS Fiber has developed a strategy to take advantage of upcoming federal and state broadband infrastructure grant opportunities to expand its territory and further grow its customer base.
- LUS Fiber should continue to improve its service catalogue, especially in the enterprise sector. A potential revenue opportunity lies in using its excess network capacity to serve additional enterprise customers.
- LUS Fiber has vacancies in its current management structure that it is actively looking to fill with qualified and experienced candidates. Based on these future hires, LUS Fiber will continue reevaluate the current business structure and is considering realignment and/or reassignment of certain components of the business to better position the company moving forward.

## **8.0 CONTINUING DISCLOSURES - SUMMARY**

Government entities that issue bonds must enter into a continuing disclosure agreement to be in compliance with the Securities and Exchange Commission (“SEC”) Rule 15c2-12. As part of the continuing disclosure agreement, the Issuer promises to provide certain annual financial information and material event notices to the public. These filings must be made electronically at the EMMA portal. Please refer to Section 9.0 for the Utilities System Continuing Disclosures, Section 10.0 for the LPPA Continuing Disclosures, and Section 11.0 for The Communications System Continuing Disclosures. Each of the following sections contains a table that cross references the required information with tables in the Report.

## 9.0 CONTINUING DISCLOSURES – UTILITIES SYSTEM

### 9.1 Introduction

Government entities that issue bonds must enter into a continuing disclosure agreement to be in compliance with the SEC Rule 15c2-12. As part of the continuing disclosure agreement, the issuer promises to provide certain annual financial information and material event notices to the public. These filings must be made electronically at the EMMA portal ([www.emma.msrb.org](http://www.emma.msrb.org)). The Utilities System had the following outstanding debt as of October 31, 2022:

- Utilities Revenue Refunding Bonds, Series 2017
- Utilities Revenue Bonds, Series 2019
- Taxable Utilities Revenue Refunding Bonds, Series 2021

At the end of 2016, LUS refunded the majority of the Series 2010 bonds with the Series 2017 Bonds. In 2020, the Series 2010 Bonds were fully redeemed by the proceeds of the Series 2017 Bonds. The Series 2012 Bonds were refunded with the Taxable Utilities Revenue Refunding Bonds Series 2021 in FY 2022. The debt service on the Series 2021 Bonds is included in the projections within these continuing disclosures.

The continuing disclosure agreements for the outstanding bonds require that specific tables contained in the Official Statements must be updated annually. This section contains these required tables, which include forward-looking financial statements based on Burns & McDonnell's current expectations and projections about future events and financial trends regarding the Utilities System. Projections as contained herein reflect estimates of what might occur in the future based on the information available as of the date of this Report. Burns & McDonnell cannot predict the future or guarantee future financial performance of the Utilities System. To the extent that assumptions used in these projections vary from those actually observed, financial performance as presented herein will vary from actual performance. Burns & McDonnell prepared a 10-year projection of financial and operating data for each of the Electric, Water, and Wastewater Systems. Projections are based on Burns & McDonnell's review of historical operating results, the 2022 Budget, visual observations of the Utilities System assets, and other assumptions and considerations as listed in the Report. The projections prepared by Burns & McDonnell are for the Projected Period of November 1, 2022, through October 31, 2032. LUS provided actual historical data for the 2017 through 2022 period.

### 9.2 Information and Assumptions Relied Upon

The projected operating results for the Utilities System, also referred to as LUS, rely upon information

and assumptions gathered in the course of Burns & McDonnell’s review. Those assumptions which we relied upon are summarized below.

1. LUS is assumed to operate and maintain the Utilities System following prudent utility practices. Prudent utility practices mean practices, methods, and acts that would be expected to accomplish the desired results in a workmanlike manner.
2. LUS is assumed to continue to hire and maintain competent personnel. If needed, LUS will provide training to personnel to ensure the safety of personnel and reliability of the utilities.
3. LUS is assumed to continue to maintain and renew any required permits or approvals related to the utilities including electric, water, and wastewater treatment plants and sites.
4. There will not be further regulation of LUS facilities that require major capital expenditures for LUS to comply beyond those referenced in this Report and included in the LUS CIP.
5. It is assumed that the Rodemacher Unit 2, Hargis-Hébert Plant, T. J. Labbé Plant, and the future combustion turbine plant will be maintained and operated in good condition throughout the Projected Period. Rodemacher Unit 2 is assumed to be retired at the end of FY 2027.
6. It is assumed that the electric transmission and distribution systems will be maintained and operated in good condition throughout the Projected Period.
7. It is assumed that the water treatment plants, ground water wells, and distribution system will be maintained and operated in good condition throughout the Projected Period.
8. It is assumed that the wastewater treatment plants and collection system will be maintained and operated in good condition throughout the Projected Period.
9. It is assumed that all existing contracts will be honored and that the Utilities System would extend or replace any expired contracts as needed.
10. It is assumed that standard operating procedure for LUS will continue and will not include the effects of any event outside of LUS’s control including events traditionally considered force majeure.
11. LUS is assumed to have adequate coal, natural gas, and water supply for operation of the power plants.
12. LUS is assumed to continue to have adequate water supply from the Chicot aquifer to meet the customers’ needs.
13. LUS is assumed to continue to be a market participant in MISO including providing capacity and meeting all other operational and financial requirements.
14. LUS is assumed to continue to have adequate transmission access in MISO to buy and sell power as

needed.

15. Utilities System financial and operating data was provided by LUS and LCG. LPPA financial and operating data was provided by LUS, LPPA and Cleco staff. Data provided includes historical financial and operating data for 2018 through 2022, the 2023 Budget, and the LPPA Operating and Capital Budget.
16. Burns & McDonnell completed a load forecast in FY 2022. The load forecast was used to develop the revenue forecast and power requirements in this financial forecast update.
17. Burns & McDonnell prepared an IRP for the electric system in 2020. The IRP contained projections of forecasted fuel usage and cost, MISO wholesale market revenues, MISO wholesale market costs, and power purchase agreement costs for both LUS and LPPA power plants. The IRP assumed Rodemacher Unit 2 is retired in 2027 and is replaced with a simple cycle gas turbine plant of similar capacity. The IRP assumed additional solar capacity and energy was assumed to be added between 2021 and 2029.
18. Burns & McDonnell prepared an updated long term forecast of fuel cost, purchased power cost, and wholesale market revenues in 2023 which was included in the financial projections. The forecast included updated projections of plant generation dispatch, plant fuel cost, plant variable O&M costs, MISO load costs, and wholesale revenues. The updated forecast also included the costs and wholesale revenues for three new 100 MW solar PPAs, the addition of a new gas turbine plant at the existing Bonin site beginning in 2028, and the retirement of Rodemacher Unit 2 at the end of 2027.
19. The existing electric rates allow LUS to pass the direct MISO power cost, fuel cost, certain LPPA costs, environmental costs, purchased power costs, and other eligible costs directly to consumers in the form of a fuel charge that is adjusted regularly. This mechanism greatly reduces risk to LUS.
20. Future costs associated with emissions or potential environmental compliance have not been included within the projected operating results. Rodemacher Unit 2 is planned to be retired in 2027 and Burns & McDonnell has included preliminary estimated costs for the retirement and closure of the plant. All operating expenses associated with environmental compliance are included in the fuel charge and passed through to customers in the retail electric rates.
21. Burns & McDonnell reviewed recent and expected trends for inflation and assumed an inflation rate of 7.5 percent in FY 2023. The most recent semiannual Blue Chip Economic Indicator projection of GDP was used for long term inflation for FY 2024 to FY 2032. The GDP inflation factor was used to escalate O&M expenses and capital similar to previous years.
22. Projected interest cost associated with future LUS bonds were assumed to be 4.0 percent with new



bonds being financed over 25 years. New bonds are assumed to be issued in FY 2023 for various capital projects. The debt service schedule for the FY 2023 bonds is based on pricing obtained by LUS in late 2022. The electric utility is assumed to issue bonds in FY 2027 for a new gas turbine power plant.

23. The forecast assumes that LUS is implementing a series of rate increases beginning in FY 2023 for each of the utilities. The rate increases are based on the increase approved by City Council in FY 2022. The electric utility is implementing 3.0 percent base rate increases in FY 2024 and FY 2025. The wastewater utility is implementing 9.5 percent rate increases in FY 2023, FY 2024, and FY 2025. The water utility is implementing 8.0 percent rate increases in FY 2023, FY 2024, and FY 2025. The FY 2023 rate increases for the water and wastewater have already been implemented.

### **9.3 Projected Operating Results Assumptions**

Tables with forecasted results over the Projected Period can be found in Section 10 of this Report.

### **9.4 Revenue Projections**

Revenues from each of the three LUS utility systems have realized steady customer growth as described in this report. LUS energy use per customer has been relatively stable over the last two years. The long-term forecast assumes that the number of customers in the electric, water, and wastewater utilities will each grow at approximately 0.4 percent per year over the next 10 years. Rate increases are assumed for both the electric, wastewater, and water utilities over the forecast while the electric utility fuel charge is assumed to adjust as LUS's power cost change.

### **9.5 Expense Projections**

LUS's largest expense is associated with the cost to purchase and generate power for the electric utility system. The projected purchased power cost is based on updated projections prepared by Burns & McDonnell in 2023. Fixed expense projections associated with operating the generating units are based on historical average levels with escalation. Variations in variable purchased power costs are directly covered by the fuel charge billed to customers. Wholesale transmission costs were projected based on input from LUS. Other electric utility fixed costs such as transmission, distribution, customer costs, A&G expenses, and debt service are recovered through LUS's base electric rates.

Water operating expenses include production, distribution, customer, and A&G expense with water production being the largest. These expense projections are generally based on historical average levels with escalation. Some variable production expenses are escalated based on volumes and changes to electric rates. The water system recovers increases in expenses through periodic rate increases that are proposed in rate studies and require approval by City Council.

Wastewater operating expenses include treatment, collection, customer, and A&G expense with wastewater treatment being the largest. These expense projections are generally based on historical average levels with escalation. Some variable production expenses are escalated based on volumes and changes to electric rates. The wastewater system recovers increases in expenses through periodic rate increases that are proposed in rate studies and require approval by City Council.

## **9.6 Debt Service Projections**

As of the date of this Report, LUS debt service includes the Series 2017 Bonds, Series 2019 Bonds, and Series 2021 Bonds. New debt service includes a new \$50 million bond issue in FY 2023 for proposed wastewater, water, and electric projects and a \$300 million bond issue in 2027 for a proposed gas turbine power plant. The projected debt service coverage ratio exceeds the minimum requirement of 1.0.

## **9.7 Other Expense Projections**

Other expenses include ILOT, normal capital and special equipment, and other miscellaneous expenses. Normal capital and special equipment are projected based on the 2022 budget and escalated for inflation.

## **9.8 In Lieu of Tax**

The ILOT calculation provides for an ILOT payment equal to 12 percent of the Receipts Fund deposits. To be eligible to make the ILOT payment, LUS must first pass an ILOT Test. The ILOT test ensures that the Utilities System retains sufficient cash to meet capital obligations. If cash available after payment of operating expenses and debt service, less 7.5 percent of the Non-fuel Revenues, is greater than 12 percent of the Receipts Fund, LUS passes the test and makes the ILOT payment to the City. If LUS fails the ILOT test, LUS pays the cash available after debt service less 7.5 percent of the Non-fuel Revenues.

## **9.9 Capital Improvement Programs**

The projections include the LUS CIP which reflects capital projects designed to upgrade, renew, and expand the system to meet customer growth requirements. In this Report, the capital plan for years 2023 through 2027 was based on the budget provided to Burns & McDonnell on March 14, 2023. The capital plan for 2028 through 2032 was based on historical levels. The five-year CIP is updated annually.

## **9.10 Bond Reserve Fund and Cash Available**

Cash available reflects remaining funds available to LUS once all other credit obligations of LUS are satisfied. LCG has a financial objective that requires a minimum cash balance of \$8,000,000 to be held in an Operation and Maintenance Fund. The Operation and Maintenance Fund resides in the Operating Fund providing a cash reserve to meet system O&M expense requirements. Once O&M expense and debt service obligations are met by LUS, accumulated cash balances are held in a Capital Additions Fund and

are applicable to capital projects or other lawful uses. The Period assumes that capital additions for LUS will be paid with a combination of cash balances available in the Capital Additions Fund and new debt.

### 9.11 Cross Reference

The following table is provided to assist in cross referencing the information contained in the Continuing Disclosures with the information contained in this Report.

**Table 9-1: City of Lafayette, Utilities Revenue Refunding Bonds, Series 2012**

Official Statement	Official Statement Page	Official Statement Table	Report Reference
Trends in Finances	35	LCG, LUS Income Statements	Table 9-5
	36	Historical Debt Service Coverage Calculation	Table 3-3

**Table 9-2: City of Lafayette, Utilities Revenue Refunding Bonds, Series 2017**

Official Statement	Official Statement Page	Official Statement Table	Report Reference
Trends in Finances	36	LCG, LUS Income Statements	Table 9-5
	37	Historical Debt Service Coverage Calculation	Table 3-3

**Table 9-3: City of Lafayette, Utilities Revenue Bonds, Series 2019**

Official Statement	Official Statement Page	Official Statement Table	Report Reference
Trends in Finances	38	LCG, LUS Income Statements	Table 9-5
	39	Historical Debt Service Coverage Calculation	Table 3-3

**Table 9-4: City of Lafayette, Taxable Utilities Revenue Refunding Bonds, Series 2021**

Official Statement	Official Statement Page	Official Statement Table	Report Reference
	24	Electric System Largest Retail Customers	Table 10-9
	25	Historical Electric System Retail and Wholesale Sales	Table 4-1
	29	Wastewater System Largest Retail Customers	Table 10-11
	29	Historical Wastewater System Retail Collection	Table 6-1
	33	Water System Largest Retail Customers	Table 10-10
	34	Historical Water System Retail and Wholesale Sales	Table 5-1
	35	Electric System Rate Summary	Table 4-26
	35	Electric System Customer Class Statistics	Table 4-28
	36	Electric Residential Rate Comparison	Table 4-22
	36	Electric Commercial Rate Comparison	Table 4-23
	37	Wastewater System Rate Summary	Table 6-17
	37	Water System Rate Summary	Table 5-24
Trends in Finances	38	LCG, LUS Income Statements	Table 9-5
	39	Historical Debt Service Coverage Calculation	Table 3-3

**Table 9-5: LUS Income Statements**

	2019	2020	2021	2022
<b>Operating Revenues</b>				
Electric	104,141,323	99,722,977	102,935,936	103,630,720
Electric Retail Fuel Adjustment	73,101,002	65,117,850	76,344,759	121,702,909
Water	20,524,232	21,144,642	21,710,500	22,574,345
Wastewater	30,911,782	30,396,508	31,513,318	31,714,091
Fiber	0	0	0	0
Total Operating Revenues	228,678,339	216,381,978	232,504,512	279,622,064
<b>Operating Expenses</b>				
Electric Fuel & Purch Power	79,275,605	74,047,342	90,256,316	132,013,586
Electric Other Production	5,097,410	3,606,585	4,997,512	4,439,140
Other Electric	35,027,667	34,390,320	33,832,947	31,550,983
Water	14,227,206	13,159,106	13,833,990	15,000,437
Wastewater	19,211,514	18,295,187	19,791,589	20,606,263
Fiber	0	0	0	0
Total Operating Expenses	152,839,402	143,498,541	162,712,354	203,610,408
Net Operating Revenues	75,838,938	72,883,437	69,792,158	76,011,656
<b>Depreciation</b>	25,130,355	25,189,698	24,589,046	25,244,789
<b>Other Income</b>				
Interest Income	4,695,793	2,904,807	1,020,016	2,055,587
Unrealized Gain/Loss on Invs	399,671	(139,572)	(128,924)	(1,471,006)
Amortization of Debt Premium	3,639,998	3,769,742	3,555,219	2,018,191
Water Tapping Fees	56,760	61,540	71,460	63,520
Communications Lease Income	0	11,379	0	7,906
Contributions in Aid of Construction	0	140,856	0	150,700
Misc. Non Operating Revenue	3,141,166	3,633,306	2,412,390	4,330,861
Total Other Income	11,933,388	10,382,059	6,930,161	7,155,760
<b>Other Expenses</b>				
Loss on Disposition of Property	309,767	290,397	507,437	255,880
Interest Expense	10,362,925	11,184,000	10,535,600	7,416,091
Amortization on Plant	600,810	488,306	395,280	316,571
Amortization - Other	1,586,946	1,498,590	1,405,838	511,011
Interest on Customer Deposits	5,331	1,834	1,897	1,927
Tax Collections/Non Operating	0	0	0	0
Misc Non Operating Expense	3,369,807	3,649,380	1,576,322	2,408,295
	16,235,585	17,112,507	14,422,373	10,909,776
Net Income Before in Lieu of Tax	46,406,385	40,963,291	37,710,900	47,012,851
ILOT	25,051,002	24,679,711	24,056,012	24,185,668
Net Income	21,355,383	16,283,580	13,654,888	22,827,183
Net Positions, Beginning as Restated	519,350,066	540,705,447	556,989,025	570,657,116
Net Positions, Ending (1), (2)	540,705,447	556,989,025	570,643,913	593,484,298

Source: LUS and Official Statement

(1) Net position year beginning balance was restated each year

(2) Year-end FY 2021 ending balance was adjusted by \$13,201 due to the implementation of GASB 87

## 10.0 CONTINUING DISCLOSURES – LPPA

### 10.1 Introduction

Government entities that issue bonds must enter into a continuing disclosure agreement to be in compliance with the SEC Rule 15c2-12. As part of the continuing disclosure agreement, the issuer promises to provide certain annual financial information and material event notices to the public. These filings must be made electronically at the EMMA portal ([www.emma.msrb.org](http://www.emma.msrb.org)). LPPA had the following outstanding debt as of October 31, 2022:

- Electric Revenue Refunding Bonds, Series 2015
- Taxable Electric Revenue Refunding Bonds, Series 2021

The Series 2012 Bonds were refunded with the Taxable Electric Revenue Refunding Bonds Series 2021 in FY 2022. The debt service on the Series 2021 Bonds is included in the projections within these continuing disclosures.

The continuing disclosure agreements for the outstanding bonds require that specific tables contained in the Official Statements must be updated annually. This section contains these required tables. This section contains forward looking financial statements based on Burns & McDonnell's current expectations and projections about future events and financial trends regarding LPPA. Projections as contained herein reflect estimates of what might occur in the future based on the information available to us as of the date of this Report. Burns & McDonnell cannot predict the future or guarantee future financial performance of LPPA. To the extent that assumptions used in these projections vary from those actually observed, financial performance as presented herein will vary from actual performance. Burns & McDonnell prepared a 10-year projection of financial and operating data for LPPA. Projections are based on Burns & McDonnell's review of historical operating results, CLECO's budgets, visual observations of the LPPA assets, and other assumptions and considerations as listed in the Report. The projections prepared by Burns & McDonnell are for the Projected Period of November 1, 2022, through October 31, 2032. LUS provided actual historical data for the 2018 through 2022 period.

### 10.2 Information and Assumptions Relied Upon

### 10.3 Revenue Projections

LPPA projected revenues reflect the full cost recovery per the PSC. Therefore, revenues are equivalent to debt service, capital, and meeting reserve requirements.

## 10.4 Expense Projections

LPPA's largest expense is its fuel cost. Rodemacher Unit 2 is economically dispatched into the MISO market. The projected fuel expense used in the forecast is based on Burns & McDonnell's forecast update completed in 2023. The forecast utilized various assumptions to dispatch the unit using fuel pricing from LUS and market prices. Rodemacher Unit 2 will no longer burn coal beginning in 2027. A new gas turbine plant is assumed to replace Rodemacher Unit 2's capacity in 2027. The other non-fuel operating expenses for LPPA were provided by CLECO through 2027. The forecast assumes that the plant is retired in 2028 with minimal continued operating expenses thereafter.

## 10.5 Debt Service

LPPA fuel, O&M expenses, debt service associated with MATS upgrades, and debt service associated with rail cars are included in the LUS FC calculation. In 2022, approximately 80 percent of LPPA debt service was passed through Schedule FC. LUS Electric System base rates recover the remaining LPPA debt service obligation. LPPA debt service has included the Series 2012 Bonds and Series 2015 Bonds through the end of FY 2021. Beginning in FY 2022 the debt service associated with the Series 2012 Bonds was replaced with the Series 2021 Bonds debt service. Projected operating results assume no future bond issues to meet LPPA capital requirements. The debt service coverage ratio meets the minimum requirement of 1.0. Because LUS pays 100 percent of LPPA costs, Operating Revenues, provided exclusively from LUS, generally equal Operating Costs including expenses, debt service, and capital spending. To the extent that DSC is greater than 1.0, any available cash is applied to capital projects.

## 10.6 Capital Improvement Programs

During the Projected Period, the LPPA CIP reflects capital projects designed to maintain the assets for reliability and environmental compliance. The capital projects include low baghouse bag and cage replacements, rotating air port upgrades on the coal pulverizers, boiler insulation repair, CCR compliance asset retirement obligation, and other small projects related to reliability or improving performance. The LPPA 5-year CIP provided to Burns & McDonnell by Cleco is \$18.7 million of which \$10 million is for the CCR compliance project.

## 10.7 Bond Reserve Fund and Cash Available

LPPA's current Bond Reserve Fund Balance is approximately \$6.92 million as required by the bond ordinance. LPPA also maintains a Reserved and Contingency Fund of approximately \$5.29 million and a Fuel Cost Stability Fund of approximately \$4.5 million.

## 10.8 Cross Reference

The following table is provided to assist in cross referencing the information contained in the Continuing

Disclosures with the information contained in this Report.

**Table 10-1: LPPA Electric Revenue Bonds, Series 2012**

Official Statement	Official Statement Page	Official Statement Table	Report Reference
Debt Service Requirements	4	Series 2012 Bonds Debt Service	Table 10-4
Summary of Historical Operating Results	18	LPPA Historical Operating Results	Table 10-6
Trends in Finances	19	LPPA Summary Statements of Revenues, Expenses and Changes in Fund Net Assets	Table 10-7
	20	LPPA Summary Statements of Cash Flows	Table 10-8
Unit 2, page 22-33	24	Unit No. 2 Operating Statistics	Table 4-13
	25	Annual Operating Expenses - LPPA's Share of Unit No. 2	Table 10-5
City of Lafayette Utilities System, page 33-57	40	Electric System Largest Retail Customers	Table 10-9
	40	Historical Electric Retail and Wholesale Sales	Table 4-1
	41	Proposed Electric System Facilities (Five Year Plan)	Table 3-5
	42	Electric Sales and Revenue Forecast	Table 10-13
	43	Electric System Operations and Maintenance Expense Forecast	Table 10-14
	44	Wastewater System Largest Retail Customers	Table 10-11
	45	Historical Wastewater Retail Flows (000 Gallons)	Table 6-1
	45	Proposed Wastewater System Facilities (Five Year Plan)	Table 3-5
	46	Wastewater Sales and Revenue	Table 10-15
	47	Wastewater System Operations and Maintenance Expense Forecast	Table 10-16
	49	Water System Largest Retail Customers	Table 10-10
	49	Historical Water Retail and Wholesale Sales	Table 10-17
	50	Proposed Water System Facilities (Five Year Plan)	Table 3-5
	51	Water Sales and Revenue Forecast	Table 10-17
	51	Water System Operations and Maintenance Expense Forecast	Table 10-17
	52	Electric System Sales and Revenues by Rate Class	Table 4-28, Table 4-2
	53	Electric Residential Rate Comparison	Table 4-22
	53	Electric Commercial Rate Comparison	Table 4-23
	56	Lafayette Utilities Systems Income Statements	Table 9-5
	57	Summary Statement of Revenues, Expenses, and Changes in Fund Net Assets	Table 10-12, Table 9-5
Appendix B-Financial & Statistical Data	B-3	Summary Debt Statement	See Section 12



**Table 10-2: LPPA Electric Revenue Refunding Bonds, Series 2015**

Official Statement	Official Statement Page	Official Statement Table	Report Reference
Debt Service Requirements	5	Series 2015 Bonds Debt Service	Table 10-4
Summary of Historical Operating Results	18	LPPA Historical Operating Results	Table 10-6
Trends in Finances	19	LPPA Summary Statements of Revenues, Expenses and Changes in Fund Net Position	Table 10-7
	20	LPPA Summary Statements of Cash Flows	Table 10-8
Rodemacher Unit 2, page 22-33	23	Rodemacher Unit No. 2 Operating Statistics	Table 4-13
	24	Annual Operating Expenses - LPPA's Share of Unit No. 2	Table 10-5
City of Lafayette Utilities System, page 33-57	39	Electric System Sales and Revenues by Rate Class	Table 4-28, Table 4-2
	40	Electric System Residential Rate Comparison	Table 4-22
	40	Electric System Commercial Rate Comparison	Table 4-23
	41	Historical and Projected Electric Retail and Wholesale Sales	Table 4-1, Table 10-13
	42	Historical and Projected Electric Sales and Revenue Forecast	Table 10-13
	43	Historical and Projected Electric System Operations and Maintenance Expense Forecast	Table 10-14
	46	Wastewater System Largest Retail Customers	Table 10-11
	46	Wastewater System Residential Rate Comparison	Table 6-13
	47	Wastewater System Commercial Rate Comparison	Table 6-14
	47	Historical & Projected Wastewater Retail Collection	Table 10-15
	48	Wastewater Historical Sales & Projected Revenue Forecast	Table 10-15
	49	Wastewater System Historical and Projected Operation and Maintenance Expense	Table 10-16
	51	Water System Largest Retail Customers	Table 10-10
	52	Water System Residential Rate Comparison	Table 5-20
	52	Water System Commercial Rate Comparison	Table 5-21
	53	Historical & Projected Water Retail and Wholesale Sales	Table 10-17
	54	Water Sales and Revenue Forecast	Table 10-17
	55	Water System Historical and Projected Expense	Table 10-18
	57	Lafayette Utilities Systems Income Statements	Table 9-5
	58	Summary Statement of Revenues, Expenses, and Changes in Fund Net Position	Table 10-12
Appendix B-Financial & Statistical Data	B-4	Summary Debt Statement	See Section 12

**Table 10-3: Taxable LPPA Electric Revenue Refunding Bonds, Series 2021**

Official Statement	Official Statement Page	Official Statement Table	Report Reference
Summary of Historical Operating Results	18	LPPA Summary of Historical Operating Results	Table 10-6
Trends in Finances	19	LPPA Summary Statements of Revenues, Expenses and Changes in Fund Net Position	Table 10-7
	20	LPPA Statements of Cash Flows	Table 10-8
Unit 2, page 22-33	24	Rodemacher Unit 2 Operating Statistics	Table 4-13
	26	Annual Operating Expenses - LPPA's Share of Unit No. 2	Table 10-5
City of Lafayette Utilities System, page 32-57	35	Utilities System Capital Improvement Program	Table 3-5
	41	Electric System Largest Retail Customers	Table 10-9
	42	Historical Electric Retail and Wholesale Sales	Table 4-1
	42	Electric System Rates Summary	Table 4-26
	43	Electric System Customer Class Statistics	Table 4-28
	43	Electric Residential Rate Comparison	Table 4-22
	44	Electric System Commercial Rate Comparison	Table 4-23
	48	Wastewater System Largest Retail Customers	Table 10-11
	49	Historical Wastewater Retail Flows (1000 Gallons)	Table 6-1
	49	Wastewater System Rate Summary	Table 6-17
	53	Water System Largest Retail Customers	Table 10-10
	54	Historical Water Retail and Wholesale Sales	Table 10-17
	55	Water System Rate Summary	Table 5-24
Utility System Trends in Finances	56	Lafayette Utilities Systems Income Statements	Table 9-5
	57	Utilities System Historical Debt Service Coverage	Table 3-3
Appendix B-Financial & Statistical Data	B-3	Summary Debt Statement	See Section 12

**Table 10-4: Debt Service Requirements**

Due Date	Series 2007 Bonds		Series 2012 and Series 2021 Bonds [1]		Series 2015 Bonds		Total Debt Service Requirement		
	Principal	Interest	Principal	Interest	Principal	Interest	Principal	Interest	Total
11/1/2014	\$605,000	\$737,078	\$2,255,000	\$1,362,975	\$0	\$0	\$2,860,000	\$2,100,053	\$4,960,053
5/1/2015	\$0	\$724,978	\$0	\$1,329,150	\$0	\$0	\$0	\$2,054,128	\$2,054,128
11/1/2015	\$630,000	\$724,978	\$2,325,000	\$1,329,150	\$0	\$0	\$2,955,000	\$2,054,128	\$5,009,128
5/1/2016	\$0	\$26,900	\$0	\$1,282,650	\$0	\$532,936	\$0	\$1,842,486	\$1,842,486
11/1/2016	\$660,000	\$26,900	\$2,415,000	\$1,282,650	\$90,000	\$571,003	\$3,165,000	\$1,880,553	\$5,045,553
5/1/2017	\$0	\$13,700	\$0	\$1,234,350	\$0	\$570,103	\$0	\$1,818,153	\$1,818,153
11/1/2017	\$685,000	\$13,700	\$2,510,000	\$1,234,350	\$95,000	\$570,103	\$3,290,000	\$1,818,153	\$5,108,153
5/1/2018	\$0	\$0	\$0	\$1,184,150	\$0	\$569,153	\$0	\$1,753,303	\$1,753,303
11/1/2018	\$0	\$0	\$2,610,000	\$1,184,150	\$800,000	\$569,153	\$3,410,000	\$1,753,303	\$5,163,303
5/1/2019	\$0	\$0	\$0	\$1,131,950	\$0	\$561,153	\$0	\$1,693,103	\$1,693,103
11/1/2019	\$0	\$0	\$2,715,000	\$1,131,950	\$815,000	\$561,153	\$3,530,000	\$1,693,103	\$5,223,103
5/1/2020	\$0	\$0	\$0	\$1,104,800	\$0	\$548,928	\$0	\$1,653,728	\$1,653,728
11/1/2020	\$0	\$0	\$2,770,000	\$1,104,800	\$845,000	\$548,928	\$3,615,000	\$1,653,728	\$5,268,728
5/1/2021	\$0	\$0	\$0	\$1,049,400	\$0	\$536,253	\$0	\$1,585,653	\$1,585,653
11/1/2021	\$0	\$0	\$2,880,000	\$1,049,400	\$865,000	\$536,253	\$3,745,000	\$1,585,653	\$5,330,653
5/1/2022	\$0	\$0	\$0	\$448,131	\$0	\$523,278	\$0	\$971,410	\$971,410
11/1/2022	\$0	\$0	\$3,464,875	\$412,185	\$900,000	\$523,278	\$4,364,875	\$935,463	\$5,300,338
5/1/2023	\$0	\$0	\$0	\$408,235	\$0	\$505,278	\$0	\$913,513	\$913,513
11/1/2023	\$0	\$0	\$3,520,000	\$408,235	\$930,000	\$505,278	\$4,450,000	\$913,513	\$5,363,513
5/1/2024	\$0	\$0	\$0	\$373,035	\$0	\$486,678	\$0	\$859,713	\$859,713
11/1/2024	\$0	\$0	\$3,575,000	\$373,035	\$970,000	\$486,678	\$4,545,000	\$859,713	\$5,404,713
5/1/2025	\$0	\$0	\$0	\$337,285	\$0	\$467,278	\$0	\$804,563	\$804,563
11/1/2025	\$0	\$0	\$3,640,000	\$337,285	\$1,010,000	\$467,278	\$4,650,000	\$804,563	\$5,454,563
5/1/2026	\$0	\$0	\$0	\$300,885	\$0	\$442,028	\$0	\$742,913	\$742,913
11/1/2026	\$0	\$0	\$3,710,000	\$300,885	\$1,065,000	\$442,028	\$4,775,000	\$742,913	\$5,517,913
5/1/2027	\$0	\$0	\$0	\$263,785	\$0	\$415,403	\$0	\$679,188	\$679,188
11/1/2027	\$0	\$0	\$3,780,000	\$263,785	\$1,105,000	\$415,403	\$4,885,000	\$679,188	\$5,564,188
5/1/2028	\$0	\$0	\$0	\$225,985	\$0	\$398,828	\$0	\$624,813	\$624,813
11/1/2028	\$0	\$0	\$3,855,000	\$225,985	\$1,140,000	\$398,828	\$4,995,000	\$624,813	\$5,619,813
5/1/2029	\$0	\$0	\$0	\$187,435	\$0	\$381,016	\$0	\$568,451	\$568,451
11/1/2029	\$0	\$0	\$3,925,000	\$187,435	\$4,325,000	\$381,016	\$8,250,000	\$568,451	\$8,818,451
5/1/2030	\$0	\$0	\$0	\$145,241	\$0	\$272,891	\$0	\$418,132	\$418,132
11/1/2030	\$0	\$0	\$4,055,000	\$145,241	\$4,505,000	\$272,891	\$8,560,000	\$418,132	\$8,978,132
5/1/2031	\$0	\$0	\$0	\$99,623	\$0	\$199,684	\$0	\$299,307	\$299,307
11/1/2031	\$0	\$0	\$4,105,000	\$99,623	\$4,690,000	\$199,684	\$8,795,000	\$299,307	\$9,094,307
5/1/2032	\$0	\$0	\$0	\$51,389	\$0	\$82,434	\$0	\$133,823	\$133,823
11/1/2032	\$0	\$0	\$4,195,000	\$51,389	\$4,885,000	\$82,434	\$9,080,000	\$133,823	\$9,213,823
5/1/2033	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
11/1/2033	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Source: LUS and Official Statement

[1] The Series 2012 Bonds were refunded with the Series 2021 Bonds in FY 2022 and the first payment was due on November 1, 2021.

**Table 10-5: Annual Operating Expenses – LPPA Share of Unit No. 2**

	2018	2019	2020	2021	2022
LPPA Share (MWh)	1,062,984	1,045,878	656,054	994,006	935,616
Fuel	\$29,566,005	\$27,808,739	\$19,288,183	\$27,019,447	\$35,240,650
Operations	3,591,720	2,731,655	3,237,018	3,409,812	3,630,381
Maintenance	5,376,070	5,357,042	6,075,341	6,485,536	4,724,001
Administrative & General	2,778,370	2,793,274	2,744,099	2,966,553	3,164,034
Total Operating Expenses	\$41,312,164	\$38,690,711	\$31,344,641	\$39,881,348	\$46,759,066
Total Operating Expenses (\$/MWh)	38.86	36.99	47.78	40.12	49.98
Total Operating Expenses Less Fuel (\$/MWh)	11.05	10.40	18.38	12.94	12.31

Source: LPPA Manager's Monthly Reports

**Table 10-6: LPPA Historical Revenues, Expenses, Balances Available for Debt Service**

	2018	2019	2020	2021	2022
Total Operating Revenues	\$50,740,877	\$47,202,751	\$37,491,409	\$50,049,857	\$57,135,203
Total Operating Expenses	41,312,164	38,690,711	31,344,641	39,881,348	46,759,065
Net Operating Revenues	\$9,428,713	\$8,512,040	\$6,146,768	\$10,168,509	\$10,376,138
Other Income	\$548,007	\$1,035,324	\$317,785	\$41,070	\$304,892
Balance Available for Debt Service	\$9,976,720	\$9,547,364	\$6,464,553	\$10,209,579	\$10,681,029
Debt Service	6,916,606	6,916,206	6,922,456	6,916,306	6,271,748
Balance After Debt Service	\$3,060,113	\$2,631,158	(\$457,903)	\$3,293,273	\$4,409,282
Debt Service Coverage Ratio (1)	1.4	1.4	0.9	1.5	1.7

Source: LPPA Manager's Monthly Reports

( 1 ) Debt service includes Series 2007, 2012, 2015, and 2021 bonds . In 2015, LPPA refunded the majority of the 2007 bonds. The Series 2007 Bonds final payment was November 1, 2017. The Series 2012 Bonds were refunded with the Series 2021 Bonds November 1, 2021. Due to a surplus in LPPA's cash balance, the Administration elected not to bill LUS for \$4.5 million of LPPA's capital expenditures in FY 2020. This resulted in a \$4.5 million decrease to LPPA's operating revenue, which in turn caused LPPA's debt service coverage ratio to drop below 1.0. This was a one-time adjustment for FY 2020 only.

**Table 10-7: Summary of Revenues, Expenses, and Changes of Fund Net Position**

	2018	2019	2020	2021	2022
<b>Operating Revenues:</b>					
Sales of Electric Energy City of Lafayette (LUS)	\$50,740,877	\$47,202,751	\$37,491,409	\$50,049,857	\$57,135,203
<b>Operating Expenses</b>					
Production	\$38,533,794	\$35,897,437	\$28,600,542	\$36,914,795	\$43,595,031
Administrative & General	2,778,370	2,793,274	2,744,099	2,966,553	3,164,034
Depreciation	1,727,062	2,314,996	2,354,239	2,278,011	2,318,325
Total Operating Expenses	\$43,039,226	\$41,005,707	\$33,698,880	\$42,159,359	\$49,077,390
<b>Non Operating Revenues (Expenses)</b>					
Other	\$485,522	\$631,584	\$499,162	\$492,006	(\$110,982)
Investment Earnings	548,007	1,035,324	\$317,785	41,070	304,892
Interest on Long Term Debt	(3,506,606)	(3,386,206)	(\$3,307,456)	(3,171,306)	(1,981,748)
Gain (Loss) on Property	(253,343)	73,948	\$0	0	0
Total	(\$2,726,420)	(\$1,645,351)	(\$2,490,509)	(\$2,638,230)	(\$1,787,838)
Net Income (Loss) for the Period	\$4,975,231	\$4,551,693	\$1,302,020	\$5,252,268	\$6,269,975
Fund Net Positions Beginning	\$81,845,390	\$86,820,620	\$91,372,314	\$92,674,334	\$97,926,601
Fund Net Positions, End of Year	\$86,820,621	\$91,372,314	\$92,674,334	\$97,926,601	\$104,196,576

Source: LPPA Manager's Monthly Reports

**Table 10-8: Summary Statements of Cash Flows**

	2018	2019	2020	2021	2022
<b>Cash Flows from Operating Activities</b>					
Receipts from customers	\$50,740,877	\$47,202,751	\$37,491,409	\$50,049,857	\$56,403,726
Payments to suppliers for goods & services	(33,881,255)	(42,037,771)	(33,645,024)	(33,361,779)	(50,124,198)
Payments to employees and for employee related costs	(453,085)	(437,879)	(413,642)	(471,979)	(489,798)
Net cash provided (used) by operating activities	\$16,406,537	\$4,727,101	\$3,432,743	\$16,216,099	\$5,789,730
<b>Cash Flows from Capital and Related Financing Activities</b>					
Proceeds from Issuance of Bonds	\$0	\$0	\$0	\$0	\$38,971,020
Premium on issuance on bonds	0	0	0	0	0
Payment to escrow agent	0	0	0	0	(41,435,727)
Principal payments on bonds	(3,410,000)	(3,530,000)	(3,615,000)	(3,745,000)	(4,290,000)
interest paid	(3,506,606)	(3,386,206)	(3,307,455)	(3,171,306)	(1,981,748)
Debt issuance costs	0	0	0	0	0
Preliminary survey investigation costs paid	0	0	0	0	0
Proceeds from redesignation of capital assets	0	0	0	0	0
Purchase and construction of capital assets	(2,612,658)	(1,786,815)	(2,901,295)	(4,566,665)	(3,222,469)
Net cash provided (used) by capital and related financing activity	(\$9,529,264)	(\$8,703,021)	(\$9,823,750)	(\$11,482,971)	(\$11,958,924)
<b>Cash Flows from Investing Activities</b>					
Sales (purchases) of investments - net	(\$11,700,000)	\$11,631,137	(\$1,889,563)	\$1,555,412	\$1,933,549
Maturities of Investments	2,000,000	0	0	0	0
Interest Earnings	578,932	1,013,331	343,193	34,196	268,120
Other	0	0	0	0	0
Net Cash provided by investing activities	(9,121,068)	12,644,468	(1,546,370)	1,589,608	2,201,669
Net increase (decrease) in cash and cash equivalents	(\$2,243,795)	\$8,668,548	(\$7,937,377)	\$6,322,736	(\$3,967,525)
Cash and cash equivalents, beginning of year	\$28,539,229	\$26,295,434	\$34,963,982	\$27,026,605	\$33,349,341
Cash and cash equivalents, end of year	\$26,295,434	\$34,963,982	\$27,026,605	\$33,349,341	\$29,381,816

Source: LPPA Financial Report

**Table 10-9: 2022 Large Customers – Electric**

Customer	Type of Business	Revenues
University of Louisiana	Higher Education	\$15,390,410
Lafayette General Hospital	Health Care	\$3,736,572
Our Lady Of Lourdes	Health Care	\$2,392,338
Lafayette Consolidated Gov-Street L	Local Government	\$2,252,197
Stuller Inc.	Jewelry Manufacturing	\$1,348,316
Halliburton Gulf Coast Campus	Refining / Petrochemical	\$1,104,747
University Hospital & Clinics Inc	Health Care	\$933,094
Wal-Mart Louisiana LLC dba Store #	Retail Shopping	\$928,900
International Paper	Paper Products	\$877,671
Lafayette Consolidated Gov-S Ww P	Local Government	\$857,903

Source: LUS

**Table 10-10: 2022 Large Customers – Water**

Customer	Type of Business	Revenues
University of Louisiana	Higher Education	\$293,927
Lafayette General Hospital	Health Care	\$177,576
Our Lady Of Lourdes	Health Care	\$129,729
Lafayette Parish Correctional Center	Correctional Facility	\$65,815
Borden Company	Dairy Products	\$62,954
Housing Authority	Public Housing	\$56,263
Bayou Shadows Apartments	Apartment Complex	\$48,679
University Hospital & Clinics Inc	Health Care	\$46,312
Stuller Inc.	Jewelry Manufacturing	\$43,007
Pinhook South Apartments	Apartment Complex	\$41,960

Source: LUS

**Table 10-11: 2022 Large Customers – Wastewater**

Customer	Type of Business	Revenues
University of Louisiana	Higher Education	\$736,359
Lafayette General Hospital	Health Care	\$323,535
Lafayette Parish Correctional Center	Correctional Facility	\$196,711
Housing Authority	Public Housing	\$163,182
Our Lady Of Lourdes	Health Care	\$163,485
Bayou Shadows Apartments	Apartment Complex	\$142,012
Westport Linen Services	Commercial Laundry	\$163,010
Borden Company	Dairy Products	\$262,856
Pinhook South Apartments	Apartment Complex	\$122,541
Emberwood Apartments	Apartment Complex	\$111,846

Source: LUS

**Table 10-12: Summary Statement of Revenue, Expenses, and Changes in Fund Net Position  
City of Lafayette, Five Years Ending October 31**

	2019	2020	2021	2022
<b>Operating Revenues</b>				
Charges for Services	\$224,216,058	\$213,915,365	\$229,562,977	\$275,891,140
Miscellaneous	5,284,370	3,078,979	3,076,324	5,085,804
Total Operating Revenues	\$229,500,428	\$216,994,344	\$232,639,301	\$280,976,944
<b>Operating Expenses</b>				
Production, Collection, & Cost of Services	\$95,182,077	\$87,551,122	\$105,998,201	\$147,544,578
Transmission, Distribution & Treatment	30,327,322	27,780,290	27,094,443	23,298,950
Administrative & General & Customer	27,330,002	28,167,129	29,587,642	32,635,183
ILOT	25,051,002	24,679,711	24,056,012	24,185,668
Depreciation & Amortization on Plant	25,731,165	25,678,004	24,984,326	25,663,986
Total Operating Expenses	\$203,621,568	\$193,856,256	\$211,720,624	\$253,328,365
<b>Operating Income</b>	\$25,878,860	\$23,138,088	\$20,918,677	\$27,648,579
<b>Non Operating Revenues (Expenses)</b>				
Investment Earnings	\$5,095,464	\$2,765,235	\$891,092	\$620,618
Interest Expense	(8,315,204)	(8,914,681)	(10,537,496)	(5,939,910)
Bond Issuance and Amortization of debt premium and loss on refundings net	(1,052,697)	0	2,149,380	(1,024,546)
Gain (Loss) on sale/disposal of assets	(309,767)	(290,397)	(507,437)	(255,880)
Federal and State Grant Revenue	1,031,268	4,295,576	4,089,440	751,148
Hurricane/Flood Expenses	(1,315,835)	(5,667,070)	(4,282,872)	(718,626)
Non Employer Pension Contribution	549,266	580,344	624,706	636,071
Other	(173,356)	200,856	330,224	317,389
Total Non Operating Revenues (Expenses)	(\$4,490,861)	(\$7,030,137)	(\$7,242,963)	(\$5,613,736)
Income Before Contributions	\$21,387,999	\$16,107,951	\$13,675,714	\$22,034,843
Capital Contributions and Transfers In (Out)	(\$32,618)	\$175,627	(\$20,826)	\$641,639
Change in Net Positions	\$21,355,381	\$16,283,578	\$13,654,888	\$22,827,182
Net Positions, Beginning as Restated	\$519,350,066	\$540,705,447	\$556,989,025	\$570,657,116
Net Positions, Ending (1), (2)	\$540,705,447	\$556,989,025	\$570,643,913	\$593,484,298

Source: LCG Annual Comprehensive Financial Report

(1) Net position year beginning balance was restated each year

(2) Year-end FY 2021 ending balance was adjusted by \$13,201 due to the implementation of GASB 87



**Table 10-13: Electric System Historical and Projected Sales and Revenue**

FY	Retail Sales (MWh)	Retail Sales:		Other Revenue	Total Operating Revenue
		Base Rate Revenue	Retail Sales: FC Revenue		
2018	2,031,847	\$102,886,777	\$72,872,661	\$5,196,252	\$180,955,690
2019	2,004,310	\$100,836,993	\$73,101,002	\$6,027,891	\$179,965,886
2020	1,917,040	\$97,878,860	\$65,117,850	\$3,470,810	\$166,467,519
2021	1,959,364	\$99,763,119	\$76,344,759	\$3,744,026	\$179,851,903
2022	1,981,782	\$100,740,765	\$121,702,909	\$4,020,528	\$226,464,202
2023	2,018,152	\$103,563,520	\$93,379,883	\$4,934,096	\$201,877,500
2024	2,026,649	\$107,362,721	\$86,618,964	\$5,200,180	\$199,181,865
2025	2,038,284	\$111,294,695	\$87,238,550	\$5,674,452	\$204,207,697
2026	2,049,961	\$112,008,712	\$83,679,395	\$6,296,839	\$201,984,946
2027	2,061,674	\$112,725,186	\$86,858,328	\$7,035,875	\$206,619,389
2028	2,073,421	\$113,443,268	\$95,501,793	\$7,651,396	\$216,596,457
2029	2,085,191	\$114,164,586	\$98,546,126	\$8,157,564	\$220,868,276
2030	2,096,980	\$114,888,899	\$100,361,460	\$8,701,251	\$223,951,611
2031	2,108,784	\$115,616,054	\$103,372,584	\$9,245,496	\$228,234,133
2032	2,120,609	\$116,346,268	\$105,054,984	\$9,787,580	\$231,188,832
Average Growth	0.6%	1.3%	1.3%	7.9%	1.5%

Source: LUS and Burns & McDonnell projections

- ( 1 ) Projections based on Burns & McDonnell load forecast.  
 ( 2 ) Base rate revenue projections include 3% base rate increases in 2024 and 2025.  
 ( 3 ) Other revenue includes miscellaneous operation revenue and interest income.

**Table 10-14: Electric System Historical and Projected Operating Expenses**

FY	Production	Transmission	Distribution	Customer		Total Operating Expenses
				Accounts, Service & Sales	Administrative & General	
2018	\$94,456,911	\$9,275,422	\$12,143,206	\$2,828,513	\$12,463,806	\$131,167,858
2019	\$84,373,015	\$8,612,596	\$11,837,879	\$2,690,275	\$11,886,918	\$119,400,682
2020	\$77,653,928	\$8,438,158	\$10,990,219	\$2,742,846	\$12,219,098	\$112,044,248
2021	\$95,253,828	\$7,103,445	\$11,109,141	\$3,406,175	\$12,214,185	\$129,086,775
2022	\$136,452,725	\$2,408,749	\$11,906,957	\$4,363,821	\$12,871,455	\$168,003,708
2023	\$114,679,542	\$2,543,126	\$12,709,297	\$3,217,052	\$12,961,280	\$146,110,297
2024	\$100,049,379	\$2,593,589	\$12,552,264	\$3,274,387	\$13,220,505	\$131,690,125
2025	\$99,866,401	\$2,645,841	\$12,803,309	\$3,350,547	\$13,484,915	\$132,151,014
2026	\$95,963,400	\$2,698,897	\$13,059,375	\$3,400,216	\$13,754,614	\$128,876,502
2027	\$100,654,915	\$2,752,775	\$13,320,563	\$3,471,325	\$14,029,706	\$134,229,284
2028	\$99,836,955	\$2,807,491	\$13,586,974	\$3,556,091	\$14,310,300	\$134,097,811
2029	\$104,479,245	\$2,864,061	\$13,858,714	\$3,629,773	\$14,596,506	\$139,428,299
2030	\$106,242,256	\$2,921,502	\$14,135,888	\$3,702,136	\$14,888,436	\$141,890,218
2031	\$109,524,145	\$2,979,832	\$14,418,606	\$3,778,743	\$15,186,205	\$145,887,531
2032	\$111,341,971	\$3,039,069	\$14,706,978	\$3,853,882	\$15,489,929	\$148,431,828

Source: LUS and Burns & McDonnell projections

- ( 1 ) Production expenses are based on 2023 Burns & McDonnell forecasts and incorporate solar PPAs and gas fired generation.  
 ( 2 ) Transmission cost reduction in FY2022 was due to expiration of Cleco contract.  
 ( 3 ) Total Operating Expenses do not include ILOT, debt service, capital, or other expenses.

**Table 10-15: Wastewater System Historical and Projected Retail Sales and Revenue**

FY	Retail Sales (1000 gallons)	Retail Sales Revenue	Other Revenue	Total Operating Revenue
2018	5,326,815	\$30,977,546	\$1,401,680	\$32,379,226
2019	5,746,278	\$29,910,672	\$2,128,101	\$32,038,772
2020	5,498,088	\$29,861,226	\$1,261,483	\$31,122,710
2021	6,328,515	\$30,119,770	\$1,648,552	\$31,768,322
2022	5,043,306	\$31,031,170	\$1,217,374	\$32,248,544
2023	5,660,149	\$33,759,830	\$1,442,897	\$35,202,727
2024	5,686,276	\$37,133,299	\$1,513,156	\$38,646,454
2025	5,710,891	\$40,831,306	\$1,648,615	\$42,479,921
2026	5,734,553	\$41,000,483	\$1,666,668	\$42,667,151
2027	5,757,103	\$42,790,562	\$1,533,515	\$44,324,077
2028	5,777,982	\$44,668,887	\$1,514,698	\$46,183,585
2029	5,798,942	\$46,604,646	\$1,572,686	\$48,177,332
2030	5,819,901	\$48,642,235	\$1,701,466	\$50,343,701
2031	5,840,940	\$50,783,304	\$1,861,212	\$52,644,517
2032	5,861,979	\$52,983,357	\$2,053,734	\$55,037,091

Source: LUS and Burns & McDonnell projections

( 1 ) Retail sales are based on projected customer growth and use per customer.

( 2 ) Revenue projections include 9.5% rate increases in 2023, 2024, and 2025. 4% rate increases assumed for 2027 to 2032.

( 3 ) Other revenue includes miscellaneous operation revenue and interest income.

**Table 10-16: Wastewater System Historical and Projected Operating Expenses**

FY	Treatment	Collection	Customer Accounting, Collecting, Service and Info	Administrative & General	Total Operating Expenses
2018	\$6,877,281	\$4,722,449	\$1,399,015	\$5,738,418	\$18,737,163
2019	\$6,987,121	\$5,312,751	\$1,365,016	\$5,546,626	\$19,211,514
2020	\$6,253,827	\$4,888,522	\$1,318,028	\$5,834,810	\$18,295,187
2021	\$6,707,776	\$5,497,827	\$1,655,511	\$5,930,475	\$19,791,589
2022	\$6,929,937	\$5,229,473	\$2,181,031	\$6,265,821	\$20,606,263
2023	\$7,207,270	\$5,584,504	\$1,734,073	\$6,440,213	\$20,966,060
2024	\$7,320,996	\$5,681,084	\$1,766,269	\$6,569,017	\$21,337,365
2025	\$7,474,201	\$5,802,536	\$1,805,381	\$6,700,397	\$21,782,515
2026	\$7,587,813	\$5,900,430	\$1,835,335	\$6,834,405	\$22,157,982
2027	\$7,737,670	\$6,021,206	\$1,873,143	\$6,971,093	\$22,603,112
2028	\$7,917,048	\$6,161,406	\$1,916,049	\$7,110,515	\$23,105,017
2029	\$8,070,959	\$6,286,413	\$1,955,279	\$7,252,725	\$23,565,377
2030	\$8,221,462	\$6,409,801	\$1,994,302	\$7,397,780	\$24,023,345
2031	\$8,380,781	\$6,539,435	\$2,035,098	\$7,545,735	\$24,501,049
2032	\$8,536,336	\$6,667,170	\$2,075,645	\$7,696,650	\$24,975,801

Source: LUS and Burns & McDonnell projections

( 1 ) Total Operating Expenses do not include ILOT, debt service, capital, or other expenses

**Table 10-17: Water System Historical and Projected Retail and Wholesale Sales and Revenue**

FY	Retail Sales (1000 gallons)	Wholesale Sales (1000 gallons)	Retail Sales Revenue	Wholesale Sales Revenue	Other Revenue	Total Operating Revenue
2018	5,363,552	2,256,911	\$14,821,240	\$6,038,256	\$877,048	\$21,736,544
2019	5,148,605	2,171,928	\$14,425,369	\$5,762,507	\$1,181,598	\$21,369,475
2020	5,075,882	2,191,571	\$14,544,345	\$6,355,680	\$796,531	\$21,696,556
2021	5,063,766	2,322,023	\$14,358,667	\$6,956,818	\$588,817	\$21,904,303
2022	5,190,827	2,424,469	\$14,888,377	\$7,359,956	\$716,575	\$22,964,907
2023	5,230,976	2,491,216	\$16,111,405	\$7,747,659	\$837,807	\$24,696,872
2024	5,255,121	2,565,108	\$17,499,552	\$8,546,935	\$843,672	\$26,890,159
2025	5,277,870	2,629,472	\$19,000,333	\$8,861,880	\$827,322	\$28,689,535
2026	5,299,738	2,693,192	\$19,079,057	\$9,682,209	\$829,484	\$29,590,750
2027	5,320,577	2,749,619	\$19,898,960	\$10,000,295	\$850,187	\$30,749,442
2028	5,339,874	2,807,902	\$20,772,110	\$10,895,079	\$920,074	\$32,587,263
2029	5,359,244	2,868,114	\$21,704,939	\$11,258,214	\$1,035,360	\$33,998,513
2030	5,378,614	2,930,333	\$22,643,966	\$12,271,284	\$1,177,923	\$36,093,173
2031	5,398,058	2,994,641	\$23,643,493	\$12,686,276	\$1,346,496	\$37,676,266
2032	5,417,501	3,061,121	\$24,703,807	\$13,834,445	\$1,544,098	\$40,082,350

Source: LUS and Burns & McDonnell projections

- ( 1 ) Retail sales are based on projected customer growth and use per customer. Wholesale sales are based on customer specific forecasts.  
( 2 ) Retail revenue projections include 8.0% rate increases in 2023, 2024, and 2025. 4% rate increases assumed for 2027 to 2032.  
( 3 ) Wholesale revenue increases of 8.0% are included every other year of the forecast beginning in 2024.  
( 4 ) Other revenue includes miscellaneous operation revenue and interest income.

**Table 10-18: Water System Historical and Projected Operating Expenses**

FY	Production	Distribution	Customer Accounting, Collecting, Service and Info	Administrative & General	Total Operating Expenses
2018	\$5,495,611	\$2,884,033	\$1,219,158	\$4,661,424	\$14,260,225
2019	\$5,496,311	\$2,889,727	\$1,172,251	\$4,668,916	\$14,227,206
2020	\$5,008,674	\$2,098,086	\$1,295,339	\$4,757,007	\$13,159,106
2021	\$5,246,546	\$2,174,002	\$1,446,359	\$4,967,083	\$13,833,990
2022	\$5,862,431	\$2,053,244	\$1,736,861	\$5,347,900	\$15,000,437
2023	\$5,980,256	\$2,207,238	\$1,449,903	\$5,550,647	\$15,188,045
2024	\$6,141,033	\$2,251,382	\$1,477,093	\$5,661,660	\$15,531,169
2025	\$6,320,824	\$2,296,410	\$1,509,389	\$5,774,894	\$15,901,516
2026	\$6,482,585	\$2,342,338	\$1,535,102	\$5,890,391	\$16,250,416
2027	\$6,662,863	\$2,389,185	\$1,566,605	\$6,008,199	\$16,626,852
2028	\$6,862,763	\$2,436,969	\$1,601,896	\$6,128,363	\$17,029,990
2029	\$7,053,697	\$2,485,708	\$1,634,594	\$6,250,931	\$17,424,930
2030	\$7,247,515	\$2,535,422	\$1,667,226	\$6,375,949	\$17,826,113
2031	\$7,451,065	\$2,586,131	\$1,701,232	\$6,503,468	\$18,241,896
2032	\$7,657,734	\$2,637,853	\$1,735,145	\$6,633,538	\$18,664,269

Source: LUS and Burns & McDonnell projections

- ( 1 ) Total Operating Expenses do not include ILOT, debt service, capital, or other expenses.

## **11.0 CONTINUING DISCLOSURES – COMMUNICATIONS SYSTEM**

### **11.1 Introduction**

Government entities that issue bonds must enter into a continuing disclosure agreement to be in compliance with the SEC Rule 15c2-12. As part of the continuing disclosure agreement, the issuer promises to provide certain annual financial information and material event notices to the public. These filings must be made electronically at the EMMA portal ([www.emma.msrb.org](http://www.emma.msrb.org)). LPPA had the following outstanding debt as of October 31, 2022:

- Communications System Revenue Refunding Bonds, Series 2015
- Communications System Revenue Refunding Bonds, Series 2021

The Series 2012 Bonds were refunded with the Communications System Revenue Refunding Bonds Series 2021 in FY 2022. The debt service on the Series 2021 Bonds is included in the projections within these continuing disclosures.

The continuing disclosure agreements for the outstanding bonds require that specific tables contained in the Official Statements must be updated annually. This section contains these required tables. This section contains forward-looking financial statements based on Burns & McDonnell's current expectations and projections about future events and financial trends regarding the Communications System. Projections as contained herein reflect estimates of what might occur in the future based on the information available to us as of the date of this Report. Burns & McDonnell cannot predict the future or guarantee future financial performance of the Communications System. To the extent that assumptions used in these projections vary from those observed, financial performance as presented herein will vary from actual performance. Burns & McDonnell relied upon a 10-year projection prepared by the Communications System for the Projected Period of November 1, 2022, through October 31, 2032. LUS Fiber provided actual historical data for the 2018 through 2022 period.

### **11.2 Information and Assumptions Relied Upon**

The projected operating results for the Communications System rely upon the information and assumptions gathered during the Burns & McDonnell project team review and summarized below.

1. Burns & McDonnell assumed the Communications System will operate, maintain, and upgrade head-end facilities and other important supporting infrastructure to ensure reliable and technologically competitive service offerings to customers.

2. Burns & McDonnell assumed the Communications System will hire and maintain competent personnel. If needed, the Communications System will provide training to personnel to ensure the safety and reliability of the Communications System.
3. Burns & McDonnell assumed the Communications System will maintain and renew any required permits or approvals.
4. Burns & McDonnell assumed standard operating procedure for the Communications System and Burns & McDonnell did not include the effects of any event outside of the Communications System's control, including force majeure.
5. Communications System financial and operating information was provided by the Communications System, LCG, interviews with LUS and LCG staff, and visual observations of the Communications System facilities. Data provided by the Communications System and LCG include historical financial and operating data for years 2018–2022, projected financial and operating data for years 2023–2032, and the 2023 Budget.
6. Burns & McDonnell reviewed recent and expected trends for inflation and assumed an inflation rate of 7.5 percent in FY 2023. The most recent semiannual Blue Chip Economic Indicator projection of GDP was used for long term inflation for FY 2024 to FY 2032. The GDP inflation factor was used to escalate O&M expenses and capital similar to previous years.

## **11.3 Projected Operating Results Assumptions**

### **11.3.1 Revenue Projections**

Since the Communications System inception in 2009, the system has successfully added customers and increased market share within the LUS service territory. The sale of CATV, Internet, and telephone services to retail and wholesale customers directly relates to the Communications System revenues. Projected operating results reflect average annual customer growth of ■■■ percent over the 2023 through 2032 period. The growth assumption results in target market share from the current ■■■ percent to ■■■ percent in 2032. Revenue per customer reflects a blend of CATV, Internet, and telephone services as described earlier in this Report. Retail service pricing levels are projected to be adjusted periodically in consideration of the cost of goods sold and other rising costs. The Communications System pricing practices reflect an opportunistic approach where the development of new or higher value service offerings and competitor price increases provide the Communications System the ability to adjust rates if warranted. The Communications System's pricing strategy is to offer comparable or higher quality services at a lower price than the competition. Additionally, wholesale customer projections remain

constant, at ■ customers, from 2023 to 2032 with revenues of ■ annually. The revenue projections included in the forecast do not account for grant funded projects and incremental customers described in Section 7.6.1 that were not yet approved by the City at the time of this report.

### **11.3.2 Expense Projections**

The expense projection includes the cost of goods sold, maintenance of plant, A&G expense, and other miscellaneous expenses. The projected cost of goods sold assumes the 2022 cost per customer (adjusted for historical cost of goods sold inflation) multiplied by the projected number of customers. Other expenses have been escalated based on expectations for inflation over the period 2023 through 2032.

### **11.3.3 Debt Service**

The projected net revenues for debt service exceed the required debt service coverage ratio of 1.0.

### **11.3.4 Credit Event**

If a Credit Event were to occur, bond covenants require that the Utilities System meet the credit obligation of the Communications System with funds available in the Utilities System Capital Additions Fund. The Utilities System has a debt service coverage ratio requirement of 1.0.

### **11.3.5 Other Expenses**

Other expense items include the Communications System's Imputed Tax obligations, repayment of inter-utility loans from the Utilities System, Operating Account reserve obligations, and other miscellaneous expenses. The Communications System utilized loans from LUS to fund the fiber system assets purchase, startup costs, and operating costs. The Communications System loans repayment will continue through 2033. The Operating Account reserve obligation was a one-time expense incurred by the Communications System to establish a Communications Systems Operating Account.

### **11.3.6 Imputed Tax**

Pursuant to terms of a regulatory settlement, the Communications System must pay an Imputed Tax. The Imputed Tax is equivalent to paying state and local sales tax, property tax, franchise tax, and income tax. The Communications System's ILOT calculation provides for an ILOT payment up to 12 percent of Adjusted Revenues deposits (revenues less cost of goods sold). However, all or a portion of this payment is made subject to an ILOT test. The ILOT test ensures that the Communications System retains sufficient cash to meet capital obligations. The ILOT test requires that the ILOT payment be no greater than 12 percent of Adjusted Revenues deposits, or the cash balance available after the payment of operating expenses and debt service less 7.5 percent of the Adjusted Revenues deposits. The Communications

System tax requirement cannot be less than that required by the Imputed Tax calculation. In 2015, the City-Parish Council approved an ordinance that revises the required ILOT payment. This ordinance recognizes that the Communications System operates in a competitive environment and the ILOT calculation was a greater expense than Imputed Tax. With the approval of this ordinance, the Communications System pays an ILOT amount equal to Imputed Taxes. The Imputed Tax payments were made to LUS and the City through 2021 as prescribed in the ordinance. Starting in 2020, 100 percent of the Imputed Tax payments started going to the City.

### **11.3.7 Capital Improvement Program**

The CIP includes the ongoing cost of customer installations, head-end, hut, network equipment and upgrades, and other miscellaneous items. In this Report, the capital plan for the years 2023 through 2027 was based on the 2023 Budget provided to Burns & McDonnell and 2027 through 2032 was based on historical spending. The CIP included in the forecast does not account for grant funded projects described in Section 7.6.1 that were not yet approved at the time of this report.

### **11.3.8 Cash Available**

Cash available reflects the remaining funds available to the Communications System once all other credit obligations of the Communications System are satisfied. For the Communications System, LUS established a financial objective that requires a minimum cash balance of \$2,250,000 to be held in an Operating Account. The Operating Account maintains a cash reserve to meet system O&M expense requirements. Once O&M expense and debt service obligations are met by the Communications System, accumulated cash balances are held in a Capital Additions Fund and are applicable to capital projects or other lawful uses. The Projected Period assumes that there are sufficient cash balances in the Capital Additions Fund to meet the entire Communications System CIP obligation.

### **11.3.9 Cross Reference**

The following table is provided to assist in cross referencing the information contained in the Continuing Disclosures with the information contained in this Report.

**Table 11-1: Communication System Revenue Bonds, Series 2012**

Official Statement	Official Statement Page	Official Statement Table	Report Reference
The Communications System, pages 24-34	28	Historical and Projected Number of Customers for the Communications	Table 11-3
	29	Projected Market Penetration	Table 11-4
	30	Operating Revenue Summary	Table 7-7
	31	Communications System Revenue Forecast	Table 11-6
	32	Communications System Operations and Maintenance Expense Forecast	Table 11-6
	34	Communications System Capital Improvement Plan	Table 7-3
	Operating Revenues and Expenses, pages 35-37	35	Communications System Historical Operating Results
36		Communications System Projected Operating Results	Table 11-7
37		Communications System Sources & Uses of Funds	Table 11-8
38		Communications System Debt Service	Table 11-7
Debt Service Coverage Calculation, pages 37-39 The Utilities System, pages 39- 60	49	Historical Electric Retail and Wholesale Sales	Table 4-1
	49	Electric System Largest Retail Customers	Table 10-9
	50	Electric System Capital Improvement Plan (Five Year Plan)	Table 3-5
	51	Electric System Sales and Revenue	Table 10-13
	52	Electric System Operations and Maintenance Expense Forecast	Table 10-14
	52	Historical Water Retail and Wholesale Sales	Table 5-1
	53	Water System Largest Retail Customers	Table 10-10
	55	Water System Capital Improvement Plan (Five Year Plan)	Table 3-5
	55	Water System Sales and Revenue Forecast	Table 10-17
	56	Water System Operations and Maintenance Expense Forecast	Table 10-18
	57	Historical Wastewater System Flows (000 Gallons)	Table 6-1, Table 10-15
	57	Wastewater System Largest Retail Customers	Table 10-11
	59	Proposed Wastewater System Capital Improvement Plan (Five Year Plan)	Table 3-5
	60	Wastewater System Operations and Maintenance Expense Forecast	Table 10-16
	Capital Improvement Plan, pages 60-69	61	Communications System Adjusted CIP (Five Year Plan) - Projected Sources and Uses of Funds
62		Historical and Projected Number of Customers by System	Table 11-9
63		Electric System Sales and Revenues by Rate Class	Table 4-28, Table 4-2
64		Electric Residential Rate Comparison	Table 4-22
64		Electric Commercial Rate Comparison	Table 4-23
65		Wastewater Sales and Revenue	Table 10-15
67		Utilities System Historical Operating Results	Table 11-10
69		Utilities System Historical Debt Service Coverage Calculation	Table 11-10
69		Utilities System Revenue and Debt Service Coverage Ratios	Table 11-11
70		Utilities System Residual Revenue Debt Service Coverage - Communications System Default	Table 11-12
Appendix B-Financial & Statistical Data	B-1 to B-11	Financial and Statistical Data for Lafayette, LA	See Section 12



**Table 11-2: Communication System Revenue Refunding Bonds, Series 2015**

Official Statement	Official Statement Page	Official Statement Table	Report Reference
Communications System, Pages 28-41	33	Historical and Projected Number of Customers for the Communications	Table 11-4
	34	Projected Retail Market Share	Table 11-4
	35	Operating Revenue Summary	Table 7-7
	36	Communications System Revenue Forecast	Table 11-5
	37	Communications System Historical Operations Expense	Table 7-12
	37	Communications System Projected Operations Expense	Table 11-6
	38	Competitive Internet Service Offerings	Table 7-2
	40	Communications System Capital Improvement Plan	Table 7-3
	40	Communications System Projected Capital Improvement Plan	Table 7-3
	Operating Revenues and Expenses, Page 42-45	42	Communications System Historical Operating Results
44		Communications System Projected Operating Results	Table 11-7
45		Communications System Sources & Uses of Funds	Table 11-8
Debt Service Coverage Calculation, Page 45-47 The Utilities System, pages 47- 77	47	Communications System Projected Debt Service Coverage Ratios	Table 11-7
	58	Historical and Projected Electric Retail and Wholesale Sales	Table 4-1, Table 10-13
	58	Electric System Customer Class Statistics	Table 4-2, Table 4-28
	59	Electric System Capital Improvement Plan (Five Year Plan)	Table 3-5
	60	Electric System Projected Sales and Revenue Forecast	Table 10-13
	61	Electric System Projected Operating Expense	Table 10-14
	62	Historical and Projected Water Retail and Wholesale Sales	Table 5-1, Table 10-17
	62	Water System Largest Retail Customers	Table 10-10
	65	Water System Capital Improvement Plan (Five Year Plan)	Table 3-5
	66	Water System Projected Sales and Revenue Forecast	Table 10-17
	66	Water System Projected Operating Expenses	Table 10-18
	67	Historical Wastewater System Flows (000 Gallons)	Table 6-1
	68	Wastewater System Largest Retail Customers	Table 10-11
	69	Proposed Wastewater System Capital Improvement Plan (Five Year Plan)	Table 3-5
	71	Wastewater System Projected Sales and Revenue	Table 10-15
	71	Wastewater System Projected Operating Expenses	Table 10-16
	72	Historical and Projected Number of Customers by System	Table 11-9
73	Electric Residential Rate Comparison	Table 4-22	
74	Electric Commercial Rate Comparison	Table 4-23	
75	Utilities System Historical Operating Results	Table 11-10	
76	Utilities System Historical Debt Service Coverage Calculation	Table 3-3	
76	Utilities System Projected Debt Service Coverage Calculation	Table 11-11	
77	Utilities System Residual Revenue Debt Service Coverage - Communications System Default	Table 11-12	
Appendix B-Financial & Statistical Data	B-1 to B-11	Financial and Statistical Data for Lafayette, LA	See Section 12

**Table 11-3: Communication System Revenue Refunding Bonds, Series 2021**

Official Statement	Official Statement Page	Official Statement Table	Report Reference
The Communications System, pages 24-34	26	Historical and Projected Number of Customers for the Communications	Table 11-4
	27	Projected Market Penetration	Table 11-4
	28	Operating Revenue Summary	Table 7-7
	29	Communications System Revenue Forecast	Table 11-5
	29	Communications System Historical Operating Expenses	Table 7-12
	30	Communications System Projected Operating Expenses	Table 11-6
	33	Communications System Capital Improvement Plan	Table 7-3
Operating Revenues and Expenses, pages 35-37	34	Communications System Historical Operating Results	Table 7-8
	36	Communications System Projected Operating Results	Table 11-7
	37	Communications System Sources & Uses of Funds	Table 11-8
Debt Service Coverage Calculation, pages 37-38	38	Communications System Debt Service Coverage	Table 11-7
The Utilities System, pages 38- 60	50	Historical Electric Retail and Wholesale Sales	Table 4-1
	50	Electric System Largest Retail Customers	Table 10-9
	51	Electric System Rates Summary	Table 4-26
	51	Electric System Customer Class Statistics	Table 4-28
	52	Electric Residential Rate Comparison	Table 4-22
	52	Electric Commercial Rate Comparison	Table 4-23
	57	Wastewater System Largest Retail Customers	Table 10-11
	58	Historical Wastewater System Flows (000 Gallons)	Table 6-1, Table 10-15
	58	Wastewater System Rates	Table 6-17
	63	Water System Largest Retail Customers	Table 10-10
	63	Historical Water Retail and Wholesale Sales	Table 5-1
	64	Water Retail Rate Summary	Table 5-24
	65	Utilities System Income Statement	Table 11-10
	66	Utilities System Historical Debt Service Coverage Calculation	Table 11-11

**Table 11-4: Communications System Number of Customers and Market Penetration**

Year	Number of Customer Accounts	Increase in Customer Accounts (%)	Market Potential	LUS Target Market	Increase in LUS Target Market (%)	LUS Target Market Share
2018						
2019						
2020						
2021						
2022						
2023						
2024						
2025						
2026						
2027						
2028						
2029						
2030						
2031						
2032						
Average Growth						

Source: LUS Fiber

- (1) Communications customer projections include retail customers with CATV, Internet, and telephone or some combination of the three services. The number of customers reflects the customers at the end of the year. The retail customer projection takes into consideration that the Communications System began serving customers in 2007 as a new market entrant. Historical percentage growth in customers has been significant because the Communications System was new to the market. The projection assumes that percentage increases in annual growth will gradually decline as LUS market presence matures and market penetration reflects levels that consider the presence of several competitors.
- (2) Projection includes all LUS residential electric customers inside the City limits, as well as other locations passed by LUS Fiber's fiber network.
- (3) Target market excludes apartments and other multifamily dwellings.

**Table 11-5: Communications System Revenue Forecast**

Year	Number of		Retail	Wholesale	Total
	Number of Retail Customers	Wholesale Customers			
2023					
2024					
2025					
2026					
2027					
2028					
2029					
2030					
2031					
2032					
Average Growth					

Source: LUS Fiber

**Table 11-6: Communications System Operation and Maintenance Expense**

Year	Cost of Goods		Total Expenses
	Sold	Other Expenses	
2023			
2024			
2025			
2026			
2027			
2028			
2029			
2030			
2031			
2032			
Average Growth			

Source: LUS Fiber

- (1) Cost of Goods Sold predominantly consists of programming and content costs associated with service offerings.
- (2) Includes O&M expenses; other expenses include customer service, and A&G costs. Excludes depreciation. Operating expenses do not include imputed tax, inter-utility loan payments to LUS, external loan payments, and other miscellaneous expenses.

**Table 11-7: Communications System Projected Operating Results**

	2023	2024	2025	2026	2027
<b>Operating Revenues</b>					
Retail Sales	████████	████████	████████	████████	████████
Wholesale Sales	████████	████████	████████	████████	████████
Other Revenues	████████	████████	████████	████████	████████
<b>Total Operating Revenues</b>	████████	████████	████████	████████	████████
<b>Operating Expenses</b>					
Cost of Goods Sold	████████	████████	████████	████████	████████
O&M and Other	████████	████████	████████	████████	████████
<b>Total Operating Expenses</b>	████████	████████	████████	████████	████████
<b>Balance Available for Debt Service</b>	████████	████████	████████	████████	████████
<b>Debt Service</b>	████████	████████	████████	████████	████████
<b>Debt Service Coverage Ratio</b>	█	█	█	█	█
<b>Balance After Debt Service</b>	████████	████████	████████	████████	████████
<b>Other Income (Expenditures)</b>					
Imputed Tax	████████	████████	████████	████████	████████
Inter-utility Loan Repayment	████████	████████	████████	████████	████████
Other Income	████████	████████	████████	████████	████████
<b>Total Other Income (Expenditures)</b>	████████	████████	████████	████████	████████
<b>Balance Available for Capital</b>	████████	████████	████████	████████	████████

Source: LUS Fiber

**Table 11-8: Communications System Sources and Uses of Funds**

	2023	2024	2025	2026	2027
<b>Construction Fund</b>					
<u>Sources of Funds</u>					
Beginning Balance	\$0	\$0	\$0	\$0	\$0
Deposits	0	0	0	0	0
Interest Income	0	0	0	0	0
<u>Uses of Funds</u>					
Capital Expenditures	0	0	0	0	0
<b>Construction Fund Ending Balance</b>	\$0	\$0	\$0	\$0	\$0
<b>Cash Available and Capital Additions Fund</b>					
<u>Sources of Funds</u>					
Beginning Balance	████████	████████	████████	████████	████████
Deposits from Earnings	████████	████████	████████	████████	████████
Other	████████	████████	████████	████████	████████
<u>Uses of Funds</u>					
Capital Expenditures	████████	████████	████████	████████	████████
Operating Account Creation	0	0	0	0	0
Sinking Fund transfer to Refunding	0	0	0	0	0
<b>Retained Earnings Ending Balance</b>	████████	████████	████████	████████	████████

Source: LUS Fiber

**Table 11-9: Utilities System Historical and Projected Number of Customers by System**

Year	Electric	Water	Wastewater
<b>Historical</b>			
2018	67,243	56,564	45,019
2019	68,495	58,316	45,623
2020	69,364	57,412	46,133
2021	70,096	57,891	46,681
2022	70,865	58,302	46,792
<b>Projected</b>			
2023	71,206	58,713	47,154
2024	71,534	58,991	47,371
2025	71,844	59,256	47,576
2026	72,142	59,512	47,774
2027	72,425	59,757	47,961
2028	72,688	59,980	48,135
2029	72,952	60,211	48,310
2030	73,215	60,442	48,485
2031	73,480	60,673	48,660
2032	73,745	60,905	48,835
<b>Average Growth</b>	<b>0.4%</b>	<b>0.4%</b>	<b>0.4%</b>

Source: LUS

- (1) Electric System projections based on the Load Forecast for LUS developed by Burns & McDonnell.
- (2) Water System retail customer projections were based on the Electric System customer growth forecast. Wholesale customer growth was based on specific growth forecasts for wholesale customers.
- (3) Wastewater System customer projections were based on the Electric System customer growth forecast.

**Table 11-10: Historical Operating Results**

<b>Operating Revenues</b>	2018	2019	2020	2021	2022
<b>Electric System</b>					
Base Rate - Electric	\$102,886,777	\$100,836,993	\$97,878,860	\$99,763,119	\$100,740,765
Fuel Charge - Electric	72,872,661	73,101,002	65,117,850	76,344,759	121,702,909
Wholesale Sales	174,622	179,515	157,404	159,823	167,965
Other Revenues (1)	5,021,629	5,848,375	3,313,405	3,584,203	3,852,563
<b>Water</b>					
Retail Sales	14,821,240	14,425,369	14,544,345	14,358,667	14,888,377
Wholesale Sales	6,038,256	5,762,507	6,355,680	6,956,818	7,359,956
Other Revenues (1)	877,048	1,181,598	796,531	588,817	716,575
<b>Wastewater</b>					
Retail Sales	30,977,546	29,910,672	29,861,226	30,119,770	31,031,170
Other Revenues (1)	1,401,680	2,128,101	1,261,483	1,648,552	1,217,374
<b>Fiber</b>	0	0	0	0	0
<b>Total Operating Revenues (2)</b>	<b>\$235,071,461</b>	<b>\$233,374,132</b>	<b>\$219,286,785</b>	<b>\$233,524,527</b>	<b>\$281,677,652</b>
<b>Operating Expenses</b>					
<b>Electric System</b>					
Generation	\$5,823,932	\$5,097,410	\$3,606,585	\$4,997,512	\$4,439,140
Fuel - Gas Generation	3,020,362	2,369,957	1,945,110	6,515,336	14,763,071
Purchased Power LPPA	50,740,877	47,202,751	37,491,409	50,049,857	57,135,203
Purchased Power Other	34,871,740	29,702,897	34,610,823	33,691,123	60,115,312
Other	36,710,947	35,027,667	34,390,320	33,832,947	31,550,983
<b>Water</b>	14,260,225	14,227,206	13,159,106	13,833,990	15,000,437
<b>Wastewater</b>	18,737,163	19,211,514	18,295,187	19,791,589	20,606,263
<b>Fiber</b>	0	0	0	0	0
<b>Total Operating Expenses (2)</b>	<b>\$164,165,246</b>	<b>\$152,839,402</b>	<b>\$143,498,541</b>	<b>\$162,712,354</b>	<b>\$203,610,408</b>
<b>Balance Available for Debt Service</b>	<b>\$70,906,215</b>	<b>\$80,534,731</b>	<b>\$75,788,244</b>	<b>\$70,812,174</b>	<b>\$78,067,244</b>
<b>Debt Service</b>	<b>\$21,427,905</b>	<b>\$22,732,925</b>	<b>\$25,374,000</b>	<b>\$25,095,600</b>	<b>\$23,741,091</b>
<b>Debt Service Coverage Ratio (2)</b>	<b>3.3</b>	<b>3.5</b>	<b>3.0</b>	<b>2.8</b>	<b>3.3</b>
<b>Balance After Debt Service</b>	<b>\$49,478,310</b>	<b>\$57,801,806</b>	<b>\$50,414,244</b>	<b>\$45,716,574</b>	<b>\$54,326,153</b>
<b>Other Income</b>					
Interest Income					
Water Tapping Fees	\$72,240	\$56,760	\$61,540	\$71,460	\$63,520
Communications Lease Income	0	0	11,379	0	7,906
Contributions in Aid of Construction	304,557	0	140,856	0	150,700
Misc. Non Operating Revenue	4,188,986	3,141,166	3,633,306	2,412,390	4,330,862
<b>Total Other Income</b>	<b>\$4,565,784</b>	<b>\$3,197,926</b>	<b>\$3,847,081</b>	<b>\$2,483,850</b>	<b>\$4,552,988</b>
<b>Other Expenses</b>					
Interest on Customer Deposits	\$4,307	\$5,331	\$1,834	\$1,897	\$1,927
Tax Collections/Non Operating	0	0	0	0	0
Misc Non Operating Expense	2,844,559	3,369,807	3,649,380	1,576,322	2,408,295
	<b>\$2,848,867</b>	<b>\$3,375,138</b>	<b>\$3,651,214</b>	<b>\$1,578,218</b>	<b>\$2,410,222</b>
<b>Payment in Lieu of Tax</b>	<b>\$23,708,786</b>	<b>\$25,051,002</b>	<b>\$24,679,711</b>	<b>\$24,056,012</b>	<b>\$24,185,667</b>
<b>Available for Bond Reserve &amp; Capital Additions</b>	<b>\$27,486,441</b>	<b>\$32,573,592</b>	<b>\$25,930,400</b>	<b>\$22,566,193</b>	<b>\$32,283,252</b>

Source: LUS

- (1) Other Revenue includes Miscellaneous Operating Revenues and Interest Income.
- (2) Debt Service was prepared on a cash basis. Debt Service includes the Series 2010 Bonds, Series 2012 Bonds, Series 2019 Bonds, and Series 2021 Bonds. The Series 2010 Bonds were fully redeemed in 2020 by the proceeds of the Series 2017 Bonds. The Series 2012 Bonds were refunded with the Series 2021 Bonds on November 1, 2021.
- (3) The Operating Revenues, Expenses, and Debt Service Coverage may differ slightly from LCG's Comprehensive Annual Financial Report.
- (4) Interest Income is included above with Operating Revenues.

**Table 11-11: Utilities System Revenues and Debt Service Coverage Ratios**

FY	Operating Revenues	Operating Expenses	Net Available Revenues for Debt Service	Debt Service	Balance Available After Debt Service	Debt Service Coverage Ratio
2023	\$261,777,099	\$182,264,401	\$79,512,698	\$26,571,994	\$52,940,704	3.0
2024	\$264,718,479	\$168,558,659	\$96,159,820	\$26,863,200	\$69,296,620	3.6
2025	\$275,377,153	\$169,835,045	\$105,542,108	\$26,837,850	\$78,704,258	3.9
2026	\$274,242,846	\$167,284,900	\$106,957,946	\$26,830,125	\$80,127,821	4.0
2027	\$281,692,908	\$173,459,247	\$108,233,661	\$26,808,950	\$81,424,711	4.0
2028	\$295,367,305	\$174,232,818	\$121,134,486	\$40,142,575	\$80,991,911	3.0
2029	\$303,044,121	\$180,418,606	\$122,625,515	\$33,679,096	\$88,946,420	3.6
2030	\$310,388,485	\$183,739,675	\$126,648,809	\$33,685,806	\$92,963,004	3.8
2031	\$318,554,916	\$188,630,477	\$129,924,439	\$33,685,284	\$96,239,155	3.9
2032	\$326,308,273	\$192,071,898	\$134,236,375	\$33,711,991	\$100,524,383	4.0

Source: LUS

- (1) Operating Revenues include interest income and other miscellaneous revenue.
- (2) Operating Expenses include O&M and other expenses such as customer service, and A&G costs. Operating Expenses do not include ILOT, normal capital and special equipment, nor other miscellaneous expenses.
- (3) LUS Debt Service was prepared on a cash basis. Debt Service includes the Series 2017 Bonds, Series 2019 Bonds, Series 2021 Bonds, and projected bond issues in 2023 and 2027.

**Table 11-12: Utilities System Revenues and Debt Service Coverage Ratios Assuming a Communications System Default**

FY	Utilities System Net Available Revenues for Debt Service	Utilities System Debt Service	Capital Additions Account, Minimum Capital Requirement	Net Revenues Available for Communications Debt Service	Communications Debt Service	Balance Available After Debt Service	Debt Service Coverage Ratio from Residual Revenues
2023	\$78,677,896	\$26,571,994	\$12,578,707	\$39,527,195	\$9,866,765	\$29,660,430	4.0
2024	\$95,356,856	\$26,863,200	\$13,297,554	\$55,196,102	\$10,198,965	\$44,997,137	5.4
2025	\$104,791,392	\$26,837,850	\$14,049,634	\$63,903,908	\$10,477,565	\$53,426,343	6.1
2026	\$106,261,567	\$26,830,125	\$14,223,271	\$65,208,171	\$10,526,865	\$54,681,306	6.2
2027	\$107,593,793	\$26,808,950	\$14,542,101	\$66,242,742	\$10,527,565	\$55,715,177	6.3
2028	\$120,553,390	\$40,142,575	\$14,906,724	\$65,504,090	\$10,531,028	\$54,973,062	6.2
2029	\$122,105,541	\$33,679,096	\$15,252,863	\$73,173,582	\$10,533,953	\$62,639,629	6.9
2030	\$126,192,402	\$33,685,806	\$15,656,461	\$76,850,135	\$10,538,448	\$66,311,687	7.3
2031	\$129,534,141	\$33,685,284	\$16,041,194	\$79,807,663	\$10,531,858	\$69,275,805	7.6
2032	\$133,914,831	\$33,711,991	\$16,482,059	\$83,720,781	\$0	\$83,720,781	N/A

Source: LUS

- (1) LUS Debt Service was prepared on a cash basis. Debt Service includes the Series 2017 Bonds, Series 2019 Bonds, Series 2021 Bonds, and projected bond issues in 2023 and 2027.
- (2) The Bond Ordinances require a minimum amount equal to 7.5 % of the total Non-fuel Revenue deposits into the Receipts Account for the purposes of paying capital costs.
- (3) Communications Debt Service was prepared on a cash basis. Debt Service includes the Series 2015 Bonds and Series 2021 Bonds. No future debt issues are projected to be issued for the Communications System from 2021 through 2030.



## **12.0 CONTINUING DISCLOSURES– FINANCIAL AND STATISTICAL DATA**

### **12.1 Introduction**

This section includes financial and statistical data. LUS provided this data to Burns & McDonnell for inclusion in this continuing disclosure.

**LAFAYETTE CONSOLIDATED GOVERNMENT  
REVENUE BONDS CONTINUING DISCLOSURE**

**Population of City of Lafayette**

<u>Year</u>	<u>Population</u>
1990	94,421
2000	110,257
2007	112,199
2008	111,088
2009	112,640
2010	120,623
2013	122,510
2014	126,066
2015	127,661
2016	127,626
2017	131,191
2018	132,747
2019	134,286
2020	132,333
2021	131,034
2022	122,177

Sources: Lafayette Economic Development Authority and U.S Census Bureau

**Assessed Value of Taxable Property of the City**

(All dollars in thousands)

<u>Fiscal Year</u>	<u>Assessed Value</u>	<u>Fiscal Year</u>	<u>Assessed Value</u>
2003	692,626	2013	1,306,098
2004	716,544	2014	1,381,041
2005	785,937	2015	1,461,552
2006	826,075	2016	1,577,908
2007	864,797	2017	1,592,059
2008	905,005	2018	1,586,428
2009	1,129,670	2019	1,615,615
2010	1,167,335	2020	1,546,875
2011	1,178,154	2021	1,548,590
2012	1,220,334	2022	1,668,799

Source: Lafayette Parish Assessor's Office

**LAFAYETTE CONSOLIDATED GOVERNMENT  
REVENUE BONDS CONTINUING DISCLOSURE**

<u>Classification of Property</u>	<b>2022 Assessed Valuation (City of Lafayette)</b>
Real Estate	\$1,330,159,497
Personal Property	308,882,195
Public Service Property	27,411,081
<b>Total</b>	<b><u>\$1,666,452,773</u></b>

Source: Lafayette Parish Assessor's Office

**Millage Rates**

	2018	2019	2020	2021	2022
<b><u>Parishwide Taxes:</u></b>					
Schools	4.59	4.59	4.92	4.92	4.92
School District No. 1 -					
Special	7.27	7.27	7.79	7.79	7.79
Special School Improvements	5.00	5.00	5.35	5.35	5.00
School 1985 Operation	16.70	16.70	17.88	17.88	17.88
Courthouse & Jail Maintenance	2.34	2.34	2.51	2.51	2.51
Library (2007-2016)	N/A	N/A	N/A	N/A	N/A
Library (2009-2018)	1.48	N/A	N/A	N/A	N/A
Library (2003-2012)	N/A	N/A	N/A	N/A	N/A
Library (2013-2022)	1.84	1.84	1.84	1.97	1.97
Library (2017-2026)	2.68	2.91	2.91	2.91	2.91
Health Unit Maintenance	N/A	N/A	N/A	N/A	N/A
Juvenile Detention Maintenance	1.17	1.17	1.25	1.25	1.25
Lafayette Economic Development Authority	1.68	1.68	1.68	1.8	1.8
Assessment District	1.56	1.44	1.67	1.67	1.67
Law Enforcement	16.79	16.79	17.36	17.36	17.36
Airport Maintenance	1.58	1.71	1.71	1.71	1.71
Minimum Security Maintenance	1.90	2.06	2.21	2.21	2.21
Bridges and Maintenance	4.17	4.17	4.47	4.47	4.47
Lafayette Parish Bayou Vermillion -					
Bond & Interest	0.17	0.17	0.1	0.1	0.1
Maintenance	0.75	0.75	0.79	0.79	0.79
Drainage Maintenance	3.34	3.34	3.58	3.58	3.58
Public Improvement Bonds	2.75	2.00	2.00	1.85	1.85
Teche-Vermillion Water District	1.41	1.41	1.41	1.41	1.41
Mosquito Abatement & Control	N/A	N/A	N/A	N/A	N/A
Health Unit, Mosquito, Ect.	3.56	3.56	3.64	3.64	3.64
<b><u>Other Parish and Municipal Taxes:</u></b>					
Parish Tax (Inside Municipalities)	1.52	1.52	1.63	1.63	1.63
Parish Tax (Outside Municipalities)	3.05	3.05	3.25	3.25	3.25
Lafayette Centre Development District	12.75	12.75	13.80	15.00	15.00
<b>City of Lafayette</b>	<b>17.80</b>	<b>17.94</b>	<b>17.94</b>	<b>18.19</b>	<b>18.19</b>

Sources: Lafayette Parish Assessor

**LAFAYETTE CONSOLIDATED GOVERNMENT  
REVENUE BONDS CONTINUING DISCLOSURE**

**Leading Taxpayers**

The ten largest property taxpayers of the City and their 2022 assessed valuations follow:

	<u>Name of Taxpayer</u>	<u>Type of Business</u>	<u>2022 Assessed Valuation</u>
1.	First Horizon Bank	Banking	\$21,161,177
2.	Stuller Inc	Manufacturing	19,522,586
3.	Whitney National Bank	Banking	10,440,004
4.	J P Morgan Chase	Banking	10,240,365
5.	Entergy Gulf States	Electric Company	8,859,320
6.	Franks Casing	Oil & Gas Support Services	8,654,310
7.	Home Bank	Banking	8,563,430
8.	A T & T / Bellsouth	Telecommunications	8,274,904
9.	Wal Mart / Sams	Warehouse Clubs & Supercenters	8,172,897
10.	Capital One	Banking	7,662,557
			\$111,551,550 *

\* Approximately 6.68% of the 2022 assessed valuation of the City.

Source: Lafayette Parish Tax Assessor

**Sales Tax Collections**

The City has collected the following amounts from its 1961 special one percent (1%) sales and use tax initially effective July 1, 1961 and 1985 special one percent sales and use tax initially effective July 1, 1985, each effective in perpetuity, for the periods indicated below:

**City of Lafayette Combined (61 & 85) Gross Sales Tax Collections**

<u>Month Collected</u>	<u>FY 20-21 Actual Collections</u>	<u>FY 21-22 Actual Collections</u>	<u>FY 22-23 Actual Collections</u>
November	4,071,551	4,485,263	4,654,516
December	3,790,641	4,467,036	4,549,612
January	4,695,488	5,235,005	5,598,951
February	3,615,819	4,395,208	4,356,841 *
March	3,631,288	4,038,535	
April	4,753,232	4,893,145	
May	4,504,199	4,773,977	
June	4,434,079	4,592,674	
July	4,857,698	4,881,122	
August	4,279,590	4,414,012	
September	4,108,196	4,539,702	
<u>October</u>	4,521,005	4,558,890	
<b>TOTAL</b>	\$51,262,785	\$55,274,568	\$19,159,920

Source: City of Lafayette. Figures unaudited.

\* Latest month for which figures are available

**LAFAYETTE CONSOLIDATED GOVERNMENT  
CASH AND INVESTMENTS  
BALANCES AS OF OCTOBER, 2022**

		<b><u>CASH AND INVESTMENTS</u></b>
<b>General Operating Funds:</b>		
101 General Fund-City	\$	54,255,186
102 Property Tax Escrow Fund		53,789
105 General Fund-Parish		4,500,825
126 Grants-Federal		5,680,628
127 Grants-State		(19,952,918)
128 Grants-Other		78,149
162 Community Development		(253,424)
163 Home Programs		32,965
165 Emergency Shelter Grant		0
166 HUD Home Loan Program		4,605
171 HUD Housing Loan Prog		356,511
185 FHWA I-49 Grant		0
187 FTA Capital		(374,601)
189 DOTD Travel Management		(32,323)
201 Recreation and Parks		0
203 Municipal Transit System		(1,098,808)
204 Heymann Performing Arts Center		(153,925)
206 Animal Control Shelter		1,660,215
207 Traffic Safety		13,498
209 Combined Golf Courses		409,211
210 Laf Develop & Revitaliz		0
232 City La DOTD Projects		4,722,421
233 Parish La DOTD Projects		11,052,688
241 Parish Parks & Rec		90,320
252 State Seized/Forfeited Property		114,424
253 Fed Narc Seized /Forfeited Property		15,140
255 Criminal Non-support		(56,847)
260 Road & Bridge Maintenance		16,141,045
261 Drainage Maintenance		7,500,315
262 Correctional Center		0
263 Library Fund		30,590,879
264 Courthouse Complex		14,192,685

**LAFAYETTE CONSOLIDATED GOVERNMENT  
CASH AND INVESTMENTS  
BALANCES AS OF OCTOBER, 2022**

	<b><u>CASH AND INVESTMENTS</u></b>
265 Juvenile Detention Facility	4,337,766
266 Public Health Unit	2,083,715
268 Criminal Court	0
269 Combined Public Health	1,665,074
271 Mosquito Abatement	960,971
272 Justice Department Federal Equitable Sharing Fund	62,649
273 Storm Water Management	7,287,285
274 Cultural Economy	624,286
275 Parishwide Street, Drainage, Bridge	2,530,175
276 Parishwide Parks & Rec Proj	584,779
278 Police & Fire Resiliency	9,162,293
279 Parishwide Fire Protection	(394,719)
296 Buchanan Parking Garage	(6)
297 Parking Program	29,191
299 Codes & Permits	108,694
550 Environmental Services	4,985,208
551 CNG Service Station	587,940
601 Payroll	3,923,314
605 Unemployment Compensation	(41,390)
607 Group Hospitalization	28,532,179
640 Hurricane Katrina	0
641 Hurricane Rita	0
643 Hurricane Gustav	(134,217)
644 Hurricane Isaac	0
645 2016 August Flood	0
646 Hurricane Barry	0
647 COVID19 Emer Preparedness	0
648 Hurricane Laura	(390,731)
649 Hurricane Delta	(4,660,030)
650 American Rescue Plan /21-City	37,715,457
651 American Rescue Plan /21-Parish	45,877,242
652 Hurricane Ida	(8,212)
702 Central Vehicle Maintenance	842,209
<b>Total General Operating Funds</b>	<b>\$ 275,813,773</b>

**LAFAYETTE CONSOLIDATED GOVERNMENT  
CASH AND INVESTMENTS  
BALANCES AS OF OCTOBER, 2022**

**CASH AND  
INVESTMENTS**

**Debt Service Funds:**

215 1961 City Sales Tax Trust Fund	\$	11,099
222 1985 City Sales Tax Trust Fund		0
290 1986 City Sales Tax Trust Fund		660,698
291 1987 City Sales Tax Trust Fund		3,870,112
302 1988 City Sales Tax Trust Fund		6,614,783
303 1989 City Sales Tax Trust Fund		8,297,930
304 1990 City Sales Tax Trust Fund		3,747,157
305 1991 City Sales Tax Trust Fund		7,891,452
356 1992 City Sales Tax Trust Fund		4,395,510
357 1993 City Sales Tax Trust Fund		368,810
358 1994 City Sales Tax Trust Fund		512,262
801 1995 City Sales Tax Trust Fund		4,203
821 1996 City Sales Tax Trust Fund		0
<b>Total Debt Service Funds</b>	<b>\$</b>	<b>36,374,016</b>

**Construction Funds:**

401 Sales Tax Capital Improvement Fund	\$	76,426,612
407 2010 Parish General Obligation Bonds		0
438 2010 Sales Tax Bond Construction		0
440 2013 Sales Tax Bond Construction		0
441 City Combined Bond Fund		20,540,625
<b>Total Construction Funds</b>	<b>\$</b>	<b>96,967,237</b>

**Other:**

602 Firemen Pension & Relief	\$	0
603 Police Pension & Relief		0
614 Risk Management		4,352,324
<b>Total Other</b>	<b>\$</b>	<b>4,352,324</b>

**LAFAYETTE CONSOLIDATED GOVERNMENT  
CASH AND INVESTMENTS  
BALANCES AS OF OCTOBER, 2022**

**CASH AND  
INVESTMENTS**

**Utility System Funds:**

501 Receipts Fund	\$	1,709,507
502 Operation and Maintenance		6,600,347
503 Bond & Interest		0
504 Capital Additions Fund		109,705,093
505 Security Deposit Fund		9,887,945
506 Bond Reserve Fund		14,646,034
507 2019 Cons Fund		27,162,512
<b>Total Utilities System Funds</b>	<b>\$</b>	<b>169,711,438</b>

**LPPA Funds:**

520 LPPA Revenue Fund	\$	12,676,690
521 LPPA Operating Fund		5,826,831
522 LPPA Fuel Cost Stability Fund		4,504,671
523 LPPA Bond Reserve Fund		7,089,236
524 LPPA Reserve & Contingency Fund		5,288,715
525 LPPA Bond Interest & Principal Fund		0
<b>Total LPPA Funds</b>	<b>\$</b>	<b>35,386,144</b>

**Communications System Funds:**

531 Receipts Account	\$	203,307
532 Operating Account		2,198,014
533 Debt Service Account		0
537 Capital Additions Account		19,588,592
538 Security Deposits Account		225,484
<b>Total Communications System Funds</b>	<b>\$</b>	<b>22,215,398</b>

<b>TOTAL ALL FUNDS</b>	<b>\$</b>	<b>640,820,329</b>
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**LAFAYETTE CONSOLIDATED GOVERNMENT  
REVENUE BONDS CONTINUING DISCLOSURE  
ECONOMIC INDICATORS**

**Per Capita Personal Income**

	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>
Lafayette Parish	\$ 47,603	\$ 48,707	\$ 49,629	\$ 52,507	\$ 57,674
Louisiana	43,932	46,207	47,460	50,874	54,217
United States	52,118	54,606	56,490	59,510	64,143

Source: U.S. Bureau of Economic Analysis

**Effective Buying Income**

**Median Household  
Effective Buying Income**

<u>Year</u>	<u>Lafayette Parish</u>	<u>City of Lafayette</u>	<u>Louisiana</u>	<u>Nation</u>
2021	\$ 63,311	\$ 55,329	\$ 53,571	\$ 69,021

Sources: U.S. Census Bureau

**Employment**

<u>Year</u>	<u>Labor Force</u>	<u>Employment</u>	<u>Unemployment</u>	<u>Parish Rate</u>	<u>State Rate</u>
2002	98,002	93,450	4,552	4.6	6.1
2003	97,675	92,904	4,771	4.9	6.4
2004	98,439	94,047	4,392	4.5	5.9
2005	104,121	98,670	5,451	5.2	7.1
2006	107,716	104,316	3,400	3.2	4.5
2007	110,161	106,874	3,287	3.0	4.3
2008	113,129	109,279	3,850	3.4	4.9
2009	111,996	106,294	5,702	5.1	6.8
2010	113,571	106,487	7,084	6.2	8.0
2011	113,869	107,117	6,752	5.9	7.8
2012	116,591	110,733	5,858	5.0	7.1
2013	118,870	113,007	5,863	4.9	6.7
2014	122,466	116,444	6,022	4.9	6.4
2015	120,075	113,260	6,815	5.7	6.3
2016	114,348	107,348	7,000	6.1	6.0
2017	113,028	107,513	5,515	4.9	5.1
2018	113,337	108,265	5,072	4.5	4.9
2019	113,607	108,685	4,922	4.3	4.8
2020	113,811	105,742	8,069	7.1	8.8
2021	115,123	109,956	5,167	4.5	5.6

Source: Louisiana Workforce Commission

**LAFAYETTE CONSOLIDATED GOVERNMENT  
REVENUE BONDS CONTINUING DISCLOSURE**

The final figures for the Parish for December 2022 were reported as follows:

Year	Labor Force	Employment	Unemployment	Parish Rate	State Rate
December 2022	115,961	112,699	3,262	2.8	*3.2

\* The seasonally adjusted rate was 3.5

Source: Louisiana Workforce Commission

The final figures for the Lafayette Metropolitan Statistical Area ("MSA") for December 2022 were reported as follows:

Year	Labor Force	Employment	Unemployment	Parish Rate	State Rate
December 2022	213,002	206,481	6,521	3.1	*3.2

\* The seasonally adjusted rate was 3.5

Source: Louisiana Workforce Commission

The following table show the composition of the employed work force in the Lafayette MSA.

**Non-Farm Wage and Salary Employment by Major Industry  
(Employees in Thousands)**

	December 2018	December 2019	December 2020	December 2021	December 2022
Mining	12.9	12.8	9.9	9.9	10.1
Construction	9.7	9.4	9.0	10.7	10.6
Manufacturing	15.7	16.6	14.6	14.8	15.4
Trade, Transportation, & Utilities	42.5	42.7	43.7	41.6	41.6
Information	2.4	2.3	2.3	2.5	2.5
Financial Activities	11	10.9	10.0	10.7	10.8
Professional And Business Services	21.7	21	19.0	21.7	22.9
Educational and Health Services	32.5	33.1	31.3	33.2	34.6
Leisure and Hospitality	22.0	22.0	24.1	21.3	22.7
Other Services	7.1	7.2	6.7	6.8	7.0
Government	27.5	27.8	27.0	26.9	25.9
Total	205.0	205.8	197.6	200.1	204.1

Source: U.S. Bureau of Labor Statistics

**LAFAYETTE CONSOLIDATED GOVERNMENT  
REVENUE BONDS CONTINUING DISCLOSURE  
ANNUAL AVERAGE LAFAYETTE PARISH CONCURRENT ECONOMIC  
INDICATORS 2018, 2019, 2020, 2021 AND THIRD QUARTER 2022**  
(All data not seasonally adjusted)

	2018	2019	2020	2021	2022:3
<b>EMPLOYMENT</b>					
<b>Total</b>	<b>130,728</b>	<b>131,140</b>	<b>124,940</b>	<b>130,702</b>	<b>133,405</b>
Agriculture, Forestry, Fishing, and Hunting	82	13,756	12,527	77	83
Mining	8,598	6,205	6,974	6,613	7,278
Utilities	419	87	69	434	427
Construction	5,478	1,948	1,594	6,495	6,819
Manufacturing	8,270	5,518	5,953	8,157	9,361
Wholesale Trade	6,030	8,365	8,299	5,629	6,094
Retail Trade	17,968	3,618	3,587	17,340	16,987
Transportation & Warehousing.	3,832	23,620	24,010	4,238	4,291
Information	2,146	2,220	1,926	2,067	1,538
Finance & Insurance	3,608	2,474	1,688	3,499	3,587
Real Estate and Rental and Leasing	3,149	8,672	7,353	2,783	3,205
Professional & Technical Services	8,477	8,592	6,332	8,593	8,738
Management of Companies and Enterprises	2,582	3,200	3,048	2,226	1,651
Administration and Waste Services	6,090	8,717	8,281	7,060	7,177
Educational Services	8,245	3,724	3,668	8,379	7,888
Health Care and Social Services	22,727	3,135	2,611	24,810	25,444
Arts, Entertainment, and Recreation	2,013	17,125	17,077	1,738	1,928
Accommodation and Food Services	14,088	3,982	4,049	13,847	14,132
Other Services, except Public Administration	3,237	420	447	3,202	3,350
Public Administration	3,689	5,761	5,446	3,513	3,425
	<b>Annual</b>	<b>Annual</b>	<b>Annual</b>	<b>Annual</b>	<b>Quarterly</b>
<b>EARNINGS (\$ in Thousands)</b>					
<b>Total</b>	<b>\$6,195,914</b>	<b>\$6,318,157</b>	<b>1,698,685,746</b>	<b>1,868,992,648</b>	<b>1,847,583,403</b>
Agriculture, Forestry, Fishing, and Hunting	3,052	235,558	57,496,272	889,786	875,555
Mining	764,490	238,549	78,953,362	166,404,281	192,752,792
Utilities	27,084	3,353	809,254	8,419,172	7,940,319
Construction	293,123	33,910	8,010,542	107,616,205	116,041,843
Manufacturing	490,361	295,091	100,872,454	136,681,567	145,927,530
Wholesale Trade	353,203	365,194	95,890,828	100,941,198	106,624,601
Retail Trade	525,883	261,533	71,663,801	167,573,459	157,770,910
Transportation & Warehousing.	192,881	1,083,972	347,438,321	66,129,034	67,644,995
Information	113,095	119,024	29,737,370	34,116,100	24,354,700
Finance & Insurance	255,300	193,100	40,636,154	74,527,396	67,604,559
Real Estate and Rental and Leasing	194,582	530,626	114,553,767	49,236,259	55,227,341
Professional & Technical Services	560,014	782,913	146,035,942	182,768,668	158,633,536
Management of Companies and Enterprises	241,813	122,363	32,866,913	57,313,563	33,767,825
Administration and Waste Services	226,378	577,816	167,251,741	86,121,376	84,392,818
Educational Services	348,028	191,421	55,658,442	98,430,384	99,404,544
Health Care and Social Services	1,023,179	193,183	43,033,846	354,117,735	352,801,538
Arts, Entertainment, and Recreation	33,426	518,698	148,480,596	8,870,830	9,489,002
Accommodation and Food Services	234,972	194,059	59,300,211	78,497,909	76,567,717
Other Services, except Public Administration	125,857	27,456	9,103,000	36,875,683	37,408,363
Public Administration	189,122	350,298	90,869,142	53,462,043	52,352,915

Source: Louisiana Workforce and Louisiana Department of Labor

**LAFAYETTE CONSOLIDATED GOVERNMENT  
REVENUE BONDS CONTINUING DISCLOSURE**

The names of the largest employers located in Lafayette Parish are as follows:

<b><u>Name of Employer</u></b>	<b><u>Type of Business</u></b>	<b><u>Approximate No. of Employees</u></b>
1 Ochsner Lafayette General	Health Care	4,344
2 Lafayette Parish School System	Education	4,198
3 Our Lady of Lourdes Reg Med Ctr	Health Care	2,875
4 University of Louisiana-Lafayette	Education	2,637
5 Lafayette Consolidated Government	Public Administration	2,478
6 Stuller Inc.	Manufacturing	1,522
7 Wal-Mart Stores Inc.	Retail Trade	1,354
8 Amazon	Transportation	1,300
9 LHC Group Inc.	Health Care	942
10 Lafayette Parish Government	Public Administration	848

Source: Lafayette Economic Development Authority

## Banking Facilities

The Lafayette Parish are is served by the following banks:

### Banks

First Horizon Bank	First National Bank
3rd District Highway FCU	First Pioneers FCU
Acadian Federal Credit Union	Gulf Coat Bank
Acadiana Medical Federal Credit Union	Hancock Whitney Bank
Advancial	Hibernia Research Corp
Advancial Federal Credit Union	Home Bank
American Bank & Trust Company	HPES
Aurora Ranch Mitigation Bank	IBERIA
BancorpSouth Bank	Investar Bank
B B & B Endeavors LLC	JD Bank
B B & L LLC	JP Morgan Chase & Co
B1Bank	LA Dotd Federal Credit Union
Bancorpsouth	Lafayette Schools Federal Credit Union
Bank of Sunset	M C Bank & Trust Co.
Bank of Sunset & Trust Company	Maple Federal Credit Union
Bayou Federal Credit Union	Meritus Credit Union
Business First Bank	PHI Federal Credit Union
Capital One	Rayne State Bank & Trust Co
Chase Bank	Regions Bank
Commercial Business Loans LLC	Section 705 Credit Union
Community First Bank	South Louisiana Bank
Coplan LLC	St. Jules Credit Union
CUSA Federal Credit Union	St. Landry Bank & Trust Company
Family Savings Credit Union	TCF INC
Farmers-Merchants Bank & Trust Company	ULFCU
Farmers State Bank & Trust Company	University of LA Credit Union
First Bank & Trust	Washington State Bank
First Horizon	Woodforest National Bank

Source: Lafayette Economic Development Authority

**STATEMENT OF BONDED DEBT  
AS OF JANUARY 2, 2023**

<u>Name of Issuer &amp; Issue</u>	<u>Interest Rates (%)</u>	<u>Dated Date</u>	<u>Final Maturity Date</u>	<u>Principal Outstanding</u>	<u>Principal Amount Due Within One Year</u>
<b><u>Debt of the Parish of Lafayette, State of Louisiana</u></b>					
General Obligation Refunding Bonds, Series 2012	3.0-4.0	5/03/12	3/01/28	\$7,145,000	\$1,235,000
General Obligation Refunding Bonds, Series 2014	3.0-4.0	8/01/14	3/01/30	6,720,000	730,000
General Obligation Refunding Bonds, Series 2020	3.0-5.0	12/29/20	3/01/35	18,385,000	1,775,000
<b><u>Debt of the Parish School Board of the Parish of Lafayette, State of Louisiana</u></b>					
Limited Tax Bonds (Taxable QSCB), Series 2009	0.8	12/11/09	10/01/24	10,000,000	0
Limited Tax Bonds (Taxable QSCB), Series 2011	0.0	3/01/11	10/01/26	10,000,000	0
Limited Tax Bonds (Taxable QSCB), Series 2012	0.0	4/03/12	3/01/27	1,460,775	0
Limited Tax Revenue Bonds, Series 2012A	2.0-4.0	1/04/13	3/01/29	2,555,000	1,570,000
Limited Tax Revenue Bonds, Series 2016	2.37	12/21/16	12/21/56	72,660,717	1,415,895
Taxable Limited Tax Revenue Refunding Bonds, Series 2020	0.454-1.825	10/15/20	3/01/32	14,700,000	205,000
Refunding Certificates of Indebtedness, Series 2010	3.06	12/29/10	11/01/23	313,000	313,000
Certificate of Indebtedness, Series 2015	2.2	8/17/15	11/01/23	313,000	313,000
Sales Tax Revenue Bonds, Series 2018	3.0-5.0	2/27/18	4/01/43	61,380,000	1,330,000
Sales Tax Revenue Bonds, Series 2018A	3.0-3.625	7/31/18	4/01/43	25,925,000	650,000
Sales Tax Revenue Bonds, Series 2019	2.0-5.0	4/18/19	4/01/49	24,700,000	500,000
Taxable Sales Tax Revenue Refunding Bonds, Series 2020	0.434-2.83	10/15/20	4/01/48	31,565,000	255,000
Sales Tax Revenue Bonds, Series 2023	3.875-5.0	2/15/23	4/01/53	162,985,000	0
<b><u>Debt of the Assessment District of the Parish of Lafayette, State of Louisiana</u></b>					
Revenue Bonds, Series 2021	2.06	11/10/21	3/01/31	2,716,000	278,000
Revenue Bonds, Series 2022	5.16	12/20/22	3/01/32	700,000	29,000
<b><u>Debt of the Law Enforcement District of the Parish of Lafayette, State of Louisiana</u></b>					
Taxable Limited Tax Revenue Refunding Bonds, Series 2020	0.48-1.9	10/20/20	3/01/32	13,245,000	160,000
<b><u>Debt of the Lafayette Parish Bayou Vermilion District, State of Louisiana</u></b>					
General Obligation Bonds, Series 2016	2.0-2.625	8/30/16	3/01/36	3,240,000	165,000
<b><u>Debt of the Lafayette Public Power Authority</u></b>					
Electric Revenue Refunding Bonds, Series 2015	3.0-5.0	11/13/15	11/01/32	24,625,000	930,000
Taxable Electric Revenue Refunding Bonds, Series 2021	2.0-2.45	11/18/21	11/01/32	38,360,000	3,520,000
<b><u>Debt of the Lafayette Parish Waterworks District North, Lafayette Parish, Louisiana</u></b>					
Water Revenue Refunding Bonds, Series 2013	2.95	1/29/13	10/01/27	1,469,000	406,000
<b><u>Debt of Lafayette Parish Waterworks District South, Lafayette Parish, Louisiana</u></b>					
Water Revenue Bonds, Series 2018	5.025	7/26/18	8/01/27	299,000	58,000
Water Revenue Bonds, Series 2021	2.0	3/25/21	8/01/31	2,710,000	288,000

<u>Name of Issuer &amp; Issue</u>	<u>Interest Rates (%)</u>	<u>Dated Date</u>	<u>Final Maturity Date</u>	<u>Principal Outstanding</u>	<u>Principal Amount Due Within One Year</u>
<b><u>Debt of the City of Lafayette, State of Louisiana</u></b>					
Certificates of Indebtedness, Series 2011	3.65	5/11/11	5/01/26	1,990,000	465,000
Communications System Revenue Refunding Bonds, Series 2015	3.5-5.0	8/21/15	11/01/31	62,165,000	5,650,000
Communications System Revenue Refunding Bonds, Series 2021A (Tax-Exempt)	2.75-4.0	11/18/21	11/01/31	6,765,000	390,000
Taxable Communications System Revenue Refunding Bonds, Series 2021B (Federally Taxable)	2.0-2.3	11/18/21	11/01/31	6,870,000	430,000
Taxable Limited Tax Refunding Bond, Series 2012	3.75	3/02/12	5/01/27	15,160,000	2,810,000
Taxable Limited Tax Refunding Bonds, Series 2020	0.482-1.824	9/18/20	5/01/32	25,835,000	2,475,000
Utilities Revenue Refunding Bonds, Series 2017	4.0-5.0	10/13/17	11/01/35	53,770,000	3,065,000
Utilities Revenue Bonds, Series 2019	5.0	5/01/19	11/01/44	54,285,000	1,390,000
Taxable Utilities Revenue Refunding Bonds, Series 2021	2.0	11/18/21	11/01/28	77,375,000	12,490,000
Public Improvement Sales Tax Refunding Bonds, Series ST-2011C	3.125-3.75	12/08/11	3/01/27	3,170,000	595,000
Public Improvement Sales Tax Refunding Bonds, Series ST-2012A	3.0-3.125	6/01/12	3/01/28	2,610,000	410,000
Public Improvement Sales Tax Bonds, Series 2013	3.125-5.0	6/21/13	3/01/38	11,650,000	535,000
Public Improvement Sales Tax Refunding Bonds, Series 2014A	5.0	10/17/14	3/01/30	9,700,000	1,140,000
Public Improvement Sales Tax Refunding Bonds, Series 2014C	5.0	12/5/14	3/01/24	4,825,000	2,355,000
Public Improvement Sales Tax Refunding Bonds, Series 2015A	2.43	12/18/15	3/01/25	1,835,000	610,000
Public Improvement Sales Tax Refunding Bonds, Series 2016D	3.0-4.0	2/26/16	3/01/32	9,345,000	770,000
Public Improvement Sales Tax Refunding Bonds, Series 2017A	5.0	7/18/17	3/01/32	8,765,000	1,120,000
Public Improvement Sales Tax Refunding Bonds, Series 2018A	4.0-5.0	12/06/18	3/01/33	16,640,000	1,265,000
Public Improvement Sales Tax Refunding Bonds, Series 2020	4.0	9/18/20	3/01/34	2,940,000	0
Taxable Public Improvement Sales Tax Refunding Bonds, Series 2020A	0.562-1.744	9/18/20	3/01/30	7,800,000	60,000
Public Improvement Sales Tax Bonds, Series 2020B	1.0-5.0	9/18/20	3/01/45	25,000,000	55,000
Public Improvement Sales Tax Refunding Bonds, Series ST-2011D	3.125-3.75	12/08/11	5/01/27	4,470,000	920,000
Public Improvement Sales Tax Refunding Bonds, Series ST-2012B	3.0-4.5	6/01/12	5/01/28	6,715,000	1,035,000
Public Improvement Sales Tax Refunding Bonds, Series 2014B	3.0-3.375	9/26/14	5/01/30	1,090,000	120,000
Public Improvement Sales Tax Refunding Bonds, Series 2015	5.0	2/06/15	5/01/24	1,630,000	800,000
Public Improvement Sales Tax Refunding Bonds, Series 2016A	3.0-5.0	2/26/16	5/01/25	4,125,000	3,290,000
Public Improvement Sales Tax Refunding Bonds, Series 2016E	2.63	2/26/16	5/01/32	1,235,000	105,000
Public Improvement Sales Tax Refunding Bonds, Series 2018B	4.0-5.0	12/06/18	5/01/34	15,590,000	1,005,000
Public Improvement Sales Tax Bonds, Series 2019A	2.5-5.0	4/11/19	5/01/44	25,830,000	125,000
Taxable Public Improvement Sales Tax Refunding Bonds, Series 2020C	0.562-1.744	9/18/20	5/01/30	5,500,000	15,000
Public Improvement Sales Tax Bonds, Series 2020D	1.0-5.0	9/18/20	5/01/45	25,000,000	10,000

**SUMMARY DEBT STATEMENT AS OF JANUARY 3, 2023**

**A. Debt of the City of Lafayette**

<u>Type of Obligation</u>	<u>Principal Outstanding</u>
Sales Tax Bonds	\$195,465,000
Utilities Revenue Bonds	\$185,430,000
Communications System Revenue Bonds	\$75,800,000
Taxable Revenue Bonds	\$40,995,000
Certificates of Indebtedness	\$1,990,000

**B. Debt of the Parish of Lafayette**

<u>Type of Obligation</u>	<u>Principal Outstanding</u>
Unlimited Ad Valorem Tax Bonds	\$35,490,000
Revenue Bonds	\$3,416,000

**C. Debt of the Lafayette Parish School Board**

<u>Type of Obligation</u>	<u>Principal Outstanding</u>
Sales Tax Bonds	\$417,931,492
Certificates of Indebtedness	\$626,000

**D. Debt of The Lafayette Parish Law Enforcement District**

<u>Type of Obligation</u>	<u>Principal Outstanding</u>
Limited Tax Revenue Bond	\$0
Taxable Revenue Bond	\$13,245,000

**E. Debt of the Lafayette Public Power Authority**

<u>Type of Obligation</u>	<u>Principal Outstanding</u>
Electric Revenue Bonds	\$62,985,000

**F. Partially Underlying Debt of the Lafayette Parish Waterworks District North**

<u>Type of Obligation</u>	<u>Principal Outstanding</u>
Water Revenue Bonds	\$1,469,000

**G. Partially Underlying Debt of the Lafayette Parish Waterworks District South**

<u>Type of Obligation</u>	<u>Principal Outstanding</u>
Water Revenue Bonds	\$3,009,000

*(NOTE: The above statement excludes the outstanding indebtedness of the Lafayette Airport Commission, the Lafayette Economic Development Authority [formerly the Lafayette Harbor, Terminal and Industrial Development District], the Lafayette Public Trust Financing Authority, Lafayette Industrial Development Board, Lafayette I-10 Corridor District at Mile Marker 103, District No. 4 Regional Planning and Development Commission, and all operating and capital leases.)*





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