

April 18, 2018

Office of Commission Clerk  
Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

Re: Docket No. 20180021-WU - Application of Country Walk Utilities, Inc. for Staff Assisted Rate Case in Highlands County – Second Supplemental Response to Staff’s First Data Request No. 13

Dear Commission Clerk,

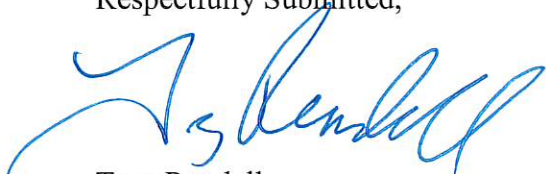
Please find attached Country Walk Utilities, Inc.’s (Country Walk) second supplemental response to Staff’s First Data Request No. 13.

13. A list of all service complaints received during the test year and four years prior to the test year. Please include an explanation of how each complaint was resolved.

**Response:** See attached.

If you have any questions, please do not hesitate to contact me at (727) 848-8292, ext. 245.

Respectfully Submitted,



Troy Rendell  
Vice President  
Investor Owned Utilities  
*// for Country Walk Utilities, Inc.*

## Troy Rendell

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**From:** Troy Rendell  
**Sent:** Wednesday, April 18, 2018 11:20 AM  
**To:** 'Tom Moran'  
**Cc:** 'Vic Budd'; 'Art Ballard'; 'Paul Brand'; 'Linda Burkell'; 'barry'; 'Cookie Knox'; 'Sue Sylvester'  
**Subject:** RE: Re: Country walk water quality

Good morning,

I discussed with the President of the utility and the utility manager. First and foremost, please understand that Country Walk Utilities is a small utility with a small customer base of approximately 71 customers. As previously discussed with the customers, the impact on water rates must be considered in any decision making.

Regarding the new treatment system - This is a forced draft aeration treatment system which is prescribed by Florida Department of Environmental Protection (FDEP) Rule 25-555.315(5)(a), Florida Administrative Code. The levels of sulfides in the source ground water rise to the level which requires forced draft aeration with pH adjustment. We worked closely with both the Homeowners Association and the FDEP on this project, which was placed into service last year. Country Walk Utilities spent approximately \$134,343.64 on the project. The actual costs were higher than that amount, but U.S. Water Services did not charge all of the costs to the utility in order to keep the rate impact at a minimum. We have had some components failures and have either replaced them or are in the process of replacing these components through the warranty. The utility still has some work to do on the equipment, particularly the control panel components that control the blower and VFD. The utility has received little to no water quality complaints, and have been told that it is the best water the customers have tasted. There is no need or requirement for an additional filter. Filters would require backwash with no means to dispose of the backwash water – as there is no wastewater plant. In addition, this would require an Industrial Wastewater Discharge Permit with the FDEP which is costly. Cartridge filters would be costly and would have no added benefits. Individual homeowners may chose to install additional home filters if they would like additional filtration. Cartridges will remove any supplemental components that may remain in the water. However, the forced draft aeration is working properly and is removing the sulfides in the water as designed. Country Walk Utilities is currently meeting all primary and secondary water quality standards. In fact with the addition of the new treatment system, the utility was able to lower the chlorine usage previously utilized. As a result, the utility is now below the disinfection byproduct limits as set by the FDEP.

Country Walk has filed a rate case with the Florida Public Service Commission. The utility estimates that the impact on the water rates for this new treatment is approximately 95% increase. Water rates for 5,000 gallons may increase from \$47.30 to approximately \$94.55 a month. Any additional plant additions or operation expense increases would result in further upward pressure on water rates.

Country Walk has also recently implemented an additional service line project. The utility has begun digging up service lines and decalcifying the service lines. This has been caused by the level of disinfection previously required to address the sulfides prior to the new treatment system. This has greatly improved the water pressure for the homes where we've completed this. The utility will continue with this project as well.

Thank you for your consideration and continued cooperation.

Troy

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**From:** Tom Moran [mailto:tmoran583@gmail.com]  
**Sent:** Tuesday, April 17, 2018 11:09 AM  
**To:** Troy Rendell  
**Cc:** Vic Budd; Art Ballard; Paul Brand; Linda Burkell; barry; Cookie Knox; Sue Sylvester  
**Subject:** Fwd: Re: Country walk water quality

Troy  
There was a Housing meeting last Saturday; a water quality issue was raised.  
I am forwarding the related emails that I have.  
Can you please respond regarding any actions that need to be taken?  
Thanks  
Tom Moran

----- Forwarded message -----  
From: "Paul Brand" <[plb2280@gmail.com](mailto:plb2280@gmail.com)>  
Date: Apr 14, 2018 10:09 PM  
Subject: Re: Country walk water quality  
To: "Tom Moran" <[tmoran583@gmail.com](mailto:tmoran583@gmail.com)>  
Cc:

Will do

Sent from my iPhone

On Apr 14, 2018, at 7:12 PM, Tom Moran <[tmoran583@gmail.com](mailto:tmoran583@gmail.com)> wrote:

Paul,  
Keep the sample refrigerated.  
Indicate date and time collected if you have it.  
Tom

On Apr 14, 2018 4:37 PM, "Paul Brand" <[plb2280@gmail.com](mailto:plb2280@gmail.com)> wrote:  
Tom, thanks for your willingness to help. Art has a solid understanding of what's going on, as does Vic Budd. Vic gave me a water and filter sample from his home that looks like a urine sample - no exaggeration!

Vic raised the issue and showed us all the sample he said was from just the last two weeks. Don't quote me, but I think he indicated that because US Water spent less on the upgrade than they should have, this is the result. He thinks that whatever costs to correct this issue will be passed along to us. Had they done it right in the first place we wouldn't face these additional costs.

Art then followed up with a description of how the system works and the fact that they did not include some type of filter. He suggested we contact US Water first, and if we get no where, have the sample analysed and then report the problem to the PUC.

Please note that this is the best of my recollection and may not be accurate.

I think Art and Vic are the one's to talk to. I have the water sample and filter at my house. Please let me know if you need more from me and keep me posted on the situation.

Thank you again for your willingness to help - that's what makes a great neighbor.

Paul

On Sat, Apr 14, 2018 at 3:31 PM, Tom Moran <[tmoran583@gmail.com](mailto:tmoran583@gmail.com)> wrote:

Art asked me to contact US Water regarding the issue that was raised at the HOA meeting today. I left early and was not present when the issue was raised. Could you forward me the comments as you remember them; I will combine them and send an email to US Water.

Thanks

Tom

# COUNTRY WALK UTILITIES, INC.

March 30, 2018

Ms. Jennifer Carpenter  
Assistant Director  
Florida Department of Environmental Protection  
South District Office  
2295 Victoria Avenue, Suite 364  
Ft. Myers, FL 33902-2549

**RE: Country Walk Utilities, Inc. – Water System PWS ID #6284114  
Highlands County, FL**

Dear Ms. Carpenter:

This is to thank you and your staff for the opportunity to meet with myself and Mo Kader on March 15, 2018, to discuss the status of compliance by the facility with the draft Consent Order (No. 17-0914) and to review the short-term and long-term options available to the facility in order to expedite the construction schedule for any potential future projects.

We have agreed that Country Walk Utilities, Inc. (“the Utility”) had initiated and physically completed all the necessary corrective measures to meet the applicable Drinking Water Standards for the Disinfection Byproducts (DBP’s) and the Utility is currently performing monthly monitoring to ascertain full compliance. Below, is a table summarizing the steps that were undertaken to complete the water plant modifications along with the corresponding completion dates according to the letter, dated May 3, 2016, by USWSC (copy attached).

No.	DESCRIPTION	COMPLETION DATE
1.	Initiate design process	5/2/2016
2.	Submit permit application to FDEP	7/8/2016
3.	Issue of final permit by FDEP	9/26/2016
4.	Coordinate with HOA and PSC to approve funding of project	12/30/2016
5.	Bidding process	2/28/2017
6.	Approval of shop drawings for all equipment including GST, degasifier, pumps, chemical tanks, electrical equipment, transfer pumps, piping, valves, fittings, etc.	4/28/2017
7.	Construction modifications of WTP	7/13/2017
8.	Startup of new system and clearance sampling	7/31/2017
8.	Submittal of COC to FDEP	8/3/2017
9.	Approval and issue of final clearance by FDEP	8/23/2017
10.	Currently, the system is monitoring monthly for TTHM’s and HAA5’s.	

As demonstrated above, the construction schedule was very reasonable and conforms to the general industry standards. However, based on your advice, the Utility is willing to implement any measures that can result in acceleration of any future construction projects. Some of the measures that the Utility recommends include, but not be limited to, the following steps:

- Prior to initiation of any corrective measures, establish a schedule of corrective actions with reasonable target completion dates that are agreed upon along with the FDEP through a permit document or a consent order.
- Prepare a schedule of the project and educate the construction team regularly on the urgency of completing the project expeditiously to meet the compliance deadlines.
- Make every attempt to get ahead of schedule, if at all possible, by starting the project earlier than planned to build an early time buffer to protect against future delays. For example, start preparing the site and order equipment before final issuance of final permit. However, initiation of any physical modifications to the system cannot be done prior to securing all the necessary approvals and permits from all applicable regulatory agencies, including FDEP.
- Coordinate with outside manufacturing vendors to expedite manufacture and deliver of necessary components, if appropriate. Unfortunately this is typically outside the control of the Utility.
- Adding additional resources to the project. Check if there is flexibility to add resources to the project such as adding more personnel and/or working overtime. Although the Utility is cognizant of the fact this may increase cost which would be passed onto the ratepayers through future rates.
- Continue to optimize the process schedule throughout the construction phase in order to save time. For example, an approval process might take two weeks. Is there a way it can be done in one week, or one day?
- As the project progresses, question everything that remains and eliminate any work that is deemed unnecessary or redundant.

The Utility believes that the above adequately addresses your outstanding compliance issues and ensures a lasting solution to the water quality issues experienced by the Utility in the past. As mentioned before, the Utility believes that it has provided your agency with all the necessary corrective measures to allow the system to continue to operate without the need for any further enforcement and penalties.

We sincerely appreciate the understanding and cooperation extended by you and your staff in resolving all issues. Country Walk Utilities, Inc. is optimistic that the above response would be adequate to resolve FDEP's concerns and that no further action is necessary at this time.

Ms. Jennifer Carpenter  
March 30, 2018

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Please feel free to contact us at your convenience should you have any questions. We can be reached directly at (727) 848-8292.

Sincerely,

A handwritten signature in black ink, appearing to read "Troy Rendell". The signature is fluid and cursive, with a large initial "T" and "R".

Troy Rendell  
Vice President  
Investor Owned Utilities  
*// for Country Walk Utilities, Inc.*

Attachment

Cc: Gary Deremer, U.S. Water  
Mo Kader, U.S. Water

# U.S. Water<sup>®</sup> Services Corporation

Water and Wastewater Operations, Maintenance, Engineering, Management

Ms. Deanna Newburg, Manager  
Florida Department of Environmental Protection  
P.O. Box 2549  
Fort Myers, FL 33902-2549

May 3, 2016

RE: Compliance Assistance Offer  
**Country Walk Utilities, Inc. WTP**  
PWS ID No. 628-4114, Highlands County

Dear Ms. Newburg:

Thank you for your letter of April 7, 2016, offering a Compliance Assistance Offer to resolve the water quality issues at this facility which are related to the disinfection byproducts levels in the treated potable water at this water system. We would like to inform you that, following our meetings and discussions with the customers served by this water system and the Florida Public Service Commission, we have received the necessary approvals to proceed with the design modifications to the existing water treatment plant to remove hydrogen sulfide prior to the addition of chlorine. These proposed design modifications will involve the addition of a forced-draft aeration system with all the necessary appurtenances and pH adjustment instruments to maximize the efficiency of hydrogen sulfide removal.

Accordingly, we have initiated the design process, and we expect to submit complete design plans of the proposed modifications along with all the required permit application(s) to your permitting section within the next four (4) weeks.

We trust that the above response would be adequate to resolve your concerns and that no further action is necessary at this time. Please feel free to contact us at your convenience should you have any questions. We can be reached directly at (727) 243-5875. Your continued cooperation in resolving this matter is most appreciated.

Sincerely,



Mo Kader, P.E.  
Engineering Services  
U.S. Water Services Corporation

MK/mk  
Attachment  
Cc: Gary Deremer, Country Walk