

Brian Schultz

From: Brian Schultz on behalf of Records Clerk
Sent: Monday, January 04, 2021 3:04 PM
To: 'Robert Hoerr'
Cc: Consumer Contact
Subject: RE: Docket #20200226-SU

Good Afternoon, Robert Hoerr

We will be placing your comments below in consumer correspondence in Docket No. 20200226-SU and forwarding your comments to the Office of Consumer Assistance and Outreach.

Sincerely,

Brian Schultz

Commission Deputy Clerk II
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
850.413.6770

PLEASE NOTE: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are considered to be public records and will be made available to the public and the media upon request. Therefore, your e-mail message may be subject to public disclosure.

From: Robert Hoerr <bobhoerr@comcast.net>
Sent: Monday, January 04, 2021 9:00 AM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: Docket #20200226-SU

To Whom It May Concern,

We are writing to you as owners of two properties on Little Gasparilla Island, which is within the service area contained in the application from Environmental Utilities, LLC [EU] for central sewer. We object to EU's request for the bifurcation of the certificate and rate-making proceedings and we object to the granting of a temporary waiver of Rule 25-30.033(1)(p) and (q). Given the inadequate information regarding the applicant's financial strength and management experience, as well as the costs to the stakeholders involved with this project, the applicant's request for a waiver should be denied.

While the proposed service may have merit, as stakeholders in the proposed service area it is critical that we be provided with all the relevant information regarding the proposed central sewer, including the proposed rates, connection fees and the type of system intended for installation.

We therefore request that EU's request for bifurcation and a temporary waiver be denied.

Sincerely,

Robert A. Hoerr
bobhoerr@comcast.net
Lilliam G. Hoerr
lhoerr@comcast.net

Relevant sections of Rule 25-30.033(1)

(p) To support the proposed rates and charges, the applicant shall provide:

1. The existing and projected cost of the system(s) and associated depreciation by year until design capacity is reached using the National Association of Regulatory Utility Commissioners (NARUC) 1996 Uniform System of Accounts (USOA), which is incorporated by reference in Rule [25-30.115](#), F.A.C. The applicant shall identify the year that 80 percent of design capacity is anticipated. If the utility will be built in phases, this shall apply only to the first phase;

2. The existing and projected annual contributions-in-aid-of-construction (CIAC) and associated amortization by year including a description of assumptions regarding customer growth projections using the same projections used in subparagraph (1)(k)1. above for the proposed service area. The projected CIAC shall identify cash and property contributions and amortization at 100 percent of design capacity and identify the year when 80 percent of design capacity is anticipated. The projected CIAC shall be consistent with the service availability policy and charges in the proposed tariff provided in paragraph (q) below, the schedule provided in subparagraph (1)(p)6. below, and the CIAC guidelines in Rule [25-30.580](#), F.A.C. If the utility will be built in phases, this shall apply only to the first phase;

3. A schedule showing the projected capital structure including the methods of financing the construction and operation of the utility until the utility reaches 80 percent of the design capacity of the system. If the utility will be built in phases, this shall apply only to the first phase;

4. The current annual operating expenses and the projected annual operating expenses at 80 percent of design capacity using the NARUC USOA. If the utility will be built in phases, this shall apply only to the first phase;

5. A schedule showing how the proposed rates were developed;

6. A schedule showing how the proposed service availability policy and charges were developed, including meter installation, main extension, and plant capacity charges, and proposed donated property; and,

7. A schedule showing how the customer deposits and miscellaneous service charges were developed, including initial connection, normal reconnection, violation reconnection, and premises visit fees, consistent with Rules [25-30.311](#) and [25-30.460](#), F.A.C.; and,

(q) A tariff containing all rates, classifications, charges, rules, and regulations which shall be consistent with Chapter 25-9, F.A.C. Form PSC 1010 (12/15), entitled "Water Tariff," which is incorporated by reference in this rule and is available at <http://www.flrules.org/Gateway/reference.asp?No=Ref-06247> and Form PSC 1011 (12/15), entitled "Wastewater Tariff," which is incorporated by reference in this rule and is available at <http://www.flrules.org/Gateway/reference.asp?No=Ref-06248>, are example tariffs that may be

completed by the applicant and included in the application. These forms may also be obtained from the Commission's website, www.floridapsc.com.