

Andrea Moen
633 Reno Street
Iowa City, IA 52245

January 4, 2021

Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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RE: Docket #20200226-SU, Application for Original Wastewater Certificate in Charlotte County by Environmental Utilities, LLC.

To Whom it May Concern,

The purpose of this letter is to object to the proposed Application for Original Wastewater Certificate in Charlotte County by Environmental Utilities (EU), LLC.

I am writing to you as a property owner on Little Gasparilla Island (LGI) which is within the service area contained in the application from Environmental Utilities for a central sewer. I object to this application for the following reasons.

1. EU has no experience with a project of this size or nature. What qualifications does EU and Mr. Boyer possess for a project of this scope? Environmental Utilities has had difficulty managing and maintaining the current potable water system which is only to LGI. This sewer application has a significantly larger scope to include Palm Island as well as LGI. If past performance is a predictor of future performance, there is dire concern of the ability of EU to operate and maintain this waste-water system. Should the stewardship of the project become untenable, another entity will have to assume responsibility for the project.
2. In EU's original application Financial Ability, Exhibit "A", the PSC asks Mr. Boyer to "Provide a detailed financial statement". In Exhibit A, the "detailed" financial statement provided does not qualify as detailed. It consists of a loan application, hand-written on Century Bank letterhead, and is only signed by Mr. Boyer. No signature of a bank officer appears, nor is there a signature of his partner in the LLC, Diane Boyer. Because the statement is "Redacted" there is no way to ascertain if the information provided is true and accurate. Furthermore, because the cost of the project has not been established, one is unable to determine whether the finances of the individual are adequate for accomplishing the project, to secure a loan, or to provide ongoing maintenance. If the service area is approved before the rate-making portion of the application is completed and released to

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the stakeholders, it could result in great expense for another utility to secure the service area from EU. This expense, in turn, would be passed to the ratepayers.

3. Financial Ability, Exhibit "B" of the application states "The applicant shall provide copies of any financial agreements between the listed entities and the utility." The letter from Centennial Bank that was referenced begins "**This letter is NOT a commitment to lend and is for discussion purposes only.**"
4. Background and credit history of Mr. & Mrs. Boyer has not been verified and could have an impact on the financing of this project. The Charlotte County Clerk's office website lists several foreclosures and lien actions involving Mr. Boyer.
5. No attempt was made by the applicant to indicate EU has had contact with any permitting agencies to ascertain whether this project is either viable or permissible. There is no indication that environmental agencies such as West Coast Inland Navigational District, Solid Waste Management District, Florida Department of Environmental Protection, Florida State Parks, or Florida Submerged Land Trust have been contacted for their input.
6. The project area is on Little Gasparilla Island, a bridgeless barrier island, with many unique characteristics that have not been addressed and will impact the cost and feasibility of this project. All project materials must come and go via barge.
7. Not environmentally necessary. It has not been shown the existing septic systems on LGI are creating environmental concerns. There are only 500 homes on LGI and the environmental gains will come at great costs for such a small number of homes. Installation of the proposed sewer system will be very disruptive to the fragile nature of the island. The costs of this plan will outweigh the benefits. An alternative solution should be sought.
8. Acquisition of easements have not been addressed. This could substantially impact this project.
9. There is inadequate information regarding the applicant's financial strength and management experience as well as the costs to the stakeholders involved with this project. It is important to have all the relevant information regarding the proposed central sewer, including the proposed rates, connection fees and the type of system intended for installation. Mr. Boyer has requested a temporary waiver of Rule 25-30.033(1)(p) and (q) which would allow the application to proceed without this critical information. There is a wide lack of transparency with this application. There is no substantiation or supporting evidence for the verbal estimates that are being given. It is a disservice to the stakeholders in the proposed area to require they evaluate and comment on the project within 30 days of notice without having the most critical information.

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10. The cost to individual property owners is unknown and most likely will be excessively burdensome. What will the plan be for dismantling the existing septic systems and how will those costs be handled?

11. The septic system on our property was replaced in 2018, at a cost of \$25,000, and approved by the Charlotte County Health Department and is functioning well.

Sincerely,



Andrea Moen (amoen59@gmail.com)

LGI Property Owner

cc:

Martin S. Friedman, Esquire, Dean Mead, 420 S. Orange Ave., Suite 700, Orlando, Florida 32801

Carol Staninger, Property Owner, Little Gasparilla Island

Rhonda Olson, Vice President, LGPOA



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