

January 31, 2021

Geraldine Schreibman
215 Capstan Drive
Cape Haze, FL 339466

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

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COMMISSION
CLERK

RE: Docket 20200226-SU

Opposition to Proposed Wastewater Service Application in above referenced docket 20200226 - SU

I wish to record my opposition to the proposed installation of wastewater treatment for Cape Haze, FL and nearby barrier islands as requested by Environmental Utilities (EU) in its application filed with FPSC on October 13, 2020, docket 20200226-SU.

I oppose this installation for the following two reasons.

- 1. Insufficiency of complete, accurate data and information in the application.***
Subheadings are those used in the application.

B) Financial Ability

Exhibit "A" shows nothing of value other than the name, address and document number of EU. The annual reports referenced (2017 – 2020) merely duplicate the name, address, and manager of the company. Exhibit "B" shows a seven-month old letter from Centennial Bank (dated June 29, 2020), with consideration for a loan. Nothing in this section of the application to FPSC shows EU's financial ability to design, construct, monitor, maintain, and repair the service proposed. Neither does it show any attempt to secure funding other than via the homeowner and Centennial Bank.

C) Technical Ability

Again, there is nothing here other than a statement of ownership of Little Gasparilla Water Utility, Inc. for the past eight years. All requested information regarding communication with DEP, county health department or related federal/state entities for purposes of drilling under the ICW are deemed N/A "Not Applicable". I would suggest that technical expertise for a project of this size and scope must be fully explained and evident. Further, the maps named W-FM-11, W3, W4 from the Charlotte County Master Sewer Plan of 2017 do not reflect effluent coming from the barrier islands. Why is this wastewater now included in the EU application? Is the Cape Haze community

adequately protected from potential accidents due to increased flow on the transmission line?

D) Need for Service

I do not wish to claim that environmental issues lack importance. Rather, I question EU's ability to address financial and technical concerns in an open manner equitable to the homeowner. Moreover, the applicant's last phrase in this section is patronizing. Indeed, given the dearth of information, I do "question" the environmental benefits of *this utility* providing wastewater service to the area.

F) Proposed Tariff

Application states N/A

G) Accounting and Rate Information

All items N/A. Specificity of this information as well as that of Section F is of critical importance to the homeowner who will undoubtedly bear the costs of the design, installation, maintenance, and repair of the system.

H) Noticing Requirements

It is worth noting that the notice to the homeowner was dated more than 2 months after the document was filed with FPSC and one week before Christmas.

2. Lack of communication and transparency in this project

While FPSC is not accountable for the lack of communication between Charlotte County government and the residents of the area under consideration, this opaqueness goes a long way to explaining the push-back from the community.

Before entering into the bulk agreement with EU one would expect the county to request bids on this project in an open and competitive environment. At present it is unknown if this occurred. Equally, one would expect some discussion of the project to take place during meetings of the county-authorized Placida Area Street and Drainage Municipal Service Benefit Unit subsequent to the July 14, 2020 signing date. This did not occur. Finally, there was no outreach program to residents notifying them of the proposed project and soliciting their feedback.

Contrast that with the county's actions in 2013. Three different presentations were held in Cape Haze to discuss wastewater services to the neighborhood. During those open-house discussions residents received specific information relative to costs and

funding of the program, types of systems under consideration, and details regarding construction. At that time Charlotte County stated it would own and operate the entire LPS system including tank, pump, and electrical panel, and would be responsible for the removal of solids from the tank. None of this is present in the application by EU. It appears that in a few years we have gone from a proposal for a county constructed and county owned conversion from septic to sewer to one which is outsourced in its entirety, outsourced to an entity whose financial ability and technical expertise is suspect.

As a concerned citizen and resident of Cape Haze I encourage FPSC to reject the application by Environmental Utilities to convert septic to sewer as seen in docket 20200226-SU. The residents deserve a more thoughtful, open, complete, and accurate proposal for a septic to sewer conversion from Charlotte County.

Thank you for your consideration and please notify me of next steps as needed.

Best regards,

A handwritten signature in cursive script that reads "Geraldine Schreibman".

Geraldine Schreibman
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