

COMMISSIONERS:  
MIKE LA ROSA, CHAIRMAN  
ART GRAHAM  
GARY F. CLARK  
ANDREW GILES FAY  
GABRIELLA PASSIDOMO SMITH

STATE OF FLORIDA



DIVISION OF ECONOMICS  
ELISABETH J. DRAPER  
DIRECTOR  
(850) 413-6410

# Public Service Commission

June 27, 2025

Susan F. Clark, Esq.  
Thomas A. Crabb, Esq.  
Radey Law Firm  
301 South Bronough Street, Suite 200  
Tallahassee, FL 32301  
[sclark@radeylaw.com](mailto:sclark@radeylaw.com)  
[tcrabb@radeylaw.com](mailto:tcrabb@radeylaw.com)

RECEIVED-PPSC  
2025 JUN 27 PM 3:21  
COMMISSION  
CLERK

**Re: Docket No. 20250052-WS – Application for increase in water and wastewater rates in Brevard, Citrus, Duval, Highlands, Marion, and Volusia Counties by CSWR-Florida Utility Operating Company, LLC.**

Dear Ms. Clark and Mr. Crabb:

Staff has reviewed the minimum filing requirements (MFRs) submitted May 30, 2025, on behalf of CSWR-Florida Utility Operating Company, LLC (CSWR-Florida). After our review, we find the MFRs to be deficient. The specific deficiencies are identified below.

## Deficiencies

1. Rule 25-30.437(1), Florida Administrative Code (F.A.C.), requires a utility to complete MFRs. The following values were either not present or not correct in the Utility's filings as set out by the instructions governing the MFRs. For the following items listed below, please correct the filings to address the errors as well as correct any fallout figures and schedules.
  - a. For C.F.A.T. H2O and Neighborhood Utilities, the explanation provided on Schedule B-11 does not address the analysis of major maintenance projects, as required by the schedule.
  - b. For all applicable systems, Schedules B-7 and B-8 require a comparison of the current and prior test year O&M expenses. While CSWR has owned each system for two years or less, all of the systems have had a prior rate case. Please use the information from these cases.

- c. For all applicable systems, Schedules B-7 and B-8 require a benchmark index calculation of the change in customer growth and CPI-U for the comparison of current and prior test year O&M expenses.
- d. For all applicable systems, Schedule B-10 requires the method of allocation between the water and wastewater systems be shown. While the allocation percentage is shown, the methodology and calculation of the allocation is not provided.
- e. Schedule E-1 requires a schedule of present and proposed rates. For the North Peninsula wastewater system, the utility's current rates do not match the rates shown in the utility's current tariff. Please correct North Peninsula's Schedule E-1 to reflect the appropriate tariffed rates.
- f. Schedule E-1 requires that residential wastewater caps be stated. For the applicable wastewater systems, please provide the current residential gallonage cap on Schedule E-1.
- g. For all systems, the rates shown on Schedule E-1 pgs. 1-2, the utility's proposed rates for consolidated and individual systems appear to be based on the American Water Works Association (AWWA) meter factors; however, some of the rates appear to be rounding up or down by a few cents. Please round the BFC for the 5/8" X 3/4" meter size to the nearest hundredths place and apply the AWWA meter factors for all other meter sizes to determine the appropriate BFC.
- h. For C.F.A.T H20 on Schedule E-2, line no. 5, column 4, indicates a 2" rate of \$101.38. However, as indicated in the utility's current tariff, the 2" rate is \$101.36. Please correct Schedule E-2 to reflect the appropriate tariffed rates.
- i. Schedule E-14 requires that a billing analysis be provided for the residential class of service by meter size for water and wastewater separately. The utility combined water and wastewater as well as all meter sized together. For all individual systems and the consolidated system, please provide the appropriate billing analysis.
- j. Schedule E-2 requires a calculation of revenues at present and proposed rates using the billing analysis for the residential service class and bills and consumption for all other classes of service be provided. For all individual systems and the consolidated system, please provide the appropriate Schedule E-2.
- k. When a wastewater system has a residential gallonage cap, the capped gallons from the respective billing analysis is used in calculating revenues on Schedule E-2. For all applicable wastewater systems, please use the appropriate gallons (consolidated factor gallons at the respective gallonage cap) for calculating revenues on Schedule E-2.
- l. When a water system has an inclining block rate structure, the gallons (consolidated factor gallons) at each tier's threshold is used in calculating revenues on Schedule E-

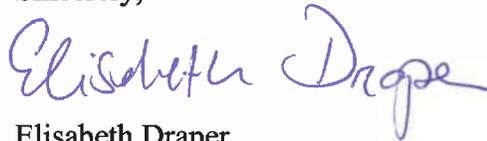
2. For all applicable water systems that contain an inclining block rate structure, please use the appropriate gallons from the respective billing analysis (Schedule E-14) for calculation revenues on Schedule E-2.
  - m. The utility did not provide Schedule E-14 for TKCB. Please provide Schedule E-14 for residential wastewater and the billing determinants for the general service class.
  - n. For all applicable systems, on Schedule E-4, please provide a schedule of present and proposed miscellaneous service charges.
  - o. For all systems, the total gallons sold on Schedule E-14 do not match total gallons sold on Schedule F-1.
2. Rule 25-30.437(3), F.A.C., requires a utility to file additional engineering information. For the following subsections of the Rule, the deficiencies for the identified systems apply.
- a. Subsection (3)(a) requires a detailed map showing: (a) the location and size of the applicant's distribution and collection lines as well as its plant sites, and (b) the location and respective classification of the applicant's customers.
    - i. Please provide a detailed map indicating the distribution and collection lines and location and respective classification of the customers for each system.
    - ii. Sunshine/Fore Oaks – The map is labeled as Floyd Clark. Please label the map with the correct system name.
    - iii. Sunshine/Oakcrest Villas/Sun Resort – The map does not include lot lines. Please indicate the lot lines on the map.
  - b. Subsection (3)(b) requires a list of chemicals used for water and wastewater treatment, by type, showing the dollar amount and quantity purchased, the unit prices paid and the dosage rates utilized.
    - i. Please provide this information for each system.
  - c. Subsection (3)(d) requires all water and wastewater plant operating reports for the test year and the year preceding the test year. Below are the missing reports by system. Please provide the missing reports.
    - i. Rolling Oaks - April, May, and November 2023.
    - ii. Sunshine/Belleview - April 2023.
    - iii. Sunshine/Florida Heights - March 2023.

Susan F. Clark, Esq.  
Thomas A. Crabb, Esq.  
Page 4  
June 27, 2025

- iv. Sunshine/Oak Haven - November 2023.
- v. Sunshine/Ponderosa - Plant 1 for December 2023.
- vi. Sunshine/Ponderosa - Plant 1 for December 2023.
- vii. CFAT - January 2025.
- viii. Tymber Creek - February 2023 through May 2024.

If any above corrections require a corresponding change to any other MFR schedules, those corrected schedules must also be submitted in accordance with Rule 25-30.436(5)(d), F.A.C. Your petition will not be deemed filed until the deficiencies identified in this letter have been corrected. These corrections should be submitted no later than July 28, 2025.

Sincerely,



Elisabeth Draper  
Director

ED:sb

cc: Office of Commission Clerk (Docket No. 20250052)