



KELSKY LAW, P.A.

1250 SOUTH PINE ISLAND ROAD

SUITE 250 PLANTATION, FL 33324

954.449.1400 | 305.749.8100 | 866.343.7888 | FAX: 954.449.8986

www.kelskylaw.com

November 23, 2021

Via Electronic Filing

Clerk's Office Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re:

Docket No. 20200226-SU, Environmental Utilities, LLC

Pre-Filed Direct Examination of Meryl Schaffer

Dear Clerk:

Enclosed please find Palm Island Estates Association, Inc.'s Pre-Filed Direct Examination of Meryl Schaffer. A copy of the testimony has been served, this date, upon all parties of record.

Thank you.

Sincerely

BKAD E. KELSK' FBN: 0059307

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Docket No.: 20200226-SU

IN RE: Application for certificate to provide wastewater service in Charlotte County by Environmental Utilities, LLC

DIRECT TESTIMONY

OF

MERYL SCHAFFER

on behalf of

Palm Island Estates Association, Inc.

- Q. Please state your name, position and address.
- 2 A. My name is Meryl Schaffer. I am the current president of Palm Island Estates
- Association, Inc., a Florida not-for-profit corporation. My physical address is
- 4 141 Kettle Harbor Drive, Don Pedro Island. My mailing address is P.O. Box
- 5 804, Placida, FL 33946.

1

- 6 Q. State briefly your relationship to Palm Island Estates Association, Inc.
- 7 A. I have lived on Don Pedro Island since 2000 and have been active in the
- 8 community as a member of Palm Island Estates Association, Inc. for the past
- 9 20 years. I have also served on the Board of Directors for several terms as
- Director, Corresponding Secretary, Vice President and now President.
- 11 Q. What is Palm Island Estates Association, Inc.?
- 12 A. Palm Island Estates Association, Inc., is a Florida not-for-profit corporation,
- made up of property owners from Don Pedro Island, Knight Island and
- 14 Thornton Key (bridgeless barrier islands) in Charlotte County for the purpose
- of promoting the collective interests of the homeowners who reside and own
- property on the islands. Its current membership is 240 households comprising
- 17 416 individuals. The organization, in part, monitors local governmental affairs
- 18 to determine how prospective action/inaction might impact the property owners
- who are members of Palm Island Estates Association, Inc. This includes the
- 20 prospect of Environmental Utilities, LLC seeking to obtain approval from the
- 21 Public Service Commission to obtain a Certificate of Authorization to provide
- sewer service to the membership of Palm Island Estates Association, Inc.
- When the information became public that Environmental Utilities, LLC, would
- be seeking the certificate, Palm Island Estates Association, Inc., consistent with
- 25 its bylaws and at the behest of its membership, formed an action committee to

- challenge the certificate application which included the retention of counsel and experts to rebut the claimed need for sewers as well as the financial wherewithal of Environmental Utilities, LLC to operate and develop the sewage utility.
- 4 Q. Are you providing testimony on behalf of Palm Island Estates Association,5 Inc.?
- 6 A. Yes.
- 7 Q. What is the purpose of your direct testimony?
- A. The purpose of my direct testimony is to discuss that, in addition to describing
  what Palm Island Estates Association, Inc. does as an organization, to the best
  of my knowledge no participant in the organization has requested sewers and
  nobody by or on behalf of Charlotte County has conducted water quality testing
  on Don Pedro Island, Knight Island or Thornton Key that has found elevated
  nitrates or other noxious chemicals associated with sewage.
- 14 Q. Does that conclude your direct testimony?
- 15 A. Yes, it does.