#### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Application for Transfer of Water And Wastewater Facilities of Tradewinds Utilities, Inc., Water Certificate 405-W, And Wastewater Certificate 342-S to CSWR-Florida Utility Operating Company, LLC in Marion County

DOCKET NO. 20220063-WS

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#### MARION COUNTY UTILITIES' RESPONSE TO TRADEWINDS UTILITIES, INC.'S APPLICATION FOR TRANSFER OF WATER AND WASTEWATER FACILITIES TO CSWR-FLORIDA OPERATING COMPANY, LLC. AND REQUEST FOR HEARING

MARION COUNTY UTILITIES (COUNTY), by and through its undersigned counsel, hereby files its response to TRADEWINDS UTILITIES, Inc.'s Application for transfer of water and wastewater facilities, Water Certificate 405-W and Wastewater Certificate 342-S to CSWR-Florida Utility Operating Company, LLC in Marion County pursuant to Fla. Stat. §360.071 and Rule 25-30.037, Florida Administrative Code and states as follows:

1. As to the request for transfer of water and wastewater facilities of Tradewinds utilities, Inc., Water Certificate 405-W, and Wastewater Certificate 432-S to CSWR-Florida Utility Operating Company, LLC, COUNTY **objects** to the following applications currently before the Florida Public Service Commission:

a. Application for Amendment of Certificate Nos. 405-W and 342-S in Marion County, by Tradewinds Utilities, Inc. Docket No. 20220206-WS; and

b. Application for Amendment of Certificate Nos. 552-W and 481-S in Marion County, by C.F.A.T. H20, Inc. Docket No. 20220203-WS.

**BASIS:** It appears that there are currently conflicts/encroachments between Tradewinds and two other independent systems off of N.E. 25<sup>th</sup> Avenue. These conflicts should be resolved before a transfer of certificates becomes effective.

Once these conflicts are resolved, the County has no objection to the transfer of the water and wastewater facilities mentioned above.

WHEREFORE, Marion County Utilities respectfully requests a hearing pursuant to Fla. Stat. §120.569 and 120.57.

Respectfully submitted this  $4^{TH}$  day of May, 2023.

*Is Matthew G. Minter* Matthew G. Minter, Esquire

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been

furnished via the FPSC electronic filing system, this 4th day of May, 2023.

## **MATTHEW G. MINTER COUNTY ATTORNEY**

# /s/ Matthew G. Minter

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