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STATE OF FLORIDA



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

Public Service Commission

August 15, 2025

Susan F. Clark, Esq.
Thomas A. Crabb, Esq.
Radey Law Firm
301 South Bronough Street, Suite 200
sclark@radeylaw.com
tcrabb@radeylaw.com

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2025 AUG 15 PM 4:34
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 responses to deficiencies submitted on July 28, 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 Rolling Oaks Utilities (wastewater), the rates shown on Schedule E-1 pg. 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.
 - b. Schedule E-1 requires that residential wastewater caps be stated. For Tymber Creek, please provide the current residential gallonage cap on Schedule E-1.

- c. For Aquarina, the proposed residential water gallonage revenue shown on Schedule E-2 is calculated incorrectly. Please correct the proposed revenue calculation on Schedule E-2.
 - d. The utility provided separate billing analysis (Schedule E-14) by meter size for the residential class of service for water and wastewater. However, some of the bills and gallons presented on the billing analysis do not match bills and gallons presented on Schedule E-2. Please make sure that the bills by meter size and the gallons on Schedule E-14 match Schedule E-2.
 - e. On Schedule E-14, the utility provided bills and gallons for a 5/8 inch meter size and a 5/8 inch x 3/4 inch meter size. However, there is no 5/8 inch meter size indicated in the utility's current tariff.
 - f. 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.
 - g. For Sebring, Tymber Creek, and Tradewinds wastewater systems please make sure the capped gallons shown on Schedule E-2 match the appropriate capped gallons on Schedule E-14.
 - h. 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.
 - i. The late payment charge shown on Schedule E-4 for the Tradewinds water and wastewater system does not match the current tariff. Please provide a revised Schedule E-4 for water and wastewater indicating the appropriate late payment charge.
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)(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. For the following systems, please provide the unit price of the chemicals used:
 - i. Aquarina
 - ii. Neighborhood
 - iii. Sebring Ridge

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- iv. TKCB (Sun Lake Estates)
- b. 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. Sunshine/Sandy Acres - July and September 2024.
 - ii. CFAT - January 2025.

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 September 15, 2025.

Sincerely,

A handwritten signature in black ink that reads "Elisabeth Draper". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Elisabeth Draper
Director

ED:sb

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