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DIVISION OF ENGINEERING
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Public Service Commission

September 26, 2025

Mr. F. Marshall Deterding, Esq.
Sundstrom & Mindlin, LLP
2548 Blaiirstone Pines Drive
Tallahassee, FL 32301
mdeterding@sflaw.com

STAFF'S FIFTH DATA REQUEST VIA EMAIL

Re: Docket No. 20250023-WS – Application for staff-assisted rate case in Polk County, by NC Real Estate Projects, LLC d/b/a Grenelefe Utility.

Dear Mr. Deterding:

By this letter, the Commission staff requests that NC Real Estate Projects, LLC d/b/a Grenelefe Utility (Grenelefe or Utility) provide responses to the following data request:

1. It is staff's understanding that in order for Grenelefe to secure a loan to finance its pro forma projects, the Utility requires approval of its service availability charges. Please state whether the Utility has secured a loan following the Commission's approval of the Utility's service availability charges at the September 4, 2025 Agenda Conference.
2. If the response to Data Request No. 1 is in the affirmative, please respond to the below questions:
 - a. Please provide the name of the bank or financial institution from which the loan was secured.
 - b. Please provide the amount of the loan.
 - c. Please provide the interest rate of the loan.
 - d. Please provide the terms of the loan.
 - e. Please provide any supporting documentation from the financial institution related to the issuance of the loan.

3. If the response to Data Request No. 1 is in the negative, please respond to the below questions:
 - a. Please explain what steps have been taken, if any, to secure the loan.
 - b. Please identify when the Utility expects the loan to be secured.
 - c. Please state whether any expectations regarding the loan or its interest rate have changed as a result of the Commission's approval of service availability charges or due to any other factors. If so, identify and describe each such change in detail.

In order to complete our analysis, staff needs the following documentation related to non-potable water services for the test year:

4. Please provide an allocation for each of the following expenses: salaries and wages; payroll taxes; associated taxes other than income; purchased power; contractual services; and any other expenses related to non-potable water.
5. Please identify specific National Association of Regulatory Utility Commissioners account number(s) of any plant items related to non-potable water and, if applicable, its allocation between potable and non-potable. Please specify if plant items are shared between potable and non-potables.
6. Please provide the revenue amounts associated with both potable and non-potable water.
7. Please provide the number of gallons sold split between potable and non-potable water.
8. Pursuant to Rule 25-30.565(2)(h), Florida Administrative Code (F.A.C.), please provide a detailed statement defining the capacity of the treatment facilities in terms of equivalent residential connections (ERCs) as used in developing the proposed service availability charges for both water and wastewater.
9. Pursuant to Rule 25-30.565(2)(j), F.A.C., please provide a list of outstanding developer agreements.
10. Pursuant to Rule 25-30.565(2)(k), F.A.C., for each developer agreement, please state whether the agreement is designed to result in contributed property, an estimated value of the contributed property to be added to the Utility's books, and a description of the property.
11. In response to Staff's Fourth Data Request, the Utility indicated that the home sites in the Smokey Groves Development by Lennar Homes have been prepared into finished lots with the distribution and collection systems fully constructed. Please elaborate on the Utility's statement that Lennar Homes is presenting its items for acceptance by NC Real Estate Projects, LLC.

12. Please explain in detail whether the requested pro forma items increase the design capacity (not permitted capacity) of the water and wastewater treatment facilities.
13. Please provide a service availability policy.
14. In the Utility's application for extension of territory, the Utility indicated it had 984 connections remaining in its existing territory and 1,080 connections in the new service area for a total of 2,064 connections. Based on the Utility's methodology of using only new connections in determining its service availability charge, please explain in detail why the Utility is only using 1,200 connections in its calculation of its connection charge.
15. Provide the design capacity (not permitted capacity) for the water treatment plant according to the Florida Department of Environmental Protection (DEP). As part of this response, provide all supporting documentation.
16. Provide the design capacity (not permitted capacity) for the wastewater treatment plant according to the DEP. As part of this response, provide all supporting documentation.
17. Explain what steps Grenelefe is currently taking, or is planning to take, to address the 46 percent EUW contained in the Staff Report.
18. Provide the rates the customers were being charged when Grenelefe was bought on May 22, 2022.
19. Provide the rates the customers were being charged when Grenelefe filed its application for a Staff-Assisted Rate Case on January 10, 2025.
20. Explain whether Grenelefe was aware, prior to the customer meeting, of the issues regarding excessive Boil Water Notices (BWN) expressed by customers at the customer meeting. If so, what actions has Grenelefe taken to reduce or eliminate the causes of the BWNs.
21. Explain whether Grenelefe was aware, prior to the Customer meeting, of the issues regarding sewage overflows entering customer's homes. If so, what actions has Grenelefe taken to correct the cause of those overflows?
22. Did Grenelefe reach out to each customer that commented at the customer meeting? If so, when was contact made, and how were the customer's concerns addressed? If not, please explain why.
23. Provide any documentation from the DEP that states the DEP is requiring the Utility to increase the permitted capacity of its wastewater treatment plant.
24. Refer to Grenelefe's response to Staff's First Data Request, No. 9. Explain why June 2024, July 2024, and August 2024 have the same amount of water usage for each day for

each month in the Utility's Monthly Operation Reports. If this is incorrect, explain why and if the DEP has been made aware of this.

25. Refer to Grenelefe's response to Staff's Fourth Data Request, No. 17. Provide a copy of the entire "ALTERNATIVES ANALYSIS FOR TREATMENT PLANT EXPANSION AND UPGRADE For Grenelefe Resort Wastewater Treatment Plant Polk County, Florida" referenced in this response.
26. Provide an estimate of how long Grenelefe's proposed meter replacement program will take. As part of your response, please include an estimated beginning and ending date for the program.
27. Refer to Grenelefe's response to Staff's Fourth Data Request, No. 24. Provide a copy of the Well #10 hydro tank inspection report delivered to Grenelefe on August 28, 2025. As part of this response, provide who performed the hydro tank inspection.
28. In response to Staff's Fourth Data Request, No. 6. The Utility indicated its pro forma project to replace water valves would be completed by October 31, 2026. Provide the number of water valves that have been replaced since October 31, 2024.
29. Provide copies of the latest inspection reports for all 5 lift stations. As part of this response, provide who performed the lift station inspections.
30. Provide the name and position of the Grenelefe employees that would be assigned to the two requested trucks.
31. Provide the name and position of the Grenelefe employees that would be assigned to the three requested golf carts.
32. Grenelefe was required to file a proposal with the most feasible option to bring Total Nitrogen limit and Total Phosphorus limit into compliance regarding the Wastewater Treatment Plant with DEP prior to September 30, 2025. Please provide a copy of the proposal required to be filed.

Mr. F. Marshall Deterding

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Please file all responses no later than **Friday, October 17, 2025**, via the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20250023-WS) and also please email the filed response to discovery-gcl@psc.state.fl.us. Please contact me by phone at (850) 413-6974 or by email aramirez@psc.state.fl.us, if you have any questions.

Sincerely,

s/ Ailynee Ramirez-Abundez

Ailynee Ramirez-Abundez
Public Utility Analyst
Division of Engineering

ARA:da

cc: Office of Commission Clerk (Docket No. 20250023-WS)