

# CITRUS WATERWORKS, INC.

FILED 12/23/2025  
DOCUMENT NO. 15534-2025  
FPSC - COMMISSION CLERK

December 23, 2025

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

**Re: Docket No. 20250140-WU - Application for quick-take amendment of Certificate No. 684-W to add territory in Citrus County by Citrus Waterworks, Inc.**

Dear Commission Clerk,

Citrus Waterworks, Inc. (Citrus) hereby submits its first initial response to Staff's Deficiency Letter dated December 16, 2025. After discussions with Staff, it was discovered that the previously approved service territory in Order No. PSC-2025-0041-PAA-WU, issued February 6, 2025 may have been incorrect. As evidence, the attached territory map obtained from the previous owner shows there have been customers on streets outside of the two subdivisions, as well as the existing general service customer since at least 1999. This map was compiled by a state certified engineer in 1999 showing these customers were already being served. Citrus has reached out to the engineering firm; however, these files have been transferred to another firm and are archived. Citrus is attempting to work with this engineering firm to obtain these records. This may take some time due to the holidays. If this is unsuccessful, Citrus will attempt to have U.S. Water Services write a territory description for this area being served back in 1999 and revise the map accordingly.

1. **Filing Fee.** Rule 25-30.036(2)(a), Florida Administrative Code (F.A.C.), requires the utility to submit a filing fee pursuant to Rule 25-30.020(2)(b), F.A.C. Citrus included a filing fee in the amount of \$100 with its application. However, the appropriate filing fee for this amendment is \$1,000 based on the capacity of the Utility's system. Please remit the remaining \$900 filing fee.

**Response:** Citrus does not agree that the filing fee is based upon the total capacity of the utility in its entirety. The filing fee for an amendment, pursuant to Rule 25-30.020(2)(b), F.A.C. Specifically, the rule states: "1. For applications in which the **area to be extended** or deleted has the **proposed capacity** to serve up to 100 ERCs, \$100" (emphasis added)

The proposed area has a proposed capacity to serve approximately 49 existing ERCs. This methodology is consistent with a previous affiliate utility, Merritt Island Utility Company in Docket No. 20170142-SU. In that previous docket, the proposed additional service territory was serving approximately 75 ERCs. The filing fee submitted and accepted by Staff was \$100. The wwtp had capacity to serve approximately 250 ERCs, but the proposed territory was 75 ERCs. Citrus believes that the appropriate filing fee should be based upon the number of proposed ERCs in the proposed territory to be extended and not

the total utility capacity. Again, this is consistent with the accepted methodology in Docket No. 20170142-SU.

2. **Proof of Noticing.** Rule 25-30.036(2)(b), F.A.C., requires the applicant to provide proof of noticing pursuant to Rule 25-30.030, F.A.C. Rule 25-30.030(6), F.A.C., states that all applications requiring noticing shall be deemed deficient until affidavits of noticing required by Sections 367.045(1)(e) and (2)(f), Florida Statutes, along with a copy of the notice, are filed with the Office of Commission Clerk. Staff notes that the Utility cannot correct this deficiency until the notice has been issued in accordance with Rule 25-30.030(5), F.A.C. Upon issuance of the notice, please provide proof of noticing pursuant to Rule 25-30.030, F.A.C.

**Response:** As indicated in the application, this will be late filed. Citrus had previously requested that staff review and approve the notice prior to sending and publishing. However, based upon the recent discovery that the requested amendment may need to be revised to include additional customers, it is probable that a revised notice may need to be submitted for approval by staff. Citrus does not believe it is prudent to spend additional money to publish and mail until it is determined that the appropriate staff approved notice includes the correct territory.

3. **Legal Description.** Rule 25-30.036(2)(f), F.A.C., requires a legal description of the proposed service area, in the format prescribed in Rule 25-30.029, F.A.C. The legal description provided with the application does not accurately describe the proposed service territory. Please provide an updated legal description that correctly describes the proposed service territory.

**Response:** The revised legal description will be submitted once additional information is obtained from the engineering company. This will be based on the 1999 water distribution map.

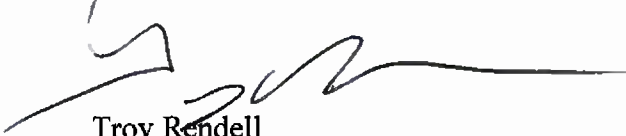
4. **Territory Map.** Rule 25-30.036(2)(h), F.A.C., requires an official county tax assessment map or other map showing township, range, and section, with a scale such as 1" = 200' or 1" = 400', with the proposed territory plotted thereon, consistent with the legal description provided pursuant to Rule 25-30.029, F.A.C. Please provide the required territory map based upon the corrected legal description.

5. **Response:** The revised territory map will be submitted once additional information is obtained from the engineering company. This will be based upon the 1999 water distribution map.

Since these existing customers have been served since at least 1999, Citrus requests additional time to provide its response to Staff's Deficiency Letter. These customers will not be harmed by allowing the utility to conduct further research and/or revise its service territory description and map.

If you have any further questions or concerns, please do not hesitate to contact me at either [trendell@uswatercorp.net](mailto:trendell@uswatercorp.net) or (727) 848-8292, ext. 245.

Sincerely,

A handwritten signature in black ink, appearing to read 'Trendell', with a long horizontal flourish extending to the right.

Troy Rendell  
Vice President  
Investor Owned Utilities  
*// for Citrus Waterworks, Inc.*

# ELLSWORTH POINT

# BACKWATER HEIGHTS

