



PHONE (850) 425-6654 FAX (850) 425-6694 WEB WWW.RADEYLAW.COM
MAIL POST OFFICE BOX 10967 | TALLAHASSEE, FL 32302 OFFICE 301 SOUTH BRONOUGH ST. | STE. 200 | TALLAHASSEE, FL 32301

March 24, 2026

VIA Electronic Filing to the Office of Commission Clerk

Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Attn: Daniel Dose, Senior Attorney

Re: Docket 20250038-WS – Petition for an acquisition adjustment for a non-viable utility, by CSWR-Florida Utility Operating Company, LLC.

Dear Mr. Dose:

CSWR-Florida Utility Operating Company, LLC (“CSWR-Florida”) submits the following responses to Staff’s March 4, 2026 Second Data Request.

1. Please refer to pages 8 through 9 of the company’s petition and Exhibit 14. For the completed projects, please fill out the table. In addition, please indicate if any of these projects are included in Exhibit 14, the Engineering Memo.

Project Name	In-Service Date	Total Cost	Included in Engineering Memo
Facility Tanks			
Aeration Equipment			
Disinfection Systems			
Electrical Equipment			
Monitoring Equipment			
Solids Handling Equipment			
Rapid Infiltration Basin			
Collection System			
Lift Stations			
Basic Site Cleanup			
Site Safety			



Response: Please see Attachment “DR 1 – North Peninsula Completed Projects” for the completed table. Additionally, please see Attachment “DR 1.1 – Completed Projects Support - NP” for details including the in-service date and total cost for each project.

2. Please refer to pages 9 through 10 of the company’s petition and Exhibit 14. For the long-term options, please fill out the table. In addition, please indicate if any of these projects are included in Exhibit 14, the Engineering Memo.

Project Name	In-Service Date	Total Cost	Included in Engineering Memo
Rehabilitation of Existing Infrastructure			
Total Plant Replacement			
Connection to Ormond Beach			

Response: Please see Attachment “DR 2 – North Peninsula Long Term Options” for the completed table. Additionally, please see Attachment “DR 2.1 – Long Term Options Support - NP” for details including the in-service date and total cost for each project.

Additionally, as discussed in the alternatives analysis presented in the acquisition adjustment filing for the North Peninsula site, CSWR-Florida previously assessed options for the long-term issues at the treatment facility and determined that connection to the City of Ormond Beach wastewater treatment system was the most cost effective and viable option for long term compliance and reliable service. CSWR-Florida has pursued that alternative but has been met with numerous roadblocks including resistance to granting required DOT permits, the eventual revocation of the granted DOT permit, resistance from the City itself to accept the flow from the community, and political pressures opposing the connection of the community to the system. As a result, CSWR-Florida has reevaluated the obstacles that made plant replacement a less viable option and has determined that while certain factors make the project complex, they can be overcome. Therefore, CSWR-Florida now believes plant replacement is the most viable alternative.

Furthermore, in the reexamination of the plant replacement option, our third-party engineers now believe the estimated cost of the plant replacement project could be significantly lower than their initial evaluation. As a result, the plant replacement option is now estimated at a total of \$4.25M compared to \$5.93M for the consolidation with City of Ormond Beach. While these are still preliminary estimates and not bids or proposals, it further justifies the decision to switch to plant replacement as the selected alternative.



3. Please refer to CSWR's responses to Staff's first data request, question number 11 and the attachment. Please explain why an Engineering GIS and Survey were needed, in addition to the Study contained in the Engineering Memo.

Response: The Engineering GIS and Survey services were required to complete an ALTA/NSPS Land Title Survey in connection with the acquisition. An ALTA Survey is customarily performed during the acquisition process to verify property boundaries, recorded easements, encroachments, and the location of system infrastructure. This work provides assurance that the acquiring utility holds legal ownership of, and has lawful access to, all facilities comprising the water and/or wastewater system. Additionally, GIS and survey work is necessary to verify locations of equipment and facility features at the treatment plant and throughout the collection system for operational and system improvement design purposes as detailed and accurate information concerning system features are typically not available or reliable from selling entities.

4. Please refer to CSWR's responses to Staff's first data request, question number 15 and the attachment. Please explain why CSWR paid for purchase sewage treatment when the project to connect to Ormond Beach is not yet complete.

Response: Upon review, CSWR-Florida determined that the amount recorded to the Purchased Sewage Treatment account was misclassified and should have been recorded to the Purchased Water account. These charges are attributable to water usage at the North Peninsula plant, where water was purchased from the City of Ormond Beach and CSWR-Florida was invoiced based on actual water usage.

Thank you for the opportunity to provide additional information in support of the application. Please feel free to contact our office at your convenience with any additional questions or concerns.

Sincerely,

/s/ Thomas A. Crabb

Thomas A. Crabb
Attorney for CSWR-Florida

cc: Aaron Silas
Walt Trierweiler, Esq.
Austin Watrous, Esq.
Patricia Christensen, Esq.
Daniel Dose, Esq.
Jennifer Crawford, Esq.
Zachary Bloom, Esq.
discovery-gcl@psc.state.fl.us

Data Request # 1
DR 1 – North Peninsula Completed Projects

Project Name	In-Service Date	Total Cost	Included in Engineering Memo
	Please see the included Excel document for In-Service Dates.	Please see the included Excel document for Total Cost.	
Facility Tanks			Yes
Aeration Equipment			No
Disinfection Systems			Yes
Electrical Equipment			Yes
Monitoring Equipment			Yes
Solids Handling Equipment			No
Rapid Infiltration Basin			Yes
Collection System			No
Lift Stations			No
Basic Site Cleanup			No
Site Safety			Yes

Data Request # 1
DR 1.1 – Completed Projects Support - NP

North Pen 20250038

DR 1.1

Project Name	In Service Date	Cost
Facility Tanks	5/1/2024	150,428.45
<i>Facility Tanks Total</i>		150,428.45
Lift Station	5/31/2023	18,782.39
	1/1/2024	19,620.24
	3/1/2025	8,498.60
	6/1/2025	11,050.57
<i>Lift Station Total</i>		57,951.80
Collection System	5/31/2023	24,604.75
	1/1/2024	42,578.66
	2/1/2024	6,594.02
	3/1/2024	31,264.63
	4/1/2024	24,967.89
	6/1/2025	6,294.00
	7/1/2025	9,897.20
<i>Collection System Total</i>		146,201.15
Monitoring Equipment	5/31/2023	23,257.14
	7/1/2024	4,543.46
<i>Monitoring Equipment Total</i>		27,800.60
Disinfection Systems	2/1/2024	1,650.00
<i>Disinfection Systems Total</i>		1,650.00
Aeration Equipment	5/31/2023	380.00
	1/1/2024	23,269.36
	2/1/2024	49,347.11
	3/1/2024	82,975.07
	4/1/2024	6,209.00
	6/1/2024	5,622.64
<i>Aeration Equipment Total</i>		167,803.18
Site Safety	5/31/2023	308.75
	1/1/2024	31,660.38
	5/1/2024	1,239.34
	6/1/2024	9,517.40
<i>Site Safety Total</i>		42,725.87
Electrical Equipment	1/1/2024	11,224.62
	4/1/2024	27,872.45
	6/1/2024	1,949.32
<i>Electrical Equipment Total</i>		41,046.39
Disinfection Systems	5/31/2023	4,932.22
	2/1/2024	7,716.00
	4/1/2024	786.25
<i>Disinfection Systems Total</i>		13,434.47
Monitoring Equipment	5/31/2023	31,721.02
	4/1/2024	8,138.34
<i>Monitoring Equipment Total</i>		39,859.36
Solids Handling Equipment	5/31/2023	5,045.27
<i>Solids Handling Equipment Total</i>		5,045.27
		693,946.54

Data Request # 2
DR 2 – North Peninsula Long Term Options

Project Name	In-Service Date	Total Cost	Included in Engineering Memo
Rehabilitation of Existing Infrastructure	Please see the included Excel document for In-Service Date.	Please see the included Excel document for Total Cost.	Yes
Total Plant Replacement			Yes
Connection to Ormond Beach	N/A	N/A	No

Data Request # 2
DR 2.1 – Long Term Options Support - NP

North Pen 20250038
DR 2.1

Project Name	In Service Date	Cost
Rehabilitation of Existing Infrastructure	5/31/2023	41,279.64
	1/1/2024	85,605.14
	2/1/2024	8,244.02
	3/1/2024	114,239.70
	4/1/2024	33,593.60
	5/1/2024	151,667.79
	6/1/2024	15,140.04
	6/1/2025	16,280.41
	7/1/2025	9,897.20
<i>Rehabilitation of Existing Infrastructure Total</i>		475,947.54
		<u><u>475,947.54</u></u>