

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Application for increase in water and )  
wastewater rates in Brevard, Citrus, Duval, ) DOCKET NO. 20250052-WS  
Highlands, Marion, and Volusia Counties by )  
CSWR-Florida Utility Operating Company, LLC. )

**REBUTTAL TESTIMONY OF**

**AARON J. SILAS**

**on behalf of**

**CSWR-Florida Utility Operating Company, LLC**

**APRIL 17, 2026**

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND TITLE.**

3 A. My name is Aaron J. Silas, and my business address is 1630 Des Peres Rd., Suite 140,  
4 St. Louis, Missouri 63131. I currently work as the Assistant Vice President of Customer  
5 & Regulatory Operations.

6 **Q. HAVE YOU PREVIOUSLY PRESENTED TESTIMONY IN THIS CASE?**

7 A. Yes. I have previously presented direct testimony on behalf of the application, CSWR-  
8 Florida Utility Operating Company, LLC. (“CSWR-Florida” or “Company”).

9 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

10 A. The purpose of my rebuttal testimony is to respond to the direct testimony of Public  
11 Service Commission Staff (“Staff”) witness John Plescow regarding the Office of  
12 Consumer Assistance history with consumer complaints against the Company.  
13 Additionally, I will address, in conjunction with Mr. Josiah Cox, the comments raised  
14 in the Service Hearings held in this case.

15 **II. STAFF’S TESTIMONY**

16  
17 **Q. PLEASE DESCRIBE MR. PLESCOW’S TESTIMONY.**

18 A. As set forth in his testimony and accompanying Exhibits JFP-1, 2 and 3, Mr. Plescow  
19 outlines the number of consumer complaints logged with the Commission against  
20 CSWR-Florida for the four-year period from February 1, 2021, to January 31, 2025.  
21 Mr. Plescow also identifies the type of complaint involved as well as whether the  
22 complaint appears to be a rule violation.

23 **Q. WHAT IS YOUR UNDERSTANDING OF THE NUMBER AND NATURE OF**  
24 **COMPLAINTS AGAINST THE COMPANY OVER THIS FOUR-YEAR**  
25 **PERIOD?**

1 A. As Mr. Plescow indicates, from February 1, 2021, to January 31, 2025, the  
2 Commission logged 83 complaints against the Company with 71% of the complaints  
3 concerning quality of service issues (Exhibit JFP-1) and 29% involving billing issues  
4 (Exhibit JFP-2). Mr. Plescow states that 12 service quality and 14 billing complaints  
5 appear to demonstrate a violation of Commission Rules.<sup>1</sup> Finally, Mr. Plescow list  
6 the complaints in Exhibit JFP-3 by close type.

7

8

### III. COMPANY RESPONSE

9 **Q. HOW ARE THE COMPLAINTS PRESENTED IN STAFF'S EXHIBITS?**

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11 A. The Exhibits attached to Mr. Plescow's testimony present complaints grouped  
12 by utility system and include summary information such as close type, close  
13 code, and close date.

14 **Q. DO THE STAFF EXHIBITS PROVIDE ADDITIONAL CONTEXT**  
15 **REGARDING OPERATIONAL HISTORY OR CHANGES OVER**  
16 **TIME?**

17 A. The exhibits provide system-level listings but do not include narrative context  
18 regarding system acquisitions or operational transitions.

19 **Q. SHOULD THE COMMISSION CONSIDER THAT SOME OF THE**  
20 **QUALITY OF SERVICE COMPLAINTS IDENTIFIED BY STAFF**  
21 **RELATE TO LEGACY CONDITIONS INHERITED BY**  
22 **CSWR-FLORIDA?**

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<sup>1</sup> Plescow Direct, Docket No. 20250052, filed March 27, 2027, page 3.

1 A. Yes. A portion of the quality of service complaints reflected in Staff exhibits  
2 are attributable to legacy system conditions that CSWR-Florida inherited from  
3 prior owners. For example, in Marion County, CSWR-Florida acquired 28 water  
4 and wastewater systems through five separate transactions. As set forth in the  
5 Direct Testimony of Mr. Freeman, these utility assets were generally in a  
6 significant state of disrepair at the time of acquisition. In several instances, those  
7 systems had longstanding infrastructure deficiencies and poor operational  
8 practices - such as the apparent lack of required boil water advisories - that  
9 predated the Company's ownership. As a result, complaints related to outages,  
10 water quality, and pressure in that area are more indicative of conditions created  
11 under prior ownership through a chronic history of disrepair and poor  
12 operational practices, rather than through failures by CSWR-Florida after  
13 assuming operational responsibility. Staff's exhibits list such complaints by  
14 system but do not attempt to distinguish between legacy issues and conditions  
15 arising after CSWR-Florida began operating and investing in those systems. The  
16 Company believes that such a distinction provides important context to Staff's  
17 Exhibits.

18 **Q. EXHIBIT JFP-1 ALSO IDENTIFIED CERTAIN CONSUMER**  
19 **COMPLAINTS THAT WERE CATEGORIZED AS POTENTIAL**  
20 **VIOLATIONS OF THE COMMISSION'S RESPONSE-TIMELINESS**  
21 **RULES. WAS CSWR-FLORIDA AWARE OF ISSUES RELATED TO**  
22 **TIMELY RESPONSES DURING THE REVIEW PERIOD?**

1 A. Yes. During the review period, CSWR-Florida became aware, that its internal  
2 processes did not consistently ensure timely responses to Commission-referred  
3 complaints and inquiries. The Company identified this as a process-related issue  
4 and took steps to address it.

5 **Q. WHAT ACTIONS DID CSWR-FLORIDA TAKE TO ADDRESS**  
6 **CONCERNS RELATED TO RESPONSE TIMELINESS?**

7 A. As an initial matter, CSWR-Florida takes Commission inquiries and concerns  
8 very seriously. The Company strives to be responsive to the interests and  
9 questions of its regulators. So, when the Company became aware of this flaw in  
10 its processes, it took immediate action.

11 CSWR-Florida implemented corrective action by hiring a dedicated  
12 escalation specialist on March 4, 2024. This position was created specifically to  
13 monitor, track, and escalate Commission inquiries and consumer complaints to  
14 ensure that responses are timely, complete, and properly documented in  
15 accordance with Commission rules.

16 Following the creation of the escalation specialist role, CSWR-Florida  
17 strengthened also its oversight of Commission-referred complaints, including  
18 centralized monitoring of response deadlines and enhanced coordination  
19 between customer service and regulatory staff. These changes are designed to  
20 prevent delays and improve compliance with Commission response  
21 requirements.

22 **Q. STAFF'S EXHIBITS ALSO INCLUDE CERTAIN COMPLAINTS**  
23 **ENTERED AFTER MARCH 4, 2024, THAT WERE CATEGORIZED AS**

1           **RESPONSE-TIMELINESS VIOLATIONS. DOES CSWR-FLORIDA**  
2           **AGREE WITH THAT CHARACTERIZATION?**

3    A.    CSWR-Florida does not agree that the post-March 4, 2024, procedural  
4           categorizations fully or accurately reflect the timing or substance of the  
5           Company’s responses to the Commission in those cases. In the post-March 2024  
6           instances identified in the staff exhibits, CSWR-Florida provided prompt and  
7           substantive responses to the Commission, including documented customer  
8           outreach, written explanations, and supporting account information. While  
9           those matters may later have been assigned procedural close-code classifications  
10          by Staff indicating untimely responses, the underlying facts demonstrate timely  
11          engagement and good-faith efforts to resolve customer concerns.

12   **Q.    CAN YOU PROVIDE SPECIFIC EXAMPLES THAT ILLUSTRATE**  
13   **THIS DISAGREEMENT?**

14   A.    Yes. For example, Case No. 1447244W, entered on June 10, 2024, was  
15          categorized by Staff as a failure to provide resolution within 15 working days.  
16          Importantly, however, CSWR-Florida provided a substantive response to the  
17          Commission on June 14, 2024, documenting customer contact efforts, including  
18          a call placed to the customer, a no-contact letter, and a written explanation  
19          addressing the concerns raised.

20                 Similarly, in Case No. 1450093W, entered on July 2, 2024,  
21                 CSWR-Florida responded to the Commission on July 3, 2024, one day after  
22                 receipt of the complaint. That response confirmed direct customer contact,

1 provided itemized billing adjustments and an updated account statement, and  
2 explained the current account status.

3 **Q. ARE THESE THE ONLY INSTANCES IN WHICH CSWR-FLORIDA**  
4 **DISPUTES THE CHARACTERIZATION OF POST-MARCH 2024**  
5 **RESPONSES AS UNTIMELY?**

6 A. No. These cases are provided as representative examples. They illustrate  
7 CSWR-Florida's broader concern that procedural close codes alone do not  
8 always capture the actual response timing or level of engagement by the  
9 Company following implementation of the escalation specialist role.

10

11

#### IV. SERVICE HEARINGS

12 **Q. DID YOU ATTEND THE SERVING HEARINGS CONDUCTED BY THE**  
13 **COMMISSION IN THIS MATTER?**

14 A. Yes. The Commission conducted four service hearings in this case. First, the  
15 Commission held live service hearings in Lecanto and Ocala, Florida on March  
16 5, 2026, and in Daytona Beach on March 25, 2026. The Commission also held  
17 a virtual service hearing on March 31, 2026. I personally attended and  
18 participated in each of these service hearings.

19 **Q. DO YOU TYPICALLY ATTEND CUSTOMER HEARINGS?**

20 A. Yes. As the Vice President in charge of customer service, I attempt to personally  
21 attend all customer hearings. Moreover, as Mr. Cox relates, given the  
22 importance that the Company places in customer hearings, it requires that a  
23 senior executive attend all customer hearings.

1 **Q. DID CSWR-FLORIDA TAKE ANY ACTION FOLLOWING THOSE**  
2 **HEARINGS TO ADDRESS CUSTOMER CONCERNS?**

3 A. Yes. Following the service hearings, CSWR-Florida proactively reached out to  
4 multiple customers who raised concerns related to service quality, billing issues,  
5 or operational matters to ensure that questions were answered and issues were  
6 addressed. Post-hearing outreach focused on concerns involving service quality,  
7 water or wastewater system operations, billing questions related to usage or  
8 leaks, boil water advisories, and other operational topics where additional  
9 clarification or follow-up could assist the customer or resolve outstanding issues.

10 **Q. CAN YOU PROVIDE EXAMPLES OF POST-HEARING FOLLOW-UP**  
11 **WITH CUSTOMERS WHO RAISED SERVICE OR QUALITY**  
12 **CONCERNS?**

13 A. Yes. Following the hearings, CSWR-Florida contacted several customers to  
14 address their concerns. For example, customers in the Rolling Oaks service area  
15 were contacted regarding meter accuracy, boil water advisories, water quality  
16 concerns, and physical service issues such as meter box conditions. In other  
17 cases, CSWR-Florida spoke directly with customers regarding sewer odor  
18 concerns, provided information on planned facility improvements, and created  
19 work orders or provided billing adjustments where appropriate.

20 **Q. WERE THERE ANY CUSTOMER COMMENTS AT THE HEARINGS**  
21 **THAT DID NOT RESULT IN DIRECT FOLLOW-UP BY**  
22 **CSWR-FLORIDA?**

1 A. Yes. In cases where customer comments related solely to general concerns about  
2 rate levels, affordability, or standardized pricing - as opposed to service quality,  
3 billing administration, or operational issues - CSWR-Florida did not initiate  
4 individual outreach. The Company believes that these matters are more  
5 appropriately addressed through the Commission's rate-setting process rather  
6 than through individual customer contacts. Customer comments focused solely  
7 on rate design or rate impacts are policy matters within the Commission's  
8 jurisdiction and are addressed through the formal proceedings in this docket. It  
9 is my opinion that outreach on these matters often create confusion regarding  
10 the regulatory process.

11 **Q. WHAT DOES CSWR-FLORIDA'S POST-HEARING OUTREACH**  
12 **DEMONSTRATE ABOUT ITS APPROACH TO CUSTOMER**  
13 **CONCERNS?**

14 A. CSWR-Florida's post-hearing outreach demonstrates the Company's  
15 commitment to engaging with customers, addressing service-related concerns  
16 and providing transparency and follow-up after customers avail themselves of  
17 the Commission's hearing process. This engagement is separate from, and in  
18 addition to, the formal regulatory review of rates in this proceeding.

19 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

20 A. Yes

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing rebuttal testimony of

Aaron J. Silas has been served via e-mail on this 17th day of April, 2026, to the following:

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