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June 5, 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: Zachary Bloom, Attorney

Re: Docket 20250136-WS – Petition for an acquisition adjustment for a non-viable utility, by CSWR-Florida Utility Operating Company, LLC.

Dear Mr. Bloom:

CSWR-Florida Utility Operating Company, LLC (“CSWR-Florida”) submits the following responses to Staff’s May 18, 2026 Fourth Data Request.

1. Please provide Rolling Oak’s current DEP compliance status (In Compliance or Out of Compliance) for both its water and wastewater systems. If either system is out of compliance, include an explanation of the Utility’s current and/or planned activities to restore compliance.

Response: Rolling Oaks’ water system is in compliance with the Florida Department of Environmental Protection (FDEP).

Rolling Oaks’ wastewater facility (Beverly Hills) is currently out of compliance with the FDEP. The existing wastewater treatment facility exhibits chronically high nutrient levels that exceed the treatment capabilities of the current infrastructure. Additionally, the facility is undersized and has been experiencing flows that exceed its permitted capacity. In response, CSWR-Florida has engaged a third-party engineering firm to design a new wastewater treatment facility capable of addressing these deficiencies. The redesigned facility will be upgraded to a true capacity of 1 million gallons per day (MGD) and will incorporate treatment processes capable of achieving effective removal of Total Nitrogen. CSWR-Florida intends to submit an application for a Permit Renewal with a Major Modification to ensure full compliance with all applicable FDEP rules and regulations. The design of the new facility is currently in development. In the interim, modifications to both the applicable permit

and the associated agreed order have been implemented to ensure ongoing compliance with all permit requirements.

2. Please refer to CSWR's response to Staff's First Data Request, No. 15, Attachment DR 15 – Post Acquisition Pro Forma. Please identify what is included in the "Other operating expense" category.

Response: Please see Attachment "DR 4.2 – Other Operating Expense."

3. Refer to CSWR's response to Staff's Second Data Request, No. 1, Attachment DR 2.1 – Rolling Oaks Completed Projects – Water.
 - a. Please explain in detail how CSWR prioritized the completed projects included in the attachment. As part of this response, identify the resulting project order, along with their in-service dates.

Response: The completed projects included in the attachment were prioritized based on the operational needs and system conditions identified at the time the Water System Assessment was prepared. Since CSWR-Florida later acquired the water system and was able to observe and assess its operations first-hand, operational priorities and system considerations changed, resulting in some completed projects not being included in the original assessment. Please see Attachment "DR 4.3 – RO Project Details – Water" for the list of projects in order by in-service dates.

- b. Please provide details of work performed for each Disinfection System project that exceeded \$5,000.

Response: Please see Attachment "DR 4.3 – RO Project Details – Water."

- c. Please provide details of work performed for each Distribution System project that exceeded \$10,000.

Response: Please see Attachment "DR 4.3 – RO Project Details – Water."

- d. Please provide details of work performed for each Electrical System project that exceeded \$10,000.

Response: Please see Attachment "DR 4.3 – RO Project Details – Water."

- e. Please provide details of work performed for each Meter project that exceeded \$10,000.

Response: Please see Attachment "DR 4.3 – RO Project Details – Water."

- f. Please provide details of work performed for each Remote Monitoring project that exceeded \$5,000.

Response: Please see Attachment “DR 4.3 – RO Project Details – Water.”

- g. Please provide details of work performed for each Site Improvement project that exceeded \$10,000.

Response: Please see Attachment “DR 4.3 – RO Project Details – Water.”

- h. Please provide details of work performed for each Well project that exceeded \$10,000.

Response: Please see Attachment “DR 4.3 – RO Project Details – Water.”

4. Refer to CSWR’s response to Staff’s Second Data Request, No. 2, Attachment DR 2.2 – Planned Projects – Rolling Oaks – Water. Please explain in detail how CSWR prioritized the planned projects included in the attachment.

Response: CSWR-Florida has prioritized the distribution system improvements ahead of the elevated storage tank project based on current operational needs, the relative timing of each improvement, and the projected costs associated with each project.

5. Refer to CSWR’s response to Staff’s Second Data Request, No. 3, Attachment DR 2.3 – Rolling Oaks Completed Projects – Wastewater.

- a. Please explain in detail how CSWR prioritized the completed projects included in the attachment. As part of this response, identify the resulting project order, along with their in-service dates.

Response: The completed projects included in the attachment were prioritized based on the operational needs and system conditions identified at the time the Wastewater System Assessment was prepared. Since CSWR-Florida later acquired the wastewater system and was able to observe and assess its operations first-hand, operational priorities and system considerations changed, resulting in some completed projects not being included in the original assessment. Please see Attachment “DR 4.5 – RO Project Details – Wastewater” for the list of projects in order by in-service dates.

- b. Please provide details of work performed for each Aeration Equipment project that exceeded \$10,000.

Response: Please see attachment "DR 4.5 - RO Project Details - Wastewater."

- c. Please provide details of work performed for each Clarifier Upgrade & Improvements project that exceeded \$10,000.

Response: Please see attachment "DR 4.5 - RO Project Details - Wastewater."

- d. Please provide details of work performed for each Collection System/Sewer System project that exceeded \$10,000.

Response: Please see attachment "DR 4.5 - RO Project Details - Wastewater."

- e. Please provide details of work performed for each Disinfection System project that exceeded \$5,000.

Response: Please see attachment "DR 4.5 - RO Project Details - Wastewater."

- f. Please provide details of work performed for each Electrical System project that exceeded \$10,000.

Response: Please see attachment "DR 4.5 - RO Project Details - Wastewater."

- g. Please provide details of work performed for each Facility Structure project that exceeded \$10,000.

Response: Please see attachment "DR 4.5 - RO Project Details - Wastewater."

- h. Please provide details of work performed for each Lift Station project that exceeded \$10,000.

Response: Please see attachment "DR 4.5 - RO Project Details - Wastewater."

- i. Please provide details of work performed for each Monitoring Equipment project that exceeded \$10,000.

Response: Please see attachment "DR 4.5 - RO Project Details - Wastewater."

- j. Please provide details of work performed for the Safety project that exceeded \$5,000.

Response: Please see attachment "DR 4.5 - RO Project Details - Wastewater."

- k. Please provide details of work performed for each Site Improvement project that exceeded \$10,000.

Response: Please see attachment "DR 4.5 - RO Project Details - Wastewater."

6. Refer to CSWR's response to Staff's Second Data Request No. 4, Attachment DR 2.4 – Rolling Oaks Planned Projects – Wastewater. Please explain in detail how CSWR prioritized the planned projects included in the attachment.

Response: CSWR-Florida has prioritized the rehabilitation of lift stations and lift station control panels ahead of the construction of a new wastewater treatment facility and additional lift station based on current operational needs, the relative timing of each improvement, and the projected costs associated with each project.

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.
Jennifer Crawford, Esq.
Zachary Bloom, Esq.
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DR 4.2 – Other Operating Expense

Rolling Oaks - 20250136
DR 4.2

[illegible]

DR 4.3 – RO Project Details - Water

Included in Water System Assessment	Project	In-Service Date	Cost	Description
Yes	Disinfection System		89,511.22	
		5/31/2023	53,377.58	Install Chlorine Monitoring System, Refurbish Chlorine Injector
		1/1/2024	1,875.67	
		4/1/2024	8,816.70	Rebuilt Disinfection Residual Monitoring Equipment, Refurbish Stenner Pump, Install French Drain Discharge Line (Well #5), Replaced and Cleaned Injection Point and Duck Bill (Well #7)
		6/1/2024	679.51	
		9/1/2024	7,256.69	Refurbish Chlorine Line
		10/1/2024	15,098.76	Refurbish Chlorine System at Well #1, Replace Multiple Chlorine Tanks, Replace Water Line to Chlorine Analyzer
		11/1/2024	811.16	
		12/1/2024	1,595.15	
Yes	Distribution System		564,124.59	
		5/31/2023	32,220.00	Refurbish Hydrant, Refurbish Service Line, Refurbish Section of Main Line
		1/1/2024	173,340.70	Refurbish Hydrants, Replace Lift Station Meter, Refurbish Multiple Sections of Service Line, Refurbish Multiple Sections of Main Line
		2/1/2024	17,920.49	Refurbish Sections of Main Line, Replace Meters
		3/1/2024	16,433.20	Refurbish Sections of Service Line, Refurbish Sections of Main Line, Install Level Transducer
		4/1/2024	120,354.18	Refurbish Hydrant, Refurbish Sections of Service Line, Refurbish Sections of Main Line, Replace Meters, Relocate Air Release for Well #1
		6/1/2024	1,520.00	
		7/1/2024	7,240.17	
		8/1/2024	8,528.24	
		9/1/2024	11,980.32	Refurbish Service Line, Replace Curb Stops, Replace Distribution Valve, Replace Isolation Valve
		10/1/2024	25,584.77	Replace Lift Station Meters, Refurbish Sections of Service Line, Refurbish Sections of Main Line, Refurbish Hydrant, Replace Curb Stops
		11/1/2024	8,368.09	
		12/1/2024	13,807.02	Refurbish Service Line, Install New Piping Inside Well
		1/1/2025	8,554.73	
		4/1/2025	75,264.79	Refurbish 10" Main Line
		6/1/2025	30,040.75	Refurbish Section of Main Line, Install New Valve and Cap Dead End Line on Main
		9/1/2025	1,402.10	
		10/1/2025	2,453.68	
		11/1/2025	9,111.36	
Yes	Electrical System		83,056.84	
		5/31/2023	6,883.92	
		1/1/2024	6,190.54	
		3/1/2024	1,601.44	
		4/1/2024	25,216.90	Refurbish Charging System, Install Breaker Panel and Site Lighting
		7/1/2024	9,544.21	
		8/1/2024	707.34	
		10/1/2024	14,392.08	Construct New 100 AMP 3 Phase Service, Install New Conduit and Wiring to Control Box, Remove Existing Starter Motor and Install New OEM Style Starter Motor
		11/1/2024	980.50	
		1/1/2025	1,703.83	
		9/1/2025	15,836.08	Refurbish Fuel Injection Pump

Included in Water System Assessment	Project	In-Service Date	Cost	Description
Yes	Meters		188,524.07	
		5/31/2023	11,558.69	Install New Meters
		1/1/2024	11,562.07	Install New Meters
		2/1/2024	583.42	
		4/1/2024	9,301.75	
		6/1/2024	431.41	
		8/1/2024	19,835.70	Install New Meters
		9/1/2024	12,251.57	Install New Meters
		10/1/2024	42,286.61	Install New Meters
		11/1/2024	21,094.09	Install New Meters
		6/1/2025	59,618.76	Install New Meters
Yes	Remote Monitoring		70,927.53	
		5/31/2023	59,204.75	Install Remote Monitoring Units
		4/1/2024	9,443.06	Install SCADA on Well
		1/1/2025	2,279.72	
Yes	Site Improvements		213,151.68	
		5/31/2023	7,588.82	
		1/1/2024	50,544.58	Refurbish Well Houses, Paint Wells, Remove Tree, Install Site Lighting
		2/1/2024	3,006.52	
		3/1/2024	4,658.51	
		4/1/2024	88,399.87	Refurbish Well House, Paint Well #8, Replace Well House Exterior Doors
		5/1/2024	36,060.00	Install Fencing
		6/1/2024	660.00	
		8/1/2024	8,286.27	
		9/1/2024	705.62	
		10/1/2024	700.78	
		12/1/2024	5,787.93	
		1/1/2025	6,752.78	
No	Wells		99,424.68	
		5/31/2023	27,739.13	Refurbish Well Pump Motors, Refurbish Well Pipe
		1/1/2024	27,774.73	Install New Meter Spigot (Well #8), Replace Lube Lines (Well #5 & Well #8), Refurbish Vertical Turbine Pump
		2/1/2024	6,119.75	
		4/1/2024	30,297.88	Refurbish Well Pump Motors, Refurbish Well
		6/1/2024	7,018.19	
		9/1/2024	475.00	
Grand Total			1,308,720.61	

DR 4.5 – RO Project Details - Wastewater

Included in Wastewater System Assessment	Project	In-Service Date	Cost	Description
Yes	Aeration Equipment		231,226.63	
		5/31/2023	2,280.00	
		3/1/2024	1,750.72	
		4/1/2024	126,440.15	Refurbish Blower, Refurbish Blower Rooms
		1/1/2025	90,275.64	Refurbish Blower, Install New Aeration Drop Legs & Diffusers
		4/1/2025	10,480.12	Refurbish Blower
No	Clarifier Upgrades & Improvements		160,046.03	
		4/1/2024	153,532.74	Refurbish Clarifier
		6/1/2025	6,513.29	
Yes	Collection System/Sewer System		97,547.02	
		1/1/2024	63,418.46	Refurbish Section of 10" Gravity Sewer Main, Refurbish Section of 8" Sewer Main, Refurbish Section of 6" Sewer Lateral, Install Isolation Valves
		4/1/2024	10,186.69	Refurbish Section of Gravity Sewer Line, Refurbish Section of Service Line
		8/1/2024	570.00	
		1/1/2025	15,859.98	Refurbish Section of Effluent Line, Install Effluent Pump, Install New Riser Section to Outfall Pipe
		1/1/2026	7,511.89	
Yes	Disinfection system		30,118.58	
		1/1/2024	3,471.08	
		3/1/2024	15,266.39	Install Chlorine Monitoring System, Install Piping for Disinfection Residual Monitoring Equipment, Install Duplex Skit Mount System
		4/1/2024	1,140.00	
		6/1/2024	2,353.33	
		3/1/2025	7,887.78	Replace Baffles in Chlorine Contact Chamber
Yes	Electrical Systems		100,929.64	
		1/1/2024	33,927.48	Install Submersible Pump Control Panel, Electrical Upgrades for Blower Room, Installed New Light and Outlet, Lift Station Electrical Upgrades (LS6 & LS8)
		3/1/2024	1,100.00	
		4/1/2024	28,252.18	Install New Conduit and Light, Install Float Control System, Install 40 HP Soft Starter
		1/1/2025	35,835.46	Refurbish Lift Station Control Panel (LS9), Construct H-Frame for Control Boxes and Remote Monitoring
		6/1/2025	1,814.52	
No	Facility Structures		46,434.96	
		1/1/2024	26,837.14	Pour Concrete Containment System for Screenings
		4/1/2024	6,169.62	
		6/1/2025	13,428.20	Convert Lime Tank to Influent Surge Tank
Yes	Lift Stations		408,384.00	
		5/31/2023	43,512.04	Refurbish Lift Station, Install New Pumps
		1/1/2024	46,288.78	Install Chain for Sewage Pump, Install Check Valve, Refurbish 8" Force Main (LS1), Install 3 HP Sewage Pump
		3/1/2024	11,056.61	Install Floats (LS5 & LS9), Install Float System (LS13)
		4/1/2024	200,903.92	Refurbish Lift Station, Install Lift Station Pump, Primed Lift Station Pump, Refurbished Gate Valve (LS8), Refurbish Base Elbow (LS2)
		6/1/2024	3,097.18	
		8/1/2024	15,068.52	Install Base and Rail System (LS9), Install Submersible Pump (LS4)
		1/1/2025	63,605.65	Replace RPZ (LS12), Install Magnetic Flow Meters, Bypass Pump for Operation (LS2), Install Submersible Pump Discharge, Refurbish Floats (LS12), Install Check Valve (LS1), Install Pump (LS2)
		1/1/2026	24,851.30	Install Guide Rails and Piping for Pump, Replace Pump (LS10)
Yes	Monitoring Equipment		154,613.20	
		5/31/2023	102,725.90	Install Remote Monitoring Units, Install Chlorine Monitoring System
		1/1/2024	9,425.59	
		3/1/2024	3,752.07	
		4/1/2024	2,897.50	
		1/1/2025	35,812.14	Composite Samplers, Inline DO Prope for WWTF
No	Pumping Equipment		3,883.98	
		1/1/2024	3,883.98	
No	Safety		22,219.70	
		1/1/2024	14,269.96	Install Eye Wash & Safety Shower, Refurbish Safety Cabinets, Refurbish Hand Rails
		4/1/2024	4,568.16	
		1/1/2025	3,381.58	

Included in Wastewater System Assessment	Project	In-Service Date	Cost	Description
Yes	Site Improvements		619,118.59	
		5/31/2023	6,300.00	
		1/1/2024	63,069.20	Install Garage Doors for Lab, Install Lift Station Lighting, Install Fencing, Remove Vegetation
		2/1/2024	23,667.91	Construct Building Over CL2 Tank and Skid
		4/1/2024	26,673.97	Refurbish Walking Beam, Refurbish Parking Lot and Driveway, Install Lighting, Install Electronic Gate Opener
		5/1/2024	84,518.00	Install Fencing (Lift Stations), Limerock Road
		6/1/2024	148,251.64	Install Fencing at WWTF
		7/1/2024	32,259.82	Install Fencing (LS3), Fabrication of Dumpster for Screens
		1/1/2025	224,370.58	Tree Removal, Refurbish Maintenance Building, Refurbish Lab, Paint Tanks and Chlorine Contact Chambers, Pour concrete pads around Chlorine Contact Chambers
		4/1/2025	10,007.47	Paint WWTF
Yes	Solids Handling Equipment		52,997.06	
		4/1/2024	21,780.00	
		5/1/2025	31,217.06	
Yes	Treatment Equipment		10,212.10	
		3/1/2024	10,212.10	
Grand Total			1,937,731.49	