

Dean, Mead, Egerton, Bloodworth, Capouano & Bozarth, P.A.
420 South Orange Avenue, Suite 700
P.O. Box 2346 (ZIP 32802-2346)
Orlando, FL 32801

Attorneys and Counselors at Law
Orlando
Fort Pierce
Tallahassee
Viera/Melbourne
Vero Beach
Stuart (By Appointment)

(407) 841-1200
(407) 423-1831 Fax
www.deanmead.com

MARTIN FRIEDMAN
407-310-2077
mfriedman@deanmead.com

May 13, 2022
via efilng

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

Re: Docket No. 20220085-WS - Application for transfer of water and wastewater facilities of River Grove Utilities, Inc., water Certificate No. 674-W, and wastewater Certificate No. 575-S to Cobblestone II RVG LLC; and amendment of water Certificate No. 674-W, and wastewater certificate 575-S, in Brevard County.

Dear Mr. Tietzman:

On behalf of Cobblestone II RVG LLC, dba River Grove Utility (“Utility”) this letter is the response to Staff’s Deficiency Letter dated May 12, 2022.

1. **Detailed Financial Statement.** The financial statement information provided with the application is not sufficient. Rule 25-30.037(2)(1)1, Florida Administrative Code, (F.A.C.), states that the buyer must provide a detailed financial statement (balance sheet and income statement), audited if available, of the financial condition of the applicant, that shows all assets and liabilities of every kind and character. The financial statements shall be for the preceding calendar or fiscal year. The financial statement shall be prepared in accordance with Rule 25-30.115, F.A.C. If available, a statement of the sources and uses of funds shall also be provided. Please provide the financial statements required by Rule 25-30.037(2)(1)1, F.A.C.

***RESPONSE:** The Utility filed the Balance Sheet as of the closing date as required. However, until the new utility engages in operations, there is no activity to report on an Income Statement. If the utility were to file an Income Statement, all of the pertinent revenue and expense values would be ‘\$0’.*

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2. **DEP Compliance - Permits, Sanitary Survey and Secondary Water Standards.** Rule 25-30.037(r)(1) and (2), F.A.C., states the applicant shall provide a copy of the utility's current permits from the Department of Environmental Protection (DEP) and the water management district as well as copies of the most recent DEP and/or county health department sanitary survey, compliance inspection report, and secondary standards drinking water report. Please provide the permits for the water treatment plant, and the latest sanitary survey and secondary water standards reports which appear to have been omitted from the application.

***RESPONSE:** The Utility does not have a water treatment plant but purchases its water from Brevard County. Thus, this requirement is inapplicable.*

3. **DEP/Health Department Correspondence.** Rule 25-30.037(r)(3), F.A.C., requires the applicant to provide copies of all of the utility's correspondence with the DEP, county health department, and water management district, including consent orders and warning letters, and the utility's responses to the same, for the past five years. The Utility did not provide any copies of correspondence for the past five years with the aforementioned parties. Please provide copies of the Utility's correspondence as required.

***RESPONSE:** As set forth in the Application, the Utility has had no such correspondence. The original utility (seller) was only certificated in 2020.*

4. **Customer Complaints.** Rule 25-30.037(r)(4), F.A.C., requires a copy of all customer complaints that the utility has received regarding DEP secondary water quality standards during the past five years. Please provide this customer complaint information, which appears to have been omitted from the application.

***RESPONSE:** As set forth in the Application, the Utility has had no such customer complaints. The original utility (seller) was only certificated in 2020.*

Should you or Staff have any questions regarding this response please do not hesitate to contact me.

Very truly yours,

/s/ Martin S. Friedman

Martin Friedman

MSF:

Cc: Clayton Lewis (via email)
Malissa Bennett (via email)
Ryan Sandy, Esquire (via email)