## STATE OF FLORIDA

MIKE LA ROSA CHAIRMAN



Capital Circle Office Center 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 (850) 413-6044

## Public Service Commission

April 8, 2025

Aaron Silas
Assistant Vice President, Customer Experience and Regulatory Operations
1630 Des Peres Road, Suite 140
Des Peres, MO 63131
asilas@cswrgroup.com

Re: Docket No. 20250052-WS - Application for increase in water and wastewater rates in Brevard, Citrus, Duval, Highlands, Marion, and Volusia Counties, by CSWR-Florida Utility Operating Company.

Dear Mr. Silas:

The Florida Public Service Commission received your letters on March 20 and March 31, 2025 regarding a proposed rate case by CSWR-Florida Utility Operating Company (CSWR-Florida or Utility). In that letter, CSWR-Florida requested to use a historic test year ended January 31, 2025, for establishing final rates.

Pursuant to Rule 25-30.430. Florida Administrative Code (F.A.C.), CSWR-Florida's test year request, as outlined above, is hereby approved for purposes of filing its Minimum Filing Requirements (MFRs). Docket No. 20250052-WS has been assigned to the forthcoming case. Your petition will be deemed filed on the date the Office of Commission Clerk receives the complete petition, the MFRs for each system, and the full filing fee. To process this case expeditiously, we request that you file the above no later than May 23, 2025.

Pursuant to Section 367.083, Florida Statutes (F.S.), the official filing date will be the date that complete corrections to deficiencies, if any, are filed. Please note that many schedules included in the MFRs are designed with a column titled "Balance Per Books." This column must reflect the balances on the general ledger and be reconciled with the balances reported in the Utility's Annual Report on file with the Commission. This requirement is applicable to all primary account balances as required by the NARUC Uniform System of Accounts. Pursuant to Rule 25-30.110(2), F.A.C., all data the Commission requests and requires to be submitted in determining a utility's rates "shall be consistent with and reconcilable with the utility's annual report to the Commission."

In addition, CSWR-Florida should satisfactorily document that it has recorded all adjustments to the Utility's general ledgers and accounts that have been ordered by the Commission in any prior proceeding relating to the individual systems. If adjustments were ordered for prior periods that impact subsequent years, the related adjustments must also be made to reflect the impact for the appropriate period up to and including the approved test year. Further, CSWR-Florida should be

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prepared to justify its requested test year operation and maintenance expenses for each individual system, particularly those expenses which have increased above the level of customer growth and inflation since the last rate case for each system.

The Utility is instructed to file all information it wishes the Commission to consider when arriving at a decision on its rate case application with its original filing. Because of the time limitations contained in Section 367.081, F.S., and the lengthy auditing and investigation required, the Commission may disregard any information not filed with the original application. Approval of the test year for filing purposes does not mean that an issue regarding the appropriateness of the test period could not be raised during the proceeding. If you have any questions, please contact Amber Norris at (850) 413-6984 or amnorris@psc.state.fl.us.

Sincerely

Mike La Rosa Chairman

## MLR/AN:js

cc: Commissioner Art Graham

Commissioner Gary F. Clark

Commissioner Andrew Giles Fay

Commissioner Gabriella Passidomo

Mr. Braulio Baez, Executive Director

Mr. Mark Futrell, Deputy Executive Director - Technical

Mr. Keith Hetrick, General Counsel

Ms. Mary Anne Helton, Deputy General Counsel

Mr. Andrew Maurey, Division of Accounting and Finance

Ms. Elisabeth Draper, Division of Economics

Mr. Tom Ballinger, Division of Engineering

Mr. Adam Teitzman, Office of Commission Clerk (Docket No. 20250052-WS)

Mr. Walter Trierweiler, Office of Public Counsel