

COMMISSIONERS:  
MIKE LA ROSA, CHAIRMAN  
ART GRAHAM  
GARY F. CLARK  
ANDREW GILES FAY  
GABRIELLA PASSIDOMO SMITH

STATE OF FLORIDA



DIVISION OF ENGINEERING  
TOM BALLINGER  
DIRECTOR  
(850) 413-6910

# Public Service Commission

June 6, 2025

Mr. F. Marshall Deterding, Esq.  
Sundstrom & Mindlin, LLP  
2548 Blairstone Pines Drive  
Tallahassee, FL 32301  
[mdeterding@sfflaw.com](mailto:mdeterding@sfflaw.com)

**STAFF'S SECOND DATA REQUEST  
VIA EMAIL**

**Re: Docket No. 20250023-WS – Application for staff-assisted rate case in Polk County, by North Carolina Real Estate Projects LLC d/b/a Grenelefe Utility.**

Dear Mr. Deterding:

By this letter, the Commission staff requests that North Carolina Real Estate Projects LLC d/b/a Grenelefe Utility (Grenelefe or Utility) provide responses to the following data request:

1. Provide copies of the invoices for sludge removal expenses for September 2024 and October 2024.
2. Provide a copy of the monthly operating report for well #6 and well #10 for May 2024, in Microsoft Excel format, if available, which includes the total water treated, total wash water, total for each chemical in points, and chemical dosage.
3. Provide copies of the monthly totals of metered water sold for November 2023 through February 2024, as well as a schedule of the monthly totals of metered water sold for the test year.
4. As is Commission practice, at least three bids should be provided for each requested pro forma project. As such, please provide any additional bids for each pro forma project listed below. If three bids cannot be provided, please explain in detail why. As part of this response, include the actual or estimated in-service dates.
  - a. Wastewater Treatment Plant Improvement
  - b. Lift Station #1 Refurbishment
  - c. Lift Station #2 Refurbishment
  - d. Lift Station #3 Refurbishment

- e. Lift Station #4 Refurbishment
  - f. Lift Station #5 Refurbishment
  - g. Radio Read Meter Replacement
  - h. New Fire Hydrants (15)
  - i. Hydro tanks (2) inspections and rehabilitation
  - j. Potable Water Well #10
  - k. Potable Water Well #6
  - l. Irrigation/non potable wells
  - m. Valve Replacement Program
  - n. New Utility Trucks (2)
  - o. New Golf Carts (3)
5. Refer to Document No. 03149-2025, filed with the Commission on April 25, 2025. On page three of this document, the Utility provided a list of its requested pro forma projects.
- a. Column 8 is labeled “Regulatory Mandate (M) or Enhancement (E).” For each of the following projects labeled as “Regulatory Mandate”, please provide the government agency that required the project, a brief explanation as to why it was required, and all documentation that supports this designation.
    - i. Meters
    - ii. Hydrants
    - iii. Valve Replacements
    - iv. Wastewater Treatment Plant
6. Refer to Document No. 03149-2025, filed with the Commission on April 25, 2025. On page four, the Utility provided a second list of its requested pro forma projects.
- a. Explain why the quotes for the irrigation wells from Ben-Tech LLC and Odom Contracting, LLC are for 10 wells, but the Utility only includes 8 wells on page four. As part of this response, provide the total number of wells being requested for pro-forma.
  - b. For the two hydropneumatic tank inspections and rehabilitation projects, please provide the bid for \$480,786 and the break-down of the parts that will be replaced or refurbished at each tank, and the costs associated with each.

7. Explain the functions of the radio read meters and why this type of meter was chosen as the replacement. Please also explain what, if any, alternatives were considered.
8. Explain why the number of meters quoted to be installed by Ben-Tech LLC and Odom Contracting, LCC of 1,359 is different from the materials quote from Ferguson Waterworks of 1,350. As part of this response, provide the total number of meters being requested for pro-forma.
9. Explain why the Utility did not choose the lower of the two bids for the Valve Replacement Program. As part of this response, provide the number of nonfunctioning water valves, total number of valves being replaced, and the timeframe in which the valves would be replaced.
  - a. Section 367.081(2)(a)(2), F.S., provides that the Commission, in fixing rates, shall consider facilities to be constructed within a reasonable time in the future, not to exceed 24 months after the end of the historic base year used to set final rates, unless a longer period is approved by the Commission, to be used and useful (U&U) if such property is needed to serve current customers. Column 10, shows that the Utility believes the Valve Replacement Project will take 10 years (2025-2035). Is that time frame correct? If so, is the Utility asking that the Commission approve a longer time period than the 24 months in Section 367.081(2)(a)(2), F.S. Please explain your response.
10. For each of the two new Utility trucks, please explain what each truck would be used for and why it is needed. In addition, please indicate the existing utility vehicles that these trucks will be replacing, if applicable.
11. For each of the three new golf carts, please explain what each cart would be used for and why it is needed. In addition, please indicate whether these golf carts will be replacing existing golf carts.

Please file all responses no later than **Friday, June 13, 2025**, via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20250023-WS) and also please email the filed response to [discovery-gcl@psc.state.fl.us](mailto:discovery-gcl@psc.state.fl.us). Please contact me by phone at (850) 413-6974 or by email [aramirez@psc.state.fl.us](mailto:aramirez@psc.state.fl.us), if you have any questions.

Sincerely,

*s/Ailynee Ramirez-Abundez*

Ailynee Ramirez-Abundez  
Public Utility Analyst  
Division of Engineering

ARA:da

cc: Office of Commission Clerk (Docket No. 20250023-WS)