

LP WATERWORKS, INC.

June 19, 2025

Office of Commission Clerk
Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

*Re: Docket No. 20250013-WS - Application for Staff Assisted Rate Case (SARC)
in Highlands County by LP Waterworks, Inc. – Response to Staff Fourth Data
Request*

Dear Commission Clerk,

LP Waterworks, Inc. (LPWW or Utility) hereby requests its response to Staff Fourth Data Request in the above referenced docket.

1. Regarding the flow meter that measures the amount of wastewater treated, please verify that it is operating properly and provide a detailed explanation of the steps taken to perform the verification, including when the meter was last calibrated.

Response: The wastewater is not measured by a flow meter. Pursuant to FDEP Permit No. FLA014340, “An elapsed time measurement on pump (pump log) shall be utilized to measure flow and calibrated at least once every 12 months. (62-600.200(25)).

The wastewater gallons are determined by utilizing the lift station pumps and Elapsed Time Meters (ETMs). By utilizing the size and type of pumps in lift stations, the appropriate gallons per minute is determined for the pump(s). Next the ETM readings and dates are used to determine run times of the pumps. Calculate the hours each pump ran by subtracting the previous reading from the current one, then convert to minutes. Multiply minutes run by the pump's rate to find the wastewater flow in gallons for that period. The sum results for total flows. In summary, the calculation is: Flow (gallons) = Minutes Run (MR) x Pump Rate (R) . If there are 2 pumps in the station this is done for each pump and the numbers are added together to get the total flows.

These pumps were last calibrated on November 12, 2024 by the Florida Rural Water Association and found to be accurate. (See Attachment Calibration Results)

2. In determining how many gallons of wastewater to bill residential customers, it is customary for utilities to use 80 percent of the water gallons billed. However, in LP's response to Staff's Second Data Request, question 7, the gallons of wastewater billed do not appear to have a specific relationship to the gallons of water billed to those customers. How does LP determine the number of gallons of wastewater to bill customers before applying the 6,000 gallon cap?

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Response: *That is an incorrect statement.* It is not customary practice. Utilities do not use “80%” of water billed to determine the wastewater billed. Pursuant to Section 367.091(4), Florida Statutes, “A utility may only impose and collect those rates and charges approved by the commission for the particular class of service involved. A change in any rate schedule may not be made without commission approval.” LPWW’s wastewater rate design was last approved by the FPSC Order No. PSC-2017-0334-PAA-WS, issued August 23, 2017, In that Order, the Commission stated:

It is our practice to set the wastewater cap at approximately 80 percent of residential water gallons sold, which typically results in gallonage caps of 6,000, 8,000, or 10,000. The wastewater gallonage cap recognizes that not all water used by the residential customers is returned to the wastewater system. However, due to the seasonality of the Utility’s customer base, 83 percent of the total water sold is captured at 3,000 gallons, which is lower than gallonage caps typically approved for wastewater. Although we typically base the approved residential wastewater cap on 80 percent of the total water sold, in this case, it would yield an exceptionally low residential wastewater cap. In addition, we find that lowering the gallonage cap below 6,000 gallons would have an adverse effect on the residential gallonage charge and resulting customer bills. Therefore, we approve 6,000 gallons per month is a reasonable residential wastewater cap. (Emphasis added)

It is impossible to determine the actual wastewater gallons returned to the wastewater system for each customer. Customers’ wastewater is not measured. Consistent with LPWW approved tariffs, billed wastewater is based upon the water recorded through the water meter. This is an industry wide standard throughout the United States. On the customer’s bills, the meter readings, meter reading dates, and water consumption is displayed. If a residential customer uses more water than the wastewater cap, the gallonage charge is based upon 6,000 gallons. Thus, if a customer used 12,000 gallons in month, the 12,000 gallons is shown on the bill, but for wastewater the charge is capped at the 6,000 gallons. When the data was previously provided, the total “billed” gallons on the residential customers bills were provided but not the actual “charged” gallons.

3. In the Utility’s response to question 7 of Staff’s Second Data Request, do the gallons of water sold to residential and/or commercial customers include water sold through separate irrigation meters? If so, please provided an updated response that separates the gallons of water sold for consumption from the gallons of water sold for irrigation.

Response: After further review of the data, it was determined that there were separate “water only” gallons for Commercial irrigation was included. These were primarily for the commons areas. Below is the updated schedule to show this separate general service irrigation water.

	Nov- 23	Dec- 23	Jan- 24	Feb- 24	Mar- 24	Apr- 24	May- 24	Jun- 24	Jul- 24	Aug- 24	Sep- 24	Oct- 24
General Service												
Water Gallons	80	132	130	172	120	103	74	30	48	30	23	15

*LP Waterworks, Inc.
Staff Fourth Data Request*

G.S. irrigation	61	104	85	108	65	63	46	19	24	23	17	10
Net Water Gallons	19	28	45	64	55	40	28	11	24	7	6	5
Sewer Gallons	18	28	45	64	55	40	29	11	26	8	7	6

LPWW does not have separate residential irrigation meters. However, based upon the utility's experience, residential irrigation does occur throughout the system. This irrigation usage does not get returned to the wastewater system.

4. For LP's wastewater customers, please identify the general service customers by name and address, provide the monthly water usage by each, as well as the wastewater gallons billed to each for the test year.

Response: All billing data has previously been provided twice in response to Audit Request Number 6 as well as in response to Staff First Data Request No. 10. This billing analysis provides monthly billed consumption for the test year by month by account (customer). Therefore, the PSC staff already has this information for its analysis.

5. For LP's residential wastewater customers, please determine the customers with usage that is at least 30 percent higher than the average demand during the test year of (1) 2,394 gallons for customers with no zero-gallon bills, and (2) 1,102 gallons for customers with one or more zero gallon bills during the test year. Please identify these customers by address, and provide the monthly water usage for each during the test year, as well as the wastewater gallons that either were billed or would have been billed to each had there not been a 6,000-gallon cap.

Response: All billing data has previously been provided twice in response to Audit Request Number 6 as well as in response to Staff First Data Request No. 10. This billing analysis provides monthly billed consumption for the test year by month by account (customer). Therefore, the PSC staff already has this information for its analysis.

Based upon this billing analysis, approximately 98.71% of the residential customers' bills were billed at or below the wastewater gallonage cap. Further, the analysis previously provided shows that approximately 93.4% of the residential water customers used 3,000 gallons or less.

6. LP's last staff-assisted rate case for its wastewater system was in 2016. In that case, staff calculated the average annual daily flows for the wastewater treatment plant at 48,032 gallons per day. In the instant case, staff has calculated 9,088 gallons per day. Please provide an explanation for the disparity in these numbers.

Response: Those flows were calculated and reported consistent with the methodology described in response to No. 1 above. This shows that the usage has declined. Historically, the usage in LPWW has decreased significantly after a rate case and new rates are implemented. Further, the majority of the customers are within an RV park. There is a sewage pump-out station located at the entrance to the park behind the old park office. LPWW believes that there may be a significant number of temporary customers who own RVs that don't use the utility's wastewater system, but use their RV's holding tanks, then pump out these tanks into this pump station.

LP Waterworks, Inc.
Staff Fourth Data Request

LPWW has no idea how much is pumped into this station. These numbers indicate that there has been a reduction in wastewater usage and treatment.

7. In response to Staff's First Data Request, question 4, regarding sludge hauling expenses for the test year, LP responded that it had none for the test year, but had a pro forma sludge hauling expense after the test year. Staff notes that this pro forma expense was not related to routine sludge hauling from percolation ponds, but rather for sludge removed from wastewater treatment plant components required by the Department of Environmental Protection. To assist staff in determining whether the Utility should have sludge hauling expenses included in its Operation and Maintenance expense calculation, please provide all invoices for sludge hauling expense for the last five years.

Response: Sludge is never hauled from percolation ponds. The perc ponds are for the disposal of treated effluent. There should not be sludge in perc ponds. If sludge is in the percolation ponds the plant is not being operated properly. The sludge removal occurs in the digester at the wastewater treatment plant. For smaller WWTP, sludge removal is not a "scheduled" event. It is determined by the amount of wastewater treated and the concentration of total suspended solids (TSS) in the digester. Our operators are required to have the TSS (total solids) in the digester at 20,000 mg/l or more to have the digester hauled. This is to ensure that we are removing solids and not a whole lot of water which is wasteful. To get to this number the operator aerates and decants the digester regularly to ensure a thick, heavy solids count that is hauled. For smaller WWTP, if "sludge" is hauled too often, there is a high concentration of water that is being hauled. This would be an inefficient and costly expense, this would not be a prudent use of funds.

Sludge hauling expense is a prudent and necessary cost for the efficient and proper operation of wastewater plants. Sludge hauling is the process of transporting sludge, a byproduct of wastewater treatment, from the plant to a final disposal or treatment location. It's crucial for maintaining the efficiency and functionality of wastewater treatment facilities, preventing environmental hazards, and ensuring proper sludge disposal.

When domestic sewage is transported and conveyed to a wastewater treatment plant (WWTP), it is treated to separate liquids from the solids, which produces a semi-solid, nutrient-rich product known as sewage sludge.

Treatment and disposal of sewage sludge are major factors in the design and operation of all wastewater treatment plants. Two basic goals of treating sludge before final disposal are to reduce its volume and to stabilize the organic materials. Stabilized sludge does not have an offensive odor and can be handled without causing a nuisance or health hazard. Smaller sludge volume reduces the costs of pumping and storage.

Treatment of sewage sludge may include a combination of thickening, digestion, and dewatering processes.

Thickening is usually the first step in sludge treatment because it is impractical to handle thin sludge, a slurry of solids suspended in water. Thickening is usually accomplished in a tank called

LP Waterworks, Inc.
Staff Fourth Data Request

a gravity thickener. A thickener can reduce the total volume of sludge to less than half the original volume. An alternative to gravity thickening is dissolved-air flotation. In this method, air bubbles carry the solids to the surface, where a layer of thickened sludge forms. Sludge digestion is a biological process in which organic solids are decomposed into stable substances. Digestion reduces the total mass of solids, destroys pathogens, and makes it easier to dewater or dry the sludge.

Attached are the sludge hauling tickets and invoices for 2024 and 2025. The records prior to 2024 were unfortunately destroyed last year from the hurricanes. These were being stored in the corporate office's storage basement, which was flooded. However, below is the historic recorded amounts by year. These may be verified by the utility's Annual Reports filed with the FPSC.

LP WW	Jan 20	Apr 20	Sep 21	Apr 22	Nov 24	Apr 25
711 - Sludge Removal Expense	882.00	882.00	1,000.00	1,468.88	2,420.00	1,240.00

Respectfully Submitted,



Troy Rendell
Vice President
Investor Owned Utilities
//For LP Waterworks, Inc.

FLORIDA RURAL WATER ASSOCIATION
2970 Wellington Circle
Tallahassee, FL 32308
(800) 872-8207

PUMPING RATE CALIBRATION USING PORTABLE FLOWMETER
Flow Values Obtained by Elapsed Time Measurement on Pumps

DATE: 11/12/2024	
FACILITY NAME & ID NUMBER: CAMP FLORIDA/ FLA014340	
FACILITY LOCATION: 1525 US HWY 27 SOUTH / Highlands County	
LIFT STATION LOCATION: INFLUENT @ FACILITY	
TESTING METHOD/INSTRUMENTATION: GE PT 900 SER # M05170096	
SIZE & TYPE OF PUMPS: 2- 4" SUBMERSIBLES	
PUMP 1 FLOW (GPM)	PUMP 2 FLOW (GPM)
150	144
150	144
150	144
AVERAGE GPM= 150.0	AVERAGE GPM= 144.0

HOURLY METER ACCURACY CHECK

PUMP 1				PUMP 2			
DATE	TIME START	TIME STOP	ACCURATE	DATE	TIME START	TIME STOP	ACCURATE
11/12/2024	353.6	353.7	YES	11/12/2024	2032.2	2032.3	YES
11/12/2024	353.7	353.8	YES	11/12/2024	2032.3	2032.4	YES
11/12/2024	353.8	353.9	YES	11/12/2024	2032.4	2032.5	YES

CALIBRATION RESULTS

CALIBRATION INFORMATION	PUMP 1	PUMP 2
Previous Pump Calibration (GPH) & Date	UNKNOWN	UNKNOWN
Current Pump Calibration (GPH)	9000	8640
Percent Difference (%)		

COMMENTS: ELAPSED TIME CLOCKS CHECKED BY STOPWATCH

Last Calibration Date of FRWA Portable Flowmeter: 12/7/2023

I hereby certify that the above pump tests were performed in accordance with the test instrumentation manufacturer's procedures and training and that to the best of my knowledge the information recorded herein is true and accurate

TECHNICIAN SIGNATURE



ALLEN SLATER

DATE 11/12/2024

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Sapp Environmental Services, Inc.
1351 Industrial Way E
Sebring, FL 33870 USA
+18634654567
sappseptic@gmail.com

INVOICE

BILL TO

US Water Services Corporation
4939 Cross Bayou Blvd
New Port Richey, FL 34652

INVOICE # 15494 CM
DATE 04/22/2025

TERMS Net 60

LP Waterworks

DATE	ACTIVITY	QTY	RATE	AMOUNT
04/22/2025	Pump Out PO#J01537-1008 CR 29 Lake Placid Provided support with 4000 gallons hauled away to Avon Park dump	4,000	0.31	1,240.00

PO#J01537-1008 CR 29 Lake Placid Provided support with 4000
gallons hauled away to Avon Park dump

BALANCE DUE

\$1,240.00

Entered: *[Signature]*
 COAC: *[Signature]*
 Approved: *[Signature]*
 Paid: _____
 Date: _____

A 1.5% interest rate per month will be added to any unpaid balance in addition to any legal fees incurred for collection of past due amounts.



W

Advanced Environmental Laboratories, Inc
125 Tower ST. Lake Placid, FL 33852
Payments: P.O. Box 551580 Jacksonville, FL 32255-1580
Phone: (863) 655-4022

FINAL

Workorder: The Woodlands Digester (L2501168)

Analytical Results

Lab ID: L2501168001	Date Collected: 04/07/2025 11:30	Matrix: Soil						
Sample ID: DIG	Date Received: 04/07/2025 12:23							
Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
WET CHEMISTRY (SM 2540G)								
Total Solids	63000	mg/Kg	10	10	1	04/16/2025 08:30	04/16/2025 08:30	T

Analysis Results Comments

Total Solids
Q/Missed Hold Time

Certificate of Analysis

This report shall not be reproduced, except in full,
without the written consent of Advanced Environmental Laboratories, Inc.



Sapp Environmental Services, Inc.

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INVOICE

BILL TO

US Water Services Corporation
4939 Cross Bayou Blvd
New Port Richey, FL 34652

INVOICE # 14454 CM

DATE 11/25/2024

TERMS Due on receipt

SITE ADDRESS

CR 29 & Jahna Concrete

LP Waterworks

DATE	ACTIVITY	QTY	RATE	AMOUNT
11/25/2024	Pump Out PO#J01537-2085 CR 29 & Jahna Concrete Provided support with 11000 gallons hauled away to Avon Park dump	11,000	0.22	2,420.00

PO#J01537-2085 CR 29 & Jahna Concrete Provided support with 11000 gallons hauled away to Avon Park dump

BALANCE DUE

\$2,420.00

Surge tank

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711
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A 1.5% interest rate per month will be added to any unpaid balance in addition to any legal fees incurred for collection of past due amounts.