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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

October 3, 2025

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2025 OCT -3 PM 2:31  
COMMISSION  
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**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, LLC.**

Dear Ms. Clark and Mr. Crabb:

Staff has reviewed the responses to deficiencies submitted on September 15, 2025, on behalf of CSWR-Florida Utility Operating Company, LLC (CSWR-Florida). After our review, we find the minimum filing requirements (MFRs) to be deficient. The specific deficiencies are identified below.

## Deficiencies

1. Rule 25-30.437(1), Florida Administrative Code (F.A.C.), requires a utility to complete MFRs. The following values were either not present or not correct in the utility's filings as set out by the instructions governing the MFRs. For the following items listed below, please correct the filings to address the errors as well as correct any fallout figures and schedules.

### **E-1**

- a. BFF Wastewater - It appears that the utility shows a 20 percent differential in the wastewater gallonage charge between the residential service and general service customers at the present rates. However, the proposed general service gallonage charge is less than the residential. A 20 percent differential in the gallonage charge of \$14.38 results in \$17.27. Please make the change between the proposed residential and general service gallonage charges.

- b. Sebring Wastewater– The proposed general service gallonage charge is the same rate of \$4.20 as the current general service gallonage charge. The proposed general service gallonage charge should not be less than residential. As mentioned above for BFF wastewater, the Sebring wastewater proposed general service gallonage charge should continue a 20 percent differential in the wastewater gallonage charge between the utility's residential and general service customers.
- c. Tymber Creek Water – The present general service charge of \$24.87 for the 1 1/2" meter size appears to be a scrivener's error and does not match the present residential charge of \$24.78 for the 1 1/2" mter size. Please provide the appropriate base facility charge for the 1 1/2 inch meter size for both classes of service.
- d. Tymber Creek Wastewater – The utility's proposed general service gallonage charge of \$11.05 is also the same gallonage charge as the present general service gallonage charge. Please update the utility's proposed general service gallonage charge.

#### **E-1 vs. E-2**

- e. North Peninsula Wastewater – The present rates on revised E-1 do not match the present rates on E-2. The rates indicated on E-2 are not current. The rates on E-1 are current and were effective November 2023. Please update any schedules affected by this change.

#### **E-2**

- f. Aquarina Wastewater – The utility's proposed revenues are significantly understated because the gallonage revenue was not calculated on line 17. The wastewater revenues are understated by approximately \$99,000 (10,538.283 x \$9.46). Please calculate the proposed gallonage revenue, which will result in the correct total wastewater revenues. Please update any schedules affected by this change.
  - g. Neighborhood Water – The consumption in the 5,001-10,000 and 10,000 and over blocks indicate gallons of 3,275 and 2,317, respectively. However, based on staff's calculation, the total consumption in the second block should be 3,214 and 2,378 in the third block. However, the total number of gallons are correct based on Schedule E-14. Please calculate the correct consumption amount in blocks 2 and 3.
  - h. Sunshine Water – It appears that Residential 2 and General Service 2 billing determinants are commingled. Please separate the billing determinants for each class of service and provide a billing analysis for Residential 2.
  - i. Tradewinds Wastewater – In column 7, the proposed revenues are significantly understated because the gallonage revenue was not calculated correctly. Please see the \$71.39, which is incorrect. Based on the number of gallons and the proposed gallonage charge, the gallonage revenues should be \$71,376 for residential. Please
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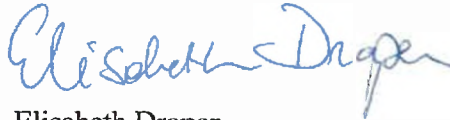
calculate the proposed residential gallonage revenue, which will result in the correct proposed wastewater revenues.

**E-2 vs. E-14**

- j. Rolling Oaks – The number of gallons indicated on Schedule E-2 do not match gallons on Schedule E-14 because the classes of service on Schedule E-2, pg. 2, are commingled. Please provide separate billing determinants for the general service and residential service.
- k. Consolidated Wastewater – The total number of bills shown on Schedule E-2, pg. 2, do not match some of the bills shown on Schedule E-14. For instance, the 5/8 inch meter size shown on Schedule E-2, pg. 2, shows 77,756 bills; however, Schedule E-14 for the 5/8 inch meter size shows 68,334 bills. Please provide the correct total number of bills per meter size for wastewater.

If any above corrections require a corresponding change to any other MFR schedules, those corrected schedules must also be submitted in accordance with Rule 25-30.436(5)(d), F.A.C. Your petition will not be deemed filed until the deficiencies identified in this letter have been corrected. These corrections should be submitted no later than November 3, 2025.

Sincerely,



Elisabeth Draper  
Director

ED:sb

cc: Office of Commission Clerk (Docket No. 20250052)