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(850) 413-6410

Public Service Commission

October 16, 2026

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2026 OCT 16 PM 3:17
COMMISSION
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SENT VIA EMAIL

F. Marshall Deterding
Sundstrom Law
2548 Blairstone Pines Dr.
Tallahassee, FL. 32301
mdeterding@sundstrom-law.com

Re: Docket No. 20260039-WS – Application for increase in water and wastewater rates in Seminole County by Hometown Palm Valley, LLC d/b/a Palm Valley Utilities.

Dear Mr. F. Marshall Deterding:

Staff has reviewed the minimum filing requirements (MFRs) submitted September 18, 2026, on behalf of Hometown Palm Valley, LLC d/b/a Palm Valley Utilities (Palm Valley). After our review, we find the MFRs to be deficient. The specific deficiencies are identified below.

Deficiencies

1. Rule 25-30.110(2), Florida Administrative Code (F.A.C.), requires that the MFRs shall be consistent and reconcilable with the Utility's 2025 Annual Report. The following schedules in the MFRs do not reconcile to the Utility's 2025 Annual Report.
 - a. MFR Final and Interim Schedule A-5, Schedule of Water Plant in Service by Primary Account
 - b. MFR Final and Interim Schedule A-6, Schedule of Wastewater Plant in Service by Primary Account
 - c. MFR Final and Interim Schedule A-9, Schedule of Water Accumulated Depreciation by Primary Account
 - d. MFR Final and Interim Schedule A-10, Schedule of Wastewater Accumulated Depreciation by Primary Account
 - e. MFR Schedule B-5, Detail of Operation & Maintenance Expense – Water
 - f. MFR Schedule B-6, Detail of Operation & Maintenance Expense by Month – Wastewater
 - g. MFR Schedule B-13, Net Depreciation Expense – Water
 - h. MFR Schedule B-14, Net Depreciation Expense – Wastewater
 - i. MFR Schedule B-15, Taxes Other Than Income

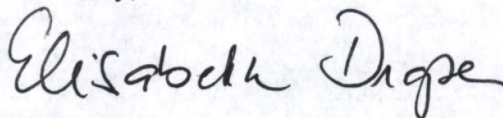
2. Rule 25-30.437(1), (F.A.C.), requires a utility to complete MFRs. The following values were either not present or not correct in the Utility's filings as set out by the instructions governing the MFRs. For the following items listed below, please correct the filing to address the errors as well as correct any fallout figures and schedules.
 - a. The sum of total gallons for each Schedule E-14 requires that total gallons sold for all customer classes and meter sizes match the total gallons sold on Schedule F-1. In its MFRs, the Utility's total amount of gallons sold on Schedule F-1 do not match the sum of total gallons for each Schedule E-14. Please provide the appropriate amount of total gallons sold that match both Schedules E-14 and F-1.
 - b. Schedule E-2 requires that total gallons sold on Schedule E-2 match the total gallons sold in the Annual Report. In its MFRs, the Utility's total amount of gallons shown on Schedule E-2 do not match total gallons sold in its 2025 Annual Report. Please correct Schedule E-2 to reflect the appropriate amount of total gallons sold in its Annual Report.
 - c. Please refer to the **gallons pumped in MFR Schedule F-1**. The values should match the monthly operating reports sent to the Florida Department of Environmental Protections (DEP). The January 2025 water monthly operating report was not included in the Utility's MFRs, and as a result, staff is unable to verify whether the values match. Please provide all monthly operating reports for the test year so the gallons pumped and dependent calculations, including unaccounted for water, can be verified.
 - d. Please refer to the **Other Uses values included in MFR Schedule F-1**. The Utility's MFRs indicate Other Uses of 0.411 million gallons, but do not provide a calculation. Please provide the calculations used to substantiate the monthly and annual Other Uses values.
 - e. Please refer to the **Unaccounted for Water included in MFR Schedule F-1 and referenced in Schedule F-5**. The January 2025 water monthly operating report was not included in the Utility's MFRs, and as a result, staff is unable to verify the calculation. The Utility's MFRs indicate a value of 28.9 percent unaccounted for water, but do not provide an explanation as required. Provide all monthly operating reports for the test year so the unaccounted for water and dependent calculations can be verified and provide an explanation as to the reasons why the unaccounted for water value is above 10 percent.
 - f. Please refer to the **Plant Capacity values in MFR Schedule F-3**. The values should match the Sanitary Surveys conducted by the health department or DEP. Sanitary Surveys were not included in the Utility's MFRs, and as a result, staff is unable to verify whether the values match. Please provide the most recent sanitary surveys conducted for the Utility's water treatment plant so the plant capacity can be verified.

- g. Please refer to the **Maximum Day value in MFR Schedule F-3 and referenced in Schedule F-5**. The value should match the monthly operating reports sent to the Florida Department of Environmental Protections (DEP). The January 2025 water monthly operating report was not included in the Utility's MFRs. Please provide all monthly operating reports for the test year so the maximum day pumping rate and dependent calculations for Water Treatment Plant used and useful can be verified.
 - h. Please refer to the **Five-Day Max Year value in MFR Schedule F-3**. The values should match the monthly operating reports sent to the Florida Department of Environmental Protections (DEP). The January 2025 water monthly operating report was not included in the Utility's MFRs, and as a result, staff is unable to verify whether the values match. Please provide all monthly operating reports for the test year so the daily pumping rate and dependent calculations for Water Treatment Plant used and useful can be verified.
 - i. Please refer to the **Average Daily Flow in MFR Schedule F-3**. This value should be calculated from the Utility's monthly operating reports to DEP. The January 2025 water monthly operating report was not included in the Utility's MFRs, and as a result, staff is unable to verify the values. Please provide all monthly operating reports for the test year so the average daily flow can be verified.
 - j. Please refer to **MFR Schedule F-9**. No data was provided for the period 2021 through 2024. Please provide the requested historical values for the period of 2021 through 2024 and the associated calculations.
 - k. Please refer to **MFR Schedule F-10**. No data was provided for the period 2021 through 2024. Please provide the requested historical values for the period of 2021 through 2024 and the associated calculations.
3. Rule 25-30.437(3), F.A.C., requires a utility to file additional engineering information. For the following subsections of the Rule, please correct the filings to address the errors below:
- a. **Subsection (a)** requires a detailed map showing: (1) the location and size of the applicant's distribution and collection lines as well as its plant sites and (2) the location and respective classification of the applicant's customers. The provided maps are not of sufficient scale and do not provide the size of the Utility's lines, the size and locations of the Utility's plant sites, or the location and respective customer classification of the customers being served by each system. Please provide updated maps that satisfy these requirements.
 - b. **Subsection (c)** requires the most recent chemical analyses for each water system conducted by a certified laboratory covering the inorganic, organic turbidity, microbiological, radionuclide, secondary and unregulated contaminants specified in Chapter 62-550, F.A.C. Please provide these analyses.

- c. **Subsection (d)** requires all water and wastewater plant operating reports for the test year and the year preceding the test year. Please provide all operating reports for the year preceding the test year for water and wastewater, the January 2025 water monthly operating report, and the full April 2025 wastewater daily sampling report.
- d. **Subsection (e)** requires the most recent sanitary survey for each water plant and inspection report for each wastewater plant conducted by the health department or the DEP. Please provide the required documentation.
- e. **Subsection (g)** requires any Notices of Violation, Consent Orders, Letters of Notice, or Warning Notices from the health department or DEP in the previous five years. Please provide these documents or a statement that the Utility's systems have not received these documents within the previous five years.

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 16, 2026.

Sincerely,



Elisabeth Draper
Director

ED:tb

cc: Office of Commission Clerk (Docket No. 20260039)