

Antonia Hover

From: Monica Errico <merrico@unitedbiochannels.com>
Sent: Sunday, January 3, 2021 5:48 PM
To: Records Clerk
Subject: Docket #2020026-SU - DUPLICATE-FORWARDED BY DONALD THOMAS
Attachments: MErrico_PSC Letter_Socket No. 20200226-SU 3 January 2021.docx

RE. Docket #2020026-SU

To Whom It May Concern,

My name is Monica Errico. I am a property owner on 321 Bocilla Drive. My property is within the service area contained in the application from Environmental Utilities, LLC [EU] for central sewer. I also hereby inform you that I want to be listed to the "Interested Persons" mailing list for further updates on the matter of Docket No. 20200226_SU.

Although I am not opposed to installation of a central sewer, I am writing to you to record my opposition to the request from EU to provide wastewater services in mine and the areas specified in their application in Docket No. 20200226-SU. I specifically object to EU's request to bifurcate the certificate and rate-making proceedings. I also object to the granting of a temporary waiver of Rules 25-30.033(1)(p) and (q) for the following reasons stated below. Therefore, I formally request that EU's Motion to Bifurcate and Temporary Rule Waiver be denied.

My opposition to the proposal in the applications based on the following:

1. **Inadequate notice was given.** Myself and may surrounding neighbors have yet to receive our letters of notification dated Dec 17, 2020. As future consumers, we have been asked to present our objections to a proposal for which we have no idea what the associated costs will be nor the type of system we will be paying for. All of which has been timed to take place during a tumultuous holiday season within a global pandemic.
2. **Insufficient information was supplied.** Property owners in the proposed service area have a deadline of January 16, 2021 to present their objections. In bifurcating the application, no information regarding estimated rates, connection fees, and the type of system installed for this project will be available until the Spring of 2022.
3. **The applicant does not have a proven track record of experience to implement and maintain central sewer utilities.** EU is a new entity to which neither EU nor Little Gasparilla Utilities (LGU) have any experience with sewer system installation, knowledge maintenance or staffing requirements. In several round table discussions with homeowners on Palm Island (Don Pedro and Knight Island) and LGI, recorded meeting minutes demonstrate that the sole proprietors of EU, Jack and Diane Boyer, cannot adequately describe the requirements and difference between the 2 types of potential server systems for the closed pressure-based systems of either Vacuum or Low-pressure systems (
4. **It is unclear if the applicants have the necessary financial resources to complete the project.** LGU has had several inquiries into financials by PSC, some of which include inability to pay construction loans for maintenance and expansion in a timely manner (<http://www.psc.state.fl.us/library/filings/2017/10506-2017/10506-2017.pdf>). The applicant has only provided a letter of interest for the sum of \$5M to complete the first phase of the project (Cape Haze installation in Phase 1). A letter of intent from a small financial institution means nothing. The cost to extend services to the barrier islands will further exceed the \$5M intent to

review to support phase 1. In fact, a **bond for the estimated completion of the project in entirety should be required prior to any approval.** Furthermore, in recorded meeting minutes the applicant consistently encourages homeowners and homeowner associations not to procure legal counsel for complete discovery - stating that all legal fees to complete discovery will be carried forward to individual EURs. As an owner of several sole proprietor LLC's this further substantiates the lack of financial resources available to EU(<https://www.palmslandestates.org/news/central-sewer-qa-more> and <https://www.palmslandestates.org/news/pie-qa-with-environmental-utilities-inc>). **THEREFORE, I STRONGLY OPPOSE THE APPLICANTS REQUEST TO TREAT ALL OF THEIR FINANCIALS AS CONFIDENTIAL.**

5. **The type of system installed has not been given.** Whereas either low-pressure and vacuum systems can be installed, low-pressure systems are not recommended for areas of high water tables, frequent power outages, terrain of high sand composure. In addition, holding tanks that require frequent replacement will be necessary to support low pressure systems (<https://www.epa.gov/sites/production/files/2015-06/documents/presewer.pdf>).
6. **Our environment is not acceptable for low-pressure grinder systems.** According to the EPA, low-pressure grinder systems require a holding tank for every 4-5 household connections, each with individual grinders that require replacement at ~5-8 years. **I am not willing to allow installation of a holding tank on my personal property required for a low-pressure grinder system.** Furthermore, low-pressure grinder systems require in ground ventilation and are therefore not recommended for low lying coastal areas (see EPA guidance: <https://www.epa.gov/sites/production/files/2015-06/documents/presewer.pdf>). Installation requires that a separate electrical panel be installed to each EUR. **Many EUR's already have 2 panels of which installation of a 3rd electrical panel cannot be completed.**
7. **A low-pressure system can lead to environmental disaster and backup in times of power outages.** We lose power frequently on the island, and in some cases for several days. What protective measures would be in place and is EU or the EURs responsible for covering costs upon environmental disaster from sewage backup during an extended power outage?
8. **No reliable costs have been given.** The estimated cost for installation and hookup per home is ~20K+. We have been informed through homeowner association meetings that this cost does not include the cost of electrical panel installation and the cost to crush / remove the existing septic system.
9. **No provisions are being made for financing the installation and connection.** Considering the installation of the grinder unit alone is ~\$19K, very few homeowners can afford to do the electrical upgrades and remove their old septic in addition as a one-time payment.
10. **Ongoing operational costs have not been determined.** When dealing with a for-profit sole proprietorship, by 2022, what are the estimated and allowable operating costs as foreseen by the PSC.

Given the lack of supporting data described herein with regards to the applicants experience, financial strength, and proven track record of mismanagement of LGU properly and with a high level of customer satisfaction have been demonstrated, the applicant's request for waiver should be denied.

A copy of this letter is also attached as an MS Word Doc.

Sincerely,
Monica Errico

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Schedule a 30 minute meeting:

<https://calendly.com/merrico-unitedbiochannels/ubc-tc>



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