

Lisa Smith

From: Hannah Barker
Sent: Monday, January 24, 2022 9:04 AM
To: Commissioner Correspondence
Subject: Docket Correspondence
Attachments: Palm Island ; Docket 20200226-SU; RE. Docket #20200226-SU; Docket - #20200226-SU; Docket # 20200226-SU - 43 Bayshore Circle Placida, FL. - Daniel Petersen; 20200226-SU; Docket#20200226-SU; Palm Island Sewer; Docket #20200226SU; SUBJECT Docket # 20200226-SU Notice of Objection to the Central Sewer System Proposal for Palm Island and Request the PSC to Deny the Application for Original Certificate of Authorization the Proposed Central Sewer System for Palm Island

Good morning,

Please place the attached email in Docket No. 20200226.

Hannah E. Barker
Executive Assistant to Commissioner Clark
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
(850) 413-6004

Lisa Smith

From: Cathy Derr <cathy@gwamarillo.com>
Sent: Sunday, January 23, 2022 9:55 PM
To: Office of Commissioner Clark
Subject: Palm Island

Cathy Derr - -
530 N Gulf
I am a Property owner on Don Pedro island.

I object to the proposal and ask the PSE to deny the application for original certification and authorization for this proposed central sewer system.

Thank you.
Cathy Derr

Cathy Derr, CCIM | Agent

Gaut Whittenburg Emerson | Brokerage & Property Management

600 S. Tyler St., Suite 101 | Amarillo, TX 79101

Office 806.373.3111 | gwamarillo.com

cathy@gwamarillo.com



Emails sent or received shall neither constitute acceptance of conducting transactions via electronic means nor shall create a binding contract or lease in the absence of a fully executed written agreement between buyer and seller or tenant and landlord. Email communications shall be subject to final client review and approval.

Lisa Smith

From: Judy Galloway <judary54@gmail.com>
Sent: Sunday, January 23, 2022 9:52 PM
To: Office of Commissioner Clark
Subject: Docket 20200226-SU

I am a homeowner on Don Pedro Island in Charlotte County. I am writing to **formally request that the PSC deny** concerns:

- 1) No need for service has been determined based on environmental impact. **No water testing has been** water pollution. I object to the destruction of natural habitats on our island when no proof has been established.
- 2) EU (Jack Boyer) has **NO experience** in developing, installing or maintaining **any** sort of sewer system. I object from consideration. I do not want my property to be his "guinea pig" for learning how to do this at **MY** expense.
- 3) **The high cost of installing EU's propose system is not fair or equitable.** The proposed monthly rate for both sewer and water combined. As a homeowner I would be responsible for providing the required electrical generator to keep the pump running in case of power failure. I would also be responsible for paying for clean septic system. And there is no "pay over time" option for the hook up fee for the project. This would create a financial burden.
- 4) I object to the **lack of oversight** for this project. There is no performance bond required and we have no recourse. We would have to deal with multiple agencies in order to get problems solved. And with EU's lack of experience, the applicant has not even addressed how the system will be serviced in the event of failure during a storm or other emergency. The PSC is required to use this criteria in order to grant certification:

1. **NEED FOR SERVICE** (environmental impacts, development concerns)
2. **FINANCIAL ABILITY** of the applicant
3. **TECHNICAL EXPERTISE** of the applicant
4. **FAIR & EQUITABLE RATES & CHARGES**

I sincerely hope that you can see that EU (Jack Boyer) does NOT meet the criteria

Judy Galloway
Judary54@gmail.com

 ReplyForward

Lisa Smith

From: Andy Ball <gab_three@yahoo.com>
Sent: Sunday, January 23, 2022 9:03 PM
To: Office of Commissioner Clark
Subject: RE. Docket #20200226-SU

Dear Commissioners,

I am a resident on Don Pedro Island, FL. I am writing in opposition to the approval of Environmental Utilities application for wastewater services here on the island. I have several concerns that have not been addressed and believe are grounds for denial of the application.

The first concern is that there are no proven grounds for the need of service on this island. Water sampling in and around the island has not demonstrated a need for a wastewater system. While septic tanks can leak, simply requiring a sewer system based on data collected from other areas does not justify the installation of a costly wastewater system as proposed on this island. The need for a wastewater system should be based on actual need such as sampling data and an evaluation of the risks. I understand that water sampling in the past has not shown any sewage contamination. Additionally, a sewer system has risks as well. A wastewater system leak would prove more environmentally hazardous than a leaking septic tank. A leak of a wastewater system into our waters would be catastrophic to the environment. Compared to occasional septic tanks leaking, a sewer leak would prove much worse. Such a leak in the sewer is a real possibility. Aside from that, and probably more importantly, if septic tanks are so bad and there is a critical need for sewer, the county should not be issuing permits for new homes with septic. Yet, the county continues to issue permits for new buildings with septic tanks. This is a complete contradiction. Since the county continues to issue permits, the need cannot be critical and therefore not justified.

The desire for a wastewater system appears to be purely of financial gain. I, nor any of my neighbors that I have talked with, have requested a wastewater system. Installation of the wastewater system will primarily benefit EU considering there is no demonstrated critical need.

Another concern is the lack of transparency regarding financing of the project. It is unclear that the project is well financed. Having this clarity would provide some confidence that the project will be done properly and actually get completed. Should EU default and not complete the project due to lack of finances, I have concerns as to what that will mean to me and the condition of the island.

There is also the issue of a lack of technical expertise by EU installing and operating a wastewater system. Operating a drinking water system is much different than operating a wastewater system. The risks and complexity are far greater with a wastewater system. If EU had experience in wastewater systems, I might have some confidence in EU's ability to install and operate the system. In the event of a sewage leak, I am also concerned that EU will not have the experience or expertise to address the problem thus, creating an even larger environmental problem than a leaking septic tank.

Lastly is my concern regarding rates and charges associated with the project. At first there was a ball park estimate of \$20,000. I recently received communication from EU explaining that hook up costs could be at least roughly \$12,000. However, that amount does not appear to address other hidden charges such as costs for new electrical panel, septic tank destruction, cost of grinder, generator, etc. I do not recall seeing anything that addresses rates. However, given the high rates we pay for water, I anticipate similarly high rates for wastewater too. This will create a significant financial burden to me while a private company profits for a service that I have already paid for. The septic tank method of treating wastewater at my residence is a safe and effective system.

Please understand that most islanders are responsible about maintaining their septic tanks and, conscientious about protecting the island where we live. Until these concerns are satisfactorily addressed, I hope the application will be denied by the PSC.

Sincerely,

George A. Ball

191 Bocilla Dr.

Gab_three@yahoo.com

Lisa Smith

From: Christopher Zenaty <czenaty@aol.com>
Sent: Sunday, January 23, 2022 7:54 PM
To: Office of Commissioner La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo
Subject: Docket - #20200226-SU

To PSC Officers

Christopher Zenaty - Owner
45 Palm Drive, Placida, Florida - Palm Island

I am formally requesting that PSC deny EU's application for wastewater service.

I am concerned with the ability of this company to responsibly complete the project without an exorbitant fee as well as overall ability to complete the project at all.

Due to lack of oversight Palm Island residents currently pay more for water usage than any other water district in the US.

We are not against upgrading to a newer sewer system but do not believe the new plan is acceptable.

We are looking for fair and equitable rate charges and do not have confidence in the technical ability of EU to complete.

- There is,
- 1-Uncertain hook up cost
 - 2-High additional electric costs
 - 3-Tree removal, landscaping will damage the islands fragile ecosystem
 - 4-No single point of general oversight
 - 5-Traffic disruption
 - 6-New easement giveaway- EU claims ownership of utility easement
 - 7-Overall technical proposal not acceptable

Christopher Zenaty
45 Palm Drive
czenaty@aol.com

Lisa Smith

From: dpetersen7735@comcast.net
Sent: Sunday, January 23, 2022 7:22 PM
To: Records Clerk; Office of Commissioner La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo
Cc: dpetersen7735@comcast.net
Subject: Docket # 20200226-SU - 43 Bayshore Circle Placida, FL. - Daniel Petersen

I am requesting that the Public Service Commission deny the application for the proposed centralized sewer system requested by Environmental Utilities LLC (Jack Boyer).

I live at 43 Bayshore Circle on Don Pedro Island. We care about our ocean and waterways here and have great concerns about Environmental Utilities request to obtain a permit to install a central sewer system.

From 1981 to 1992 I was a District Manager for Indiana Gas, Inc. for several cities in Southeastern Indiana, then Accounting Manager in the Corporate Office in Indianapolis. I know and have experience on the details of managing a utility operation and had the opportunity to work with the Indiana Utility Regulatory Commission. I am familiar with how utilities work and the resources necessary to run a successful utility.

In reading through the testimony provided in the dockets, it is quite clear that EU does not have the experience running a sewer system, nor has he proven the financial capacity to undertake this project.

We are a barrier island accessible by a ferry ride across the intercostal waterway and we often lose power for extended periods of time. Since we have moved here only three years ago, we have lost power for an extended period at least once a year. The LPS system that EU proposes has considerable issues during power loss. The only way to protect the environment in these situations so the smaller tank does not back up and overflow during an extended power loss, would be the installation of a generator at each home. EU has not considered any of these issues and is clearly looking to build the cheapest system available without consideration of the extreme environment on the island. Besides not properly considering all the costs associated to the homeowner, my concern is the "estimated" hook up cost of approximately \$13K that EU has submitted. These proposed hook up costs are not based on anything but EU's estimates. I have not been able to find anything that EU provided that substantiates these construction costs and what happens or what is EU's plan if the construction costs are higher than the estimated costs? What is the impact to us homeowners then, especially since EU has not provided information that they have the financial ability to complete the project in the first place?

For the above reasons and for the protection of our environment on this island, I respectfully request that you deny the Application for Original Certificate of Authorization for EU's proposed central sewer system.

Thank you-

Daniel Petersen
Palm Island homeowner.

Lisa Smith

From: Holly Parrish <hollyparrish@me.com>
Sent: Sunday, January 23, 2022 6:14 PM
To: Office of Commissioner Clark
Subject: 20200226- SU

Holly Parrish homeowner - 540 N Gulf
Steve Parrish homeowner - 540 N Gulf

Property owners on Don Pedro island

We object to the proposal and ask the PSE to deny the application for original certification and authorization for this proposed central sewer system.

Thank you.

Sent from my iPhone

Lisa Smith

From: Richard Collett <rhapsodyballroom@aol.com>
Sent: Sunday, January 23, 2022 6:04 PM
To: Office of Commissioner Clark
Subject: Docket#20200226-SU

From Richard J. Collett, property owner on Don Pedro Island (Colony Don Pedro unit #8; also 50 S. Gulf Blvd)

I hereby formally request that the PSC deny EU's application for wastewater service, based on the arguments in opposition to the proposed central sewer system as listed below.

I have been an owner on this beautiful island for over thirty years. My love for this special place is based on the unforgettable memories of wildlife, ocean and the fellowship of friends that we have met over the years. I can't count the many times this fantastic getaway has helped released the stress of life's burdens.

I just cannot even think of the unimaginable upheaval and disruption that the incredible noise of heavy equipment, the endless digging, and dramatic traffic disruption that full time residence and vacation renters will have to endure for months or, yes, even years. But I personally believe that the most damage will be done to the other residents of this island, the wildlife. The biggest thing that makes this island so very special is seeing things like a gopher tortoise snacking on vegetation or as simple as rabbits with their offspring enjoying a morning adventure. Not to mention the numerous species of birds that have called this island home for so many years. It will not take much to disrupt this delicate balance of nature. Past history tells us that once it has been disrupted by, yet again, man's desire to change something that does not need changing, it will never be the same.

The thirty plus years I have been coming to this island I have yet to hear of problems with the septic systems that is in place. I did have to address the septic system on my property once, and that was due to the drain field being clogged by roots. Which brings up the point that I now have a new drain field and septic tank at a cost of approximately \$17,000. If this proposal is approved what am I to do with a perfectly good septic system? Will EU reimburse me for a 1 year old system, or will they just dig it up and haul it away, in the name of "progress?"

The cost that has been mentioned in this proposal would most likely force many long term owners to abandon their dream. The cost of living for property owners on the island is extreme as it is. The upfront costs as well as future expenses proposed would place an extreme financial burden to each family. All of this to replace a system that has worked perfectly, just as it was intended to, because a company that really has no track record in safety or in financial stability, wants to do it. Once they completely disrupt what is now a beautiful and peaceful island, they will move on and leave the residents with the full responsibility of physically and financially maintaining their "new and improved system". As anyone can tell you, these last few years have been taxing on everyones pocketbook. This company is telling us that we must come up with large sums of money up front and who knows how much in "special assessments" for unexpected maintenance due to corrosion and mechanical and electrical breakdowns for years to come. They are also taking away part of our property to make room for the laying of the sewer pipes. My question is simple. Why go through this horrendous change when it really is not needed? Again, I state, that I have been a property owner for over thirty years. I have two properties on the island and I have never heard of anyone, from other owners, renters or property managers having problems with our current sewer system.

Therefore, based on the arguments above, I hereby formally request that the PSC deny the EU's application for wastewater service. The overall impact on our livelyhood both emotionally and financially, the devastation of the wildlife and overall uniqueness of our island makes this, I believe, a very easy decision to make.

Sincerely,
Richard J. Collett
Rhapsodyballroom@aol.com

Lisa Smith

From: James Davis <drjwdavis@mac.com>
Sent: Sunday, January 23, 2022 4:53 PM
To: Office of Commissioner Clark
Subject: Palm Island Sewer

Hello,

I am a home owner on Don Pedro Island and would like to express my opposition to the proposed sewer service.

The opacity on the finances of this company and the proposed project are a concern. We are giving them a blank check to charge us whatever they want to install the sewer and the opportunity to change us any thing that they want to in reoccurring charges. They have no experience in a project of this scope and no track record of even finishing what they have started.

If sewers are needed, there has to be a better way to go about it than to hire a company with no technical expertise for such a project.

I also do not feel the need for sewers on the island has been established. There seems to be no benefit to the homeowners who will fund the cost of the entire project. The needs of the island need to be determined by a company that is not going to profit from the sewer system.

Please deny EU's application for wastewater service

Thank You
James W and Christie Davis
161 S Gulf Blvd
Placida, FL 33946

Lisa Smith

From: quaintfox@aol.com
Sent: Sunday, January 23, 2022 4:45 PM
To: Records Clerk; Office of Commissioner La Rosa; Office of Commissioner Clark; Office of Commissioner Passidomo
Subject: Docket #20200226SU

From:
Catherine Harvie
9878 Little Gasparilla Island
Placida, FL 33946

Quaintfox@aol.com
407 694 5816

January 23, 2022

To: Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee,
FL 32399-0850

Dear Commissioners of the Public Service Commission,

I am a property owner at 9878 Little Gasparilla Island Placida FL 33946 which is a property within the service area of the proposed central sewer system (hereafter referred to as "project"), Docket #20200226SU. I formally object to and request that PSC deny Environment Utilities (EU) application for Original Certificate of Authorization for the proposed central sewer system.

Installation of proposed central sewer system will impose multiple hardships on the property owners on the LGI both financially, and logistically as well as have a potential for causing environmental damage.

Original estimate of hook-up cost for the project was about \$20K per unit. Even though after the rates and tariffs were finally submitted by the applicant, the requested Service Availability Charge per ERC was reduced to total estimated \$13,221, other financial and logistical consideration cannot be ignored.

Every homeowner on the LGI will be obligated to pay a monthly sewer ONLY bill in the amount currently estimated at \$178.78. This amount is basically two times the amount of what residents pay in Rotonda, the closest to LGI mainland location, and for Rotonda residents their bill includes BOTH water and sewer. In the meantime, the average cost to EU per unit per month is \$97.18.

Due to installation on a barrier island the project will not utilize central pump stations and each owner will be required to have individual "grinder" pumps installed which is an additional cost ranging from \$1,100 to over \$6,000 per pump (here are a couple of sample pricing/requirements, we are not sure which exact grinder pump would be required by project installers [Liberty Pumps 2448LSG202 \\$5,807.76 Grinder Package, Simplex | Zoro.com](#), [Gol Pumps Sewage-Grinder Pump, 460V, 3PH, 3in., SS304, Max. Flow 20640 GPH, Horsepower 7-1/2 HP, Port Size 3 in, Model# GPQ-732 | Northern Tool](#), [Liberty Pumps PRG102M \\$1,155.75 Grinder Pump, Manual, 230V | Zoro.com](#)). Moreover, a "grinder" pump requires a dedicated 230-240V electrical panel installed by a licensed electrician at owner's expense, and if the owner has maxed out their main electric grid with other large-draw items, the panel will need an expensive upgrade to accommodate the new panel.

Grinder pumps have limited capacity (typically, 60 gal), so if there is a power outage, which happens on LGI A LOT and often for prolonged periods of time (sometimes for over a week, if it's due to a large storm) the pump will get over filled and cause sewage back up. This can be avoided by installing a back-up power generator, however this is another cost from about \$700 for a manual start generator to over \$10,000 for a stand-by one. Given that a lot of owners on the LGI

don't live there full time, and even those who do live on LGI full-time are under evacuation orders during hurricanes that cause lengthy power outages, manual start generators are not an option since there would be no one to start them. Stand-by ones are exponentially more costly and their installation involves even more costs and logistical difficulties due to frequent flooding during high tides and storms.

Project installation would also require mandatory hook-up as per Charlotte County regulations within 1 year of availability with no grandfathering of existing septic tanks even if they are of recent installation. Homeowners would find themselves financially responsible for removing and crushing and filling the septic area regardless of septic tank age and/or condition as well as clearing landscape/removing trees to gain access for septic tanks to be removed.

With all these costs required to hook up to the project and no pay-overtime plans homeowners may be forced to take personal loans to cover the lump-sum costs of connection to the project regardless of their financial circumstances/ability to pay these loans back on time.

Moreover, some properties have access constraints (such as no road to the property), permanently or semi-permanently submerged immediately adjacent grounds, etc. that will further complicate how applicant gains access for project installation without leaving a single property boundaries or causing structural and/or environmental damage. Most current utility easements are located in the road right-of way. The applicant (EU) has claimed ownership of a utility easement solely for the purpose of the project that will go from the sewer equipment, located near the house to the connection in the road without compensating the homeowner, causing further financial damages to homeowners by negatively affecting their property values.

Applicant is NOT a contractor and has NOT won a bid to install a sewer. Homeowners have no say in who will be contracted for the project installation. Applicant has the right to outsource the installation to a contractor of their choice, no performance bond is required, so there is no single point of recourse for the homeowners in case of project failure. Moreover, multiple agencies (County, DEP, etc.) are responsible for their specific areas under regulation/permitting, which creates a nightmare for determining the exact entity to be held responsible if the project runs out of money or fails entirely.

If the project installation is successfully completed the homeowners are still facing problematic system maintenance issues and emergency repairs. At this point the applicant has not addressed how the project will be serviced for regular maintenance issues or emergency failures/repairs due to weather and/or other adverse conditions. By being located on a barrier island the equipment is exposed to harsh environmental factors such as salt air and increased humidity as well as frequent flooding during high tides and/or storms which greatly reduces the life of equipment. For instance, average exterior A/C unit lasts about 5 years. The project equipment will likely need replacing about every 5 years as well at homeowners' responsibility and expense.

Additionally, no water quality testing has been done in our area to prove a need for sewer. Construction activities required to install the project will negatively affect the habitat and interfere with endangered species such as the gopher tortoise. Widespread construction and vehicle access will also damage the protected plant species of sea grapes and sea oats which, in turn, protect the dunes that form the barrier Little Gasparilla Island from erosion. Destroying dune-stabilizing plants will expose the properties to greater damage during storm and high tide flooding. For comparison: just to install a wooden dune walk-over requires DEP permitting and the installer must ensure that such walk-over does not damage the dunes and the stabilizing plants. Imagine what havoc would a sewer installation wreak on a barrier island with just golf cart or pedestrian use-created paths, no paved roads, or current vehicle access!

In the event of damage to the project equipment a sewer spill will pollute the adjacent waters of the Gulf and the Intracoastal. We just had that happen in the Tampa area when their sewage system failed ([60,000 gallons of wastewater overflow into Tampa Bay waterways | wtsp.com](#)). That will damage the environment much more than a subaqueous crossing from one or more septic systems that develop leaks.

To summarize: this project imposes a great financial burden and too much responsibility on homeowners. In addition it causes tremendous logistical difficulties and has a grave potential for large-scale environmental damage. For these reasons, I formally object to and request that PSC deny Environment Utilities (EU) application for Original Certificate of Authorization for the proposed central sewer system.

Respectfully,

Catherine Harvie

Lisa Smith

From: robert.der.der@gmail.com
Sent: Sunday, January 23, 2022 4:25 PM
To: Office of Commissioner Clark
Subject: SUBJECT: Docket #20200226-SU Notice of Objection to the Central Sewer System Proposal for Palm Island and Request the PSC to Deny the Application for Original Certificate of Authorization the Proposed Central Sewer System for Palm Island

My name is Robert Der and I own a home and reside on Palm Island at:

171 South Gulf Boulevard
Placida, FL 33946-3294

My mailing address is:

P.O. Box 3294
Placida, FL 33946-3294

I am writing you to formally object to the proposed central sewer system for waste water service for Palm Island and request the PSC to deny the Environmental Utilities (EU) Application for Original Certificate of Authorization for the Proposed a Central Sewer System which includes Palm Island. Please understand that Palm Island is a bridgeless barrier island where access is only by a small ferry/barge system with very limited capability to transport large and heavy equipment that will be required for the project. This would significantly increase the project timing and cost and significantly reduce the ability of the islanders to get on and off the island during construction. I think this application lacks sufficient detail and analysis from an inexperienced small operator with a questionable reputation. I believe EU is hoping to obtain approval of the application and flipping it to another company for a quick profit. I formally request that you reject or deny EU's Application for Original Certificate or Authorization for the Proposed a Central Sewer System for the following reasons:

1. **NEED FOR SERVICE.** I am not aware of any scientific or environmental studies have ever been conducted to determine that there is a need for a central sewer system for Palm Island. I am a seasonal resident of Palm Island and am here only just over six months a year. Many home owners, including renters, stay on Palm Island much less than six months a year. I estimate that the total occupancy duration for our homes, including renters for the rental homes, would average substantially less than six months, probably closer to three months, per year. Palm Island has primarily residential properties with only Palm Island Resort (Resort) at the north end of Knight Island as the ONLY commercial entity on the island. The Resort consists of privately owned condo units and homes for rent as well as some owner occupied private residences with a restaurant and a couple of small shops. There are no additional stores, restaurants or other businesses that would dictate a need for a centralized municipal sewage treatment facility. Palm Island Resort owns and operates its own sewage treatment facility. The Resort and sewage facility should continue to provide for and take care of the Resort's needs. While the Palm Island homes have been on septic systems for years, the local water has been periodically tested and the results consistently do not show that the current residential septic systems are negatively impacting the water quality and local environment. I believe a possible leak from the proposed underwater pipeline carrying the waste material poses a much higher risk. I, also, believe the construction of the central sewer system would have a negative effect on local habitat and endangered species like the gopher turtles.

The installation of the new sewer system would require us homeowners to:

- Pay a huge connection fee
- Pay a large monthly fee
- Pay a large monthly fee that could be twice as high as some nearby areas
- Impact on current utilities such as electrical upgrades and a need for a generator for power interruptions (Palm Island experiences multiple power outages each year)
- Additional costs for yard and landscaping work due to sewer hookup

We should not be trying to fix something that is not broken. Due to the lack of demonstrated scientific evidence for the need for a centralized sewer system and the significant costs to be incurred, I strongly recommend that EU's application must be denied or rejected.

2. **FINANCIAL ABILITY.** EU has not provided sufficient and fully transparent information regarding its ability to finance this multi-million dollar and multi-year project. EU is a newly formed small company with no track record or financial statements to indicate that they would be capable of obtaining financing for and reliably managing a project of this magnitude and complexity. The requirement for performance bonds is a common business practice for construction projects and in this specific case of an inexperienced and small company like EU, this should be mandatory and nonnegotiable! I believe there is substantial risk that EU would not have the technical expertise or financial resources to obtain a performance bond, much less reliably completing the project.

If for some unfathomable and unbelievable reason, the application is granted, the application should be non-transferable. This would prevent EU from flipping the rights to the project as it may not have any intention or capability of completing the project. This would prevent an unqualified company like EU to flip the application to another company for a large fee and a quick profit.

Due to the small size of the company and lack of demonstrated financial resources and questionable intent and ability to execute on the project, I strongly recommend that EU's application must be denied or rejected.

3. **TECHNICAL EXPERTISE.** It is apparent that EU does not have technical expertise or skill set to put in a central sewer system. The only experience the owners of EU claim is the distribution of water to Little Gasparilla Island. That company has a history of poor service and dissatisfied customers. A water supply company that accepts treated water from another mainland utility and then distributes it, reads the meters, and collects the payments, is vastly different from the complexity and magnitude of designing, installing, maintaining and running a municipal sewage system on a barrier island. I understand that EU plans to contract with an engineering/construction firm to design and build out the proposed system. I question if the two owners of EU would even be qualified to draft the technical specifications for a request for a proposal to build the system or evaluate the proposals once they arrive. The EU owners have no experience or qualifications in designing, building and management of a project of this size and complexity. Due to EU's lack of technical expertise, experience and resources, I strongly recommend that EU's application must be denied or rejected.

4. **FAIR AND EQUITABLE RATES & CHARGES.** From the start, EU has not been transparent or fully analyzed the the costs and resulting rates and charges for the proposed central sewer system. Initially, EU boldly and without merit requested to have the Authorization separated from any information on proposed installation costs or rates. The PSC thankfully denied the request. Following the denial, EU suggested a possible connection fee of \$20,000 per dwelling. It seems that this was simply a guess they hoped to get approved. Now, EU is "guessing" a much lower connection fee of \$13,000 per dwelling. EU has yet to present transparent and realistic cost estimates, calculations and related assumptions based on certified preliminary

designs and specifications to justify rates and charges. Reliable cost estimates cannot be calculated without an adequate preliminary design and cost calculations from a licensed and qualified engineering firm with experience in designing and overseeing the construction of central sewer systems. Due to EU's lack of a preliminary design and cost calculations from or evaluated by a qualified engineering firm, the financial information provided by EU cannot be relied on. As a result, any rates and charge information based on EU provided information could be wildly inaccurate and should not be relied upon. Due to the lack of reliability and transparency of EU's cost estimates and are not based on valid engineering projections, I strongly recommend that EU's application must be denied or rejected.

Thank you for your consideration.

Best regards,

Robert Der

Mobile telephone numbers:

USA: +1-630-373-7886

China: +86-136-6196-0494

Email: robert.der.der@gmail.com

or derro@yahoo.com