

Lisa Smith

From: Office of Commissioner Passidomo
Sent: Monday, January 24, 2022 12:37 PM
To: Commissioner Correspondence
Subject: FW: Formal request to DENY Environmental Utilities Docket #20200226-SU
Attachments: Wilkins PSC Letter Docket #20200226-SU .pdf; ATT00001.htm

Please place the attached in Docket No. 20200226.

Thank you!

From: bocilla@comcast.net <bocilla@comcast.net>
Sent: Monday, January 24, 2022 12:36 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>; Office of Commissioner La Rosa <Commissioner.LaRosa@psc.state.fl.us>; Office of Commissioner Clark <Commissioner.Clark@psc.state.fl.us>; Office of Commissioner Passidomo <Commissioner.Passidomo@psc.state.fl.us>
Subject: Formal request to DENY Environmental Utilities Docket #20200226-SU

January
24, 2022

Clerk of the Commission clerk@psc.state.fl.us
Commissioner LaRosa: Commissioner.LaRosa@psc.state.fl.us
Commissioner Clark: Commissioner.Clark@psc.state.fl.us
Commissioner Passidomo: Commissioner.Passidomo@psc.state.fl.us

SUBJECT: Docket #20200226-SU

Dear Commissioners and Clerk of the Commission.

My name is Marcia Wilkins. My husband Gary and I have been fulltime residents on Don Pedro Island since we built in 1989, and part-time residents before then. We are writing to formally request that the Public Service Commission DENY Environmental Utilities LLC's (EU) application under Docket #20200226-SU for wastewater service.

We ask that the EU application be **DENIED** for the following reasons:

1. **Lack of technical expertise:** EU personnel have no experience operating a wastewater service.

2. **No demonstrated need for wastewater service for our local waters:** We are not aware of any environmental studies or water quality testing showing a need for central sewer for our local Lemon Bay and northern Charlotte Harbor waters.
3. **No grandfathering of existing/new septic systems:** We have been fulltime residents for more than 30 years. A few years ago we went to great expense, time and effort to permit and replace our existing septic system. As we had gone to this expense just a few years ago, we like many other owners of newer homes look for some grandfathering of newer systems, but this is not contemplated by the EU application. All homeowners are expected to connect within a year ... no exceptions.
4. **Egregious Connection Charges:** We, like many island residents, are retired and on a fixed income. The exorbitant costs of the more than \$12K connection fee PLUS crushing and filling our existing septic tank PLUS the cost of running lines through our private common drive over to our property PLUS the added electrical service PLUS the added generator for EU's sewer solution PLUS moving and replacing displaced landscaping are well beyond our planned expenses for this time of our lives – especially given the recent full replacement of our septic tank system.
 - a. The original 12/2020 estimate for connection fees was nearly \$20K and while the current \$12K is somewhat reduced with no logical explanation, the ongoing monthly fees in perpetuity have increased significantly.
 - b. There has been no “pay-over-time” plan proposed suggesting all expenses will come due at one time.
5. **Even More Egregious Monthly Rates:** It appears the estimated monthly cost of EU's sewer service would average more than \$250/month for usage based on 4,000 gallons. This is 3x – 4x the cost of comparable monthly service in surrounding areas.
6. **No centralized oversight:** As there is no official governmental body with oversight and enforcement authority over this immensely expensive project, the likelihood of a failure in full or in part is increased which would leave homeowners stuck paying these costs more than once. The likelihood is significant given:
 - a. EU has never undertaken a wastewater project.
 - b. EU would not be required to take out a performance bond in the event of cost overruns or project failure, leaving island owners left paying even more to complete the project.
 - c. The PSC, Florida DEP, Charlotte County and the Army Corps of Engineers each have oversight over a single, specific area of the project covered by specific regulation or permitting.
7. **Negative impact on island wildlife:** We love the native environment of the barrier islands and work hard to support efforts to protect this special environment. EU has not offered anything showing plans to minimize impact on the native island wildlife from the protected gopher tortoises, indigo snakes, nesting Bald Eagles, etc. As the sewer grinder pump proposed has a limited capacity of 60 gallons (~25-30 flushes), if islanders don't have electrical power nor external fuel for generators during our frequent power interruptions, localized raw sewage issues will devastate wildlife and general quality of life at each property. Further, the risk of issues with raw sewage transiting under the intracoastal waterway independent of any storm related power outages is far greater than anticipated from individual septic tanks with the potential to have a devastating impact on our marine life and shore birds.

For these reasons, we are formally requesting that the Public Service Commission **DENY** Environmental Utilities request under Docket #20200226-SU.

Thank you for considering our concerns.

Sincerely,

Marcia and Gary Wilkins

7 Pointe Way, Don Pedro Island, FL

Email: Bocilla@comcast.net

January 24, 2022

Clerk of the Commission clerk@psc.state.fl.us
Commissioner LaRosa: Commissioner.LaRosa@psc.state.fl.us
Commissioner Clark: Commissioner.Clark@psc.state.fl.us
Commissioner Passidomo: Commissioner.Passidomo@psc.state.fl.us

SUBJECT: Docket #20200226-SU

Dear Commissioners and Clerk of the Commission,

My name is Marcia Wilkins. My husband Gary and I have been fulltime residents on Don Pedro Island since we built in 1989, and part-time residents before then. We are writing to formally request that the Public Service Commission DENY Environmental Utilities LLC's (EU) application under Docket #20200226-SU for wastewater service.

We ask that the EU application be DENIED for the following reasons:

1. **Lack of technical expertise:** EU personnel have no experience operating a wastewater service.
2. **No demonstrated need for wastewater service for our local waters:** We are not aware of any environmental studies or water quality testing showing a need for central sewer for our local Lemon Bay and northern Charlotte Harbor waters.
3. **No grandfathering of existing/new septic systems:** We have been fulltime residents for more than 30 years. A few years ago we went to great expense, time and effort to permit and replace our existing septic system. As we had gone to this expense just a few years ago, we like many other owners of newer homes look for some grandfathering of newer systems, but this is not contemplated by the EU application. All homeowners are expected to connect within a year ... no exceptions.
4. **Egregious Connection Charges:** We, like many island residents, are retired and on a fixed income. The exorbitant costs of the more than \$12K connection fee PLUS crushing and filling our existing septic tank PLUS the cost of running lines through our private common drive over to our property PLUS the added electrical service PLUS the added generator for EU's sewer solution PLUS moving and replacing displaced landscaping are well beyond our planned expenses for this time of our lives – especially given the recent full replacement of our septic tank system.
 - a. The original 12/2020 estimate for connection fees was nearly \$20K and while the current \$12K is somewhat reduced with no logical explanation, the ongoing monthly fees in perpetuity have increased significantly.
 - b. There has been no "pay-over-time" plan proposed suggesting all expenses will come due at one time.
5. **Even More Egregious Monthly Rates:** It appears the estimated monthly cost of EU's sewer service would average more than \$250/month for usage based on 4,000 gallons. This is 3x – 4x the cost of comparable monthly service in surrounding areas.
6. **No centralized oversight:** As there is no official governmental body with oversight and enforcement authority over this immensely expensive project, the likelihood of a failure in full or in part is increased which would leave homeowners stuck paying these costs more than once. The likelihood is significant given
 - a. EU has never undertaken a wastewater project.
 - b. EU would not be required to take out a performance bond in the event of cost overruns or project failure, leaving island owners left paying even more to complete the project.
 - c. The PSC, Florida DEP, Charlotte County and the Army Corps of Engineers each have oversight over a single, specific area of the project covered by specific regulation or permitting.
7. **Negative impact on island wildlife:** We love the native environment of the barrier islands and work hard to support efforts to protect this special environment. EU has not offered anything showing plans to minimize impact on the native island wildlife from the protected gopher tortoises, indigo snakes, nesting Bald Eagles, etc. As the sewer grinder pump proposed has a limited capacity of 60 gallons (~25-30 flushes), if islanders don't have electrical power nor external fuel for generators during our frequent power interruptions, localized raw sewage issues will devastate wildlife and general quality of life at each property. Further, the risk of issues with raw sewage transiting under the intracoastal waterway independent of any storm related power outages is far greater than anticipated from individual septic tanks with the potential to have a devastating impact on our marine life and shore birds.

For these reasons, we are formally requesting that the Public Service Commission DENY Environmental Utilities request under Docket #20200226-SU. Thank you for considering our concerns.

Sincerely,

Marcia and Gary Wilkins
7 Pointe Way, Don Pedro Island, FL
Email: Bocilla@comcast.net