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# Public Service Commission

December 14, 2022

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2022 DEC 14 PM 4:24  
COMMISSION CLERK

Troy Rendell  
U.S. Water Services Corporation  
4939 Cross Bayou Blvd.  
New Port Richey, FL 34652

VIA ELECTRONIC MAIL

**Re: Docket No. 20220201-WU - Request by Florida Community Water Systems, Inc. for a revenue-neutral rate restructuring in Brevard, Lake, and Sumter Counties**

Dear Mr. Rendell:

We have reviewed the minimum filing requirements (MFRs) submitted on November 14, 2022, on behalf of Florida Community Water Systems (FCWS or utility). After reviewing this information, we have determined that two of the systems have never had a rate case, and two additional systems have not had a rate case within seven years of the date the petition for limited proceeding was filed with the Commission; and therefore, such a limited proceeding is not allowed pursuant to Rule 25-30.445(6)(c), Florida Administrative Code (F.A.C.). However, we recognize that the utility has subsequently filed on December 5, 2022, a rule waiver of the aforementioned rule. A decision must be made on the rule waiver in order to proceed with this filing. In the event the ruling is in your favor, we find the MFRs to be deficient.

1. Pursuant to Rule 25-30.445(3), F.A.C., a filing fee, as required in Rule 25-30.020, F.A.C., must be submitted at the time of application. Staff calculated the appropriate filing fee to be \$8,400 for water and \$500 for wastewater. FCWS submitted a filing fee of \$1,750 for water and \$500 for wastewater. For water, an additional \$6,650 is due for the filing fee.
2. Pursuant to Rule 25-30.445(4)(j), F.A.C., applications must include annualized revenues for the most recent 12-month period using the rates in effect at the time the utility files its application for limited proceeding and a schedule reflecting the calculation by customer class and meter size. The systems in this filing had price index rate adjustments in 2022. In addition, three systems (Black Bear, Harbor, and Jumper Creek) did not have annualized revenue calculations in the filing. Please provide annualized revenue schedules for all systems with the appropriate rates. Please update any schedules affected by the revisions.

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3. Pursuant to Rule 25-30.445, F.A.C., applications for limited proceedings for water must also include a copy of all customer complaints that the utility has received regarding DEP secondary water quality standards during the past five years; and a copy of the utility's most recent secondary water quality standard test results.

Your petition will not be deemed filed unless the Commission waives the rule requirement and the deficiencies identified in this letter have been corrected. If the utility would like to cure the deficiencies prior to the decision on the rule waiver, please submit to the following address:

**Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850**

Should you have any questions concerning the information in this letter, please feel free to contact Shannon Hudson at (850) 413-7021 for technical questions.

Sincerely,



Judy Harlow  
Director

JH:sja

cc: Office of Commission Clerk (Docket No. 20220201-WU)