

Office of Commission Clerk  
Florida Public Service Commission

CORRESPONDENCE  
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April 17, 2024

Dear Commissioners of the Public Service Commission,

We are property owners 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. We formally object to and request that PSC **deny** Environment Utilities (EU) application for Original Certificate of Authorization for the proposed central sewer system.

In addition, we cannot understand why this is even under discussion, since it was **denied** 2 years ago and **nothing** changed on the island environmentally or physically to all of a sudden justify a new application. The financial burdens are still the same, even worse after hurricane Ian. The environmental conditions are still the same, the hurricane only made it more obvious how devastating a hurricane damaged failed sewer system can be to a barrier island.

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 \$13,511, other financial and logistical consideration cannot be ignored.

- **Hook-up Cost:** According to the application, the initial connection fee will be \$12,000. There is an additional \$1,097 "Sewer Lateral Connection" fee to run the pipe from the road to the location of the equipment near your home. There is also an initial deposit required of \$414, which is identified as 2x the estimated monthly bill. **That's a total of \$13,511.00.** Note that

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costs could exceed the estimates by large measure and homeowners will likely be saddled with additional burdens.

Every homeowner on the LGI will be obligated to pay a monthly sewer ONLY bill in the amount currently estimated at \$207.00. 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.

- **Average Residential Bill:** The rates and tariffs submitted to the PSC shows a base rate of \$115.81 per month just to provide wastewater service. In addition, the monthly residential service charge is \$39.64 per 1000 gallons. EU estimates average household usage at 2,500 gallons/month. Based on this, **the monthly billing would be \$207.00/month**. However, when the PSC prepared a Rate Case summary that was distributed at the 2022 Administrative Hearing, they cited a more realistic average household usage estimate of 4,000 gals/month. Using this average the monthly billing would be **\$263.57/month for wastewater service alone. This is exclusive of your water bill.**

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.

The financial burdens are even higher now after hurricane Ian damage to the area. People are finding themselves in financial hardship due to insurance issues (insurance companies do not pay enough to restore/rebuild damaged homes even if policies provide to higher payouts - we have experienced it ourselves, when our insurance company tried to pay us 1/5 of the total damage coverage and make us go away. We had to hire a public adjustor to fight the insurer).

Negative environmental consequences cannot be enough emphasized, especially after hurricane Ian - the level of destruction and extra-long times it took to restore power and infrastructure on the island make it abundantly clear that all the equipment required for the sewer system to function properly, not to mention actual piping will incur long-term damage and be non-operational for a long time after such an event as a hurricane, causing the island to literally drown in sewer waste!

**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 on 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

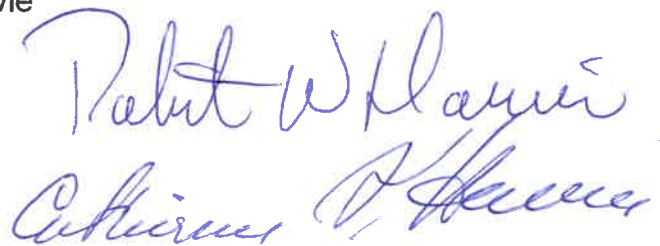
that form the barrier Little Gasparilla Island from erosion. Destroying dune-stabilizing plants will expose the properties to greater damage during storm and high tide flooding. For comparison: just to install a wooden dune walk-over requires DEP permitting and the installer must ensure that such walk-over 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](https://www.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, **we formally object to and request that PSC deny Environment Utilities (EU) application for Original Certificate of Authorization for the proposed central sewer system.**

Respectfully,

Robert and Catherine Harvie



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