

Charlie Smith

From: Charlie Smith on behalf of Records Clerk
Sent: Monday, May 13, 2024 8:57 AM
To: 'David Cohen'
Cc: Consumer Contact
Subject: RE: Docket #20240032-SU

Good morning David Cohen,

We will be placing your comments below in consumer correspondence in Docket No. 20240032, and forwarding them to the Office of Consumer Assistance and Outreach.

Best regards,

Charlie Smith II

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
850-413-6770

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From: David Cohen <david.paul.cohen@gmail.com>
Sent: Friday, May 10, 2024 11:20 AM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Cc: Office of Chairman 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>; Office of Commissioner Graham <Commissioner.Graham@PSC.STATE.FL.US>; Office of Commissioner Fay <Commissioner.Fay@psc.state.fl.us>
Subject: RE: Docket #20240032-SU

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To the Clerk and Commissioners of the FL PSC,

I am writing to ask that you deny the application for EU to provide the services as outlined in Docket #20240032-SU.

This letter begins to deal with various missing financial, environmental and county impacts that must be part of a complete submission to the commission.

As the Commission is well aware, The cost of living in FL is getting higher and higher. You are currently holding hearings on the cost of electricity and learning the impact it has on various households and businesses.

The same is true for the impact, both initially and ongoing, for the sewer system in question.

As I am sure you have heard from many, the provided cost estimates grossly underestimate or completely neglect to correctly specify the actual costs to the clients and county as well as a lack of sound financial planning, including but not limited to:

- Right of Way issues that have been ongoing for some time on Knight and Don Pedro Islands. There is a great number of non-permitted ROW and Clean Area blockages with boulders and other hardscape obstacles that, to date, the county has refused to deal with as obligated by ordinance. Finally dealing with physical and political issues will add considerable cost that would be passed on to the clients as well as the county as greatly impacted timelines as the county itself is currently insufficiently staffed..
- Endangered species habitat and migration considerations.. There are a great many endangered species that make a home on the islands. Further, there are well documented migratory species, some endangered, that use the island as layover or nesting areas over the course of the year. There is no environmental study or submitted plans to deal with relocation of endangered species in the right of way or on the easements of nor a plan to prevent interruption of migratory patterns. This adds a great deal of time, permitting and cost that would be passed on to the clients.
- The actual costs of providing electrical connection with a separate panel and emergency power such as a client provided generator have not been specified.
- There are completely unknown costs associated with the land composition of the barrier islands. This is sand, not dirt. The roads are sand, not dirt and, except for 1 mile, not asphalt. How will required manholes be dealt with on sand roads? Will we be able to even maintain sand roads that have manholes? These are complete unknowns as they have NEVER been dealt with at scale. There is no study and no understood financial impact in dealing with this type of challenge.
- There are no submitted plans to deal with an emergency that has a wide scale impact. Loss of electricity for more than 8 hours prevents the system in question from operating quickly. What is the financial capability of the EU LLC to deal with a 2 week lack of power, highly restricted access to the island and regional lack of fuel to operate the local septic tanks on a bridgeless barrier island and to then quickly restore hundreds to individual systems to say nothing of the collection system itself? That is to say, what is the disaster plan and why is it not part of the submission?

These actual costs, to the client the county and EU have not been analyzed correctly, resulting in the EU application being materially erroneous in its cost to clients and even the county.

Further, there is no verified disaster recovery plan with sufficient capital reserves. Surely the commission is aware of major spills that occur with central sewer systems even without a major disaster. With an LLC running the operation as opposed to the county, who is going to pay for any incurred costs of cleanup for fines levied by various government agencies? I have seen no capital reserve or disaster reserve financial planning.

Thank You,
David Cohen
201-600-1450