

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application for certificate to provide
wastewater service in Charlotte County, by
Environmental Utilities, LLC

DOCKET NO. 20240032-SU

**NOTICE OF FILING OF PREFILED REBUTTAL TESTIMONY OF DAVE WATSON
ON BEHALF OF ENVIRONMENTAL UTILITIES, LLC**

Environmental Utilities, LLC, by and through its undersigned counsel, hereby notices the
filing of the attached Prefiled Rebuttal Testimony of Dave Watson.

Respectfully submitted this 6th day of December,
2024.

/s/ Martin S. Friedman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Filing of Rebuttal Testimony has been furnished by electronic mail to the following parties this 6th day of December, 2024:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for certificate to provide
wastewater service in Charlotte
County by Environmental Utilities, LLC

Docket No. 20240032-SU

REBUTTAL TESTIMONY

OF

DAVE WATSON, Charlotte County Utilities Director

on behalf of

Environmental Utilities, LLC

1 **Q. What is the purpose of your Rebuttal Testimony.**

2 A. The purpose of my Rebuttal Testimony is to address certain testimony filed on behalf of
3 Intervenors.

4 **Q. What efforts is Charlotte County Utilities making to reduce nutrients in the effluent**
5 **from its Water Reclamation Facilities?**

6 A. Nutrient reduction for Charlotte County Utilities means advanced wastewater treatment. CCU
7 is currently underway with a plant expansion at its Eastport WRF. Part of this expansion is
8 the inclusion of Advanced Wastewater Treatment which will bring the nutrient output to meet
9 the 5:5:3:1 requirements from the FDEP. We intend on continuing the AWT throughout our
10 other plants to meet the State's goals by 2034 and as directed by our Board of County
11 Commissioners. Each of our remaining plants are in various stages of planning and design
12 that ultimately will include AWT.

13 **Q. Does Charlotte County agree with witness Hardgrove that the conversion of septic tanks**
14 **on the islands is not consistent with the Sewer Master Plan?**

15 A. No, it does not. This is made abundantly clear when the Board of County Commissioners
16 adopted Resolution 2023-155 finding "Charlotte County verifies that the proposed EU
17 Project is not inconsistent with the 2017 Charlotte County Sewer Master Plan." Figure 4-7 in
18 the Sewer Master Plan clearly shows the island as within the 5-year plan to eliminate septic
19 tanks.

20 **Q. Does Charlotte County agree with witness Hardgrove that the conversion of septic tanks**
21 **on the islands is not consistent with the Charlotte County Comprehensive Plan?**

22 A. No, it does not. This is made abundantly clear when the Board of County Commissioners
23 adopted Resolution 2023-155 finding "Charlotte County verifies that the proposed EU
24 Project is not inconsistent with the Charlotte County Comprehensive Plan." The
25 Comprehensive Plan provisions that Ms. Hardgrove relies by its terms addresses the

1 extension of public facilities and services outside of the Urban Services Area, not those of
2 private utility providers. The provisions that Ms. Hardgrove relies upon applies to both central
3 water and wastewater service. Except for the State Park property, the whole island is already
4 served by central water service. There are currently three utilities providing central water
5 service to the islands, one of which also provides central wastewater service. So,
6 Environmental Utilities would not even be the first utility on the island providing central
7 wastewater service. One of the central water systems even provides water service via an
8 interconnect with Charlotte County Utilities. It should be abundantly clear that Charlotte
9 County believes that the granting of authority to operate another central wastewater system
10 on the island is not contrary to the Charlotte County Comprehensive Plan.

11 **Q. Do you agree with Ms. Cotherman’s statement that the CCU wastewater treatment**
12 **plant that will be accepting sewage from Environmental Utilities is not designed to**
13 **accept that sewage?**

14 A. No. The wastewater from the proposed Environmental Utilities collection system will be
15 domestic wastewater acceptable at the Rotunda WRF.

16 **Q. When Environmental Utilities installs a sewer collection line adjacent to a developed**
17 **residential property will that property have to connect the same as it would if the line**
18 **was installed by Charlotte County?**

19 A. Yes, Charlotte County has enacted a mandatory connection ordinance which applies to both
20 public and private utilities. The Section applicable to wastewater service is 3-8-41 of the
21 Charlotte County Code.

22 **Q. How does a utility enforce the Mandatory Connection Ordinance?**

23 A. When Charlotte County installs a water or wastewater line adjacent to a property it sends a
24 Notice to the property owner that connection must be made within 365 days, and outlines the
25 process to apply for service and pay the appropriate fees. If the property owner does not

1 comply the County sends a Final Notice, which also advises that if connection is not made
2 the County will begin to bill its base facility charge anyway. If the property owner continues
3 to refuse to connect, the property owner could be subject to a Code Enforcement proceeding.

4 **Q. Are you sponsoring any rebuttal exhibits?**

5 A. No.

6 **Q. Does that conclude your rebuttal testimony?**

7 A. Yes, it does.

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