



PHONE (850) 425-6654 FAX (850) 425-6694 WEB WWW.RADEYLAW.COM  
MAIL POST OFFICE BOX 10967 | TALLAHASSEE, FL 32302 OFFICE 301 SOUTH BRONOUGH ST. | STE. 200 | TALLAHASSEE, FL 32301

*tcrabb@radeylaw.com*

July 25, 2025

VIA Electronic Filing to the Office of Commission Clerk

Florida Public Service Commission  
Office of Commission Clerk  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Attn: Daniel Dose, Senior Attorney

Re: Docket 20250052-WS – Application for increase in water and wastewater rates in Brevard, Citrus, Duval, Highlands, Marion, and Volusia Counties by CSWR-Florida Utility Operating Company, LLC

Dear Mr. Dose:

On behalf of CSWR-Florida Utility Operating Company, LLC (“CSWR-Florida”), the following is the company’s response to the Commission’s July 23, 2025, First Data Request:

1. Per MFR B-3 of the 2025 interim filing and the supplemental annualization work papers provided via e-mail on July 17, 2025, Tymber Creek imputed months of data based on annualizing expenses and revenues for months the Utility was not under CSWR’s ownership.

The following questions relate to this adjustment.

- a. Please provide actual expenses and revenues for the months under the former owner to reflect a full 12 months of historical data.

**Response:** CSWR-Florida acquired the Tymber Creek systems from the Estate of J. Stanley Shirah in a transaction that closed on May 31, 2024. Mr. Shirah, the longtime owner and operator of Tymber Creek Utilities, died on August 10, 2020. CSWR-Florida has contacted the Personal Representative of the Estate in an attempt to obtain the “actual expenses and revenues for the months under the former owner,” which would be January through May, 2024. CSWR-Florida has not yet received any of the requested data from the Estate and CSWR-Florida has no information regarding whether the requested data exists.



b. If CSWR is unable to provide this data, please justify the inclusion of the imputed months based on the prescriptive nature of interim, as prescribed by Statute 367.082(5)(b) and Rule 25-30.437(2)(d), Florida Administrative Code, which requires a historical basis for the interim request.

**Response:** CSWR-Florida received the First Data Request only two (2) days ago so it would be premature to say CSWR-Florida is “unable to provide this data.” If the Estate provides the requested data to CSWR-Florida, then CSWR-Florida will immediately supplement its filings accordingly. The data provided by CSWR-Florida, including the imputed data from the first half of 2024, is the best available and most accurate information given the circumstances under which CSWR-Florida acquired the Tymber Creek systems. Section 367.082(5)(b), Florida Statutes, refers to data “for the most recent 12-month period” and Rule 25-30.437(2)(d), Florida Administrative Code, requires the utility to submit “schedules of rate base, cost of capital and net operating income on an historical basis . . . .” The data provided by CSWR-Florida is the best available account of the 12-month historical period and CSWR-Florida should not be unfairly penalized for circumstances beyond its control.

Thank you for the opportunity to provide additional information in support of the application. Please feel free to contact our office at your convenience with any additional questions or concerns.

Sincerely,

*/s/ Thomas A. Crabb*

Thomas A. Crabb  
Attorney for CSWR-Florida

cc: Aaron Silas (via email)  
Walt Trierweiler, Esq. (via email)  
Austin Watrous, Esq. (via email)  
Daniel Dose, Esq. (via email)  
Jennifer Crawford (via email)  
Jennifer Augspurger (via email)