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STATE OF FLORIDA



DIVISION OF ECONOMICS
ELISABETH J. DRAPER
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Public Service Commission

October 31, 2025

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2025 OCT 31 PM 3:50
COMMISSION
CLERK

Re: Docket No. 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 Ms. Clark and Mr. Crabb:

Staff has reviewed the responses to deficiencies submitted on October 15, 2025, on behalf of CSWR-Florida Utility Operating Company, LLC (CSWR-Florida). After our review, we find the minimum filing requirements (MFRs) to be deficient. The specific deficiencies are identified below.

Deficiencies

1. Rule 25-30.437(1), Florida Administrative Code (F.A.C.), requires a utility to complete MFRs. The following values were either not present or not correct in the utility's filings as set out by the instructions governing the MFRs. For the following items listed below, please correct the filings to address the errors as well as correct any fallout figures and schedules.

E-2

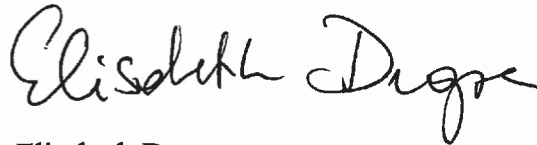
- a. Tradewinds Water –In column 7, the proposed revenues are significantly understated because the gallonage revenue was not calculated correctly. Please see the residential tiers, which are incorrect. Based on the number of gallons and the proposed gallonage charge, the gallonage revenues should be corrected for residential.
- b. Schedule E-2 requires a calculation of revenues at present and proposed rates using the billing analysis for the residential service class and bills and consumption for all

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other classes of service be provided. For the individual systems, the consumption for the residential water and wastewater classes are presented in kgals while the consumption for the general service are presented in kgals or in mg. Please provide the consumption presented on Schedule E-2 in a consistent manner, which should be in all kgals or in all mg.

If any above corrections require a corresponding change to any other MFR schedules, those corrected schedules must also be submitted in accordance with Rule 25-30.436(5)(d), F.A.C. Your petition will not be deemed filed until the deficiencies identified in this letter have been corrected. These corrections should be submitted no later than December 1, 2025.

Sincerely,

A handwritten signature in black ink, appearing to read "Elisabeth Draper". The signature is fluid and cursive, with the first name "Elisabeth" written in a larger, more prominent script than the last name "Draper".

Elisabeth Draper
Director

ED:sb

cc: Office of Commission Clerk (Docket No. 20250052-WS)