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DIVISION OF ENGINEERING
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Public Service Commission

March 6, 2026

Susan F. Clark, Esq.
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Radey Law Firm
301 South Bronough Street, Suite 200
Tallahassee, FL 32301
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tcrabb@radeylaw.com

VIA EMAIL

Re: Docket No. 20260019-WS. Application for transfer of facilities of Forest Utilities, Inc. and Wastewater Certificate No. 300-S to CSWR-Florida Utility Operating Company, LLC, in Lee County.

Dear Ms. Clark and Mr. Crabb:

The Florida Public Service Commission (Commission) staff has reviewed the application for transfer of facilities of Forest Utilities, Inc. (Seller) and Wastewater Certificate No. 300-S to CSWR-FL (Buyer), filed on February 4, 2026. After reviewing the information provided, we find the application to be deficient. The specific deficiencies are:

1. **Filing Fee.** Rule 25-30.037(2)(a), Florida Administrative Code (F.A.C.), requires that the applicant provide a filing fee pursuant to Rule 25-30.020(2)(c), F.A.C. Based on Rule 25-30.020(2)(c), F.A.C., and the wastewater plant capacity permitted with the Department of Environmental Protection for Forest Utilities, Inc.'s wastewater system, staff has determined that the filing fee is \$2,250. The Buyer previously paid \$1,500 by check on February 6, 2026. Please provide the remaining \$750 for the filing fee.
2. **Notice of Application.** Rule 25-30.030(4)(c), F.A.C., requires that public notices include the common name of developments served by the utility. The common names of the developments are lacking on the provided notice and should be clearly stated, if there are any. Please submit a revised notice with this information for staff's review.
3. **Proof of Noticing.** Rule 25-30.037(b), F.A.C., requires proof of noticing pursuant to Rule 25-30.030(6), F.A.C., which states that all applications requiring noticing shall be deemed deficient until affidavits of noticing required by Sections 367.045(1)(e) and (2)(f), Florida Statutes, along with a copy of the notice are filed with the Office of Commission Clerk. After staff has reviewed and approved the notice of application, and the notices have been distributed in accordance with Rule 25-30.030(5), F.A.C., please provide the affidavits of noticing.

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4. **Economies of Scale.** Rule 25-30.037(v), F.A.C., requires buyers that own other water or wastewater utilities that are regulated by the Commission provide a schedule reflecting any economies of scale that are to be achieved within the next three years and the effect on rates for existing customers served by both the utility being purchased and the buyer's other utilities. While an extensive justification of the Buyer's economy of scale was provided, no anticipated three year plan and its effects on the ratepayers was provided. Please provide a summary of what, if any, economies of scale are anticipated to be achieved within the next three years and the effect on rates for existing customers served by both the Buyer and Seller.

Your application will not be deemed filed until the deficiencies identified in this letter have been corrected. The corrections should be submitted no later than **Thursday, April 2, 2026**, to the following address:

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Please direct any questions regarding the information contained in this letter by contacting Connor Willis at (850) 413-6632 or by email at CWillis@psc.state.fl.us for technical questions, or Zachary Bloom by phone at (850) 413-6524 or email at ZBloom@psc.state.fl.us for legal questions.

Sincerely,

s/ L. Connor Willis

L. Connor Willis
Engineering Specialist
Division of Engineering

LCW:da

cc: Office of Commission Clerk (Docket No. 20260019-WS)