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DIVISION OF ENGINEERING
TOM BALLINGER
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Public Service Commission

February 10, 2020

D. Bruce May, Jr.
Holland & Knight LLP
316 South Calhoun St., Suite 600
Tallahassee, FL 32301
bruce.may@hklaw.com

VIA EMAIL & US MAIL

Re: Docket No. 20190194-WS - Application for original water and wastewater certificates and approval of initial rates, charges and standard service agreements in Lee County, by CPI Citrus Park Utility TRS, L.L.C.

Dear Mr. May:

Staff has reviewed CPI Citrus Park Utility TRS, L.L.C.'s (CPI) response to staff's November 21, 2019 deficiency letter. After review, we find the application is still deficient. The specific deficiencies are identified as:

1. **Financial statement.** Rule 25-30.033(1)(h)1., Florida Administrative Code (F.A.C.), requires a detailed financial statement (balance sheet and income statement), audited if available, of the financial condition of the applicant, that shows all assets and liabilities of every kind and character. The financial statements shall be for the preceding calendar or fiscal year. CPI provided a balance sheet for the year ending December 31, 2020. However, CPI needs to provide a balance sheet and income statement for the preceding calendar or fiscal year.
2. **List of entities.** Rule 25-30.033(1)(h)2., F.A.C., requires a list of all entities, including affiliates, upon which the applicant is relying to provide funding to the Utility and an explanation of the manner and amount of such funding. The list need not include any person or entity holding less than 5 percent ownership interest in the Utility. The applicant shall provide copies of any financial agreements between the listed entities and the utility and proof of the listed entities' ability to provide funding, such as financial statements. CPI provided a balance sheet for the outside entity. However, CPI needs to also provide an income statement for the outside entity.

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3. **Notice of Application.** Rule 25-30.030(6), F.A.C., 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, F.A.C., please provide affidavits of noticing.

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 **February 21, 2020**, to the following address:

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

Should you have any questions concerning the information in this letter, please feel free to contact Mrs. Melinda Watts by phone at (850) 413-6952 or by email at mwatts@psc.state.fl.us for technical questions, or Ms. Kristen Simmons by phone at (850) 413-6175 or by email at ksimmons@psc.state.fl.us for legal questions. Please include the docket number on all submissions to the Commission Clerk.

Sincerely,



Melinda Watts
Engineering Specialist

MW/jp

cc: Office of Commission Clerk (Docket No. 20190194-WS)