

Jacob Veaghn

From: Jacob Veaghn
Sent: Tuesday, January 12, 2021 6:27 PM
To: 'ufdaugherty@yahoo.com'
Cc: Consumer Contact
Subject: RE: Docket 20200226-SU - Letter of Objection

Good afternoon Debbie Daugherty
My apologies for responding with the incorrect docket number, this error has been corrected.
We will be placing your comments below in consumer correspondence in Docket No. 20200226 and forwarding your comments to the Office of Consumer Assistance and Outreach.
Thank you for your patience,

Jacob Veaghn

Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
Jacob.Veaghn@psc.state.fl.us
850.413.6656

From: Jacob Veaghn **On Behalf Of** Records Clerk
Sent: Tuesday, January 12, 2021 4:10 PM
To: 'ufdaugherty@yahoo.com' <ufdaugherty@yahoo.com>
Cc: Consumer Contact <Contact@PSC.STATE.FL.US>
Subject: FW: Docket 20200226-SU - Letter of Objection

Good Morning,

We will be placing your comments below in consumer correspondence in Docket No. 20200181 and forwarding your comments to the Office of Consumer Assistance and Outreach.

Jacob Veaghn

Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
Jacob.Veaghn@psc.state.fl.us
850.413.6656

From: Debbie Daugherty <ufdaugherty@yahoo.com>
Sent: Tuesday, January 12, 2021 3:51 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: Docket 20200226-SU - Letter of Objection

See attached letter of objection for Docket 20200226-SU Application for certificate to provide wastewater service in Charlotte County by Environmental Utilities, LLC. A hard copy of this letter will be placed in the mail today, Jan 12, 2021 and EU's attorney will receive a copy also.

Thank you for your consideration with this request.

Debbie Daugherty
9850 Little Gasparilla Island
ufdaugherty@yahoo.com

Florida Public Service Commission
Office of Commission Clerk
Commission Clerk

2540 Shumard Oak Boulevard

Tallahassee, FL 32399-0850

RE: Docket No. 20200226-SU; Application for wastewater service by Environmental Utilities

Dear Commission Clerk:

My name is Debbie Daugherty. I am a property owner on Little Gasparilla Island. My property is within the service area contained in the application from Environmental Utilities, LLC for central sewer. I have over 20 years' experience in water and wastewater utilities and a bachelor's and master's degree in environmental engineering. I am writing to object to application for original certificate to provide wastewater service in Charlotte County by Environmental Utilities, LLC per Docket No. 20200226-SU.

I have concerns about the construction, operation, maintenance, and cost of the wastewater system that is in the early planning stages with Charlotte County, Environmental Utilities LLC and the Public Service Commission. I understand that Little Gasparilla Island (LGI) and the surrounding areas are environmentally sensitive and would benefit from a wastewater system to curb the nutrient runoff from aging septic systems on the island. I have reviewed the comprehensive Sewer Master Plan that Charlotte County released in 2017. It does not appear at this time the Environmental Utilities has conducted any further investigation past what was provided in the sewer master plan and is now seeking an application to provide wastewater service.

Little Gasparilla Island only has about 60-80 full time residents on the island. The other homes are vacation homes and not inhabited on a regular basis. The project also does not include the two condominium complexes on the island, which have the highest concentration of residents. Given the unique nature of Little Gasparilla Island, there needs to be an extensive engineering study conducted

on which type of sewer system will work best given the range of flow variations and extended time with minimal usage. The study should include an evaluation of the low-pressure system proposed, as well as the vacuum system mentioned in the master plan. Another viable alternative that should be considered is advance treatment units which treat individual residential systems to a higher biological level than traditional septic systems. With the nature of the use of homes on Little Gasparilla Island, I foresee many challenges collecting and conveying the wastewater back to the mainland for treatment. If the system is not properly designed and maintained for the different flow conditions that will be experienced, it could create more environmental issues than we are currently experiencing.

We are existing customers of Little Gasparilla Water Utility (LGWU), which is owned and operated by the same parties that are applying as Environmental Utilities, LLC. The owners have minimal experience operating a water system and no experience operating a wastewater system. The water system on Little Gasparilla Island is constructed poorly and not operated responsibly by these parties. When we purchased our current home, one of the conditions of the sale was for the seller to connect the home to LGWU. For our home and others to be connected to water, LGWU had to install a water line in 2016. We do not currently have any utility easements on our property or on neighboring properties. There is an ingress/egress easement adjacent to our property as well as a private road designation that spans our property and the adjacent property. LGWU proceeded to install the water line on our property without obtaining proper easements or utilizing existing easement locations to install the water line. When we questioned Jack Boyer about the location of the water line, he told us "he could put the line wherever he wanted to and there wasn't anything we could do about it". This behavior is very typical of how Jack operates the water utility. His customer service is extremely poor, he does not seek proper utility easements for installation of the water facilities, and until recently had not issued appropriate precautionary boil water notices when water main breaks occur. Based on the operation of LGWU, I am concerned about the lack of environmental and public health responsibility demonstrated by the parties involved in Environmental Utilities, as well as their lack of professionalism and poor customer service.

Environmental Utilities has already demonstrated this poor customer service by sending out a non-descript letter that had the appearance of junk mail on December 17th just before the holiday season, giving future customers 30 days to respond to the Public Service Commission regarding the application for wastewater service. With the USPS delays, many customers are just receiving their notices in the mail as the deadline is approaching. As future consumers, we have been asked to present our objections to a proposal for which we have no idea what the associated costs will be nor the type of system we will be paying for. All of which has been timed to take place during a tumultuous holiday season within a global pandemic. It should also be noted that Environmental Utilities has applied to the Public Service Commission without developing a plan for what the sewer system will entail, so we are being asked to agree with something without any details on what the sewer system will be, what impacts it will have to our property, and what the connection costs or rates will be in the future.

While the project to bring sewer services to the island has merit, Environmental Utilities is not the appropriate party to complete a project of this nature. This project should be taken on by Charlotte County to design, construct, and operate the sewer system. If Charlotte County is interested in

assistance on this project, the County should continue to seek experienced parties through a Request for Qualifications process to provide sewer service to Little Gasparilla Island.

I object to Environmental Utilities for the reasons presented in this letter, plus the applicant's lack of experience as an owner/operator of a wastewater utility and the inadequate information regarding the applicant's financial strength. Therefore, I formally request that EU's Application for a Certificate to provide wastewater service to Little Gasparilla Island be denied.

I would like to be informed of all meetings, notices, recommendations, information and final orders with regards to the wastewater system project affecting Cape Haze/Knight Island/Don Pedro/LGI.

Sincerely,

Debbie Daugherty
9850 Little Gasparilla Island

cc: Martin S Friedman

Contact information:

Debbie Daugherty

5930 NW 19th Place

Gainesville, FL 32605

ufdaugherty@yahoo.com

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9850 Little Gasparilla Island

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Gainesville, FL 32605
January 12, 2021

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Office of Commission Clerk
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Florida Public Service Commission
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