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STATE OF FLORIDA



DIVISION OF ENGINEERING
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Public Service Commission

December 20, 2021

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STAFF'S SECOND DATA REQUEST
VIA EMAIL

Re: Docket No. 20210093-SU - Application for transfer of water and wastewater systems of Aquarina Utilities, Inc., Water Certificate No. 517-W, and Wastewater Certificate No. 450-S to CSWR-Florida Utility Operating Company, LLC, in Brevard County.

Dear Ms. Clark:

Please provide the information requested below regarding CSWR-Florida Utility Operating Company, LLC (CSWR or Utility) to the Office of Commission Clerk by **January 7, 2022**.

1. Please refer to Exhibit N, page 2 of 3, of the Utility's application.
 - a. The Utility states that anticipated improvements in compliance with regulatory mandates would include necessary upgrades to the wastewater aeration system, clarifier and filtration system to comply with the operating permit. However, on pages 2 and 3 of Exhibit G of the Utility's application, the Florida Department of Environmental Protection's (DEP) previous three compliance evaluation inspections found the Utility to be in-compliance with DEP rules and regulations. Please explain how these upgrades would improve compliance with regulatory mandates when the Utility is currently in-compliance with DEP rules and regulations.
 - b. The Utility states that the reverse osmosis system used by Aquarina Utilities, Inc. (Aquinaria) has a high operational cost. Please describe CSWR's alternative system, provide the cost to purchase and install the alternative system (including costs associated with DEP permitting), provide the monthly operational costs of each system, and compare the effectiveness of CSWR's alternative system to Aquarina's reverse osmosis system.
 - c. The Utility states that it will assess the compliance history of the water system to identify improvements to achieve regulatory compliance and bring the system into a maintainable condition. Based on the DEP sanitary surveys and

primary/secondary water quality test results, it appears that the Aquarina water treatment system is both compliant and maintainable. Given this, please explain how “remote monitoring,” valued in Exhibit G, page 4 of 4, of the Utility’s application at \$15,000 per unit with 3 units needed, will add sufficient value to maintaining a compliant system to justify the cost.

2. Please refer to Exhibit G of the Utility’s application.
 - a. On page 2 of 4 of Exhibit G, it states that the estimated daily flow, based on the number of connections, is approximately 85,000 gallons per day (GPD). However, it appears from the Discharge Monitoring Reports submitted to the DEP by Aquarina for the 12-month period of October 2020 to September 2021, that the actual average daily flow is much less at approximately 56,000 GPD. Please provide the calculations for CSWR’s estimated daily flow, and explain why CSWR’s daily flows differ from those in the Utility’s Discharge Monitoring Reports.
 - b. Please provide the in-depth memoranda prepared by a third-party engineering contractor for the wastewater and water systems referenced on pages 3 and 4, respectively, of Exhibit G.

Please file all responses electronically at the Commission’s website at www.floridapsc.com, by selecting the Clerk’s Office and Electronic Filing Web Form. Please contact me by phone at (850) 413-6952 or by email at mwatts@psc.state.fl.us, if you have any questions.

Sincerely,

/s/ Melinda Watts

Melinda Watts
Engineering Specialist

MW/jp

cc: Office of Commission Clerk (Docket No. 20210093-WS)
Thomas Crabb, Esq. (tcrabb@radeylaw.com)