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April 27, 2022

VIA Electronic Filing to the Office of Commission Clerk

Attn: Kerri Maloy, Engineering Specialist
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20220019-WU - Application for transfer of water facilities of Neighborhood Utilities, Inc. and Water Certificate No. 430-W to CSWR-Florida Utility Operating Company, LLC, in Duval County.

Dear Ms. Maloy:

CSWR-Florida Utility Operating Company, LLC (“CSWR-FL UOC” or the “Company”) submits the following responses to Staff’s April 6, 2022 Second Data Request.

1. Please refer to page 5 of the application, specifically the second paragraph where the applicant states that CSWR and its affiliates have acquired and operate water and wastewater (WAW) systems in nine states. Please identify each WAW system a CSWR-affiliate has acquired in each of the nine states since 2012. For purposes of this response, please identify the date each system was acquired and the date when the decision regarding whether a positive acquisition adjustment should be recognized was made.

CSWR RESPONSE: Please see attachment “DR 2.1 – Systems Purchased” for each WAW system acquired. Additionally, please see the Company’s response to item 2 of Staff’s First Data Requests for narrative regarding deferral to a subsequent rate case of the decision whether a positive acquisition adjustment should be recognized.

2. For each WAW system a CSWR-affiliated utility has acquired since 2012, please identify the net book value at the time of acquisition, the purchase price paid, and the amount of the positive acquisition adjustment, if any, that was approved by the respective state regulatory body. For purposes of this response, please identify the Order No. associated with the respective decision.

Ms. Kerri Maloy
Page 2
April 27, 2022



CSWR RESPONSE: Please see the Company’s response to item 2 of Staff’s First Data Requests as well as attachment “DR 2.1 – Systems Purchased” and attachments labeled “DR 1.2” for narrative regarding acquisition adjustments, docket numbers, and the dates Orders were received.

Thank you for the opportunity to submit additional information in support of the application. Please feel free to contact our office at your convenience with any additional questions or concerns.

Sincerely,

/s/ Thomas A. Crabb

Thomas A. Crabb
Attorney for Buyer CSWR-FL

cc: Charles Rehwinkel, Esq., Office of Public Counsel (rehwinkel.charles@leg.state.fl.us)
Steven Baird, Esq., Office of Public Counsel (baird.steven@leg.state.fl.us)

DR 2.1 - Systems Purchased

Central States Water Resources

CSWR Pipeline

4/8/2022

CSWR Operating Co		System	State	Location	# of Customers	Water Customers	Wastewater Customers
Eagle Ridge	Eaglebrook		AR	Conway	68	-	68
Eagle Ridge	Huntington Ridge		AR	Conway	84	-	84
Eagle Ridge	Shadow Ridge		AR	Conway	157	-	157
Hayden's Place	Hayden's Place		AR	Conway	121	-	121
Oak Hill	North Hills		AR	Conway	134	-	134
Oak Hill	Oak Tree		AR	Conway	64	-	64
Sebastian Lake	Sebastian Lake		AR	Hackett	228	123	105
St. Joseph's Glen	St. Joseph's Glen		AR	Alexander	190	-	190
Confluence Rivers	Hillcrest		MO	Cape Girardeau	502	249	253
Confluence Rivers	Hunter's Ridge (WSS)		MO	Sedalia	170	-	170
Confluence Rivers	Indian Hills		MO	Cuba	674	674	-
Confluence Rivers	South Walnut Hills (WPC)		MO	Sedalia	85	-	85
Confluence Rivers	Villages at Whiteman		MO	Knob Noster	272	-	272
Flushing Meadows	Flushing Meadows		AR	Conway	294	-	294
Bluegrass Water	Airview Utilities		KY	Elizabethtown	210	-	210
Bluegrass Water	Arcadia Pines		KY	Paducah	25	-	25
Bluegrass Water	Brocklyn Utilities		KY	Richmond	170	-	170
Bluegrass Water	Carriage Park		KY	West Paducah	38	-	38
Bluegrass Water	Center Ridge		KY	New Concord	348	348	-
Bluegrass Water	Fox Run Utilities		KY	Frankfort	39	-	39
Bluegrass Water	Joann Estates		KY	Paducah	69	-	69
Bluegrass Water	Kingswood		KY	Mt. Washington	131	-	131
Bluegrass Water	Lake Columbia Utilities		KY	Sheperdsville	32	-	32
Bluegrass Water	LH Treatment		KY	Georgetown	345	-	345
Bluegrass Water	Marshall County Environmental		KY	Paducah	190	-	190
Bluegrass Water	Marshall Ridge		KY	West Paducah	38	-	38
Bluegrass Water	Persimmon Ridge		KY	Louisville	355	-	355
Bluegrass Water	Randview		KY	mayfield	56	-	56
Bluegrass Water	River Bluffs		KY	Westport	179	-	179
Magnolia Water	Acadiana		LA		666	332	334

Central States Water Resources

CSWR Pipeline

4/8/2022

CSWR Operating Co		System	State	Location	# of Customers	Water Customers	Wastewater Customers
Magnolia Water	C'Est Si Bon		LA		6		6
Magnolia Water	Cherry Ridge		LA	Monroe	180		180
Magnolia Water	Coast Waterworks		LA	Slidell	10,382	5,388	4,994
Magnolia Water	Colonial Oaks		LA	Gonzales	70	-	70
Magnolia Water	Curtis Environmental		LA	Lake Pontchartrain	334	48	286
Magnolia Water	Evangeline		LA	Shreveport	72	72	-
Magnolia Water	Garden Heights		LA	Youngsville	348	174	174
Magnolia Water	Guste Island		LA	mandeville	2,504	1,271	1,233
Magnolia Water	H2O Systems		LA	St. Tammany Parish	10,358	5,387	4,971
Magnolia Water	Jones Rolling Ridge		LA	Shreveport	84	42	42
Magnolia Water	Major Sewage Service		LA	Ventress	162	-	162
Magnolia Water	Mo-Dad Utilities		LA	Various	10,141	59	10,082
Magnolia Water	Olde Oaks Sewer		LA	Haughton	112	-	112
Magnolia Water	S&S Sewage		LA	Ruston	55	-	55
Magnolia Water	Suburban		LA	Shreveport	296	296	-
Magnolia Water	Superior Sewage		LA	Thibodaux	536	-	536
Magnolia Water	Wildwood South		LA	Shreveport	302	179	123
Confluence Rivers	Auburn Lake		MO	Moscow Mills	87	44	43
Confluence Rivers	Calvey Brook		MO	St. Clair	26	13	13
Confluence Rivers	Eugene		MO	Eugene	58	58	-
Confluence Rivers	Evergreen Lakes		MO	Catawissa	70	70	-
Confluence Rivers	Glad Lo		MO	Rolla	129	67	62
Confluence Rivers	Lake Virginia		MO	Hematite	38	-	38
Confluence Rivers	Majestic Lakes		MO	Moscow Mills	350	175	175
Confluence Rivers	Mill Creek		MO	Florissant	75	-	75
Confluence Rivers	MO Utilities		MO	Sedalia	270	138	132
Confluence Rivers	Rainbow Acres		MO	Knob Noster	45	-	45
Confluence Rivers	Roy-L		MO	High Hill	117	60	57
Confluence Rivers	Smithview		MO	Columbia	151	151	-
Confluence Rivers	State Park Village		MO	Knob Noster	176	-	176

Central States Water Resources

CSWR Pipeline

4/8/2022

CSWR Operating Co		System	State	Location	# of Customers	Water Customers	Wastewater Customers
Confluence Rivers	Twin Oaks		MO	Knob Noster	43	-	43
Confluence Rivers	Villa Ridge		MO	Villa Ridge	204	-	204
Confluence Rivers	Willows		MO	Springfield	318	159	159
Eagle Ridge	Chicot		AR	Mabelvale	105		105
Eagle Ridge	WR Holdings		AR	Heber Springs	15		15
St. Joseph's Glen	Cherokee Village		AR	Jonesboro	306	-	306
Cactus Water	Carter Water		AZ		11	11	-
Cactus Water	Citrus Park Water		AZ		30	30	-
Cactus Water	El Prado Water Company		AZ		141	141	-
Cactus Water	Harrisburg Utility Company		AZ		548	548	-
Cactus Water	Lake Verde Water Company		AZ		64	64	-
Cactus Water	Loma Estates Water Company		AZ	Yavapai County	32	32	-
Cactus Water	Loma Linda Water		AZ		135	135	-
Cactus Water	Q Mountain Water		AZ		449	449	-
Cactus Water	Rancheros Bonitos Water Company		AZ		45	45	-
Cactus Water	Stoneman Lake		AZ		78	78	-
Cactus Water	Sweet Water Creek Utilities, Inc.		AZ		590	-	590
Cactus Water	Tierra Mesa Water Company		AZ		243	243	-
Cactus Water	Tonto Village Utility Systems, LLC		AZ		190	190	-
Cactus Water	Utility Systems Inc		AZ		264	264	-
Cactus Water	Verde Lee Water Company		AZ		248	248	-
Cactus Water	White Hills Water Company		AZ		95	95	-
Bluegrass Water	Delaplain Disposal Co		KY	Georgetown	1,074		1,074
Bluegrass Water	Herrington Haven		KY	Lancaster	24		24
Bluegrass Water	Springcrest Sewer		KY	Lancaster	42		42
Bluegrass Water	Woodland Acres Utilities, LLC		KY	Sheperdsville	91		91
Magnolia Water	Brown Rd Sewer		LA	Shreveport	442		442
Magnolia Water	Clear Stream Utilities		LA	Houma	649		649
Magnolia Water	Clearwater Oaks		LA	prien lake	424		424
Magnolia Water	Ismay Harbor		LA		22	22	-

Central States Water Resources

CSWR Pipeline

4/8/2022

CSWR Operating Co		System	State	Location	# of Customers	Water Customers	Wastewater Customers
Magnolia Water	Raiders Ridge Inc.		LA	livingston	12	-	12
Magnolia Water	Resolve Systems		LA	Slidell	5,472	2,921	2,551
Magnolia Water	Ruth Eternal		LA		23		23
Magnolia Water	Southwood Ridge		LA	hammond	14		14
Magnolia Water	Utilities of Lake Charles		LA		302	199	103
Magnolia Water	Western Utilities		LA	Monroe	720	360	360
Confluence Rivers	Branson Cedar		MO	ridgedale	114	57	57
Confluence Rivers	Central Rivers		MO	Orrick	286		286
Confluence Rivers	Clemstone Sewer		MO	Platte	80	-	80
Confluence Rivers	DeGuire		MO		24		24
Confluence Rivers	Fawn Lake		MO		29	29	
Confluence Rivers	Freeman Hills		MO	mexico	16		16
Confluence Rivers	Missing Well (Sun Valley)		MO	Clinton	118	68	50
Confluence Rivers	Osage Water		MO	Camden	767	374	393
Confluence Rivers	Port Perry		MO	Perryville	679	419	260
Confluence Rivers	Prairie Heights		MO	Bolivar	54	54	
Confluence Rivers	Prairie Heights (Sullivan)		MO		18	-	18
Confluence Rivers	Spring Branch		MO	Benton	131	131	
Confluence Rivers	Terre Du Lac		MO	Bonne Terre	2,761	1,399	1,362
Great River Water	Affordable Homes		MS	Vicksburg	30		30
Great River Water	Bea-Dor Partners		MS		39	-	39
Great River Water	Belmor Lakes		MS	Olive Branch	218		218
Great River Water	Cedar Creek Development		MS	Vicksburg	56		56
Great River Water	Culkin Utility		MS	Vicksburg	80		80
Great River Water	Delta Rain		MS	Hernando	1,391	934	457
Great River Water	Desoto Sewer		MS	Lake Cormorant	71		71
Great River Water	Enviroserve		MS	Vicksburg	35		35
Great River Water	H&B Sewer Company		MS	Vicksburg	234		234
Great River Water	Ironwood Utilities		MS	Vicksburg	19		19
Great River Water	King Farms Road		MS	Panola	29		29

Central States Water Resources

CSWR Pipeline

4/8/2022

CSWR Operating Co	System	State	Location	# of Customers	Water Customers	Wastewater Customers
Great River Water	Knolwood (Coast Waterworks)	MS	Pass Christian	42	42	
Great River Water	Lipe Waterworks	MS	Panola	465	465	
Great River Water	Oakland WaterWorks	MS	Natchez	594	300	294
Great River Water	Pecan Lakes Utility	MS	Panola	365		365
Great River Water	Pecan Village	MS	Hattiesburg	32		32
Great River Water	Pine Woods	MS		22		22
Great River Water	Ring Road Utility	MS	Vicksburg	243		243
Great River Water	Robertson Utilities	MS	Vicksburg	667		667
Great River Water	S2 Environmental (No Rates)	MS	Richland	488		488
Great River Water	S2 Environmental (Rates)	MS	Richland	701		701
Great River Water	Starling Construction Co.	MS	Lee County	28	-	28
Great River Water	Twelve Oaks Utility	MS	Panola	436	122	314
Great River Water	Utility One	MS	Vicksburg	516	79	437
Great River Water	Wallace LTD	MS	Olive Branch	114		114
Great River Water	Western Properties	MS		315		315
Great River Water	Westover West	MS	Natchez	321		321
Great River Water	Wilco Properties Inc.	MS		2,481	285	2,196
Great River Water	Woodall Mountain	MS		50	-	50
Red Bird Water	Ocean Terrace	NC	Outer Banks	34		34
Red Bird Water	Pine Knoll Shores 1	NC	Outer Banks	48		48
Red Bird Water	Pine Knoll Shores 2	NC	Outer Banks	46		46
Red Bird Water	Pine Knoll Shores 3	NC	Outer Banks	48		48
Limestone Water	Aqua Utilities	TN	Adamsville	824	455	369
Limestone Water	Cartwright Creek	TN	Thompson's Station	1,189		1,189
CSWR Texas	Abraxes	TX	North Richland	509	257	252
CSWR Texas	Alpha Utility of Camp County (Woodland Harbor)	TX		163	163	-
CSWR Texas	Big Wood Springs	TX	cypress	81	81	
CSWR Texas	Coleto	TX	Victoria	178	178	
CSWR Texas	Copano Heights	TX	Magnolia	111	111	
CSWR Texas	Council Creek	TX		155	155	

Central States Water Resources

CSWR Pipeline

4/8/2022

CSWR Operating Co	System	State	Location	# of Customers	Water Customers	Wastewater Customers
CSWR Texas	Flag Creek Ranch & Live Oak Hills	TX		72	72	-
CSWR Texas	Franklin County 1 & 3 (Water)	TX		133	133	
CSWR Texas	Jones-Owen	TX		93	93	
CSWR Texas	LaGuana Vista/Tres	TX	Magnolia	457	449	8
CSWR Texas	Leon Springs Utility Company	TX	san antonio	1,195		1,195
CSWR Texas	North Victoria	TX	Victoria	75	75	
CSWR Texas	Oak Hills Ranch	TX	la vernia	215	215	
CSWR Texas	Pelican Isle	TX	SE Dallas	328	164	164
CSWR Texas	QV Utilities	TX	Donna	420	210	210
CSWR Texas	Ranch Country	TX	Houston	334	334	
CSWR Texas	Rocket Water (Woodlands Water System)	TX	Austin	68	68	-
CSWR Texas	Shady Oaks	TX		604	604	
CSWR Texas	Tall Pines	TX	cypress	74	74	
CSWR Texas	Thousand Oaks Subdivision	TX	Erath	17	17	-
CSWR Texas	Treetop Estates	TX	Magnolia	39	39	
CSWR Texas	Walnut Bend	TX		22	22	
CSWR Texas	Waterco	TX		16	16	
CSWR Texas	Woodlands West	TX	Magnolia	20	20	

DR 1.2 - Attachments

CSWR Docket Information

Missouri Docket Numbers	Kentucky Docket	Louisiana Docket	Texas Docket
SA-2018-0313*	2020-00297	S-35197*	51036
WA-2019-0185	2020-00028*	S-35198*	51003
SM-2020-0146	2019-00360*	S-35282*	51047
WM-2020-0282	2019-00104*	S-35284*	51130
WM-2020-0403		S-35285*	51031
WA-2019-0299		S-35286*	51146
WM-2018-0116*		S-35287*	51065
		S-35288*	51026
		S-35289*	51118
		S-35290*	50989
		S-35291*	50276
		S-35292*	50311
		S-35293*	50251
		S-35294*	50251
		S-35295*	
		S-35296*	
		S-35297*	
		S-35582*	
		S-35711*	
		S-35732*	
		S-35746*	
		S-35757*	
		S-35760	
		S-35761	
		S-35783	
		S-35784	

*Contains systems which have been included in a rate case filing

State	Regulatory Entity	CSWR UOC	Docket Number	Order Date	Relevant Language
TN	Tennessee Public Utility Commission	Limestone Water	2100053	1/24/2022	"In any future rate proceeding, Limestone may present evidence and argument concerning the value of assets used and useful for provisioning public utilities services, and the Consumer Advocate or other interested parties may oppose such values or present their own evidence and argument concerning the value of such assets. Limestone, the Consumer Advocate, or other interested parties, may present evidence and set forth their respective arguments related to the appropriateness of an Acquisition Premium or Gain on Sale for this transaction in the next rate proceeding."
TN	Tennessee Public Utility Commission	Limestone Water	1900062	12/7/2020	"In any future rate proceeding, Limestone may present evidence and argument concerning the value of assets used and useful for provisioning public utilities services, and the Consumer Advocate or other interested parties may oppose such values or present their own evidence and argument concerning the value of such assets"
AZ	Arizona Corporation Commission	Cactus State	SW-03036A-21-0141; WS-21155A-21-0141	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-01557A-21-0161; WS-21155A-21-0161	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-01967A-21-0139; WS-21155A-21-0139	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-01982A-21-0143; WS-21155A-21-0143	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-020940A-21-0137; WS-21155A-21-0137	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-02096A-21-0140; WS-21155A-21-0140	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-02169A-21-0151; WS-21155A-21-0151	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-02211A-21-0138; WS-21155A-21-0138	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-02245A-21-0135; WS-21155A-21-0135	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-02498A-21-0155; WS-21155A-21-0155	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-02564A-21-0156; WS-21155A-21-0156	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-02800A-21-0153; WS-21155A-21-0153	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-03254A-21-0154; WS-21155A-21-0154	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-03868A-21-0152; WS-21155A-21-0152	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-1580A-21-0150; WS-21155A-21-0150	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
AZ	Arizona Corporation Commission	Cactus State	W-20459-21-0149; WS-21155A-21-0149	12/28/2021	"It is further ordered that Cactus State Utility Operating Company, LLC may record a deferred debit of not greater than _____ subject to audit, verification, and true-up in it's next rate case"
MS	Mississippi Public Service Commission	Great River	2020-UA-144	6/8/2021	"The rate base used to set rates in Great River's initial state-wide rate caes shall not exceed the total purchase price paid for the acquired systems (in aggregate) plus the reasonable and prudent costs associated with any capital investments made for post-acquisition improvements and capitalized acquisition-related expenses. It is anticipated that evidence concerning all of these issues will be presented by Great River and any other interested party in Great River's first rate case post-acquisition."
MS	Mississippi Public Service Commission	Great River	2020-UA-143	6/8/2021	"The rate base used to set rates in Great River's initial state-wide rate caes shall not exceed the total purchase price paid for the acquired systems (in aggregate) plus the reasonable and prudent costs associated with any capital investments made for post-acquisition improvements and capitalized acquisition-related expenses. It is anticipated that evidence concerning all of these issues will be presented by Great River and any other interested party in Great River's first rate case post-acquisition."
MS	Mississippi Public Service Commission	Great River	2021-UA-157	12/7/2021	"Therefore, the Commission grants Great River's request for an acquisition adjustment consistent with the policy and conditions outlined by the Commission in Docket No. 2020-UA-143."
MS	Mississippi Public Service Commission	Great River	2021-UA-158	12/7/2021	"Therefore, the Commission grants Great River's request for an acquisition adjustment consistent with the policy and conditions outlined by the Commission in Docket No. 2020-UA-144."