



November 21, 2023

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

RE: Docket No. 20230123-WS – Proposed Rule 25-30.0372, Florida Administrative Code, Alternative Procedure for Establishing Rate Base Value of Acquired Utility System

Dear Commission Clerk,

In response to the rulemaking workshop held on November 14, 2023 for the above referenced docket, I respectfully submit the following comments.

I am the Vice President of Investor Owned Utilities representing the following utilities, hereafter referenced as “**Collective Utilities**” regulated by the Florida Public Service Commission:

Country Walk Utilities, Inc.
Florida Community Water Systems, Inc.
HC Waterworks, Inc.
LP Waterworks, Inc.
Merritt Island Utility Company
North Florida Community Water Systems, Inc.
Royal Waterworks, Inc.
SGI Wastewater Services, Inc.

- Section (3)(a) – The quality of service and quality of product language in this section goes beyond the language of Section 367.0811(4)(b), Florida Statutes. This section of the statute has no language concerning quality assessments and impacts. The Engineering Assessment is to analyze the age and condition of the tangible assets. There are many water and wastewater assets that do not have anything to do with quality of service and/or product. For example, office buildings, vehicles, water meters, lift stations, etc.

Collective Utilities acknowledges that Section 367.0811(9), F.S. requires the Commission to consider improvements in quality of service and improvements in compliance with regulatory requirements. This should be included as part of the filing requirements under Section (4) Petition of the proposed rule. This is required by Section 367.0811(5), F.S.

Docket No. 20230123- WS – Alternative Procedure for Establishing Rate Base
November 23, 2023

- Section (4)(a) – we agree with the comments of Sunshine Water Services made at the workshop concerning the official date of filing. This should be established like the provisions of a rate case – where the official date of filing is the date the utility has met the minimum filing requirements. See Rule 25-30.025, F.A.C. It is the date the utility meets the filing requirements of the petition.
- Section (4)(c) – it would be difficult to accurately project billing determinants. There are many factors that may affect these such as customer growth and/or decline, repression of consumption, drought, water restrictions, etc. Billing determinants are fluid and change each month. This section states that the CPVRR must support these projections; however, the CPVRR form itself does not contain any input request for this.

Thank you for your consideration, and if you have any questions, please do not hesitate to contact me at (727) 848-8292, ext. 245, or via e-mail at trendell@uswatercorp.net.

Sincerely,



Troy Rendell
Vice President
Investor Owned Utilities