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December 12, 2023

VIA Electronic Filing to the Office of Commission Clerk

Attn: Sevini Guffey, Public Utility Analyst IV
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket No. 20230000-OT; Statement of Estimated Regulatory Costs (SERC)
Data Request for Proposed Amendment of Rule 25-14.004, Florida
Administrative Code (F.A.C.), Determination of Total Corporate Income Tax.

Dear Ms. Guffey:

CSWR-Florida Utility Operating Company, LLC (“CSWR-Florida UOC” or “the Company”) submits the following responses to Staff’s November 28, 2023 SERC Data Request.

1. Proposed revisions to Rule 25-14.004, F.A.C., describes the methodology how a regulated utility's stand-alone income tax expense will be calculated. Would calculating your utility's stand-alone income tax expense using the proposed methodology result in incremental costs to your utility? If yes, please state the incremental annual cost.

RESPONSE: The Company does not expect any such increased costs.

2. Would the proposed revisions to Rule 25-14.004, F.A.C., directly or indirectly result in incremental regulatory costs to your utility in excess of \$200,000 in the aggregate in Florida within 1 year after implementation of the rule?

RESPONSE: The Company does not expect any such increased costs.

3. Please state if the proposed rule revisions would result in any cost savings to your utility and if so, state the categories and estimated amounts of cost savings.

RESPONSE: The Company does not expect any such cost savings.



A "Small Business" is defined by Section 288.703, F.S., as an independently owned and operated business concern that employs 200 or fewer permanent full-time employees and that, together with its affiliates, has a net worth of not more than \$5 million or any firm based in this state which has a Small Business Administration 8(a) certification. As to sole proprietorships, the \$5 million net worth requirement shall include both personal and business investments.

4. Considering the above stated definition, please state if your water and/or water and wastewater utility is a small business.

RESPONSE: CSWR-FL UOC does not qualify as a small business.

5. If yes, please state if the proposed rule would have an adverse, minimal, or no financial impact on your utility.

RESPONSE: N/A

6. Would the proposed rule directly or indirectly result in incremental regulatory costs to your utility in excess of \$200,000 in the aggregate in Florida within 1 year after implementation of the rule?

RESPONSE: The Company does not expect any such increased costs.

7. Would the proposed rule revisions have an adverse incremental impact on economic growth, private-sector job creation or employment, and private-sector investment in excess of \$1 million in the aggregate within 5 years after implementation of the rule?

RESPONSE: The Company does not expect any such adverse impact.

8. Would the proposed rule revisions have an adverse incremental impact on business competitiveness, productivity, and innovation in excess of \$1 million in the aggregate within 5 years after implementation of the rule?

RESPONSE: The Company does not expect any such adverse impact.

9. Would the proposed rule revisions result in incremental regulatory costs, including any transactional costs ("Transactional costs" include filing fees, the cost of obtaining a license, the cost of equipment required to be installed or used, procedures required to be employed in complying with the rule, additional operating costs incurred, the cost of monitoring or reporting, and any other costs necessary to comply with the rule) to your utility, in excess of \$1 million in the aggregate within 5 years after the implementation of the rule? If yes, please explain.

RESPONSE: No



A "Small City" is defined by Section 120.52, F.S., as any municipality that has an unincarcerated population of 10,000 or less according to the most recent decennial census. A "small county" is defined by Section I 20.52, F.S., as any county that has an unincarcerated population of 75,000 or less according to the most recent decennial census.

10. Considering the above definition, please state if your utility serves a small city or several small cities, or a small county/counties? Would the small city/cities/county/counties served by your utility have financial impacts or no impacts due to the proposed rule revisions?

RESPONSE: CSWR-Florida UOC does not currently serve any municipal service areas such as a city or county.

11. Please provide any additional information, including any tasks not identified above, which would result in incremental costs to you[r] utility, due to the proposed revisions to the rule, which the Commission may determine useful. [120.541(2)(f), F.S.]

RESPONSE: The Company does not have any such information.

If the Company can be of additional assistance, please let us know.

Sincerely,

/s/ Thomas A. Crabb

Thomas A. Crabb
Attorney for CSWR-Florida UOC