

Yvette Gillespie

From: Yvette Gillespie on behalf of Records Clerk
Sent: Friday, April 12, 2024 9:55 AM
To: 'Angie Ridings'
Cc: Consumer Contact
Subject: RE: New Docket #20240032-SU

Good morning JP Ridings,

We will be placing your comments below in consumer correspondence in Docket No. 20240032, and forwarding your comments to the Office of Consumer Assistance and Outreach.

Thank you

Yvette Gillespie
Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
ygillesp@psc.state.fl.us
Phone: (850) 413-6195

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-----Original Message-----

From: Angie Ridings <a.ridings@att.net>
Sent: Thursday, April 11, 2024 6:41 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Cc: Office of Chairman La Rosa <Commissioner.LaRosa@psc.state.fl.us>; Office of Commissioner Clark <Commissioner.Clark@psc.state.fl.us>; Office of Commissioner Passidomo <Commissioner.Passidomo@psc.state.fl.us>; Office of Commissioner Graham <Commissioner.Graham@PSC.STATE.FL.US>; Office of Commissioner Fay <Commissioner.Fay@psc.state.fl.us>; Pat Ridings <pridings1109@gmail.com>
Subject: Re: New Docket #20240032-SU

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Dear Clerk/Commissioners,

We are truly surprised Environmental Utilities (EU) request has once again been submitted when the prior application was denied in 2022 (Old Document # 20200226-SU). Our objections in regard to EU providing a wastewater service to Little Gasparilla Island have not changed. The conclusions for denial remain the same now as in the original filing.

There has been no evidence provided that supports the need for such service, and no request for such service has been requested or warranted. Nor will it be a request in the future. Little Gasparilla Island is a small private, bridge-less barrier island that we believe falls under the Rural Service Area Classification, which prohibits the county to extend a central

sewer service to a bridge-less barrier island. Individual septic systems are already in place. This island is not suited for high-density development.

Again, how does EU plan to use "our" private property and/or easements for their pump stations/waste collection system without cost to them? Our property will just be donated? Access to our private property would be required at all times in order for EU to empty their septic tank. How is installing "their" septic tank and taking out our septic tank any improvement? In addition, their system needs to be connected to each homeowner's electrical service. In Florida, electricity is unavailable quite frequently. Especially on a barrier island, the time it takes to restore electricity can be extensive thereby making the system unusable with the likelihood of a sewer backup. How is that environmentally sound?

The "estimated" cost to homeowners is astronomical. Best guess hook up fee at \$12,000, plus this fee, and that fee and oh yes, that other fee. Not including the wastewater charge and probably a maintenance charge, and I'm sure there is just one more charge to add on. This doesn't even include the water bill that EU currently charges, which is radically high as well. With the recent devastation from Hurricane Ian, many islanders are still engaged in fighting with insurance companies, and many have already paid out large sums to rebuild their homes. Several have just put in new septic systems and others have spent thousands on improvements. This places excessive burden on all the homeowners of LGI.

The owners of EU still have no technical expertise needed to operate a wastewater system on a barrier island, nor have they provided any documentation of qualified professionals who they "may" hire to operate such a system. No health concerns have been identified, nor any water quality issues. IF this were the case why would the County still continue to issue permits for new septic systems on the island?

It makes me ponder, what is the real reason this application is back on the table?
Please consider our concerns. They are the very same as before, nothing has changed.
Best Regards,

- > JP Ridings
- > pridings1109@gmail.com
- > Angela Ridings
- > a.ridings@att.net

- > On Jan 20, 2022, at 1:01 PM, Records Clerk <CLERK@PSC.STATE.FL.US> wrote:
- >
- > Good Afternoon, JP Ridings,
- >
- > We will be placing your comments below in consumer correspondence in Docket 20200226-SU and forwarding them to the Office of Consumer Assistance and Outreach.
- >
- > Thank you.
- >
- > Lisa Smith
- >
- > Commission Deputy Clerk I
- > Office of the Commission Clerk
- > Florida Public Service Commission
- > 2540 Shumard Oak Blvd.
- > Tallahassee, FL 32399-0850
- > 850-413-6770
- >

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> -----Original Message-----

> From: Angie Ridings <a.ridings@att.net>

> Sent: Thursday, January 20, 2022 12:46 PM

> To: Records Clerk <CLERK@PSC.STATE.FL.US>

> Cc: Pat Ridings <pridings1109@gmail.com>

> Subject: Docket #20200226-SU

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> Dear Clerk of the Commission,

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> As an interested party in property located on Little Gasparilla Island, We object to the Application of Certificate by Environmental Utilities (EU) for the proposed central sewer system based on the following:

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> 1. Environmental Impact. Little Gasparilla is a Barrier Island with no connecting roadways or bridges to the mainland of Florida, you arrive only by boat. There are no commercial facilities, no roadways or retail development on the island, only our modest homes. It is old Florida, not Boca Grande. If a sewer pipeline is installed across the intracoastal waterway, how will a pipe leak in the middle of the waterway be detected? Who will be responsible for cleanup of such an environmental catastrophe? Who will be responsible for maintenance and/or equipment failure of such proposed sewer line? A private company with no employees or experience? To our knowledge, no water testing has been performed to determine the actual need of a sewer line vs. the septic systems currently in place. The waste management system in Florida is already overtaxed. If a central sewer system is installed, how will the mainland system handle additional households from the barrier islands, along with any additional development occurring on the mainland itself? Millions of gallons of raw sewage have been spilled into waterways by damaged lines throughout the State of Florida; therefore, is a sewer pipeline across the waterway the correct solution for our island and the environment?

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> 2. Financial Stability/Experience of EU. Environmental Utilities (EU) is a "for profit" private company with no financial history and unknown sewer utility management experience regarding environmentally sensitive endeavors such as tying a sewer line from the mainland to a private barrier island. EU should be required to provide a history of all sewer projects of this magnitude, especially since it involves environmentally sensitive areas including the intracoastal waterway. Do they have such history? No, they do not. In addition, how will EU financially complete this project? What happens when EU runs out of money or goes bankrupt prior to the completed project? Where does that leave the homeowners? Where is our recourse?

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> 3. Unknown Cost to Homeowners. There are so many unknown/hidden costs to the homeowners with this proposal. An estimated upfront hookup fee of \$15,000-20,000 per homeowner has been rumored regarding the system connection and current septic removal. Since there are no "roads" on the island how will large equipment transverse the island to fill or remove all septic tanks without destroying private property? Who pays for that damage? In addition, no estimated cost of monthly rates, no estimated amount of maintenance costs and no estimated operational costs have been provided. What happens when equipment needs to be replaced in five years due to the nature of island living? Will this be our expense directly or indirectly through rate hikes? Power outages occur frequently on the island, what happens if the system uses a grinder pump? The system will be unable to operate without power, resulting in a sewer back-up. Is that more environmentally friendly than septic? Will homeowners be required to purchase and have generators in place to ensure EU's system is operational during power outages? Will the homeowners pay for the charges to run those generators? In addition, if there is an upfront fee required, there should be other payment options available to homeowners such as payments spread over time. Rates should be fair and equitable, not just to the benefit of a private company who can increase rates whenever they want.

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> 4. 2017 Sewer Master Plan. If this sewer project is state mandated, why is this environmentally sensitive project being proposed by an unknown inexperienced sewer utility management company (EU) and not handled by the County and/or State of Florida?

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> 5. Location of Lift Station(s)and Sewer Lines. No map has been provided indicating the location of any lift stations, lines, etc. The island is private; therefore, no easements. Homeowners should be provided with a map(s) of the proposed location of all lift stations, lines, etc. and given ample time to review such plans prior to any approval or commencement. IF this project is approved, EU should be required to pay all homeowners current market value for any and all easements they may require for implementation.

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> Possible Alternatives:

> 1. Perform a Water Quality Test to determine if such a system is necessary.

> 2. Property owners commit to have current septic systems inspected, and upgraded/improved (if necessary).

> 3. County to initiate, complete and maintain the project vs. a “for profit” private company with no financial history or sewer utility management experience.

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> As a stakeholder in the proposed service area, it is important to have all of the relevant information regarding the proposed central sewer, including but not limited to, the proposed rates, connection fees, maintenance and operational costs, homeowners recourse, and the type of system intended for installation We therefore request that EU’s request be denied.

>

> Sincerely,

>

> JP Ridings

> pridings1109@gmail.com

> Angela Ridings

> a.ridings@att.net