

**Hiep Nguyen**

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**From:** Hiep Nguyen on behalf of Records Clerk  
**Sent:** Tuesday, May 14, 2024 8:37 AM  
**To:** 'Patty Palmer'  
**Subject:** RE: No Palm island 🗑️ sewer system

Good morning Patty Palmer,

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

Thank you,

*Hiep Nguyen*

Commission Deputy Clerk II  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399  
Phone: (850) 413-6746

**From:** Patty Palmer <markpalmerelectric@gmail.com>  
**Sent:** Friday, May 10, 2024 2:29 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Subject:** No Palm island 🗑️ sewer system

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## **Palm Island Estates**

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# **Reasons Why Sewer is a Bad Idea**

There has been no evidence provided that supports a need for service in the proposed service area. Expert witnesses at the last Administrative Hearing refuted the arguments that EU put forward supporting the need for service.

No water quality testing has been done in our area to prove a need for sewer. This project brings the potential for destruction of habitat and interference with endangered species such as the gopher tortoise.

The Charlotte County Comprehensive Plan categorizes land into two groups: the Urban Service Area and the Rural Service Area. In order to direct development to places that are desirable for large populations, the Urban Service Area provides infrastructure and utilities to attract developers. In the same way, if government wishes to direct development away from an area, it puts it into the Rural Service Area. Our barrier islands are in the Rural Service Area. The Comp Plan mandates on-site septic systems for the Rural Service Area. Now they are insisting that the Comp Plan prohibits the County from installing central sewer, but not a privately owned utility.

## **We would be forced to give up our private property rights for**

**free.** According to County regulations, hook-up to central sewer is mandatory within one year of the utility being installed and available to their property. EU's application for certification of the service area includes a copy of the contract that homeowners would have to sign. Here's a segment:

14.0 RIGHT-OF-WAY OR EASEMENTS - The Customer shall grant or cause to be granted to the Company, and without cost to the Company, all rights, easements, permits, and powers necessary for the rendering of wastewater service.

Remember, this is not just a utility easement on your side boundary. With a low-pressure sewer system, the tank and equipment will be located close to your home. You will be forced to give up easement rights across your property without compensation.

**Traffic Congestion.** The combination of post-storm rebuilds, new home construction, and tourist traffic during season has made wait lines at the ferry both unpredictable and outrageous. Now, consider the heavy equipment and materials transport needed to construct an island-wide central sewer system. This project could result in years of traffic issues.

**The Costs.** The costs of central sewer are quite considerable at a very bad time for Islanders. Many are still engaged with fighting their insurance companies for settlements from Hurricane Ian and have had to lay out large sums for their re-builds while they wait for compensation. Some owners have just paid deep-pocket sums to install new septic systems at their newly built or re-built homes. Many property owners simply do not have the resources available to convert from septic to sewer. Here is an outline of what we anticipate:

### **BASIC COSTS**

According to the application, the initial connection fee will be \$12,000. There is an additional \$1,097 "Sewer Lateral Connection" fee to run the pipe from the road to the location of the equipment near your home. There is also an initial deposit required of \$414, which is identified as 2x the estimated monthly bill. **That's a total of \$13,511.00.** PIE believes that this figure does not include additional expenses that the homeowner may be obliged to pay (*see below*).

### **MONTHLY COSTS**

The rates and tariffs submitted to the PSC shows a base rate of \$115.81 per month just to provide wastewater service. In addition, the monthly residential service charge is \$39.64 per 1000 gallons. EU estimates average household usage at 2,500 gallons/month. Based on this, **the monthly billing would be \$207.00/month.** However, when the PSC prepared a Rate Case summary that was distributed at the 2022 Administrative Hearing, they cited a more realistic average household usage estimate of 4,000 gals/month. Using this average the monthly billing would be **\$263.57/month for wastewater service alone. This is exclusive of your water bill.**

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## **Other Potential Impacts to Stakeholders**

**\$\$ System Maintenance:** since the system pump removes only fluid effluent, the tank will require pump-outs identical to septic maintenance.

**\$\$ Electric:** the system pump requires a separate electric panel, installed by a licensed electrician at the expense of the homeowner.

**\$\$ More electric:** If the owner has maxed out their main electric grid with pool equipment or other large-draw items, the panel will need an expensive upgrade.

**\$\$ Generator:** the pump has a limited capacity (60 gal) and in the event of a power outage will be unable to function for long. Homeowners will need a generator to keep the system running to avoid sewage back-up.

**\$\$ Landscaping and hardscaping:** The septic area will need to be cleared at the expense of the homeowner to gain access to crush & fill the existing septic tank and install the new one. The cost of replacing anything

more than the “basic landscaping” that the hook-up agreement states will be replaced will ultimately be the responsibility of the ratepayer.

**\$\$ No pay-over-time plan:** Ratepayers may need to take loans to cover the cost of connection.

**\$\$ Mandatory Hook-up:** Charlotte County regulations require all homes to connect to central water and wastewater within 1 year of availability.

**\$\$ No grandfathering of septic systems:** regardless of age or condition.

**\$\$ No “contractor” and no single point of general oversight:** EU is not a contractor that has won a bid to install sewer. The PSC approves certification based solely on four criteria: need for service, financial ability of the applicant, technical expertise of the applicant and fair/equitable rates and charges. Each of the other agencies (County, DEP, Army Corps, etc.) is responsible for supervising only their specific area where regulation and/or permitting is involved. There is no performance bond required and we have no single point of recourse in the event of cost overruns or project failure.

**\$\$ Access to homes:** Some properties have physical constraints that will complicate how the applicant gains access to the property without leaving the boundaries or damaging the grounds.

**\$\$ System maintenance and emergencies:** The applicant has not addressed how the system will be serviced in the event of failure during a storm or other adverse conditions.

**\$\$ Lifespan of the equipment:** Salt air takes a heavy toll on mechanical and electrical equipment here. Equipment will need replacing when it fails, possibly at 5-year intervals. This proposal places too much responsibility on the homeowner at too great a cost.

**\$\$ Potential of sewer spill in the Intracoastal:** The risk of a central sewer leak with a subaqueous crossing is greater than the risk of one or more septic systems developing

Thank you

Patty Palmer

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**Palm Island Estates Association, Inc.**

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