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DIVISION OF ENGINEERING
TOM BALLINGER
DIRECTOR
(850) 413-6910

Public Service Commission

September 20, 2024

Ms. Sherri Boyd
P.O. Box 786
Ponchatoula, LA 70454
consolidatedwatersystem@gmail.com

VIA EMAIL

Re: Docket No. 20240121-WU - Application for grandfather certificate to operate water utility in Columbia County by Consolidated Water Works.

Dear Ms. Boyd:

Staff has reviewed Consolidated Water Works' (CWW or Utility) application for a grandfather certificate to provide water service in Columbia County. After reviewing this information, we find the application to be deficient. The specific deficiencies are identified as follows:

- Filing Fee.** Rule 25-30.035(2), Florida Administrative Code (F.A.C.), requires that the applicant provide a filing fee pursuant to Rule 25-30.020(2)(d), F.A.C. Based on Rule 25-30.020(2)(d), F.A.C., and the combined plant design capacity provided in the most recent sanitary survey reports from the Department of Environmental Protection (DEP) for each of CWW's water systems, staff has determined that CWW's filing fee should be \$1,000, whereas the Utility provided a filing fee of \$500. Please submit the remaining filing fee balance of \$500.
- Company Name.** Rule 25-30.035(3), F.A.C., requires that the applicant provide the utility's name and other contact information. The utility's business name on the application should reflect the business name registered with the Florida Department of State's Division of Corporations. CWW's business name with the Division of Corporations includes a comma (,) followed by the abbreviation "Inc." after the word "Works," whereas the comma and abbreviation are missing in the application. Please submit a statement clarifying that the Utility's name should be, "Consolidated Water Works, Inc."
- Wastewater Service Statement.** Rule 25-20.035(6), F.A.C., requires that the applicant provide a statement indicating whether the application is for water service, wastewater service, or both. If only one service is provided, the applicant should also indicate how the other service is provided in its statement. While the Utility indicated that it does not provide wastewater service, it appears that no explanation for how this service is

provided was included. Please submit a statement indicating how wastewater service is provided (i.e., septic tanks).

4. **Legal Description.** Rule 25-30.035(10), F.A.C., requires the applicant to provide a legal description of the territory proposed to be served, in the format prescribed in Rule 25-30.029, F.A.C. Rule 25-30.029(2)(a), F.A.C., states that legal descriptions must identify references to townships, ranges, land sections, and counties. Rule 25-30.029(2)(b), F.A.C., states that a complete and accurate description of the service area should be provided in either a sections format or a metes and bounds format, shall have a point of beginning referenced from either a section corner or a subsection corner, and not rely on references to government lots, recorded plats or lots, tracts, or other recorded instruments.

While the Utility provided legal descriptions for the territory it proposes to serve, the legal descriptions for the Azalea Park and Shady Oaks subdivisions are illegible, and the legal description for the 242 Village subdivision does not conform to the requirements of Rule 25-30.029(2), F.A.C., as outlined above. Please submit legible versions of the legal descriptions for the Azalea Park and Shady Oaks subdivisions individually, and submit an amended version of the legal description for the 242 Village subdivision to conform to the requirements of Rule 25-30.029(2), F.A.C.

5. **System Map.** Rule 25-30.035(14), F.A.C., requires the applicant to provide a detailed system map showing the existing and proposed lines and treatment facilities, with the territory proposed to be served plotted thereon, consistent with the legal description provided pursuant to Rule 25-30.035(10), F.A.C., and discussed in request number four above. The system maps that were provided do not appear to be of sufficient size and detail to clearly show the existing and proposed lines and treatment facilities. Please provide revised system maps of sufficient size and detail that include identification of the locations and sizes of all existing and proposed pipelines, and the locations of all water treatment facilities, customer meters, flush points, fire hydrants, and pumping stations. Please include legends on all maps in order to clearly identify the locations of the outlined items on the maps.
6. **Territory Map.** Rule 25-30.035(15), F.A.C., requires an official county tax assessment map or other map showing township, range, and section with a scale such as 1'' = 200' or 1'' = 400', with the proposed territory plotted thereon, consistent with the legal description provided pursuant to Rule 25-30.035(10), F.A.C., and discussed in request number four above. The maps provided do not appear to be of sufficient scale to verify the territory descriptions. Please provide a set of territory maps of sufficient size and scale that, together, clearly show the perimeter of the entire territory being requested, consistent with the requirements of Rule 25-30.029(2), F.A.C., and that meet all of the requirements of Rule 25-30.035(15), F.A.C.
7. **Permits.** Rule 25-30.035(16), F.A.C., requires that the applicant provide a copy of all current permits issued by the DEP and water management district. It appears that the Utility provided copies of drinking water invoices as opposed to copies of current permits. Please submit copies of all current permits issued by the specified agencies.

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Your application will not be deemed filed until the deficiencies identified in this letter have been corrected. These corrections should be submitted no later than **Monday, October 21, 2024**, to the following address:

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Should you have any questions concerning the information in this letter, please feel free to contact Ms. Takira Thompson by phone at (850) 413-6592 or email at tthompso@psc.state.fl.us for technical questions, or Mr. Carlos Marquez by phone at (850) 413-6212 or email at cmarquez@psc.state.fl.us for legal questions. Please include the docket number on all submissions to the Commission Clerk.

Sincerely,

s/Takira Thompson

Takira Thompson
Engineering Specialist
Division of Engineering

TTT:da

cc: Office of Commission Clerk (Docket No. 20240121-WU)