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DIVISION OF ECONOMICS
ELISABETH J. DRAPER
DIRECTOR
(850) 413-6410

Public Service Commission

October 9, 2024

Troy Rendell
U.S. Water Services Corporation
4939 Cross Bayou Blvd.
New Port Richey, FL 34652

RECEIVED FPSC
2024 OCT -9 AM 11:38
COMMISSION
CLERK

Re: Docket No. 20240106-WU - Application for a revenue-neutral uniform water rate restructuring limited proceeding in Alachua, Duval, Leon, Okaloosa, and Washington Counties, by North Florida Community Water Systems, Inc.

Dear Mr. Rendell:

We have reviewed North Florida Community Water Systems, Inc.'s (utility) responses dated August 23, 2024. Based on staff's review of the utility's responses to staff's deficiencies and a more thorough review of the MFRs submitted on July 25, 2024, the application is still deficient.

1. Pursuant to Rule 25-30.445(4)(j), F.A.C., applications must include annualized revenues for the most recent 12-month period using the rates in effect at the time the utility files its application for limited proceeding and a schedule reflecting the calculation by customer class and meter size. In the utility's revised MFRs, the general service six-inch meter size for the Duval water system shown on Schedule E-2, does not include the billing determinants shown in revised Schedule E-14 for the six-inch meter size for the Duval water system. Please provide corrected annualized revenue schedules for the Duval water system. Please update any schedules affected by the revisions.
2. For the Lake Talquin water system, the 5/8 inch x 3/4 inch general service customer shown on Schedule E-2 is not shown on Schedule E-14. Schedule E-14 reflects 1 inch and 1 1/2 inch general service customers. Please provide corrected schedules for the Lake Talquin water system. Please update any schedules affected by the revisions.
3. The Sunny Hills water system did not have the correct annualized revenue calculations in its original filing. The total residential gallons shown on Schedule E-2 does not match the gallons shown on Schedule E-14. Please provide corrected annualized revenue schedules for the Sunny Hills water system. Please update any schedules affected by the revisions.
4. The utility's tariff for the Okaloosa water system reflects a general service customer for the North Florida Speedway, which is charged only a gallonage charge. If there is an

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active customer, please submit the appropriate schedules to reflect the customer's billing determinants and revenues.

Furthermore, as indicated in Staff's Deficiency Letter dated August 21, 2024, the minimum filing requirements (MFRs) submitted on July 25, 2024 consisted of three systems, which never had a rate case, and one system that has not had a rate case within seven years of the date the petition. Therefore, the utility filed a rule waiver on August 2, 2024. The rule waiver was scheduled to be addressed at the October 1, 2024 Commission Conference. However, the rule waiver will be addressed at the November 5, 2024 Commission Conference.

The petition will not be deemed filed unless the Commission waives the rule requirement. In the event the ruling is in the utility's favor, staff find the MFRs to be deficient until the deficiencies identified in this letter have been corrected. If the utility would like to cure the deficiencies prior to the decision on the rule waiver, please submit 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 Terence Bethea at (850) 413-6435 for technical questions.

Sincerely,



Elisabeth Draper
Director

ED:tb

cc: Office of Commission Clerk (Docket No. 20240106-WU)