

COMMISSIONERS:
MIKE LA ROSA, CHAIRMAN
ART GRAHAM
GARY F. CLARK
ANDREW GILES FAY
GABRIELLA PASSIDOMO SMITH

STATE OF FLORIDA



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

Public Service Commission

March 3, 2025

Martin S. Friedman, Esquire
Dean Mead Law Firm
420 S. Orange Ave., Suite 700
Orlando, FL 32801
mfriedman@deanmead.com

STAFF'S FIRST DATA REQUEST

VIA EMAIL
COMMISSION
CLERK

2025 MAR -3 AM 11:05

RECEIVED-FPSC

Re: Docket No. 20240108-SU - Application for increase in wastewater rates in Monroe County by K W Resort Utilities Corp.

Dear Mr. Friedman:

By this letter, Commission staff requests K W Resort Utilities, Corp. (KW or Utility) provide responses to the following questions.

Pro forma projects

1. Please refer to the utility's Minimal Filing Requirements (MFRs) Volume III, page 9, the Compliance Inspection Report dated March 20, 2024. Please detail the cause of each unauthorized discharge of wastewater. As a part of this response, detail what corrective action the Company took to prevent further spills from occurring at the site. If no actions were taken, please explain why.

Please refer to page 4 of the utility's Petition for the following questions.

2. Regarding the "South WWTP Blowers project," provide the following information.
 - a. Explain the necessity of the capital project. This should include (if applicable): when the original components were installed, any historical failures of the original components and what alternatives the company considered versus replacement of the original components.
 - b. Detail the amount of pro forma associated with this capital project. This should include an itemized list of all expenses associated with this capital project and the account number for each entry.

- c. Refer to the utility's MFRs Volume III, Pro Forma Project Documents. Explain why the utility's chosen bid was selected over all other bids for completing this capital project.
 - d. Refer to the utility's MFRs Volume III, Pro Forma Project Documents. Clarify if the "East & West tank blower system" replacement is the same project as the South WWTP Blowers project. If not, please explain the "East & West tank blower system" project with the information requested in a through c, above.
 3. Regarding the "Treatment Plant" electrical upgrade project, provide the following information.
 - a. Explain the necessity of the capital project. This should include (if applicable): when the original components were installed, any historical failures of the original components and what alternatives the company considered versus replacement of the original components.
 - b. Detail the amount of pro-forma associated with this capital project. This should include an itemized list of all expenses associated with this capital project and the account number for each entry.
 - c. Refer to the utility's MFRs Volume III, Pro Forma Project Documents. Explain why the utility's chosen bid was selected over all other bids for completing this capital project.
 - d. Refer to the utility's MFRs Volume III, Pro Forma Project Documents. Clarify if the SCADA implementation project pro-forma expenses are included in the Treatment Plant Electrical Upgrade project. If not, detail the expenses associated with this upgrade.
 4. Regarding the Collection System Action Plan, provide the following information.
 - a. Detail the utility's proposed Collection System Action Plan. At a minimum, this should include: a description of the plan and the expected implementation date of the plan.
 - b. Detail the amount of pro-forma associated with this pro-forma expense. This should include an itemized list of all requested expenses associated with this pro-forma expense and the account number for each entry.
 - c. Detail how the utility's proposed plan satisfies the requirements of Rule 62-600.705(2)(a), F.A.C., subsections 1 – 10.

5. Regarding the permit renewal engineering expense, provide the following information.
 - a. Explain the necessity of the pro-forma expense. As a part of this response, detail any relevant Rules or Statutes that require this expense.
 - b. Detail the amount of pro-forma associated with this pro-forma expense. This should include an itemized list of all requested expenses associated with this pro-forma expense and the account number for each entry.
6. Refer to Commission Order No. PSC-2018-0446-FOF-SU. For each item listed below, explain if the pro-forma expense is related to the Asset Management and Preventative Maintenance Plan as required by the Commission's Order. If so, explain how each pro-forma expense satisfies the requirement to implement an Asset Management and Preventative Maintenance Plan. If not, detail the utility's Asset Management and Preventive Maintenance Plan.
 - a. South WWTP Blower project
 - b. Treatment Plant electrical upgrade project
 - c. Collection System Action Plan
 - d. Permit renewal engineering expense

Miscellaneous Revenues, MFR Schedule E-5, Page 1.

7. For miscellaneous revenues, please provide the number of occurrences separately for the Initial Connection and Violation Reconnection. Please verify and note whether the charge occurred during Normal Hours or After Hours, if applicable.
8. Please provide a cost breakdown and explanation for the miscellaneous revenues in the amount of \$2,785, shown on Line 8, column (5).

Allowance for Funds Prudently Invested (AFPI) Charge

9. Please provide the number of ERCs Equivalent residential connection by year, since July 2017.

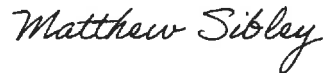
Martin S. Friedman, Esquire

Page 4

March 3, 2025

Please file all responses electronically no later than **Monday, March 24, 2025**, via the Commission's website at www.floridapsc.com, by selecting the Clerk's office tab and Electronic Filing Web Form (reference Docket No. 20240108-SU). Should you have any questions concerning the information in this letter, please feel free to contact Mr. Matthew Sibley by phone at (850) 413-6516 or email at msibley@psc.state.fl.us.

Sincerely,



Matthew Sibley
Public Utility Analyst IV

cc: Office of Commission Clerk (Docket No. 20240108-SU)