BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for increase in water and wastewater rates in Brevard, Citrus, Duval, Highlands, Marion, and Volusia Counties by CSWR-Florida Utility Operating Company, LLC.	)))))	DOCKET NO. 20250052-WS

DIRECT TESTIMONY OF

JACOB FREEMAN

on behalf of

CSWR-Florida Utility Operating Company, LLC

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Jacob Freeman. My business address is 1630 Des Peres Road, Suite 140, St. Louis, Missouri, 63131.

Q. WHERE ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am Director of Engineering of CSWR, LLC ("CSWR"), the parent company responsible for providing management services and oversight to CSWR Florida Utility Operating Company, LLC ("CSWR Florida" or "Company"), and all its affiliated utility operating companies. More specifically, I oversee all engineering, surveying, and facility construction for all CSWR-affiliated water and wastewater utilities. I also oversee ongoing capital upgrades for all CSWR-affiliated water and wastewater utilities.

Q. PLEASE DESCRIBE THE RELATIONSHIP BETWEEN CSWR AND CSWR FLORIDA.

A. CSWR is a holding company that, as of May 1, 2025, operated affiliated utility operating companies in eleven states. CSWR Florida is the CSWR utility operating company in the State of Florida. On behalf of all its affiliates, CSWR provides a host of services, including general management, accounting, finance and capital acquisition, legal, engineering, and construction planning and management.

Q. ON WHOSE BEHALF ARE YOU FILING THIS DIRECT TESTIMONY?

A. I am filing this testimony on behalf of CSWR Florida.

Q. PLEASE DESCRIBE YOUR EDUCATION AND PROFESSIONAL BACKGROUND.

A. I hold a Bachelor of Science degree in Mechanical Engineering from the University of Missouri - Columbia. I am a licensed Professional Engineer in the states of Missouri,

Illinois, and Kansas.

Before joining CSWR in January 2019, I was employed for two years by Corrigan Mechanical, a design-build mechanical contractor in St. Louis, Missouri. In that position my responsibilities included designing, estimating, and managing plumbing, HVAC, and process piping construction projects in Missouri and southern Illinois. After leaving that position, I spent eleven years performing similar tasks for Brotcke Well and Pump, one of the Midwest's largest well and pump service contractors, servicing wells and water treatment equipment throughout Missouri, Illinois, Kentucky, and Kansas. Immediately before leaving Brotcke, I served as Vice President and Principal in charge of all the company's engineering services. I also managed Brotcke's regional office in Kansas City, Kansas.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE STATE PUBLIC UTILITY COMMISSIONS?

A. Yes. I have testified before the state utility commissions in Missouri, Kentucky, Louisiana, Mississippi, Tennessee, and Texas.

Q. PLEASE DESCRIBE THE SCOPE OF YOUR TESTIMONY.

A. The Commission has authorized CSWR Florida to make eleven separate acquisitions that encompass 38 different systems, which break down into 29 drinking water and 9 wastewater systems. My testimony will (1) identify each of the acquired systems that are part of the current rate case, (2) describe the condition of each of those systems at the time of acquisition, (3) describe and discuss each system's pre-acquisition history of compliance with applicable health, safety, and environmental regulations, (4) describe the work CSWR Florida has done to date to upgrade and improve each system, and (5) describe the Company's longer-term plans for upgrades and improvements required at each system.

Q. ARE YOU SPONSORING ANY EXHIBITS.

A. Yes. I am co-sponsoring, along with witnesses Brent Thies, Aaron Silas and Todd Thomas, the following exhibits:

Exhibit JF-1: E-6 Schedules (Public Fire Hydrants Schedule) of MFR Volume I

Exhibit JF-2: E-7 Schedules (Private Fire Protection Service) of MFR Volume I

Exhibit JF-3: F-2 Schedules (Gallons of Wastewater Treated in Thousands of Gallons) of MFR Volume I

Exhibit JF-4: F-3 Schedules (Water Treatment Plant Data) of MFR Volume I

Exhibit JF-5: F-4 Schedules (Wastewater Treatment Plant Data) of MFR Volume I

Exhibit JF-6: F-5 Schedules (Used and Useful Calculations-Water Treatment Plant) of MFR Volume I

Exhibit JF-7: F-6 Schedules (Used and Useful Calculations-Wastewater Treatment Plant) of MFR Volume I

Exhibit JF-8: F-7 Schedules (Used and Useful Calculations-Water Distribution and Wastewater Collection Systems) of MFR Volume I

Exhibit JF-9: F-8 Schedules (Margin Reserve Calculations-Water and Wastewater) of MFR Volume I

Q. WERE THESE EXHIBITS PREPARED BY YOU OR YOUR STAFF UNDER YOUR SUPERVISION AND CONTROL?

A. Yes.

A. North Peninsula Wastewater

Q. **PLEASE DESCRIBE NORTH PENINSULA WASTEWATER AS IT EXISTED AT ACQUISITION.**

A. The North Peninsula wastewater system is a wastewater treatment facility and collection system that serves 615 equivalent residential connections ("ERCs") in a

subdivision near Ormond Beach in Volusia County. The wastewater treatment plant is permitted to treat an average daily flow of 210,000 GPD. CSWR Florida acquired the facility in May 2022.

The treatment plant consists of three package plants; a concrete plant serving as flow equalization and two steel plants providing primary treatment. The structures of all three package plants making up the facility were in poor condition and related treatment equipment is in similarly poor condition. Prior to acquisition the facility faced a regular history of compliance issues and enforcement action from the Florida Department of Environmental Protection ("FDEP").

The photos below show an aerial view of the North Peninsula wastewater treatment facility and some of the system's components.

Aerial view of the North Peninsula Community.

Aerial view of the North Peninsula Treatment Facility.


The two steel ("Plant 1" top left and "Plant 3" right) and concrete ("Plant 2" bottom) package plants making up the treatment facility at acquisition. Note poor condition of all steel equipment, tanks, and structures.


Rapid infiltration basins at time of acquisition. Note accumulation of solids, ponding effluent, and vegetation overgrowth indicating disfunction and poor maintenance.

Q. **PLEASE PROVIDE A SUMMARY OF THE NORTH PENINSULA WASTEWATER SYSTEM'S COMPLIANCE HISTORY UNDER PREVIOUS OWNERSHIP.**

A. Under previous ownership the North Peninsula wastewater treatment system had a history of noncompliance and enforcement actions from FDEP. In the five years leading up to acquisition by CSWR Florida this included repeated enforcement actions concerning issues with the facility that the previous owners failed to address to the satisfaction of FDEP. Enforcement actions during this five-year period were as follows:

In May 2017 FDEP sent a letter to the previous owners that proposed a "Compliance Assistance Offer" letter designed to address several incidences of non-compliance observed during a March 7, 2017, inspection. Violations specifically noted in that letter included:

- Failure to keep current reduced pressure zone ("RPZ") certification onsite;
- Failure to keep current flow calibrations onsite;
- Repeated fecal coliform exceedances (identified as "Significantly Out of Compliance"); and
- Fencing around the effluent ponds is in disrepair meaning the facility is not completely enclosed.

To allow the owner to avoid the issuance of formal citations, FDEP's letter instructed North Peninsula's owner to respond by providing information regarding steps taken to remedy the observed deficiencies and bring the system into compliance. To further assist the system owner, the letter provided contact information for department personnel who could answer questions and an offer to arrange for the FDEP case manager to re-visit the facility and discuss specific items of concern.

On October 13, 2017, FDEP sent a follow-up notice, which it designated as a "Warning Letter," because the owner of the North Peninsula system failed to respond to the Compliance Assistance Offer sent in early May. The letter instructed North Peninsula to contact FDEP within ten (10) days to arrange a meeting to discuss the previously identified violations. The letter also warned North Peninsula that failure to address those violations "may result in liability for damages and restoration, and the imposition of civil penalties."

In March 2018, during the permit renewal process, FDEP sent North Peninsula a request for information regarding required improvements to a long-term sludge leak identified during the previous permit period. Specifically, the letter cited North Peninsula for failing to include adequate plans to complete the improvement in its permit renewal application. In a follow-up letter sent approximately two months later, FDEP noted North Peninsula had failed to reply to the agency's request for additional information regarding plans to remediate the sludge leak, and as a result would face inspection and a formal Consent Order to address deficiencies at the facility.

In July 2018, FDEP issued a Consent Order, which cited numerous compliance violations at the North Peninsula facility. Issues identified in the Consent Order included:

- Failure to properly operate and maintain the wastewater treatment facility;
- Failure to submit required groundwater monitoring reports for the third and fourth quarters of 2017;
- Failure to monitor wells for Sodium in violation of one of the conditions specified in North Peninsula's operating permit; and
- Failure to properly address chloride exceedances in monitoring wells in violation of another operating permit condition.

The Consent Order obligated North Peninsula to institute numerous specifically identified corrective actions within prescribed time periods. In addition, because the utility's facilities were in such a significant state of deterioration and disrepair, North Peninsula was required to "[i]mmediately implement preventive measures to ensure system failure does not occur due to deteriorating facility components while the process of reconstruction is under way."

On April 28, 2021, FDEP issued another Warning Letter related to deficiencies the agency identified during an inspection earlier that month. In its letter, the FDEP identified the following deficiencies/violations at North Peninsula:

- Insufficient staffing by an appropriately certified operator;
- Excessive odors emanating from the facility; and
- Excessive vegetation at the facility's Rapid Infiltration Basin.

As with the previously issued Warning Letter, North Peninsula was instructed to contact FDEP to arrange a meeting to discuss the identified deficiencies and violations and was advised that failure to address those matters could result in further agency action.

Independent of the previously described actions by FDEP, in September 2020, the Volusia County Growth and Resource Management Department conducted its own routine inspection of the North Peninsula facility. In its written inspection report, the county noted numerous "unsatisfactory conditions" identified during that inspection. Those included:

- Logbook entries indicating insufficient staffing by an appropriately certified operator;
- Rapid Infiltration Basins contained excessive solids and vegetation;
- Major deterioration of treatment plant structures; and

- Non-functional traveling sludge returns.

Because of continued and additional violations at the North Peninsula system, in August 2021 FDEP issued a new Consent Order, this time aimed at compelling compliance and improvements at the wastewater treatment facility. Violations cited in the new order included the following:

- Failure to complete by the required date (December 31, 2018) the "Improvement Action" listed in the facility's current permit, including adding concrete pads around monitoring wells, repairing or replacing risers, removing vegetation in the well area, providing locked well caps, and labelling wells.
- Failure to address significant corrosion issues in both internal and external walls of steel plants 1 and 3 as well as in the master lift station pump;
- Failure to address objectionable odors beyond the boundaries of the facility;
- Failure of the facility operator to fulfill required site time of 3 hours per day, 5 days per week in addition to a weekend visit. In addition, the facility's lead/chief operator must be a Class C operator or higher; and
- Excessive vegetation in the effluent disposal area.

Finally, in May 2022, shortly after CSWR Florida closed on its acquisition of the North Peninsula system, FDEP issued another Notice of Violation. This notice resulted from, and pertains to, deficiencies FDEP identified in the North Peninsula system in 2021 – many months before it was acquired by CSWR Florida – and appears to have been issued because North Peninsula's prior owner failed to address deficiencies and violations FDEP previously noted. Items providing the basis for the May 2022 Notice of Violation include:

- Failure to maintain adequate facility staffing;
- Failure to control foul odor emanating from the facility;

- Failure to properly maintain Rapid Infiltration Basins;
- Failure to address corrosion of critical facilities; and
- Failure to properly maintain groundwater monitoring wells.

Although all conditions that led to this Notice of Violation relate to the period before CSWR Florida acquired the North Peninsula system, CSWR-Florida will be required to remediate all the violations FDEP identified and bear all associated costs.

Q. **PLEASE PROVIDE AN OVERVIEW OF THE CONDITION AND ISSUES OF THE NORTH PENINSULA WASTEWATER SYSTEM WHEN IT WAS ACQUIRED BY CSWR FLORIDA.**

A. As was discussed in the summaries of enforcement action against the North Peninsula system under previous ownership, the wastewater treatment plant was in extremely poor condition at the time of acquisition. All three package plants that make up the facility are in failing condition. Both steel plants have been repeatedly repaired, but with negligible effect on the overall condition of the tanks, which continue to have leaks and exhibit bowing walls. The concrete tank has experienced a wall failure, which resulted in the release of wastewater since CSWR Florida took ownership. Each of these package plants has reached the end of its useful life and further repairs will not significantly extend the life or meaningfully remedy each plant's problems. The previous ownership's attempt at repairs failed to address the deteriorating condition of the facility, as evidenced by the repeated enforcement action demanding more adequate repairs to the treatment infrastructure. While the plant did not often violate permitted limits (with the exception of chloride levels in the groundwater monitoring and anecdotal observations of discolored effluent by CSWR Florida's third-party engineers that have not been captured in DMR sampling), the overall deteriorating condition puts North Peninsula facility at risk of catastrophic failure, which would cause service

interruption to customers and result in environmental damage. This demonstrates an ongoing failure to adequately reinvest in the treatment plant to offset deterioration and ensure reliable wastewater treatment.

Q. DO YOU HAVE PHOTOS SHOWING THE POOR CONDITION OF THE WASTEWATER ASSETS AT ACQUISITION?

A. Yes. Please see the photos below.

Poor condition of blowers at acquisition with signs of rodent nesting.

Examples of steel tanks and equipment deterioration at close and examples of the numerous poorly installed welded patches on the tanks.

Examples of cracking and exposed rebar in concrete tanks.

Discolored effluent and floating sludge at discharge at acquisition, indicating poor treatment.

Examples of overgrowth of rapid infiltration basins.

Q. **PLEASE DISCUSS CSWR FLORIDA'S APPROACH TO REPAIRS, IMPROVEMENTS, AND UPGRADES FOR THE NORTH PENINSULA WASTEWATER SYSTEM.**

A. The evaluation of the facility's condition made repairing the existing facility an inadequate long-term option for addressing compliance issues at the facility. Three options were evaluated to bring the facility into a condition which could ensure safe, reliable, environmentally responsible service to customers: (1) rehabilitation of the existing infrastructure, (2) total plant replacement, and (3) connection to a publicly owned treatment works for purchased treatment and decommissioning of the existing facility. Preliminary evaluation indicated that the tanks of the three treatment plants may be possible to repair, however, following acquisition more detailed evaluation showed the tanks were in worse condition than initially indicated. The steel tanks had undergone repeated repairs in the past but had reached the end of their useful lives, meaning further repair work would not yield significant extension of useful life. The concrete package plant being used for flow equalization was found to be in similarly poor condition, with cracked concrete and exposed rebar in many places. Indeed, that plant has experienced a catastrophic wall failure since its acquisition. These issues demonstrated that repairs to the existing facility were not a workable long-term solution.

The next option evaluated was total replacement of the treatment facility. This option would require the construction of a new lift station and trying to complete the construction of a new treatment plant while maintaining operations of the existing facility to prevent interruption in wastewater service. The construction would then be followed by the decommissioning and removal of the deteriorating package plants. Investigation of this option showed that while there is a large amount of open space near the facility, little of this property was included in the sale of the utility, and even if additional property could be acquired it would not meet the minimum setback requirements for separation between wastewater treatment infrastructure and

residential homes. Although the existing facility is situated beyond the minimum setback distance, construction of a new facility would require it to remain in service during the project to facilitate continued treatment of wastewater, and there is no location where a new facility could be constructed that would satisfy the setback requirements.

The remaining option was to seek to connect the system to a publicly owned treatment facility and convey untreated wastewater to another treatment facility for purchased treatment. This would also require construction of a new lift station and installation of a new force main to connect to the City of Ormond Beach's treatment facility, followed by the decommissioning of the existing treatment facility. A significantly lower capital cost (approximately $2 million lower based on a preliminary third-party assessment) caused CSWR Florida to select this option as the best and most cost-effective long-term solution to resolve the noncompliance problems that have plagued the North Peninsula wastewater treatment facility.

Regardless of which of the first two options were selected, CSWR Florida determined an additional issue that would need to be addressed is the impact on a threatened species of wildlife (gopher tortoises) living in the rapid infiltration basins at the treatment facility. This would require either approved relocation of the tortoises during required construction activity or permitting and protection of the area occupied by the tortoises during construction activities. The costs associated with these measures further reduce the viability of either of the first two options.

Protected Gopher Tortoise creating obstacles to regular operations, maintenance activities and construction projects (pictured in rapid infiltration basin)

Connecting to the City of Ormond Beach's facility will limit CSWR Florida's future direct operations activities and costs to the collection system and lift station, ensure all noncompliance issues concerning system effluent are resolved. It also will ensure CSWR Florida can provide customers served by this system with safe and reliable service.

This project cannot be immediately undertaken because of the need to design, permit, bid, and construct the connection to the City's system. As a result, some intermediate improvements are required at the existing treatment plant to keep it in an operable condition until it can be properly decommissioned. These necessary interim improvements fall into two general categories: immediate repairs and improvements needed to continue to operate the facility currently, and the activities related to connection to the City of Ormond Beach's facility and the planned decommissioning of the existing North Peninsula treatment facility.

Q. **PLEASE DISCUSS IMPROVEMENTS COMPLETED TO DATE AT THE NORTH PENINSULA WASTEWATER SYSTEM.**

A. CSWR Florida has made various interim improvements to the existing facility that were

required to keep the facility operational and to meet FDEP compliance requirements for the facility. The areas where repairs have been completed to date include the facility tanks, aeration equipment, disinfection systems, electrical equipment, monitoring equipment, solids handling equipment, rapid infiltration basins, collection system, and lift stations. In addition, CSWR Florida has conducted basic site cleanup and has made improvements to site safety. These are the bare minimum repairs necessary to maintain the operational status of the facility to, as much as possible, meet permit limits and ensure continuous service to customers while recognizing the facility ultimately will be decommissioned.

Repairs to tanks have been made to patch leaks and a temporary tank has been installed following the failure of the concrete package plant used for flow equalization. This is the bare minimum required to prevent ongoing releases of untreated or partially treated wastewater on the site.

Example of patching leaks in steel tanks at North Peninsula (left) Temporary tank in place since concrete tank failure (right).

Aeration system improvements have consisted of repairs and replacement of damaged air lines, diffusers, blowers, sludge returns, and installation of a sound dampening barrier around blowers following continued complaints regarding excessive

noise from the facility which began under previous ownership. The installation of the sound barrier was a requirement of the compliance agreements entered into by the previous ownership.

New temporary PVC aeration and sludge return lines throughout facility (left). Sound dampening shed installed around blowers (right).

Disinfection system improvements consisted of repairing the chemical feed pump to ensure proper dosage and patching a leak in the chlorine contact chamber.

Repaired chemical feed pump.

Repairs to the electrical system included repairs and replacements of failed panels, blower timers, pumps, breakers, and placement of a temporary generator on the site.

Mobile generator placed temporarily at North Peninsula site.

Improvements to monitoring systems included installation of remote monitoring equipment on collection system lift stations, replacement of various meters that had failed but are necessary for sampling requirements, repairs to a groundwater sampling well, and connection of equipment to the remote monitoring system. The remote monitoring unit installed at the treatment plant will be able to be moved to the new lift station that will convey wastewater to the City of Ormond Beach's system in the future.

New remote monitoring units installed at the treatment plant (left) and lift stations (center).

New monitoring equipment including flow meter (right) installed at the treatment plant.

Solids handling improvements consisted of replacement of return active sludge pumps and the decant pump for the digester. Maintenance of the rapid infiltration

basins included mowing and tilling the basins and replacing the discharge valve controlling flow from the plant to the rapid infiltration basins. Collection system repairs included completing a CCTV inspection to identify damaged lines, repairs to those lines, and repairs to damaged manhole rings to reduce inflow and infiltration of stormwater into the system. Improvements to lift stations have included replacement of damaged or poorly performing pumps, repairs to discharge lines, repairs to pump rails and chains, replacement of level transducers, and repairs to electrical and control systems. Discharge piping has been replaced on the main lift station as well.

New discharge piping installed on lift station.

Basic cleanup has included removing impacted sludge from the treatment basins of the facility, removing trash, debris, and nuisance vegetation from the site, and removing nuisance vegetation from lift station sites in the collection system. Safety improvements included repairs to stairs and catwalks over the treatment facility, installation of eyewash stations, and fencing repairs. These improvements were required to ensure the continued safe and reliable operation of the facility until secondary improvements can be completed.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR PLANS TO COMPLETE IN THE FUTURE AT THE NORTH PENINSULA WASTEWATER SYSTEM.**

A. As discussed above, the project selected to resolve the long-term compliance issues at the North Peninsula facility is to connect to the City of Ormand Beach for treatment and then decommission the existing facility, converting the system to a purchased treatment wastewater system. While all the treatment equipment will be removed during decommissioning process, portions of the rapid infiltration basins will be allowed to remain to facilitate the survival of the gopher tortoises who live in the basins. Permitting is underway to proceed with the project, however permitting has been delayed due to an upcoming road project that will involve the same right of way as the new force main. Even though the road project is not yet ready to begin, the Florida Department of Transportation ("DOT") has been resistant to allowing the North Peninsula project to proceed until the road project is completed. Negotiation is ongoing to secure the required DOT permit so the wastewater connection project can proceed without further delay.

B. Sebring Ridge Wastewater

Q. **PLEASE DESCRIBE SEBRING RIDGE WASTEWATER AS IT EXISTED AT THE TIME CSWR FLORIDA ACQUIRED THE FACILITY.**

A. The Sebring Ridge wastewater system is a wastewater treatment facility and collection system serving 287 equivalent residential connections ("ERCs") in Highlands County, FL. CSWR Florida closed on the Sebring Ridge wastewater system on August 31, 2023.

Q. **PLEASE PROVIDE AN OVERVIEW OF THE CONDITION OF THE SEBRING RIDGE WASTEWATER SYSTEM WHEN IT WAS ACQUIRED.**

A. There were many issues with the Sebring Ridge wastewater facility's condition left unresolved at the time it was acquired by CSWR Florida. The facility was in poor condition with many assets having reached the end of their useful lives and many others

having been poorly maintained or simply being inadequate to meet the demands of applicable regulatory standards. Issues regarding the condition of the Sebring Ridge system that CSWR Florida identified at the time of acquisition included the following:

- Rapid infiltration basin and percolation ponds overgrown with vegetation and show signs of sludge accumulation,
- Bottom of the percolation pond coincides with water table, which reduces its functionality,
- Disinfection chemicals were stored on an elevated tote for spill containment; also were exposed to sunlight, which causes accelerated breakdown of the disinfection chemicals,
- Existing handrails, catwalks, and stairs were in poor condition and were altogether missing in some areas,
- Electrical service in need of upgrade to facilitate required improvements in treatment,
- No remote monitoring units were present at treatment plant or lift stations,
- Deteriorating improvised shade structure over blower system,
- Failing blower controllers and blowers in poor condition with only one blower functional
- Return active sludge/waste active sludge ("RAS/WAS") piping in poor condition,
- Access road and gravel at site in poor condition; gravel has washed out over time and vegetation growth is present,
- All aeration equipment (blowers, aeration piping, air headers, drop legs, diffusers, etc.) were in poor condition and could not reliably treat wastewater

to permit limits,

- The existing aeration system was not adequate to run main aeration basins and digester; digester lacks the means to decant to reduce water content,
- Facility incapable of treating to new phosphorus limits,
- Nuisance solids were accumulating in treatment basins, harming equipment and treatment processes,
- Lift stations were in poor condition, with a majority of the pumping, rail, and piping infrastructure in need of replacement due to age and lack of maintenance.
- Lift stations lacked means to connect emergency power (generator quick connects and manual transfer switches) or emergency pumps (bypass pumping lines) so there was no existing means to operate them in the event of pump failure or power outage,
- Perimeter fencing was in poor condition and in need of replacement,
- Smoke testing and collection system repairs were required as part of permit renewal under previous ownership but were never completed.

Q. **DO YOU HAVE ANY OVERVIEW PHOTOS OF THE SEBRING RIDGE WASTEWATER SYSTEM?**

A. Yes, the photos below show an aerial view of the Sebring Ridge facility and photos of some of its system components.

Aerial view of the Sebring Ridge community (left) and of the wastewater treatment facility (right).

Sebring Ridge treatment basins at acquisition.

Q. **PLEASE PROVIDE A SUMMARY OF THE COMPLIANCE HISTORY OF THE SEBRING RIDGE SYSTEM UNDER PREVIOUS OWNERSHIP.**

A. The Sebring Ridge wastewater treatment plant has a long history of noncompliance with FDEP rules and regulations. A review of compliance documents for the five-year period preceding the system's acquisition by CSWR Florida shows the facility repeatedly received warning letters, inspection reports noted noncompliance that must be addressed and calls for corrective action that included compliance schedules. The record also shows mixed results on follow-through by the utility's previous owner. None of these enforcement actions were fully closed out as of CSWR Florida's

acquisition because some of the items highlighted by FDEP were left unaddressed. Items noted in the various letters include failures to comply with compliance schedules included as part of the permitting process; failure to properly maintain system components, including rapid infiltration basins, alarm systems on lift stations, clarifiers, and aeration and wastewater piping; modifications to system components and treatment process without proper permitting (e.g. conversion of an aeration basin into additional sludge holding); failure to maintain a copy of the operations and maintenance manual on site; failure to meet new total nitrogen limits; failure to complete engineering reports in association with the statewide total nitrogen Agreed Order; failure to maintain equipment calibration and calibration logs; and various issues regarding sample procedure and documentation. Although the utility sometimes provided responses to these violations those responses were insufficient because they failed to submit adequate documentation of the items addressed in the responses or submitted photographs for verification that showed partially or inadequately addressed items.

Since its acquisition, CSWR Florida has worked to make improvements to the facility, which will be described later in my testimony. Evaluation of the facility shows that it will require what is essentially a total overhaul and upgrade due to the poor condition of all equipment, the facility's inability to meet permitted limits, and potential capacity issues. This work cannot begin immediately because it requires permitting and will be competitively bid to ensure projects are completed at the lowest cost possible. CSWR Florida is working with FDEP to facilitate the long-term corrections required without wasting investment on short term fixes. However, because FDEP has continued to issue inspection reports and warning letters regarding issues left unresolved by prior ownership, some interim fixes will be required. To demonstrate

its commitment to bring the Sebring Ridge system into full compliance as quickly and cost-effectively as possible CSWR Florida regularly meets with FDEP to provide updates and maintain a cooperative relationship while working toward full compliance.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA HAS COMPLETED TO DATE AT THE SEBRING RIDGE WASTEWATER SYSTEM.**

A. Various improvements have been made to date to the Sebring Ridge wastewater system. Both the percolation ponds and the rapid infiltration basin had issues that needed to be addressed to ensure adequate disposal of treated wastewater. Both these sets of assets had significant sludge accumulation resulting in vegetation growth. Furthermore, the elevation of the bottom of the percolation ponds meant that during rain events groundwater would rise to the point of accumulating in the percolation ponds, thereby preventing wastewater from percolating into the ground. To address these issues, sludge and nuisance vegetation has been removed and a maintenance schedule implemented to regularly service the ponds. In addition, a layer of sand was added to raise the elevation of the bottom of the percolation ponds to prevent the previously described groundwater issues.

Rapid infiltration basin (left) and percolation ponds (center) before sludge and vegetation removal. Note percolation pond is holding water rather than draining both due to

groundwater level and sludge slowing percolation rate. Aerial photo after vegetation and sludge removal, and application of sand layer to bottom of percolation basins. Note the percolation basins are draining properly.

At acquisition, the disinfection chemical storage was an elevated spill tote with chemical storage above. Although this provided spill containment and allowed chemicals to be distributed to the contact chamber without a chemical pump, delivered chemicals still would have to be pumped up into the tank upon arrival. In addition, the disinfection chemicals and tank were exposed to sunlight, which accelerates the breakdown of the chemicals and thereby reduces the efficacy of the disinfection process. A new spill tote and chemical storage tank with a chemical feed pump have been installed at ground level and the chemical storage tank has been covered by a shade structure to eliminate the issue with UV exposure. This will also allow for more precise dosing for disinfection and tracking of chemical inventory.

Disinfection chemical storage before (left) and after (right) improvement.

New chemical feed pump system for precise dosing of sodium hypochlorite.

At acquisition the existing handrails, catwalks, and stairs were in poor condition and some areas lacked access with any operator safety features. CSWR Florida has begun to replace damaged safety features and install new ones and will continue to do so as improvement projects proceed.

Examples of inadequate safety features for operations access. Rotting wooden stairs with missing handrail on one side (left), aluminum ladder resting across tanks for access to air header (center), no leading edge protection or grating over open basins throughout plant (right).

New access stairs with handrails, high friction tread plates, high visibility coating (left) and new fall protection rails around the exterior of the facility to prevent falls from the plant (right).

At acquisition, no remote monitoring equipment was present at the wastewater treatment facility or lift stations, and the other monitoring equipment at the plant was either in poor condition or missing entirely. New remote monitoring equipment has been installed at the treatment plant and at each lift station. A new flow meter has also been installed to allow for active measurement of flow through the remote monitoring system.

Remote monitoring equipment installed at the wastewater treatment plant (left) and lift stations (right).

New ultrasonic flow meter in weir box (left) and meter controller (right).

Although more improvements are required, some improvements also have been made to the power and control systems at the treatment plant to replace damaged equipment found throughout the facility. This included replacing the heavily deteriorated power and control panel for the blower system. Also, a proper shade structure has been installed over the blowers. Previously the blowers were protected from sunlight and rain with a tarp secured to scrap piping with rope and bungee cords. A proper structure has now been installed and the area cleaned up from trash and debris.

Blower control panel and shade structure before (left) and after (right) improvements, note general cleanup of area from trash and debris as well.

Emergency repairs to the aeration system have also been implemented. At acquisition, only one of the two blowers was functional, with no blower motor present

on the second blower. In addition, the blower housings were in poor condition, the functioning blower motor was in poor condition, belts were missing for the out of service blower, and both blower housings were deteriorating. Both blower motors and blowers have been replaced, including rewiring both units to the new blower controller. A belt housing has been installed along with new blower mufflers. Air leaks have been identified, and some aeration piping repairs have also been implemented.

Blowers before (left) and after (right) improvements.

At acquisition, the clarifier sludge returns and skimmers were not properly functioning, and significant suspended solids in the clarifiers were noted in FDEP's previous enforcement action. To improve the function of the clarifiers, new sludge returns, sludge air lifts, and skimmers have been installed.

Old skimmer and air lifts (left) and newly installed air lifts and sludge returns (right), note

improved clarity in the clarifiers.

At the time CSWR Florida acquired the system, the access road and gravel throughout the site were eroded, crushed, and poorly maintained, with bare spots and nuisance vegetation growing throughout. To maintain facility access and operational access throughout the site, new gravel has been applied and nuisance vegetation removed.


Typical degraded condition of roads and surfaces at acquisition.


Site and road conditions following improvement.

Finally, general site improvements have been implemented, which consisted of removing trash, debris, broken equipment, and nuisance vegetation from the site to improve operational safety and efficiency.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA PLANS TO**

COMPLETE IN THE FUTURE AT THE SEBRING RIDGE WASTEWATER SYSTEM.

A. Further improvements, upgrades and/or replacements, will be required for the Sebring Ridge wastewater system to ensure its facilities are in a safe and operable condition so the facility can consistently meet regulatory requirements and compliance standards and ensure the facilities can be properly maintained in the future. While some improvements have been made to the aeration system to keep the facility operational until the longer-term projects can be undertaken, further improvements are needed. This will involve a comprehensive overhaul of the aeration system, including replacement of current aeration piping with steel piping, replacement of diffusers and drop pipes to ensure proper function and eliminate leaks, and upsizing blowers to enhance treatment. Improvements to the clarifier equipment will also be implemented to improve clarifier function. A designated blower will also be installed to improve the digesters' breakdown of solids. This process will be further enhanced by adding a decanter to reduce the water content of treated sludge thereby reducing sludge hauling expense over time. The existing process also does not adequately meet phosphorus limits, so a new treatment process will be added to allow the plant to treat to those limits. At acquisition, it also was noted that large amounts of nuisance solids (non-wastewater solids) were entering the facility. These solids can hinder treatment and potentially damage treatment equipment. To date these solids have been captured with a manually cleaned bar screen. But that process has not been effective at stopping nuisance solids from entering the facility. A fine screening system will be installed to automatically capture solids and drop them into a dumpster. This eliminates the process of manual raking of a bar screen and prevents the screen from being filled and overwhelmed, allowing solids into the facility.

Existing bar screen (left), examples of Hydrosieve with automatic trash collection beneath at two CSWR affiliated facilities (center and right).

To facilitate improvements and upgrades to the treatment processes at the Sebring Ridge facility, electrical upgrades will be required at the facility. This will include upgrading from a 200 amp service to a 400 amp service and replacing the current power supply and control panels, as appropriate, to meet the needs of upgraded equipment and to replace damaged or corroded electrical equipment. The new power supply will also include the means to connect an emergency generator to the system and prevent service interruption in the event of a power outage.

Extremely corroded existing 200 amp power supply.

All three of the existing lift stations in the collection systems are in poor condition and will require significant improvements. Many of the components are

aging and in need of replacement, including control panels, manhole covers, pumps, and piping. Much of the discharge piping has been repeatedly repaired and is no longer properly supported (e.g., raised on piles of cinder blocks with wood shims) and often consists of improper piping materials including flex hoses and PVC pipes. The lift stations also do not include rail systems to aid in pump maintenance. None of the systems currently include emergency bypass piping, which allows a mobile pump to be connected to the lift station for operation during pump malfunctions or during power outages. All three stations will be overhauled with new pumps, control systems, rails, and piping to ensure proper function. Emergency bypass piping will also be installed during the piping overhaul. In addition, none of the lift stations currently include the means necessary to connect an emergency generator. This would typically be an emergency quick connect and manual transfer switch allowing a mobile generator to be connected to provide power to the lift station during a power outage. This equipment will be installed to improve the system's resiliency.

Example of lift station piping and condition currently.

Additional collection system repairs will include identification and repair of leaks, locating and uncovering manhole covers, and replacing damaged manhole covers and rings. General site improvements will continue, including addressing grading

issues, further vegetation control, and replacing damaged fencing around the facility to ensure site security.

C. Sunshine Utilities of Central Florida Water Systems

Q. **PLEASE DESCRIBE SUNSHINE UTILITIES.**

A. CSWR Florida acquired the assets of the Sunshine Utilities of Central Florida water utility on May 24, 2022. While under one certificate of authorization issued by the Commission (363-W), Sunshine consists of twenty-three water systems, all located in Marion County, Florida. All the Sunshine water systems are groundwater systems that source water from their own wells. Most of the systems consisted of a single well site, but the Ponderosa Pines and Ocklawaha Water Works systems each have two well sites.

Q. **PLEASE DESCRIBE THE OVERALL CONDITION OF THE SUNSHINE WATER SYSTEMS AT THE TIME OF THEIR ACQUISITION BY CSWR FLORIDA.**

A. All the Sunshine water systems had at least some problems that required improvements. The general condition of the systems was fair. Most of the issues encountered were consistent across many or all systems with certain categories of deficiencies in common. Many systems had issues with their disinfection systems. These issues often included poor chemical containment, improper chlorine dosing, lack of shade structures to prevent breakdown of disinfection chemicals, and lack of continuous chlorine monitoring. Many of the facilities had hydropneumatic tanks in poor or failing condition with leaks and corroding interior and/or exterior surfaces. This is a serious issue as a tank failure can not only cause service interruptions but can also result in tank explosions causing damage to the utility site, surrounding property, and even potentially causing injuries to nearby people. Shortly after CSWR Florida closed on

the Sunshine systems the hydropneumatic tank at Oakcrest Villas experienced this sort of catastrophic failure causing damage to the utility site and interrupting service until temporary bladder tanks could be installed.

Many of the Sunshine systems had issues related to wells and well equipment. These issues ranged from damage and corrosion to well casings and piping, damaged valves, well pumps and motors in need of replacement due to age, underperformance, or issues with cavitation, and wells requiring reworking, chemical treatment, or screen installations due to age. Several sites had out of service wells that required proper abandonment or reworking to be brought back into service. Several sites had inadequate water supply with the existing wells.

All sites had issues with the electrical and monitoring systems. Many sites had corroding power boxes and control panels, improperly mounted boxes, exposed wiring, or poor condition power services. Most sites lacked emergency backup power or means to connect a mobile generator, and some of the sites which had emergency generators had generators in poor condition, inadequate fuel storage, or improperly installed generators. Some sites lacked metering equipment or metering equipment was in aging or poor condition. All sites lacked remote monitoring equipment.

All sites had issues requiring some form of distribution system improvements. These included leak and main break repairs, damaged or inadequate flushing hydrants and isolation valves, and replacement of sections of distribution piping which have reached the end of useful life or were constructed from improper materials.

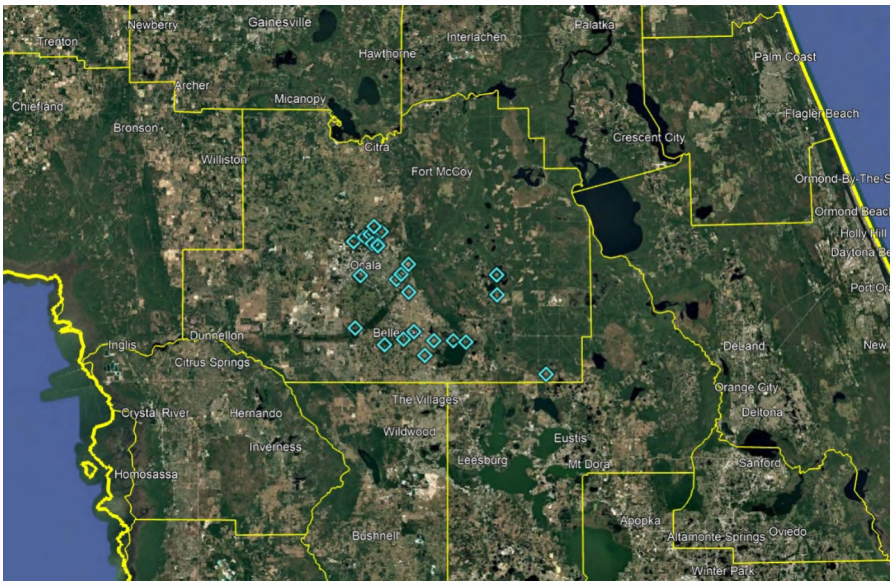
All sites had some issues with general site conditions. Typical issues included damaged structures, damaged fencing, missing or inadequate all-weather access, vegetation overgrowth throughout the sites, and poor grading resulting in erosion.

Finally, two sites – Ocklawaha Water Works and Oak Haven Quadruplexes –

had sulfur present in groundwater, requiring installation of new treatment equipment.

Q. **DO YOU HAVE ANY OVERVIEW PHOTOGRAPHS OF THE SUNSHINE WATER SYSTEMS?**

A. Yes, the photographs below show an aerial view of the Sunshine drinking water systems.



Locations of the 23 Sunshine drinking water systems.

Aerial (left) and ground level view (right) of the Ashley Heights drinking water facility (FL3424962) at acquisition.

Aerial view of the Belleview Oaks (FL3424621) drinking water facility at acquisition.

Ground level views of the well (left) and tank and treatment sites (right) at the Belleview Oaks (FL3424621) drinking water facility at acquisition.

Aerial (left) and ground level view (right) of the Country Walk drinking water facility (FL3424657) at acquisition.

Aerial view of the Eleven Oaks (FL3424099) drinking water facility at acquisition.

Ground level views of the Eleven Oaks (FL3424099) drinking water facility at acquisition.

Aerial (left) and ground level view (right) of the Emil Mar drinking water facility (FL3420340) at acquisition.

Aerial (left) and ground level view (right) of the Florida Heights drinking water facility (FL3424031) at acquisition.

Aerial (left) and ground level view (right) of the Floyd Clark drinking water facility (FL3420411) at acquisition.

Aerial (left) and ground level view (right) of the Fore Oaks drinking water facility (FL3424644) at acquisition.

Fore Oaks well sites (FL3424644) at acquisition.

Aerial (left) and ground level view (right) of the Hilltop At Lake Weir drinking water facility (FL3424662) at acquisition.

Aerial (left) and ground level view (right) of the Little Lake Weir drinking water facility (FL3420761) at acquisition.

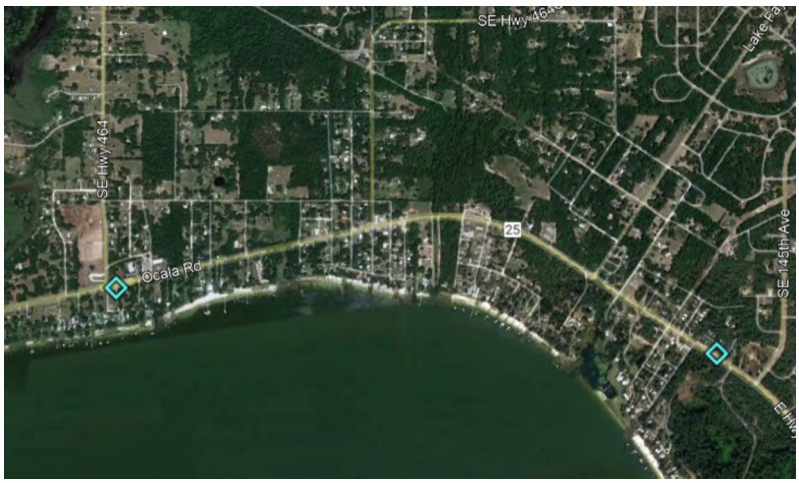
Aerial (left) and ground level view (right) of the Oak Haven Quadruplexes drinking water facility (FL3424106) at acquisition.

Aerial (left) and ground level view (right) of the Oakcrest Villas drinking water facility (FL3421201) at acquisition.

Aerial (left) and ground level view (right) of the Oakhurst drinking water facility (FL3424032) at acquisition.

Aerial (left) and ground level view (right) of the Ocala Garden Apartments drinking water facility (FL3421554) at acquisition.

Aerial (left) and ground level view (right) of the Ocala Heights drinking water facility (FL3424651) at acquisition.



Aerial View of the two Ocklawaha Water Works (FL3420939) Well Sites (Terrace on left,

Pines on right).

Ground level view of the Terrace (left) Pines (right) well sites.

Aerial View of the two Ponderosa Pines (FL3424062) drinking water sites.

Ground level views of Ponderosa Pines well site 1 (left) and well site 2 (right) at acquisition.

Aerial (left) and ground level view (right) of the Quail Run drinking water facility (FL3424046) at acquisition.

Aerial (left) and ground level view (right) of the Sandy Acres drinking water facility (FL3421118) at acquisition.

Aerial View of the two Sun Ray Estates (FL3421314) drinking water site.

Sun Ray Estates (FL3421314) well and hydropneumatic storage tank (left). Generator and disinfection shed (right).

Aerial (left) and ground level view (right) of the Sunlight Acres drinking water facility (FL3421520) at acquisition.

Aerial (left) and ground level view (right) of the Whispering Sands drinking water facility (FL3424009) at acquisition.

Aerial (left) and ground level view (right) of the Winding Waters drinking water facility (FL3424691) at acquisition.

Q. **PLEASE DESCRIBE THE COMPLIANCE HISTORY OF THE SUNSHINE DRINKING WATER SYSTEMS PRIOR TO ACQUISITION BY CSWR FLORIDA.**

A. During the five years immediately prior to their acquisition by CSWR Florida the twenty-three Sunshine water systems experienced a variety of compliance issues. Many of these issues were recurring and were experienced across multiple facilities, often multiple times, which indicates systemic issues with operations and reporting practices.

The primary types of noncompliance related to monitoring and reporting violations. Eleven Sunshine systems were cited for violations related to synthetic organic chemical sampling requirements, eleven facilities were cited for violations related to disinfection byproduct sampling requirements, six facilities were cited for violations related to radionuclide sampling requirements, and one facility was cited for a violation related to revised total coliform rule sampling requirements. All told, twenty-one of Sunshine's twenty-three systems were cited for violations of monitoring and reporting requirements within the five years immediately prior to CSWR- Florida's

acquisition. Properly completing and reporting monitoring in accordance with drinking water sampling requirements is critical because it is the mechanism regulators use and rely on to verify that drinking water is safe for consumers. Although the numerous citations for failure to comply with monitoring and reporting regulations do not necessarily indicate water provided by Sunshine was unsafe to drink, the requirements are in place to ensure customer safety, and compliance with those standards is not discretionary. Most of these violations resulted in FDEP Compliance Assistance Offer agreements, which are an enforcement mechanism FDEP uses to ensure missing sampling is completed. Such agreements are considered an informal enforcement tool that provides a window of time for a utility to correct noncompliance violations. However, two Sunshine systems had additional noncompliance noted in facility inspections that required corrective action relating to flow meter calibration, repairs to system components, exceedance of permitted capacities, and failure to conduct required tank inspections. In addition, one system was subject to a Consent Order – a more serious enforcement action utilized when Compliance Assistance Offers fail to achieve compliance or when repeated violations indicate a lack of effort to comply with requirements. The Sunshine Consent Orders included monetary penalties.

While the information I just provided summarizes the formal and informal enforcement actions that occurred in the five years immediately prior to CSWR-Florida's acquisition of the Sunshine systems, soon after its acquisition CSWR-Florida invited FDEP to conduct facility inspections to ensure all instances of noncompliance could be identified and addressed in a cooperative manner. The FDEP inspections noted hydropneumatic tanks at three sites that were either actively leaking or patched with temporary patches. CSWR-Florida's actions to address these problems is discussed in the portion of my testimony that focuses on improvements planned and

completed at each system. The severely deteriorated hydropneumatic tanks CSWR-Florida acquired from Sunshine included one that experienced a catastrophic tank failure (i.e., an explosion) shortly after closing, which shows the system's previous ownership failed to maintain system components in accordance with FDEP requirements. Indeed, CSWR-Florida identified hydropneumatic tanks at twenty-two of the twenty-three Sunshine system sites that did not meet minimum FDEP standards.

The Sunshine systems' history of noncompliance demonstrates a recurring failure by the previous owners to satisfy sampling and reporting standards that were put in place to ensure the water delivered is safe for customers. Maintaining proper sampling and reporting procedures is a basic and important part of a water utility's operations practices, and repeated failures to follow those procedures indicate an inability or unwillingness to responsibly operate drinking water systems in a manner that ensures water consumed by customers is safe.

Q. **PLEASE DESCRIBE THE WORK COMPLETED TO DATE BY CSWR FLORIDA AND IMPROVEMENTS THE COMPANY PLANS TO IMPLEMENT AT THE SUNSHINE WATER SYSTEMS.**

A. After closing on the Sunshine water systems, CSWR-Florida made initial improvements at every facility. For example, all systems received improvements to their electrical systems. This included installation or replacement of emergency generators, improvements to power supplies and panels, relocation of power services, installation of lighting to enable safe operation in emergency responses after dark, and improvement to site and well head wiring. CSWR-Florida has installed, repaired, or replaced emergency generators at almost every Sunshine site and will complete installations at remaining sites in the near future. Emergency backup power is important to prevent service interruptions at any drinking water facility but is especially

important for facilities that rely on hydropneumatic tanks or booster pumps for pressurization.

Prior to acquiring the Sunshine water systems, CSWR-Florida determined that many of the hydropneumatic tanks were in poor condition and in need of evaluation followed by repair or replacement. Poor maintenance of these tanks by previous ownership was made obvious when the hydropneumatic tank at the Oakcrest Villas site failed catastrophically and exploded, damaging the site and interrupting service. These sorts of failures are extremely serious because they not only interrupt service but can cause severe damage to property on and around the utility site, thus posing a threat to customers, their property, and people on or near the site. CSWR-Florida responded immediately to the Oakcrest Villas tank failure and quickly installed three temporary bladder tanks to restore service until a new hydropneumatic tank could be acquired, permitted, and installed.

To prevent similar occurrences, CSWR-Florida has worked to evaluate and repair or replace hydropneumatic tanks at each of the Sunshine sites. This resulted in the replacement of four hydropneumatic tanks to date and replacements or installations of additional tanks planned for 21 of the 23 Sunshine sites. Other existing tanks also will be repaired and recoated at 19 of the 23 sites.

At each of the Sunshine systems CSWR-Florida has implemented improvements to disinfection systems. These include the installation of continuous chlorine monitoring to ensure proper disinfection, installation of shade structures over sodium hypochlorite tanks to prevent premature breakdown of chemical and dosage equipment, and installation of proper chemical containment to prevent environmental damage from leaks of sodium hypochlorite solution. In addition, all sites have or will soon undergo evaluation of their wells, and improvements will be made as required.

These improvements may involve minor improvements like cleanup and recoating of above ground piping, or more comprehensive rehabilitations such as replacement of pumps and motors, redrilling or chemical treatment of the well column, addressing exposed wiring, repairing well casings, installation of new wells, and rehabilitation or proper abandonment of out of service wells.

All water systems are also undergoing distribution system evaluation and improvements to reduce water loss and harden the distribution systems against leaks and breaks leading to service outages. Distribution system improvements, both completed and still planned, include addressing leaks, repairing breaks, replacing substandard material piping (some sections were found to utilize schedule 20 PVC that is not approved for potable water usage), and the addition of flushing hydrants and isolation valves. Above ground piping improvements have also been made at some water production sites. These improvements primarily consist of replacing damaged piping and replacing coatings where they were damaged.

Remote monitoring equipment has also been installed at all sites. This allows operations staff to immediately identify any abnormal operating conditions, which allows for quick responses to minimize and sometimes eliminate service interruptions. Remote monitoring equipment also allows for live recording and tracking of operational data, giving operators a more complete picture of system performance, which allows for better operational control. It also provides information necessary to identify and design system improvements.

All the systems have also undergone or are undergoing improvements to general site conditions. These activities include repairs to structures; clearing of vegetation and debris from the site and fence lines; repair, replacement, or installation of fencing; repair or installation of all-weather access equipment; installation of safety equipment;

and site grading to address flooding and erosion. In addition, the Ocklawaha Water Works and Oak Haven Quadruplexes systems have planned improvements that include installing sulfur remediation to improve the flavor of water produced.

Q. **DO YOU HAVE PHOTOGRAPHS SHOWING THE IMPROVEMENTS CSWR FLORIDA COMPLETED AT THE SUNSHINE WATER SYSTEMS.**

A. Yes. Please see below for photos showing areas before and after improvements made by CSWR Florida, including an in depth look at the tank failure at Oakcrest Villas.

Hydropneumatic tank at Oakcrest Villas showing pinhole leaks and rust prior to catastrophic failure.

Oakcrest Villas hydropneumatic tank explosion. Failed tank with damaged fencing (left) and damage to other water assets (right).

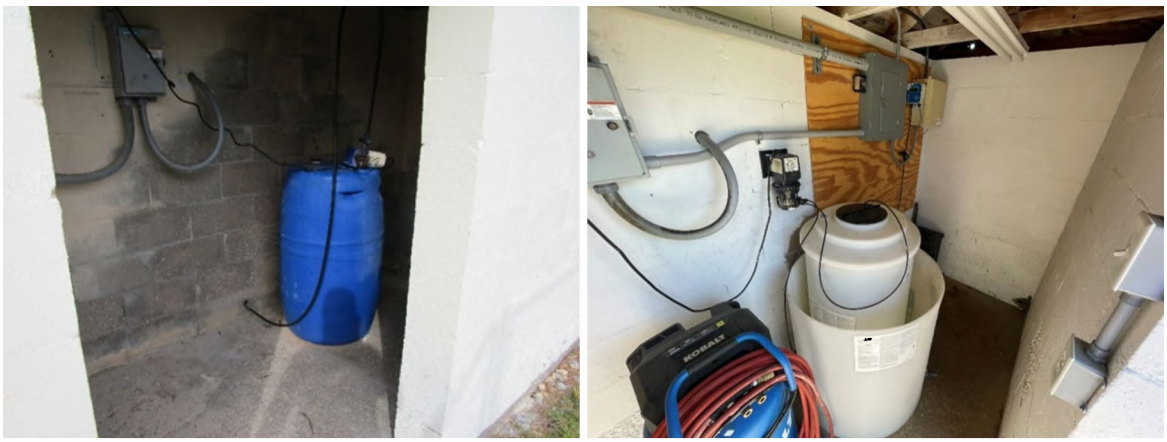
Temporary bladder tanks installed at Oakcrest Villas system to restore service until new hydropneumatic tank could be installed.

New hydropneumatic tank was installed at Oakcrest Villas to replace failed tank. Damage to site caused by tank explosion also repaired including new fence installation.

Before (Left) & After (Right): Flow Meter Replacement - Ashley Heights system

Before (Left) & After (Right): Chemical containment upgrades - Ashley Heights system.

Before (Left) & After (Right): Disinfection system improvements (shade structure and containment) - Belleview Oaks Estates system.



Before (Left) & After (Right): Disinfection improvements, containment, and lighting - Country Walk system.

Before (Left) & After (Right): Chemical containment and shade structure - Emil-Mar system.

Before (Left) & After (Right): New Chemical containment and shade structure - Oakcrest Villas system.

Before (Left) & After (Right): New Chemical containment and shade structure - Ponderosa Pines system.

Before (Left) & After (Right): Hydropneumatic tank replacement (current tank leaking and at risk of failure) - Ashley Heights system.

Before (Left) & After (Right): Hydropneumatic tank replacement - Belleview Oaks Estates system.

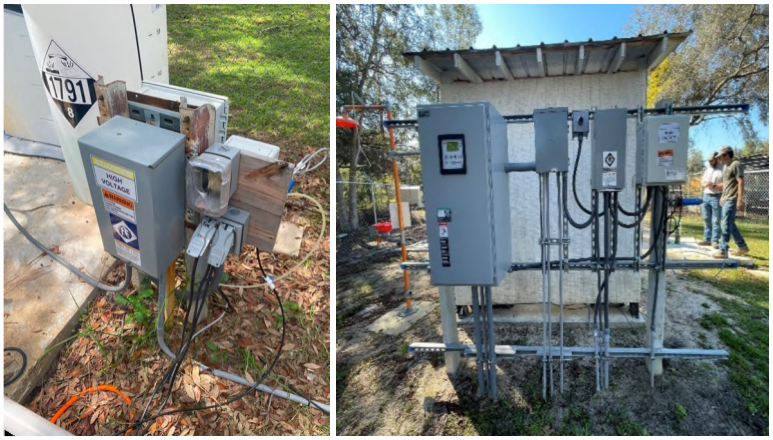
Before (Left) & After (Right): Hydropneumatic tank replacement - Country Walk system.

Before (Left) & After (Right): Hydropneumatic tank replacement - Ponderosa Pines system.

Before (Left) & After (Right): Hydropneumatic tank replacement - Winding Waters system.

Before (Left) & After (Right): Electrical Panel Improvements - Eleven Oaks system.

Before (Left) & After (Center & Right): New Electric Panels - Oakcrest Villas system.



Before (Left) & After (Right): Electrical panel improvements - Pondarosa Pines system.

Emergency generator installation - Eleven Oaks system

Emergency generator installation - Ashley Heights system.

New generator - Belleview Oaks Estates system.

New generator - Country Walk system.

New generator - Emil-Mar system.

New generator - Florida Heights system.

New generator and fence - Oakcrest Villas system.

New generator - Ponderosa Pines system.

Remote monitoring unit - Florida Heights system (Note: The same equipment has been installed at all 23 Sunshine systems).

Emergency eye wash and chemical shower station and fires extinguisher - Ashley Heights system (Note: Similar safety installations at other systems, as requirea).

New fencing - Emil-Mar system. (Note: similar fencing improvements have been made at all Sunshine water sites)

Before (left) and after (right) access road installation - Oakcrest Villas system. (Note: similar access road improvements have been made at all Sunshine sites where appropriate)

Example of before (left) and after (right) well rehabilitation work at Emil Mar water system (Note: similar improvements have been made at many Sunshine sites)

D. CFAT H2O (aka Landfair) Wastewater System

Q. **PLEASE DESCRIBE THE LANDFAIR WASTEWATER SYSTEM AS IT EXISTED AT THE TIME OF ITS ACQUISITION.**

A. The Landfair wastewater system is a wastewater treatment facility and collection system serving 242 equivalent residential connections ("ERCs") in Marion County, Florida. The wastewater system serves a subdivision in the Northern portion of Ocala, Florida. CSWR Florida closed on its acquisition of the water and wastewater systems of CFAT H2O, Inc. on November 30, 2023. On its FDEP domestic wastewater facility permit (FLA010722), the wastewater system is identified as the "Landfair WWTF." For purposes of my testimony I will refer to this wastewater system as "Landfair."

The Landfair facility consists of a Marolf style concrete modular package plant, and includes a flow equalization basin, aeration, secondary clarification, chlorination and aerobic digestion of biosolids, and a rapid infiltration basin system. The collection system includes 6 lift stations, all of which are maintained by the utility, but only two of them (lift stations 1 & 2) are owned by the utility.

Q. **PLEASE DESCRIBE THE CONDITION OF THE LANDFAIR WASTEWATER SYSTEM WHEN IT WAS PURCHASED.**

A. As I will describe below in testimony concerning the system's compliance history, there were many issues concerning the condition of the Landfair wastewater system when it was acquired by CSWR Florida. These issues fell into two primary categories. First, there were items that required immediate attention to ensure the facility could continue to properly function. Second, there were issues related to the facility's long-term compliance and compliance with a Consent Order (primarily related to compliance with total nitrogen limits which will be discussed below in a review of the facility's compliance history) that require a more thorough design, permitting, bidding,

and construction process. Items identified in the first category include the following:

- No remote monitoring present at Landfair facility
- Damaged fencing
- The need to comply with Consent Order requirements for holding pond maintenance
- No chemical containment for spills of disinfection chemicals
- An aeration pattern indicating damage to diffusers and drop legs causing poor treatment
- Discharge and emergency bypass piping at main lift station in poor condition
- No means to connect emergency power to two of the lift stations
- No guiderail system for pump maintenance in lift stations 1 and 2

Items identified in the second category, which cannot be immediately addressed and will require a more thorough design and permitting process, include the following:

- Ongoing failure to meet total nitrogen limits
- Ongoing failure to meet total suspended solids limits
- Many areas of damage to concrete tanks indicating poor tank condition

Q. **DO YOU HAVE ANY OVERVIEW PHOTOS OF THE LANDFAIR WASTEWATER SYSTEM?**

A. Yes, please see the photos below showing an aerial view of the Landfair wastewater treatment facility and photos of system components.

Aerial view of the Landfair Community.

Ground level overview photo of Landfair WWTF at acquisition.

Q. **PLEASE PROVIDE A SUMMARY OF THE COMPLIANCE HISTORY UNDER PREVIOUS OWNERSHIP.**

A. The facility has a long history of noncompliance and failure to comply with permitted limits as well as failure to adequately plan for and complete upgrades to the facility to meet the total nitrogen limit compliance schedule. The most significant ongoing issue, which is present throughout the compliance history, is the system's failure to achieve compliance with total nitrogen limits and the prior owner's failure to implement any effective plans to meet those limits. In permit conditions included as part of the system's 2016 permit renewal, the facility was required to meet limits for total nitrogen

by October 2020. The then-owner of the facility sent an update to FDEP in June of 2019 stating the facility would consistently comply with the 12-month average limits for total nitrogen before the October 2020 compliance date. In March 2021, FDEP issued a warning letter to the utility that highlighted excessive total suspended solids violations, ongoing failure to comply with total nitrogen limits, failure to submit semiannual groundwater monitoring reports for two years, and a buildup of solids in the holding pond. The report noted additional deficiencies, stating that at the time of FDEP's inspection the site failed to maintain a copy of the operations and maintenance manual on site as required, incorrectly calculated the geometric mean for fecal coliform on multiple discharge monitoring reports ("DMRs"), failed to provide documentation of flow meter calibration, violated 21 total suspended solids parameters in DMRs completed during 2020, significantly exceeded total nitrogen limits, had an observable buildup of solids in the holding pond, and failed to submit any of the required semiannual groundwater monitoring reports for 2019 and 2020. The system's continuing noncompliance, as detailed in the warning letter and inspection report, resulted in the issuance of a Consent Order on May 11, 2021. The order implemented interim limits for total suspended solids and total nitrogen that were to remain in effect until October 31, 2022, to provide the utility additional time to achieve compliance with final total nitrogen limits.

In addition to establishing interim limits, the Consent Order contained a number of other requirements and compliance schedules, including requirements to immediately maintain the lined holding pond, remove excess solids and nuisance vegetation from the holding pond, and to, within 30 days of the Consent Order's effective date, submit an evaluation of the facility and collection system by a registered professional engineer to determine the causes of the identified violations. In addition,

within 30 days of the submission of the engineering evaluation the utility was required to submit to FDEP design modifications, prepared by a professional engineer, to ensure future facility compliance. All necessary improvements to the wastewater facility were required to be completed within 365 days of permit issuance, and if no permit is required within 180 days of FDEP approval of the proposed facility modification submission I previously mentioned. Thereafter the utility was required to submit quarterly reports updating FDEP on the progress of projects being completed related to the Consent Order and also provide the department with information on any noncompliance with parameters specified in the Consent Order, including construction requirements and effluent limits, and providing reasons for the noncompliance. The reports were also required to include a projection of work to be performed in the 12-month period following the date of the report. The Consent Order also required submission of an Operations and Maintenance Performance report, issued a $3,000 penalty, and laid out conditions for additional stipulated penalties in the event of noncompliance with terms of the order.

Following the issuance of this Consent Order issues arose concerning the utility's efforts to satisfy the requirements of the order and concerning additional unrelated noncompliance. First, while the utility ultimately submitted the required Operations and Maintenance Performance report it was submitted 20 days after the 90 day requirement set forth by the Consent Order. In addition to being late the Operations and Maintenance Performance Report was found to be deficient because, among other things, it did not include the required information concerning the collection system. Furthermore, on October 26, 2021, FDEP sent a letter to the utility stating it failed to submit a facility modification plan (required to be completed by June 11, 2021) as required by the Consent Order, and further stating no permit applications (required to

be completed by July 11, 2021) had been submitted. The utility then requested a six-month extension to achieve final compliance, which FDEP granted on November 1, 2021.

On December 15, 2021 a DMR was issued noting multiple exceedances and noting that several DMR samples were mishandled, mislabeled, reported in incorrect units, or miscalculated. Shortly thereafter FDEP issued a warning letter stating the utility had failed to timely submit a permit renewal application, that the chlorine contact chamber was leaking effluent, and that as previously noted several obligations imposed by the Consent Order remained unsatisfied. Ultimately, the prior owner sold the wastewater system to CSWR Florida, in part to avoid higher levels of enforcement action related to the failure to properly upgrade the facility and achieve compliance with limits and the Consent Order.

The Landfair facility is currently subject to a Consent Order that is primarily related to the facility's ongoing inability to maintain compliance with total nitrogen limits and the maintenance issues that were unaddressed by previous ownership. Essentially, FDEP reissued the earlier Consent Order but adjusted the compliance schedule timeline. Since acquiring the system CSWR Florida has maintained compliance with the requirements of the current Consent Order and plans to achieve full compliance through the system improvements I describe later in my testimony.

Q. **PLEASE DISCUSS CSWR FLORIDA'S APPROACH TO REPAIRS, IMPROVEMENTS, AND UPGRADES FOR THE LANDFAIR WASTEWATER SYSTEM.**

A. As discussed above, the issues requiring attention at the Landfair wastewater system fall into two categories, items that must or can be worked on immediately either because they must be addressed to ensure proper operation of the facility, or because

the work does not conflict with the major improvement projects, and major improvement projects for the site aimed at addressing the long term compliance requirements and conditional issues. The primary long-term issue faced by the Landfair facility is ensuring the plant can consistently treat to its permit's total nitrogen limits. The facility, as it exists today, cannot meet these limits without significant changes. CSWR Florida's third-party engineering partners evaluated the facility to determine if the existing plant could be upgraded to meet these limits, or if a new treatment plant would be required. In this evaluation the current condition of the treatment plant structures was considered and the work that would be required to ensure the tanks are in good condition for the future. The third-party engineers determined the existing leaking concrete tanks cannot be effectively repaired, and therefore the most cost-effective and responsible approach to achieving compliance will be constructing a new wastewater treatment facility that is designed with total nitrogen limit compliance in mind. The process of designing, permitting, bidding, and constructing a new treatment plant is a long one. Therefore, the existing facility must remain operational throughout the whole process. This means CSWR Florida will make only the minimal necessary repairs to ensure the existing facility can continue to operate until a new facility can be brought online. Improvements to be made will, to the greatest extent possible, ensure any new equipment will be usable at, or will not conflict with, the new facility. Any improvements made to the existing facility will involve the bare minimum investment necessary to ensure the existing facility is operating as required to comply with applicable environmental laws and ensure customers receive safe and reliable service.

Q. **PLEASE DISCUSS IMPROVEMENTS COMPLETED TO DATE AT THE LANDFAIR WASTEWATER SYSTEM.**

A. Improvements made to date to the Landfair wastewater system include installation of remote monitoring equipment at the wastewater treatment facility including all six lift stations. The remote monitoring unit installed at the treatment plant will be able to be moved to the new treatment facility in the future.

Newly installed remote monitoring equipment at the Landfair facility and lift stations (example at treatment plant)

Damaged fencing was identified at the treatment facility, rapid infiltration basins, and lift stations 1 and 2. Adequate fencing is important to prevent members of the public from entering utility sites, both to protect the equipment and ensure its safe and reliable operation and to protect the public from potential injury or illness due to exposure to wastewater and wastewater equipment. To ensure site security and public safety all fencing has been repaired.

Example of damaged (left) and repaired (right) fencing at the Landfair treatment facility.

As identified in the initial Consent Order, the previous ownership failed to

properly maintain the holding pond for treated wastewater, allowing significant sludge accumulation and vegetation growth in the holding pond. As required by the current Consent Order, CSWR Florida immediately cleaned the holding pond and has maintained it since taking acquisition.

Condition of holding pond before (left) and after (right) improvements by CSWR Florida.

At acquisition, no spill containment was present for the sodium hypochlorite disinfection chemicals. This means if a spill occurred the chemicals could flow freely on and into the ground, potentially damaging the environment or exposing operators to disinfection chemicals. A spill containment drum was installed to contain potential spills of the chemicals.

Sodium hypochlorite storage before (left) and after (right) addition of spill catching drum.

Additional improvements have been made to the aeration system and lift

stations. Portions of the aeration apparatus in the aeration basin were not functioning properly, indicating damage to some of the drop pipes and diffusers. These needed to be repaired to maintain proper function of the treatment facility until the plant replacement can be completed. The discharge and bypass piping of the main lift station were in very poor condition at the time of acquisition, with rusting piping and damaged valves supported by stacks of loose brick and rotting wood. The piping has been replaced to ensure proper function and to prevent a support failure resulting in service interruption.

Main l.ft station piping at acquisition with brick and rotting wood supports.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA PLANS TO COMPLETE IN THE FUTURE AT THE LANDFAIR WASTEWATER SYSTEM.**

A. Substantial additional improvements are needed at the Landfair wastewater system to ensure the facilities are in a safe and operable condition, that the facility can consistently meet regulatory requirements and compliance standards, and to ensure that the facilities can be maintained in the future. The Landfair wastewater treatment facility has had an ongoing inability to meet new total nitrogen limits and has struggled to meet other limits. This represented a failure by previous ownership to implement improvements needed to meet the new total nitrogen permit limits. CSWR Florida's

third-party engineering partners evaluated the facility and determined that the tanks could not be cost-effectively repaired or refurbished and had reached the end of their useful lives. These issues related to poor tank condition were present on both the system's steel and concrete treatment tanks. Numerous active leaks were present on the tanks, which had persisted for some time and had been addressed only through ineffective attempts at patching leaks. In addition, there is significant algal and bacterial growth on tanks exteriors where leaks have occurred. Examples of the leaks and damage to the facility's treatment tanks can be seen below.

Examples of leaks on the steel (top left) and concrete (all other photos) tanks with ongoing leaks evident by ineffective patching and significant growth of algae and rust accumulation below leaks.

The dismal condition of the tanks led the third-party engineering partners to

recommend total plant replacement to ensure the facility can be designed to properly meet regulatory limits and that the facility will have a full useful life and the ability to be maintained moving forward. The design phase for the new treatment facility is currently underway. All treatment processes will be replaced, including influent screening, aeration treatment, clarification, and disinfection, and the new facility will utilize the existing effluent disposal system and rapid infiltration basins. The holding pond is being evaluated to determine if it should be rehabilitated, decommissioned, or repurposed for solids holding and processing. Apart from the replacement of the treatment facility, improvements are planned for the two lift stations owned by the utility as well. Both lift stations will have generator quick connects installed to provide the ability to connect a mobile generator to ensure continuous operation in the event of a power failure, and rail systems will be installed in the lift stations to facilitate improved ability to perform maintenance on lift station pumps.

E. CFAT H2O (aka Landfair) Water System

Q. **PLEASE DESCRIBE THE LANDFAIR WATER SYSTEM AS IT EXISTED AT ITS ACQUISITION BY CSWR FLORIDA.**

A. The Landfair water system is a water system serving 240 equivalent residential connections in Marion County, Florida. The water system serves a subdivision and several commercial locations in the northern portion of Ocala. CSWR Florida closed on its acquisition of the CFAT H2O, Inc. water and wastewater systems on November 30, 2023. The consumptive use permit issued by the St. Johns River Water Management District identifies this water system as the "Landfair" system so I will similarly refer to it as Landfair in my testimony.

Q. **PLEASE PROVIDE AN OVERVIEW OF THE CONDITION OF THE LANDFAIR WATER SYSTEM WHEN IT WAS PURCHASED BY CSWR**

FLORIDA.

A. At acquisition, CSWR Florida identified a number of issues with the Landfair water system that would require repairs or improvements to ensure the system can provide safe and reliable service and can be properly and efficiently maintained and operated in the future. Issues identified include the following:

- No remote monitoring present at the water treatment plant
- An out of service well was not properly abandoned
- No live data/digital flow meters were present that can communicate with a remote monitoring system
- Protective coatings on wells, tanks, and the interior and exterior of a building have deteriorated
- No continuous chlorine monitoring
- Several distribution system issues were noted, including leaks and inadequate or damaged isolation valves and flushing hydrants
- The surge tank and control panels for booster pumps were in poor condition.
- The system's hydropneumatic tank was not properly certified and cannot be recertified due to age. Additionally, the hydropneumatic tank is massively oversized for the system, meaning ongoing maintenance costs would be much higher than for an appropriately sized tank.
- The stationary generator was broken and impractical to repair. A mobile generator was on site, but is not usable as it is currently installed
- Both working wells are due for rehabilitation due to age.
- A section of distribution system has a dead end with no flushing hydrant
- The well pad for well 2 is cracked and deteriorating

Q. **DO YOU HAVE ANY OVERVIEW PHOTOGRAPHS OF THE LANDFAIR DRINKING WATER SYSTEM?**

A. Yes, the photos below show an aerial view of the Landfair drinking water facility and a ground level view of the water plant.

Aerial view of the Landfair Community.

Aerial (left) and ground level (right) views of the Landfair water treatment site.

Q. **PLEASE PROVIDE A SUMMARY OF THE LANDFAIR WATER SYSTEM'S COMPLIANCE HISTORY UNDER PREVIOUS OWNERSHIP.**

A. A review of the compliance history of the Landfair drinking water system in the five years immediately preceding its acquisition by CSWR Florida shows regular instances of noncompliance related to monitoring and reporting requirements. A review of the

EPA Safe Drinking Water Information System (SDWIS) database shows seven violations of monitoring and reporting requirements related to disinfection byproducts, lead and copper rule sampling, and coliform sampling. One additional groundwater rule violation for failing to conduct assessment monitoring is also listed during this period. A review of FDEP's database shows violations consistent with what appeared in the SDWIS database, with most of the violations including Compliance Assistance Offers, which are utilized to facilitate returning the systems to compliance. The details available in the FDEP database also show that most of these violations were for samples that were completely missing rather than partially or incorrectly completed.

There are no active compliance agreements currently in effect for the Landfair drinking water system.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA HAS COMPLETED TO DATE AT THE LANDFAIR DRINKING WATER SYSTEM.**

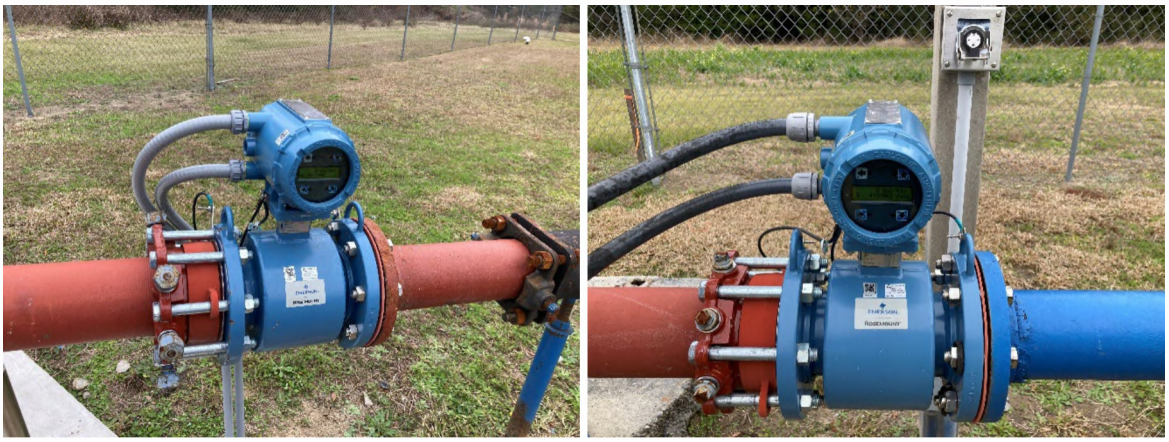
A. To date, CSWR Florida has completed several improvements to the Landfair drinking water system. First, the out of service well was properly decommissioned. Proper decommissioning of wells is important to prevent potential contamination of groundwater and to eliminate tripping hazards from the utility site.

Out of service well now properly decommissioned and removed.

The well pad for well 2 has been replaced, and flow meters have been installed on both active wells. Active flow metering allows for greater operational awareness

and control over the system and allows flow data to be communicated live through the new remote monitoring equipment.

Well pad for well 2 before (left) and after (right) replacement. Well piping has also been replaced and well casing will be rehabilitated with future well reworking.



New flow meters installed for Well 2 (left) and Well 3 (right).

Remote monitoring equipment has been installed at the water site. With the installation of the remote monitoring equipment, a continuous chlorine analyzer was also installed. These analyzers actively monitor to ensure that adequate chlorine residual is maintained in drinking water, which prevents bacteriological contamination issues in the drinking water and reduces manual testing requirements.

New Remote monitoring unit (left) and continuous chlorine analyzer (right).

The out of service stationary generator has been removed so that, in the future, a new stationary generator can be installed. Once a new stationary generator is installed, the mobile generator that currently is permanently connected to the system can be disconnected so that it can be mobilized to provide emergency power to the nearby Landfair wastewater treatment facility and any of the lift stations in its collection system during power outages.

Before (left) and after (right) removal of stationary generator. Also note painting of building interior.

Much of the equipment, piping, and structures on the site had either deteriorating protective coatings or lacked such coatings entirely. Maintaining paint and coatings on equipment is important to prevent deterioration due to exposure and to

extend the useful life of the equipment. CSWR has worked to recoat the tanks, piping, and structures on the site, where needed.

Hydropneumatic tank before (left) and after (right) recoating.

Examples of piping and valves before (left) and after (right) recoating.

Treatment, pumping, and control building before (left) and after (right) recoating.

At acquisition, the disinfection system at the water plant did not have any proper

form of chemical containment. Without proper containment, spilled chemicals can cause damage to the environment, present a hazard to operators, or damage equipment. CSWR Florida has installed chemical containment at the water system site.

Chlorine storage before (left) and after (right) installation of spill containment.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA PLANS TO COMPLETE IN THE FUTURE AT THE LANDFAIR DRINKING WATER SYSTEM.**

A. Despite what has been done thus far, further improvements are needed at the Landfair drinking water system to ensure the facilities are in a safe and operable condition, that the facility can satisfy regulatory requirements, and to ensure the facilities can be properly and efficiently maintained moving forward. As I previously mentioned, the existing hydropneumatic tank has several issues that need to be addressed. The tank was never properly certified for drinking water use and cannot be properly certified now due to the tank's age. Additionally, the tank is oversized for the system. A water system that has both ground storage and a booster pump system does not require large amounts of pressurized storage. Consequently, the cost to maintain the larger tank will be excessive over time compared to an appropriately sized tank. For these reasons CSWR Florida plans to replace the existing hydropneumatic tank with a 5,000-gallon

tank that has proper certification for use in drinking water.

Oversized uncertified hydropneumatic tank to be replaced with appropriately sized and certified tank.

The control systems and surge tank connected to the booster pump system are in poor condition due to age and poor maintenance practices. The surge tank is rusted, has deteriorating coatings and is unnecessary due to the variable frequency drives ("VFDs"). To ensure the system can function properly, CSWR Florida will replace the controls and the surge tank.

Booster pump control system (left) and surge tank (right)

As I previously testified, a new stationary generator will be installed at the Landfair water system to replace the failed generator. Due to the age of the two wells currently in service, both wells are due for full evaluation and rehabilitation, as

appropriate. In addition, immediately notable issues include rust to the exposed well casings, damaged above ground piping and equipment coatings, and potentially underperforming well pumps. CSWR Florida will perform the required evaluations and will make whatever repairs, upgrades, or refurbishments are required.

Well 2 (left) and well 3 (right) showing rusting on well columns, damaged coatings on attached equipment, exposed wiring, etc.

The final area of planned improvements concerns general improvements to the distribution system. These are planned to include the identification and repairs of leaks or breaks; identification, evaluation and repair of isolation valves and installation of additional valves where needed to minimize impacts to customers due to breaks and maintenance activities; and installation of automatic flushing units on flushing hydrants and dead end fire hydrants to reduce accumulation of debris in water lines.

F. Beverly Hills/Rolling Oaks Wastewater Treatment Facility

Q. **PLEASE DESCRIBE THE CONDITION OF THE BEVERLY HILLS WASTEWATER TREATMENT FACILITY AT ACQUISITION.**

A. The Beverly Hills/Rolling Oaks wastewater system is a non-discharging community wastewater treatment system serving 4932 equivalent residential connections in Citrus County. The facility is located in Beverly Hills, Florida. The wastewater system is

regulated under FDEP Domestic Wastewater Facility Permit (non-discharging) FLA011869. CSWR Florida closed on the Rolling Oaks Water and Wastewater systems on November 30, 2022.

Q. **PLEASE PROVIDE AN OVERVIEW OF THE CONDITION OF THE BEVERLY HILLS/ROLLING OAKS WASTEWATER SYSTEM WHEN IT WAS PURCHASED BY CSWR FLORIDA.**

A. At acquisition, various components of the facility showed signs of wear and tear, with deteriorating coatings on structures and above ground piping, issues with components of the treatment processes, and issues with the overall site itself. Additional issues requiring repairs and improvements were identified as CSWR Florida began operating the facility.

Issues CSWR Florida was able to identify after it had a chance to operate and evaluate the facility after closing included the items below:

- The digester air header was damaged and leaking air
- Existing aeration drop legs and diffusers were in poor condition
- A failed blower attributable to a failed motor
- Clarifier skimmer/rake arm not functioning properly
- The disinfection dosing system lacked a variable feed rate and disinfection chemical was stored with no shade structure, which allowed for early chemical breakdown with UV exposure
- The roll up door of the shop building was broken
- The shop building roof was in poor condition
- The blower building was in poor condition
- Catwalks and handrails were in poor condition and missing at some locations around the treatment facility

- Exterior coatings of tanks, piping, and buildings were deteriorating and in poor condition
- Lift Station 14 had only one functional pump
- Discharge piping at lift station 12 was in poor condition
- The control panel for lift stations 1 and 9 control failed shortly after acquisition
- There was no remote monitoring equipment present at the treatment plant and the lift stations
- No fencing was present at lift stations 3, 4, 5, 7, 9, and 10
- Vegetation, trash, and debris had accumulated around the site and along the fence line, damaging perimeter fencing
- Fencing around the site was damaged and/or missing in some locations, including the main gate
- Significant corrosion was notable on all steel tanks, indicating limited useful life for the plant superstructure
- The permit cycle improvement plan required the facility to be upgraded to 1 MGD capacity, and to meet total nitrogen ("TN") limits
- The facility's hydrosieve system was regularly overwhelmed, leading to sanitary sewage overflows and nuisance solids entering the facility
- The lime stabilization basin was out of service and needed to be restored, removed, or repurposed
- Effluent pipeline to rapid infiltration basins ("RIBs") was in poor condition and needed to be repaired or replaced
- Lift stations 5, 7, and 9 lacked guide rail systems necessary for pump maintenance

- Control panels at lift stations 3, 4, 5, 6, and 12 were in poor condition and mounted near the ground
- Lift station 2 had an outdated design and was in poor condition
- Various collection system deficiencies (inadequate, unlocated, and unexercised isolation valves, leaks in collection lines, missing or buried cleanout/manholes, broken manhole rings and missing manhole covers) also were noted. Much of the collection system was determined to be old and made of poor materials necessitating a replacement plan to ensure all old piping is eventually replaced

Q. **DO YOU HAVE ANY OVERVIEW PHOTOS OF THE BEVERLY HILLS/ROLLING OAKS WASTEWATER SYSTEM?**

A. Yes, please see the photos below showing an aerial view of the Beverly Hills/Rolling Oaks Wastewater System and an overview photo.

Aerial view of the Beverly Hills/Rolling Oaks Community (left) and aerial view of the wastewater treatment plant including drain field area (right).

Beverly Hills/Rolling Oaks Wastewater Treatment Facility

Q. **PLEASE PROVIDE A SUMMARY OF THE COMPLIANCE HISTORY UNDER PREVIOUS OWNERSHIP AND DESCRIBE ANY FDEP COMPLIANCE AGREEMENTS TO WHICH THE BEVERLY HILLS/ROLLING OAKS WASTEWATER SYSTEM IS CURRENTLY SUBJECT.**

A. The Beverly Hills/Rolling Oaks Wastewater facility had some history of noncompliance under previous ownership. In January 2018, an FDEP facility inspection report noted issues related to effluent exceedances of fecal coliform and total residual chlorine limits; groundwater sample results exceeding limits for total nitrogen, pH, and nitrate; and damage to the fencing surrounding the effluent disposal area.

Over the next several years, no enforcement action was taken against the system, however the utility regularly reported sanitary sewage overflows ("SSOs") at the treatment plant. Most of the reported instances suggested issues with the configuration or operation of the hydrosieve system installed at the treatment plant.

The next instance of noncompliance resulted from an inspection conducted as part of the permit renewal cycle beginning in November 2021. The inspection noted solids passing over the clarifier weir, a skimmer failure in the weir, clogs in the aeration

basin, uneven aeration in the aeration basin, some blowers not functioning, scum in the chlorine contact chamber, damage to the baffling in the chlorine contact chamber, a stilling well with buildup of sludge and debris, handrails and catwalks in poor condition , the lack of emergency contact information posted at lift stations, pH exceedances in groundwater sampling, failure to submit biosolids reporting, and a large number of SSOs during the preceding period. A May 2022 request for additional information added more issues, including TN and pH exceedances in groundwater sampling.

The permit renewal was completed shortly before the facility was sold to CSWR Florida; however, the new permit included a requirement to upgrade the treatment capacity to 1 MGD and to meet TN limits by the next permit cycle.

Q. **PLEASE DISCUSS IMPROVEMENTS COMPLETED TO DATE AT THE BEVERLY HILLS/ROLLING OAKS WASTEWATER SYSTEM.**

A. Since its acquisition by CSWR Florida, various improvements have been made to the Beverly Hills/Rolling Oaks Wastewater System. Areas of improvements completed to date by CSWR Florida include the aeration equipment, the clarifier, the disinfection system, facility structures, lift stations, monitoring equipment, and general site conditions.

Q. **PLEASE DISCUSS IMPROVEMENTS MADE TO THE BEVERLY HILLS/ROLLING OAKS WASTEWATER AERATION EQUIPMENT.**

A. Improvements have been made to the facility's aeration equipment. A damaged air header for the digester was replaced. Leaking air headers reduce the air supply (in this case to the digester), which impedes the breakdown of sludge, resulting in higher sludge hauling costs. Deteriorated drop legs and diffusers have been replaced, and areas where drop legs and diffusers had been removed previously and not replaced had

new drop legs and diffusers installed. Deteriorated or removed drop legs and diffusers reduce the efficacy of aeration treatment by creating poor diffusion patterns, reducing air flow in leaks, and creating uneven aeration in basins. Restoring the aeration system will result in greater oxygen transfer to water, which improves biological treatment processes, improves mixing and mechanical breakdown of wastewater solids, and eliminates dead spots where mixing does not occur and solids can accumulate in the aeration basin, which results in reduced treatment capacity. A failed blower motor was also replaced to restore treatment effectiveness and facility resiliency by allowing for greater air supply and blower redundancy in the event of blower failures and during maintenance activities.

Examples of Aeration headers and drop pipes before and after replacement.

Blower motor before (left) and after (right) replacement, also repair work to blower building underway at time of photo.

Q. **PLEASE DISCUSS IMPROVEMENTS MADE TO THE BEVERLY HILLS/ROLLING OAKS CLARIFIER.**

A. As I discussed in the compliance section, the skimmer arm for the clarifier was not functioning at the time of the permit renewal. This allows pin floc and other floating solids to pass over the weir trough and leave the facility in effluent, thereby elevating suspended solids discharged. CSWR Florida has repaired the damaged skimmer to eliminate this problem.

Clarifier with excessive floating solids before repair (left) and clear following repair (right).

Q. **PLEASE DISCUSS IMPROVEMENTS MADE TO THE BEVERLY HILLS/ROLLING OAKS WASTEWATER DISINFECTION EQUIPMENT.**

A. As I previously noted, at acquisition the disinfection system lacked any sort of shade structure over the disinfection chemicals (sodium hypochlorite), and the feed system used a continuous rate dosing pump. With no shade structure the chemical drum is exposed to ultraviolet light in sunlight, which leads to a breakdown in the potency of disinfection chemicals, which requires higher dosing rates and higher chemical costs. A continuous dosing rate system also leads to higher chemical costs because it does not adjust chemical dosing based on factors such as time of day or active flow rate through the disinfection system. CSWR Florida has installed a new shade structure and a new

pumping system to resolve these issues, which should result in reduced chemical costs over time. A new emergency chemical shower and eye wash station was also installed at this location as a safety measure in the event of operator exposure to disinfection chemicals.

Chemical storage before (left) and after (right) improvement.

New variable chemical dosing pump (left) and emergency chemical shower and eyewash station (right)

Q. **PLEASE DISCUSS IMPROVEMENTS MADE TO THE BEVERLY HILLS/ROLLING OAKS STRUCTURES.**

A. In addition to the issues I already discussed, at acquisition issues related to the condition of structures and coatings were identified throughout the site. These included a failed roll up door on the shop building, a failing roof on the shop building, overall poor

condition on the blower building, damaged or missing handrails and catwalks around the treatment facility, and deteriorating coatings on the facility's tanks, pipes, and other equipment. Repairs and regular maintenance of basic facility structures like these are important to protect equipment and materials stored within. Handrails and catwalks are essential to operator safety. Structure and equipment coatings are essential to protect equipment and halt corrosion processes that can lead to failures and reduce useful life. CSWR Florida has made the appropriate structure repairs, recoated all tanks, structures, and appropriate equipment, and made repairs and improvements to the catwalk and handrail systems, including repainting all handrails and stairs in high visibility coatings to enhance operator safety.

Facility tanks before (left) and after (right) recoating.

Disinfection mixing tank before (left) and after (right) recoating and repainting handrails

and stair treads.

Main access stairs before (left) and after recoating and adding high visibility paint.

Typical conditions of handrails before (left) and after (right) recoating.

Typical condition of catwalks and rails before (left) and after (right) improvements.

Examples of before (left) and after (right) recoated piping and equipment (effluent pumps and piping)

Q. **PLEASE DISCUSS IMPROVEMENTS MADE TO THE BEVERLY HILLS/ROLLING OAKS LIFT STATIONS.**

A. At acquisition, many of the lift stations exhibited problems that required repairs and improvements. Lift stations must be properly maintained to prevent backups and properly convey wastewater to the treatment facility, and failure to do so can affect customers or lead to SSOs. CSWR Florida has begun necessary lift station improvements, including replacing broken pumps, making repairs to discharge piping, and replacing damaged control panels. All tripping hazards have been painted or repainted with high visibility paint to ensure operator safety. Where fencing was missing or damaged at lift stations, new fencing was installed to prevent unauthorized entry, which helps ensure equipment functions properly and members of the public are not exposed to treatment equipment or wastewater. CSWR Florida will make further lift station improvements to further improve operational function and resiliency.


Examples of high visibility paint application to tripping hazards.

Example of before (left) and after (right) control panel replacement at Lift Station #9. Note remote monitoring unit to the left of the new panel installed as well to be discussed below.

Example of new fencing installed at lift stations.

At acquisition, the facility and lift stations also did not include remote monitoring equipment. Remote monitoring equipment has been installed at the

wastewater treatment facility and all lift stations. Remote monitoring equipment allows live collection of data, providing continuous information on system performance and equipment status over time allowing for more precise and efficient operations, and provides operators with real-time information concerning system performance and equipment status. This allows for immediate notifications regarding abnormal operating conditions and emergencies, which often enable operations staff to respond to and address problems before they can result in service interruptions.

Examples of new remote monitoring equipment installed at the lift stations (left and center) and the treatment plant (right).

Q. **PLEASE DISCUSS GENERAL SITE IMPROVEMENTS MADE TO THE BEVERLY HILLS/ROLLING WASTEWATER SYSTEM.**

A. As I previously stated, facility fencing was in poor condition or even missing altogether in some locations. Some areas were overgrown or had trash and debris along the property perimeter, which had caused damage to fencing. CSWR Florida has cleared the vegetation and debris and repaired or replaced fencing as appropriate.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA PLANS TO COMPLETE IN THE FUTURE AT THE BEVERLY HILLS/ROLLING OAKS WASTEWATER SYSTEM.**

A. Further improvements are needed at the Beverly Hills/Rolling Oaks wastewater system

to ensure consistent compliance with regulatory requirements, to ensure the facility is in safe and operable condition, and to ensure that the facility can be maintained moving forward. The most significant improvement required is to upgrade the plant capacity to 1 MGD and to meet total nitrogen effluent limits of 3 mg/l. Given the poor condition and limited remaining useful life of the facility tanks and plant superstructure, a new plant will need to be constructed to meet these requirements. To make sure no other options were available, CSWR Florida reached out to the nearest publicly-owned treatment works ("POTW") to explore the viability of connecting to that facility. However, the nearest POTW advised CSWR Florida the existing POTW facility did not have sufficient capacity for flows from the Beverly Hills/Rolling Oaks wastewater system. Therefore, connection to the POTW would require CSWR Florida to pay for upgrades to that facility. After analysis, CSWR Florida determined the option with the lowest likely rate impact would be for CSWR Florida to construct a new facility at the Beverly Hills/Rolling Oaks site and then decommission failing components of the existing facility. The new plant, which is currently in the design phase, will provide both greater capacity (as required by the FDEP permit) and improved biological treatment of total nitrogen to permit limits. Until CSWR Florida can complete design, permitting, bidding, and construction of the new facility, some interim improvements are required to ensure the existing facility can continue to function within permit limits. The main issue that remains to be addressed at the existing facility is the hydrosieve system, which is regularly overwhelmed by existing flows. This leads to clogs of the hydrosieve, which causes overflows of wastewater, and nuisance solids entering the treatment plant. To resolve this problem, the out of service lime stabilization basin will be converted into an influent surge basin, the existing hydrosieve will be relocated to this tank, and one or two additional hydrosieves will be installed to split the flow and

thereby prevent the system from being overwhelmed. This will also require pumping modifications to then convey the screened wastewater to the existing headworks.

Overwhelmed hydrosieve (right) resulting in overflows of wastewater at the nuisance solids collection dumpster (left).

Out of service lime stabilization tank to be converted to influent surge basin (left) and additional hydrosieves on site to be repaired for use (right)

Additional improvements will be made to the lift stations, including the installation of new guiderails at lift stations 5, 7, and 9 to aid in future pump maintenance. The control panels at lift stations 3, 4, 5, 6, and 12 are in poor condition and will be replaced to ensure reliable function. Finally, because lift station 2 is in poor condition and is an older-style dry well lift station, it will be replaced to ensure proper function.

Lift station 2 dry well basin

Additional work is also required to the collection system and wastewater conveyance piping. The wastewater piping, both in the collection system and running from the treatment plant to the rapid infiltration basins, is old and nearing the end of its useful life. A line replacement plan will identify problem areas, prioritize areas for replacement, and establish a replacement schedule to ultimately replace all piping as required. Additional issues identified in the collection system will continue to be addressed, including repairing leaks and breaks as they are identified, working to locating and exposing any buried manholes and cleanouts, repairing or replacing any missing or damaged manhole covers, and repair to any damaged manhole rings.

G. Rolling Oaks Water System

Q. **PLEASE DESCRIBE THE ROLLING OAKS WATER SYSTEM AS IT EXISTED AT ACQUISITION.**

A. The Rolling Oaks drinking water system is a community drinking water system serving 6282 equivalent residential connections in Citrus County, Florida. The Rolling Oaks drinking water system is a groundwater system consisting of nine active groundwater wells with two elevated 300,000-gallon storage tanks. CSWR Florida closed on the Rolling Oaks Water and Wastewater systems on November 30, 2022. Bellow is a table

of the well and storage components of the Rolling Oaks Water system with basic information on each asset.

Component Description	Location	Size (GPM)	Year Drilled	Depth	Casing	HP
Well # 1	27 N Monroe St	400	1961	320'	10"	40
Well #2	27 N Monroe St	400	1961	350'	10"	40
Well #4	17 S Osceala St	400	1969	280'	10"	40
Well #5	71 S Osceala St	550	1969	208'	10"	50
Well # 6	74 S Washington St	400	1969	340'	10"	40
Well # 7	200 S Monroe St	600	1975	405'	12"	60
Well # 8	267 Fathom Loop	750	1975	405'	12"	100
Well # 9	37 SJ Kellner Blvd	800	1981	455'	12"	100
Well # 10	324 W Staggerbush Path	800	1987	300'	12"	100
Elevated Tanks	**Location**	**Size (Gal.)**	**Last Inspect.**	**Repainted**		
North Tank	5 Esskey St	300,000		2021		
South Tank	4 Laurenshire St	300,000	Apr-19	2022		

Q. **PLEASE DESCRIBE THE CONDITION OF THE ROLLING OAKS WASTEWATER SYSTEM WHEN IT WAS ACQUIRED BY CSWR FLORIDA.**

A. At closing, CSWR Florida identified a number of issues with the Rolling Oaks drinking water system that require repairs or improvements to ensure the system can provide safe and reliable service and can be properly and efficiently maintained and operated. These issues include the following items:

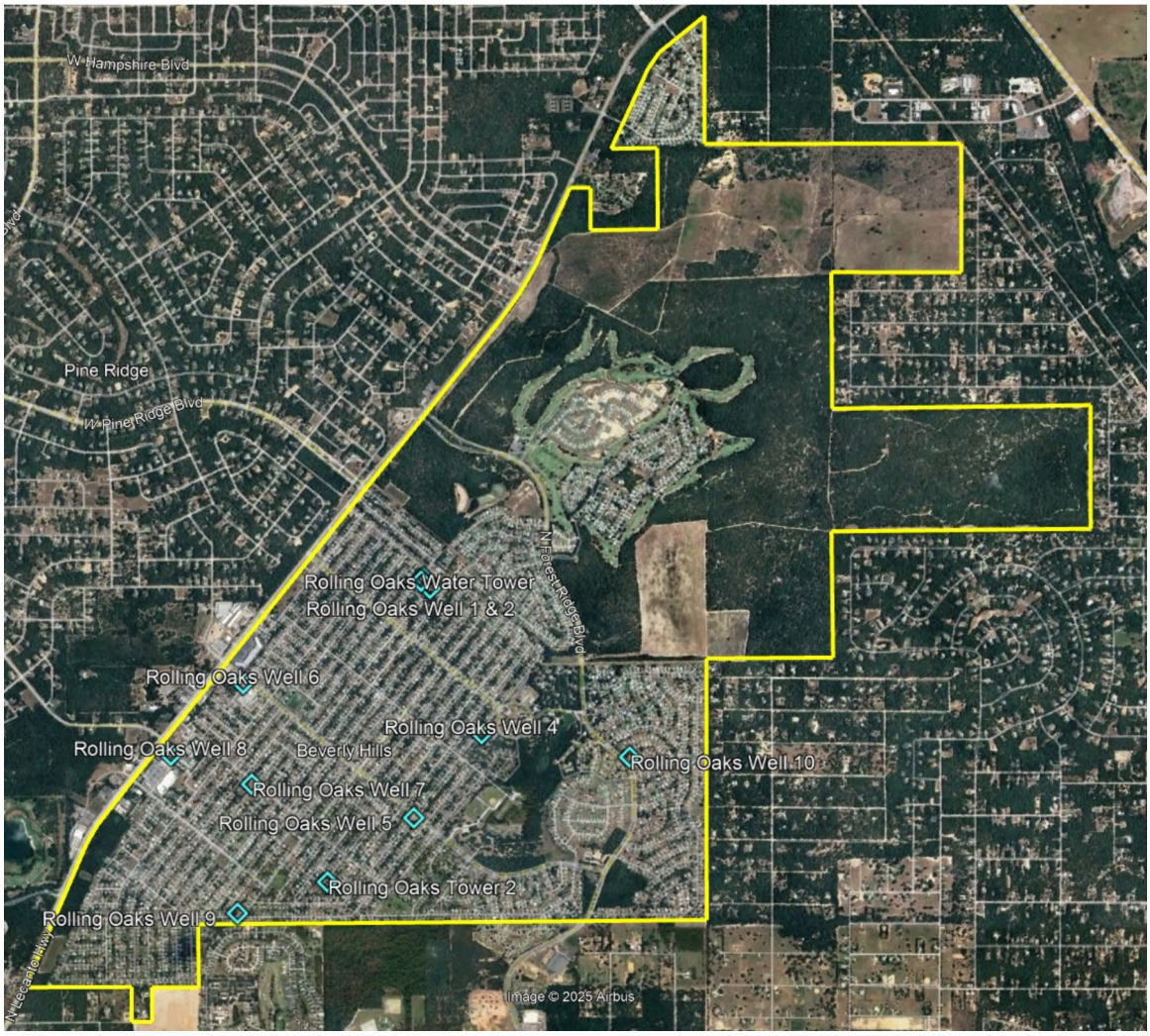
- All wells are due for evaluation and potential repair or rehabilitation due to age
- Electrical systems at all well houses are original and are reaching the end of their useful lives
- Sodium hypochlorite drums at all well sites lacked spill protection
- No chlorine residual monitoring was present at any well site
- No remote monitoring equipment was present at any of the wells
- There was a main break along Fores Ridge Boulevard requiring road restoration
- Although their overall condition was generally good, various minor damage

was observed on well houses and the structures appeared to be due for repainting to extend their useful lives

- The roof on well houses 8 and 9 were in poor condition
- Fencing at both the elevated storage tank sites and at well sites 1 and 2 site were rusted and had areas with significant damage
- The pump at well 10 began failing shortly after the acquisition closed, thereby reducing production.
- Only the primary wells are on backup power, which can supply the system during outages, but if either well fails during an outage the system would experience a water shortage
- Various collection system deficiencies were noted, including inadequate, unlocated, and unexercised isolation valves; leaks in collection lines; missing or buried cleanouts and manholes; broken manhole rings, and missing manhole covers
- The meters in the system are aging and are due for replacement

Q. DO YOU HAVE ANY OVERVIEW PHOTOGRAPHS OF THE ROLLING OAKS DRINKING WATER SYSTEM?

A. Yes, the photographs below show an aerial view of the Rolling Oaks drinking water facilities.



Aerial view of the Rolling Oaks Community.

Aerial view of well 1, well 2, and elevated storage tank 1 site (left) and ground level view of well 1 (right).

Well 2 site (left) and elevated storage tank 1(right).

Aerial view(left) and ground level view (right) of well 4 site.

Aerial view(left) and ground level view (right) of well 5 site.

Aerial view(left) and ground level view (right) of well 6 site.

Aerial view(left) and ground level view (right) of well 7 site.

Aerial view(left) and ground level view (right) of well 8 site.

Aerial view(left) and ground level view (right) of well 9 site.

Aerial view(left) and ground level view (right) of well 10 site.

Aerial view(left) and ground level view (right) of elevated storage tank 2 site.

Q. **PLEASE PROVIDE A SUMMARY OF THE COMPLIANCE HISTORY OF THE ROLLING OAKS WATER SYSTEM UNDER PREVIOUS OWNERSHIP.**

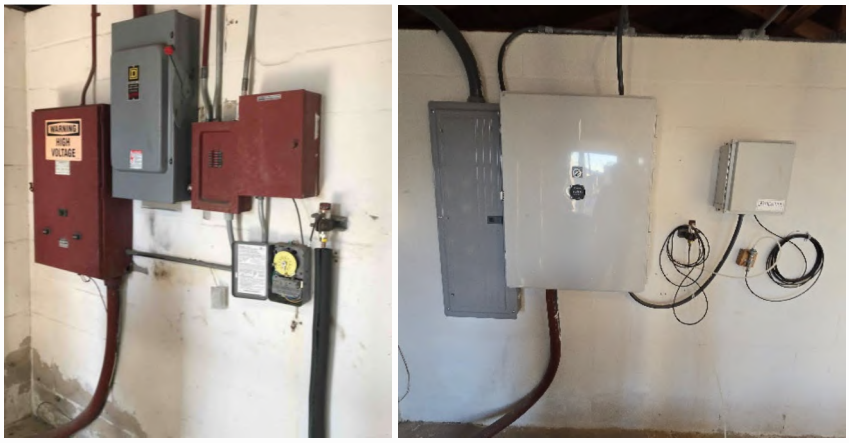
A. A review of the compliance history of the Rolling Oaks drinking water system in the

five years immediately preceding its acquisition by CSWR Florida shows some instances of noncompliance related to monitoring and reporting requirements. A review of the EPA Safe Drinking Water Information System (SDWIS) database shows four instances of monitoring and reporting violations consisting of late routine lead and copper samples in 2018 and 2022 and two monitoring violations related to a positive bacteriological sample from Well 7 in 2019. A review of the FDEP database showed repeated issues with positive bacteriological samples in groundwater from Well 7 throughout the five years preceding the system's acquisition by CSWR Florida. There were also a series of water odor complaints resulting in four Warning Letters issued in August 2022, which suggest the prior owner of the utility was not taking the complaint seriously. There are no compliance agreements or Consent Orders currently in effect for the Rolling Oaks drinking water system.

Q. **PLEASE DESCRIBE IMPROVEMENTS COMPLETED TO DATE AT THE ROLLING OAKS DRINKING WATER SYSTEM.**

A. Since it acquired the Rolling Oaks system CSWR Florida has made several improvements to the drinking water system. Due to the age of the system, all wells were due for evaluation and potentially repairs or reworking. This process began with the rehabilitation of well 6, which also included replacing the electrical system at the well house. The existing electrical controls and service were installed when the system was originally built and had reached the end of their useful life.

Well 6 before (left) and after (right) rehab work. Motor and pump serviced, leaking section of pipe replaced.



Well 6 electrical before (left) and after (right) replacement.

All sodium hypochlorite drums at the well sites were single wall drums with no spill containment. Due to the limited space for containment in the well houses, single walled drums were replaced with double walled drums at all nine well sites to help reduce the risks of spills and to contain spills that occur.

Example of sodium hypochlorite drums before (left) and after (right) replacement in this cast at Well 6.

At acquisition, the well sites lacked remote monitoring and chlorine residual monitoring equipment. Remote monitoring equipment and a continuous chlorine analyzer have been installed. These analyzers actively monitor to ensure adequate chlorine residuals are maintained to prevent bacteriological contamination issues in the drinking water and to also reduce manual testing requirements.

Examples of remote monitoring unit installed at each well site (left) and new chlorine residual monitoring equipment installed at each well site (right) (examples from Well 8 site.

Various issues with well house structures were identified that required repairs or improvements. All cinder block buildings were painted and repaired, as necessary, to ensure their longevity. The roofs of the well houses at wells 8 and 9 were in poor condition and were replaced to protect the equipment inside.

Example of before (left) and after (repainting) (example is the Well 5 well house)

Example of deteriorating (left) and replaced (right) fencing at Elevated Storage Tank 1.

Example of damaged (left) and new (right) fencing at Well 2 site.

Distribution system improvements have also begun at the Rolling Oaks drinking water system. This includes typical repairs like locating, exercising, and potentially repairing isolation valves, repairing fire and flushing hydrants, and repairing

leaks. There was also a significant main break that required repair and restoration of a section of the Forest Ridge Boulevard main.

Q. **PLEASE DESCRIBE IMPROVEMENTS CSWR FLORIDA PLANS TO COMPLETE IN THE FUTURE AT THE ROLLING OAKS DRINKING WATER SYSTEM.**

A. In addition to the improvements I have already mentioned, additional improvements are needed at the Rolling Oaks drinking water system to ensure the facilities are in a safe and operable condition that can meet regulatory requirements and be properly and efficiently maintained. Shortly after closing the system's acquisition, the pump at well 10 failed. This is one of the primary wells used for water supply and one of two with emergency backup power, so it is essential to restore it to service and keep it running. The well pump, motor, shaft, and column pipe must be replaced to restore the well. Although well 6 has already undergone evaluation and rehabilitation, all wells will require additional work due to their ages. Well 10 is already being rehabilitated due to the previously mentioned pump failure, and the remaining seven wells will be evaluated and rehabilitated as appropriate. This will include replacing aging electrical systems at all wells. In addition, a backup generator will be installed to provide emergency power to both wells 1 and 2. Currently only the primary wells (wells 8 and 10) have backup power, and problems related to the pump failure experienced at well 10 showed why this is not adequate. Maintaining backup power for wells 1 and 2 will ensure the system will not experience water shortages in the event of a power outage, even if one of the primary wells is also out of service. Although the two elevated storage tanks are in good condition and had been painted prior to the acquisition, the existing maintenance contract will not continue. Shortly after closing the Rolling Oaks system, operations staff noted the contractor was making frequent visits to the facility and

billing the system for each visit. The visits were occurring more frequently than inspections needed to occur and much of the day to day inspection process was also being performed by the operations staff, making the visits redundant. To reduce associated expenses CSWR Florida asked the contractor to reduce the frequency of the visits, but the contractor refused. Therefore, CSWR Florida terminated the contract and hired a different contractor to provide tank inspections. These changes will reduce operations and maintenance costs associated with the elevated storage tanks.

The remaining work CSWR Florida has planned relates to maintenance and improvements to the distribution system. General improvements are planned, including ongoing identification and repairs of leaks or breaks; identification, evaluation, and repair of isolation valves and installation of additional valves where needed; and installation of automatic flushing units on flushing hydrants and dead end fire hydrants to reduce accumulation of debris in water lines. Additionally, because of the age of the meters, a meter replacement program will be implemented which will result in all customer meters being eventually replaced.

H. Neighborhood Utilities Water System

Q. **PLEASE DESCRIBE THE NEIGHBORHOOD UTILITIES DRINKING WATER SYSTEM AS IT EXISTED AT THE TIME OF ITS ACQUISITION BY CSWR FLORIDA.**

A. The Neighborhood Utilities drinking water system is a community drinking water system serving 447 equivalent residential connections in Duval County, Florida. The drinking water system serves two subdivisions in the southwestern portion of Jacksonville. CSWR Florida closed on the Neighborhood Utilities water system on November 17, 2022.

The Neighborhood Utilities drinking water system is a groundwater system

with two wells, though only one was in service and properly registered for use. The system has an emergency use water connection to the City of Jacksonville (JEA) water system.

Q. **PLEASE DESCRIBE THE CONDITION OF THE NEIGHBORHOOD UTILITIES WATER SYSTEM WHEN IT WAS ACQUIRED BY CSWR FLORIDA.**

A. At acquisition, several issues with the Neighborhood Utilities drinking water system were identified that would require repairs or improvements to ensure the system can provide safe and reliable service and can be properly maintained and operated moving forward. Those issues included the following:

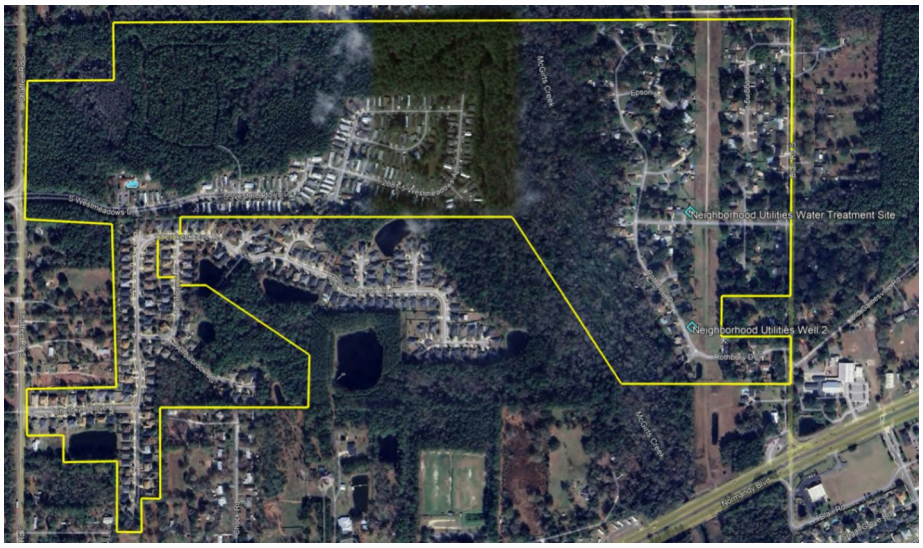
- Well pump was reaching the end of useful life and failed shortly after acquisition
- Tank coatings were in poor condition and tanks were overdue for evaluation for potential repairs or replacement
- No remote monitoring was present at the well or treatment sites and missing metering equipment, including flow metering, was noted
- The system had no continuous chlorine monitoring equipment
- The emergency generator has been out of service since 2017
- No lighting for after-hours operations response
- Well 1 was out of service but not properly abandoned
- Well 2 was in poor condition and overdue for evaluation and rehabilitation
- The two ground storage tanks were in poor condition
- The aerator mounted to Tank 2 was in poor condition
- The functioning well does not have a soft start or variable frequency drive

("VFD"), which could lead to water hammer events and cavitation when the well starts, resulting in undue wear on pump and piping

- Booster pumps lack VFD, which would allow more efficient operations and reduce water hammer
- The booster pumps were reaching the end of their useful lives and would need to be replaced soon
- Emergency water connection with the City of Jacksonville is not properly metered
- Distribution system issues were noted, including leaks, inadequate or damaged isolation valves and flushing hydrants.

Q. **DO YOU HAVE ANY OVERVIEW PHOTOGRAPHS OF THE NEIGHBORHOOD UTILITIES DRINKING WATER SYSTEM?**

A. Yes, the photographs below show an aerial view of the Neighborhood Utilities drinking water facility.



Aerial view of the Neighborhood Utilities Community.

Well 2 site at acquisition (left aerial view, right ground level view).

Main water site at acquisition (left aerial view, right ground level view).

Q. **PLEASE PROVIDE A SUMMARY OF THE COMPLIANCE HISTORY OF THE NEIGHBORHOOD UTILITIES SYSTEM UNDER PREVIOUS OWNERSHIP.**

A. A review of the compliance history of the Neighborhood Utilities drinking water system during the five years immediately preceding its acquisition by CSWR Florida shows regular instances of noncompliance related to monitoring and reporting requirements as well as noncompliance related to the condition of utility assets. A review of the EPA Safe Drinking Water Information System (SDWIS) database shows five violations of monitoring and reporting requirements related to coliform sampling, lead and copper sampling, and consumer confidence reporting. A review of FDEP's

database shows violations consistent with those reported in the SDWIS database as well as warning letters and an eventual Consent Order, with an assessed fine, related to an ongoing failure to address issues regarding the condition of various system assets. This FDEP compliance record began with a Warning Letter issued in May 2019, which concerned a missing bacteriological sample, rust located below the aerator on Tank 2, and agency's finding that the emergency generator did not function. The letter noted that the rust and generator issues had originally been highlighted in 2017 but had still not been addressed. An additional Warning Letter was issued in September 2020, and noted that pump 2 was leaking, the well pump was leaking (with biological growth on the well casing), and that the generator was still nonfunctional after more than three years. A Consent Order was issued in April 2022, which highlighted all the same issues as the 2020 Warning Letter because none of those issues had been addressed. The order included a $2,500 penalty (including enforcement costs).

The prior owner's failure to address issues at the treatment plant despite repeated warnings from FDEP over the course of several years indicates a general failure in the operation and maintenance of the facility and an inability or unwillingness of the prior owners to adequately invest in repairs and improvements required by FDEP.

There are no active compliance agreements or Consent Orders currently in effect for the Neighborhood Utilities drinking water system.

Q. **PLEASE DESCRIBE IMPROVEMENTS COMPLETED TO DATE AT THE NEIGHBORHOOD UTILITIES WATER SYSTEM.**

A. CSWR Florida has already completed several upgrades and improvements to the Neighborhood Utilities drinking water system. First, because well pump on Well 2 was in poor condition and failed shortly after acquisition, CSWR Florida replaced the pump

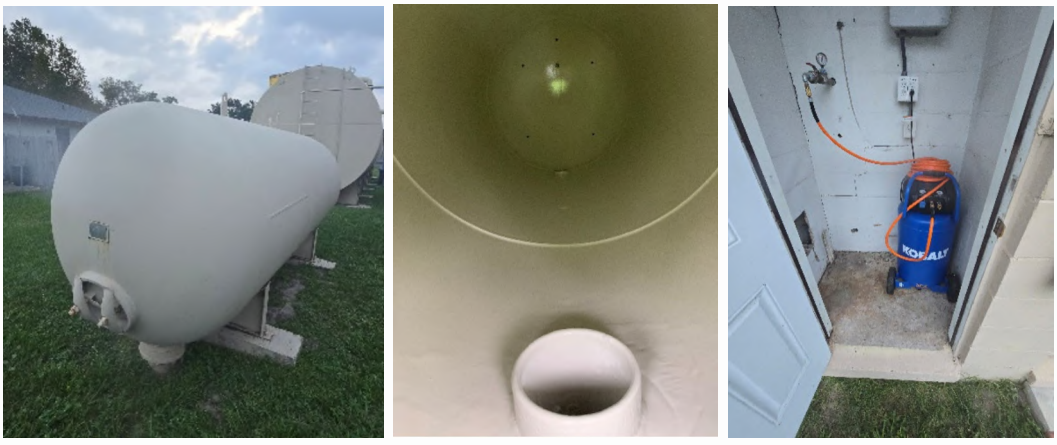
to restore service to the system. Additional maintenance work was performed on the well itself, including clearing nuisance vegetation, replacing damaged piping, and installing a new flow meter.

Well 2 pump before (left) and after replacement (right) well casing and wiring also replaced.

Tank inspections have been completed on all tanks at the Neighborhood Utilities site. As a result, it was determined that both ground storage tanks were in poor condition and would need to be replaced. The hydropneumatic tank was found to be in fair condition, so the interior and exterior of the tank was recoated to extend its useful life. A new compressor was also installed to maintain pressure and air gap in the hydropneumatic tank. The replacement of the ground storage tanks will take time for design, permitting, equipment lead time, and construction. To address the longer-term issues related to corrosion on Tank 2 until the it can be replaced, the exterior of Tank 2 was recoated.

Examples of rust on the ground storage tanks and general poor condition.

Exterior recoating completed on Tank 2 and the aeration unit.



Recoated hydropneumatic storage tank exterior (left) and interior (center) and new compressor for hydropneumatic storage tank (right).

As I previously testified, at acquisition no remote monitoring equipment was present at the water treatment plant or the well site. CSWR Florida has installed remote

monitoring equipment at both locations and installed a continuous chlorine analyzer. These analyzers ensure that adequate chlorine residuals are maintained in drinking water to prevent bacteriological contamination issues in the drinking water and reduce manual testing requirements, and the remote monitoring equipment allows operators to monitor the analyzers to ensure they are performing as required.

Remote monitoring unit (left) and continuous chlorine monitor installed at Neighborhood Utilities

As I discussed in the compliance section of my testimony, the emergency generator has been nonfunctional since 2017 and has resulted in numerous warning letters and a Consent Order. CSWR Florida replaced the generator to ensure the facility can deliver uninterrupted service in the event of a power outage. Flood lighting has also been installed to ensure operators can safely complete maintenance activities after dark and during emergency maintenance responses.

Emergency generator at Neighborhood Utilities before (left) and after (right) replacement.

New flood lighting.

Safety equipment, including a chemical shower and emergency eye wash station, has also been installed at the treatment site to ensure operator safety in the event of a fire or exposure to disinfection chemicals.

New emergency eye wash station and chemical shower.

Q. **PLEASE DESCRIBE IMPROVEMENTS CSWR FLORIDA PLANS TO COMPLETE IN THE FUTURE AT THE NEIGHBORHOOD UTILITIES WATER SYSTEM.**

A. Further improvements are needed at the Neighborhood Utilities drinking water system to ensure the facilities are in safe and operable condition, that the facility can meet regulatory requirements, and that the facilities can be properly and adequately maintained. As previously testified, well 1 has been out of service for some time but was not properly abandoned by the prior owner. CSWR Florida will properly decommission and abandon the well to protect groundwater quality and eliminate a tripping hazard from the water treatment site.

Well 1 needs to be properly decommissioned and removed.

While the well pump and some of the piping was replaced, well 2 still requires additional rehabilitation work. The well is being evaluated to also determine if chemical treatment or subsurface casing repair is needed. A flow meter will be installed on the well and piping that has not already been coated with a protective coating yet will be properly painted. The well will also have a soft start controller installed to reduce risk of cavitation, reduce wear and tear on the motor, and reduce water hammer in the line connecting the pump to the treatment site.

Well 2, new piping needs to be painted, flow meter needed, etc.

Tank 1 and tank 2 as the aeration treatment unit mounted on tank 2 are in poor condition. The two tanks will be replaced with a single, larger ground storage tank (a standpipe) and a new aeration treatment unit will be installed.

Tanks 1 & 2 (left) to be replaced with a single larger ground storage tank and aeration treatment unit (right) to be replaced.

The high service pumps are in poor condition and are nearing the end of their useful lives. In addition, since closing on acquisition of the system, one of the three pumps has failed. To ensure the pumping system can continue to ensure adequate system pressure, the booster pumps will be replaced. The existing high service/booster pump system also does not include VFDs in the control system, which allows pumps to run at less than full power and allows pumps to be ramped up rather than starting at

full power. This helps to reduce power consumption, reduce wear and tear to pumps, and reduce pressure hammer when pumps turn on. CSWR Florida will install VFDs on the booster pump control system.

Booser pumps in need of replacement, note empty pump flange from pump which failed since acquisition by CSWR Florida, emphasizing the poor condition of the pumps.

The remaining areas requiring additional improvements relate to the distribution system. I previously testified that the emergency interconnect with the City of Jacksonville drinking water system is not properly metered. A new meter pit, master meter, backflow preventer, and shutoff will be installed to ensure proper interconnection. Other improvements to the distribution system will focus on general distribution repairs, including exercising, repairing, and installing additional isolation valves, installation of automatic flushers on flushing hydrants, and repairs to any leaks or breaks that can be identified will be repaired.

I. Tymber Creek Wastewater System

Q. **PLEASE DESCRIBE THE TYMBER CREEK WASTEWATER SYSTEM AS IT EXISTED AT THE TIME OF ITS ACQUISITION BY CSWR FLORIDA.**

A. The Tymber Creek wastewater system is a wastewater treatment facility and collection system serving 430 equivalent residential connections in Marion County, Florida.

CSWR Florida closed on its acquisition of the Tymber Creek water and wastewater systems on May 31, 2024.

Q. **PLEASE PROVIDE AN OVERVIEW OF THE CONDITION OF THE TYMBER CREEK WASTEWATER SYSTEM WHEN IT WAS ACQUIRED.**

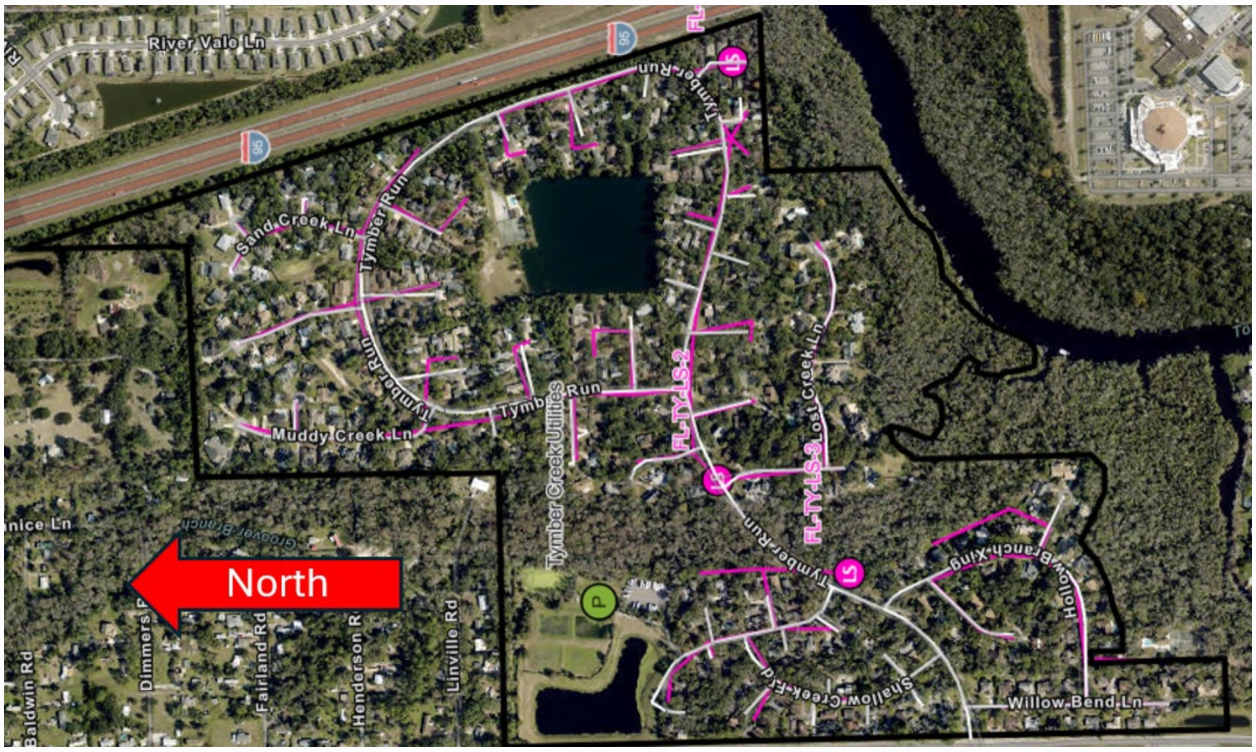
A. There were many issues with the Tymber Creek facility when acquired by CSWR Florida. This is further supported by the information reviewed in the facility compliance history below. Issues identified as requiring repair, replacement, or improvement include the following:

- Sludge accumulation was noted in several portions of the treatment plant, which contributes to total suspended solids ("TSS") exceedances and reduces treatment capacity.
- No remote monitoring was present at treatment plant or lift station.
- The system's flow meter was in poor condition and the current meter cannot communicate with the new remote monitoring system installed by CSWR Florida.
- No washdown water system was present at the facility.
- Blowers are in poor condition and reaching the end of their useful lives.
- Sand filter media is impacted in some locations, contributing to the ongoing daily maximum limit TSS exceedances.
- Rapid infiltration basin 4 was unusable at acquisition due to a failed valve.
- Ongoing sanitary sewage overflow (SSO) issues under previous ownership revealed issues with all lift stations, requiring equipment repairs at lift stations 2 and 3 the total replacement of lift station 1.
- Lift Station 1 lacked security fencing at acquisition.

- The system's FDEP permit requires composite sampling, and no composite sampler was on site at acquisition.
- No emergency eyewash and shower present in connection with the disinfection chemical system.
- Various collection system deficiencies were noted, including inadequate, unlocated, and unexercised isolation valves, leaks in collection lines, missing or buried cleanout/manholes, broken manhole rings and missing manhole covers.

Q. **DO YOU HAVE ANY OVERVIEW PHOTOGRAPHS OF THE TYMBER CREEK WASTEWATER SYSTEM?**

A. Yes, please see the photos below showing an aerial view of the Tymber Creek wastewater treatment facility.



Aerial view of the Tymber Creek Community.

Aerial view (left) and ground level (right) photos of Tymber Creek WWTF at acquisition.

Q. **PLEASE PROVIDE A SUMMARY OF THE COMPLIANCE HISTORY OF THE TYMBER CREEK SYSTEM UNDER PREVIOUS OWNERSHIP.**

A. The Timber Creek wastewater facility has a long history of noncompliance prior to its acquisition by CSWR Florida. While the previous owner was somewhat responsive to problems identified by FDEP, some issues were never permanently addressed leading to noncompliance issues that still required action when CSWR Florida took ownership. A review of noncompliance related documentation in the FDEP database for the five years leading to acquisition by CSWR Florida showed several ongoing issues with the Tymber Creek system. In June 2020, Volusia County conducted an inspection which found effluent exceedances in sampling history. In February 2021, Volusia County conducted another inspection and noted excessive accumulation of solids in rapid infiltration basins 1 and 2. In April 2021, during the facility's permit renewal cycle, total suspended solids, pH, fecal coliform, and nitrate exceedances were noted. Shortly thereafter, in May 2021, FDEP conducted an inspection that noted the same issues highlighted in the permit renewal process and identified several additional issues related to DMR and groundwater sample reporting. The FDEP issued a Consent Order to allow a schedule of compliance to be established k to resolve issues related to the

TSS") and nitrate limit exceedances. The Consent Order, issued in July 2021, required Tymber Creek's previous owners to implement operational improvements, conduct an evaluation to determine the causes of the violations, submit a modification plan to allow the facility to meet limits, agree to a schedule of compliance for completing improvements, and submit a sanitary sewage overflow response plan. In January 2023, Volusia County conducted an inspection and noted noncompliance because the flow meter calibration was out of date and one blower was inoperable. In September 2023 an inspection report and Compliance Assistance Offer highlighted ongoing exceedance of TSS daily maximum limits, continuing reporting issues, a failure to maintain the SSO (Sanitary Sewage Overflow) response plan and collection system operations and maintenance plan on site and also noted the flow meter calibration was out of date, as previously noted in the Volusia County inspection. In November 2023, a complaint investigation was conducted when members of the community complained a lift station regularly overflowed wastewater into a ditch. The state investigated and confirmed an ongoing/recurring SSO problem that the utility seemed to know about but had never reported to the state. (All SSOs are required to be reported as an unauthorized discharge and must be addressed as soon as the utility becomes aware of the issue.) This determination led to the issuance of a Warning Letter. Following receiving the warning letter emphasizing the requirement to report all SSOs, the utility began regularly reporting SSOs throughout the remainder of the compliance history. A new Consent Order was issued in March 2024 which included a $12,660 penalty relating to the history of failing to report SSOs that the utility was aware of.

The Tymber Creek facility is still subject to the SSO Consent Order and CSWR Florida's evaluation of the lift stations showed the primary lift station to be poorly designed and undersized, which will require total replacement to resolve the SSO

issues. CSWR Florida's evaluation also determined the remaining lift stations would require overhauls and raised rings to bring them above the 100-year flood level to avert additional SSO problems. These improvements are being implemented.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA HAS COMPLETED TO DATE AT THE TYMBER CREEK WASTEWATER SYSTEM.**

A. Various improvements have been made to date to the Tymber Creek wastewater system. At acquisition, sludge accumulation was noted in several of the tanks throughout the wastewater treatment plant. This reduces the treatment volume of affected tanks thereby reducing treatment efficacy and could contribute to the ongoing exceedance of maximum daily limits for TSS. Excess and impacted solids have been removed from all treatment basins to restore capacity and reduce TSS levels.

Remote monitoring equipment has been installed at the wastewater treatment facility and all three lift stations. The remote monitoring unit installed at the treatment plant will be able to be moved to the new treatment facility in the future.

Newly installed remote monitoring equipment at the Tymber Creek facility and lift stations (example at treatment plant)

In addition to installing the remote monitoring equipment, other monitoring improvements have been made to the system. A new flow meter was installed because

the older meter was in poor condition and could not communicate with the remote monitoring system.

New ultrasonic flow meter.

Finally, a bladder tank and water service were installed to provide washdown water at the treatment plant. Washdown water aids in operations activities and enhances operator safety by allowing for easier cleanup of any splashed or spilled chemicals and wastewater material.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA PLANS TO COMPLETE IN THE FUTURE AT THE TYMBER CREEK WASTEWATER SYSTEM.**

A. Further improvements are planned at the Tymber Creek wastewater system to resolve problems the previous owner failed to address. The blowers running the digester/surge tanks and aeration basins are in poor condition, with all blowers for the aeration basins nearing the end of their useful lives. In addition, one of the blowers for the digester and surge tanks failed prior to acquisition by CSWR Florida. The entire blower system for the aeration basins and the failed blower from the surge basin and digester system will be replaced.


Surge basin / digester blowers (left) and aeration basin blowers (right)

The facility's sand filters have some areas with impacted sludge preventing proper flow through the filter and allowing vegetation to grow in the filters. The sand filters provide additional removal of solids prior to discharge. The impaired function of the filters contributes to the ongoing daily maximum TSS limit exceedances. The sand filter media will be replaced to enhance solids removal.

Sand filter with impacted sludge allowing vegetation growth.

The control valve for rapid infiltration basin 4 is currently broken, locking it in the closed position. This reduces the area available for effluent dispersal and the ability to rotate basins in and out of service for maintenance.

As discussed in the compliance section, the facility is currently subject to a Consent Order related to ongoing or recurring sanitary sewage overflows from lift

station 1. An evaluation by CSWR Florida showed that all three lift stations are located below the 100-year flood elevation and further found that all lift stations need significant rehabilitation. In addition, CSWR Florida determined that lift station 1 was poorly designed and cannot handle the flows it receives during high flow periods. Consequently, lift station 1 will be completely replaced and lift stations 2 and 3 will be rehabilitated, including adding riser rings to bring the top of the lift stations above the 100-year flood level. Lift station 1 also lacks security fencing, so following replacement security fencing will be installed.

Lift Stations 1 (left), 2 (center), and 3 (right).

Tymber Creek's FDEP permit requires composite sampling be conducted periodically, but following its acquisition of the system CSWR Florida determined no composite sampler was on site. CSWR Florida will install a composite sampler to allow for composite sampling in the future. At acquisition, there also was no emergency shower and eye wash station near where the alum and sodium hypochlorite chemicals were stored. To ensure operator safety, an emergency shower and eyewash station will be installed. Finally, various unresolved issues in the collection system need to be addressed, including repairing leaks and breaks as they are identified, working to locate buried manholes and cleanouts and expose them (potentially

requiring installation of new risers), repairing or replacing any missing or damaged manhole covers, and repairing damaged manhole rings.

J. Tymber Creek Water System

Q. **PLEASE DESCRIBE THE TYMBER CREEK WATER SYSTEM AS IT EXISTED AT ACQUISITION BY CSWR FLORIDA.**

A. The Tymber Creek drinking water system is a community drinking water system serving 430 equivalent residential connections in Volusia County, Florida, northeast of Daytona Beach. CSWR Florida closed on the Tymber Creek water and wastewater system on May 31, 2024. The Tymber Creek water system purchases water from the City of Ormond Beach water system and distributes it to customers through Tymber Creek's distribution system. All the distribution assets are approximately 45 years old.

Q. **PLEASE PROVIDE AN OVERVIEW OF THE CONDITION OF THE TYMBER CREEK WATER SYSTEM WHEN IT WAS ACQUIRED BY CSWR FLORIDA.**

A. The Tymber Creek drinking water system was in fairly good condition when acquired by CSWR Florida. Because the system only consists of a distribution system, items requiring improvement all relate to the distribution system:

- No flushing hydrants were present in system
- Distribution system repair was needed, including locating, exercising, and repairing isolation valves and flushing hydrants; installation of additional isolation valves and flushing hydrants; leaks and break repairs were required, and damaged segments of water mains required replacement

Q. **DO YOU HAVE ANY OVERVIEW PHOTOGRAPHS OF THE TYMBER CREEK DRINKING WATER SYSTEM?**

A. Yes, the photographs below show an aerial view of the Tymber Creek drinking water facility.

Aerial view of the Tymber Creek Community.

Tymber Creek master meter connection to City of Ormond Beach

Example of Tymber Creek fire hydrants (left is one replaced by CSWR Florida since taking ownership of the system right is an original hydrant).

Q. **PLEASE PROVIDE A SUMMARY OF THE COMPLIANCE HISTORY OF THE TYMBER CREEK WATER SYSTEM UNDER PREVIOUS OWNERSHIP.**

A. A review of the compliance history of the Tymber Creek drinking water system in the five years immediately preceding its acquisition by CSWR Florida shows no instances of noncompliance, in either the federal or state databases, related to monitoring and reporting requirements.

There are no active compliance agreements currently in effect for the Tymber Creek drinking water system.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA HAS COMPLETED TO DATE AT THE TYMBER CREEK DRINKING WATER SYSTEM.**

A. Since acquisition, CSWR Florida has made basic distribution system improvements to the Tymber Creek drinking water system as issues have been identified. This included repairs to line leaks and breaks, locating and exercising isolation valves, repairing or replacing nonfunctional or damaged valves and fire hydrants.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA PLANS TO COMPLETE IN THE FUTURE AT THE TYMBER CREEK DRINKING**

WATER SYSTEM.

A. The only significant improvement project needed at the Tymber Creek drinking water system is the installation of flushing hydrants at dead ends in the distribution system. Flushing hydrants allow accumulated sediment to be flushed from distribution mains.

K. Aquarina Utilities Wastewater Treatment Facility

Q. **PLEASE DESCRIBE AQUARINA UTILITIES WASTEWATER TREATMENT FACILITY ("WWTF") AS IT EXISTED AT ACQUISITION.**

A. The Aquarina Utilities wastewater system is a non-discharging community wastewater treatment system serving 433 equivalent residential connections in Brevard County. The facility is located South of Melbourne Beach. CSWR Florida closed on the Aquarina Water and Wastewater systems on May 16, 2022.

At acquisition, the Aquarina wastewater treatment system consisted of a 0.099 MGD Annual Average Daily Flow (AADF) permitted capacity extended aeration domestic Wastewater Treatment Plant. The system had various issues at the time of acquisition. These ranged from equipment in poor condition, missing safety features required for typical operations activities, failed equipment or equipment components, accumulation of sludge and nuisance solids in some treatment components, portions of the facility configured in ways not approved in construction permits, out of service equipment that had not been properly decommissioned, and other various issues.

Q. **PLEASE PROVIDE AN OVERVIEW OF THE CONDITION OF THE AQUARINA WASTEWATER SYSTEM WHEN IT WAS PURCHASED.**

A. Various components showed signs of wear and tear, with deteriorating coatings on structures and above ground piping, issues with components of the treatment processes, and issues with the site. Further issues requiring repairs and improvements were identified as CSWR Florida began operating the facility and embarking on evaluating,

operating, and implementing repairs and improvements at the Aquarina wastewater system.

Aquarina wastewater system had a number of concerns and issues at acquisition. These issues include:

- The electrical system was in need of repairs and improvement
- One of the pumps in the influent lift station had failed
- No Remote monitoring was present
- Equipment and structural coatings were deteriorating and in need of repairs/recoating
- The system lacked remote monitoring and proper telemetry between system components for proper operational control
- Return active sludge/waste active sludge ("RAS/WAS") pump system was in poor condition
- Blowers were in poor condition and shade structure had been removed
- Aeration system in poor condition
- No catwalks present over clarifier and no safety grating over influent lift station. Other handrails and catwalks are in poor condition
- Plant headworks regularly overwhelmed by nuisance solids
- One monitoring well in drain field is chronically dry
- Disinfection system not built in accordance with permitted plan and not properly dosing chlorine
- Out of service tertiary filters need to be properly removed
- Lift stations in collection system lack fencing
- The irrigation pumping system is in poor condition

- Emergency generator has reached the end of useful life
- Fencing damaged and overgrown with nuisance vegetation around water and wastewater site

Q. **DO YOU HAVE ANY OVERVIEW PHOTOS OF THE AQUARINA WASTEWATER SYSTEM?**

A. Yes, please see the photos below showing an aerial view of the Aquarina Wastewater System and an overview photo.

Aerial view of the Aquarina Community (left) and aerial view of the wastewater treatment plant including drain field area (right).

Q. **PLEASE PROVIDE A SUMMARY OF THE COMPLIANCE HISTORY UNDER PREVIOUS OWNERSHIP.**

A. The Aquarina wastewater system had several incidents of noncompliance in the five years prior to acquisition by CSWR Florida. First, in August 2017, an inspection noted that there was an inadequate cross connection control plan as required for the site and no audio-visual alarm present for power failures where backup power is required. The backup power system would be a recurring issue as the automatic transfer switch was later discovered to have been out of service. The most significant noncompliance issues were documented in an inspection that occurred in January 2018, which found

several issues. First, one of the effluent infiltration cells (area where treated effluent is allowed to drain into the ground) was oversaturated, indicating the cells were not being properly rotated. The operator indicated to the inspector that this was because the electric gate used to access the discharge area had failed and it was inconvenient to drive around the entire discharge area to access the point where the flow can be diverted between the two cells. This indicates a failure to maintain equipment, a failure to repair damaged equipment which is impacting operations, and a failure to take steps to properly operate the facility.

The inspection also noted significant sludge accumulation in aeration basins, which adversely affected the facility's treatment capacity, and rusted gratings over the filters, which made the gratings unsafe for operators.

The inspection report also notes a consistent history of effluent exceedances. These exceedances include total suspended solids exceedances and nitrate limit exceedances. Exceedance of permitted limits is a serious issue indicating a facility is failing to properly treat wastewater due to facility disrepair, inadequate operational standards, or the facility not being designed to adequately meet permitted limits.

Finally, in response to an inspection report (which is missing from the FDEP database) a response from the previous owner noted that the automatic transfer switch for the generator had been repaired after having been found to be nonfunctional for several years. An automatic transfer switch allows a generator to activate automatically in the event of a power outage, preventing water and wastewater service interruptions and is often utilized to conduct automatic testing of generators to ensure they will function when needed. Allowing the automatic transfer switch to remain broken for these years reduces the resiliency of the system and should have been addressed without enforcement pressure. This again indicates a failure to maintain equipment and a

failure to repair damaged equipment which is impacting operations. These sorts of practices could also have contributed to conditions or operational practices that led to the previously referenced effluent exceedances.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA HAS COMPLETED TO DATE AT THE AQUARINA WASTEWATER SYSTEM.**

A. To date, CSWR Florida has made improvements to the return active sludge/waste active sludge (RAS/WAS) pumping system. At acquisition, the RAS/WAS pumping system piping was in poor condition. Conditions observed included corrosion, signs of leaks, failed valves, one of the two pumps was out of service, and the electrical service box was heavily corroded and no longer weatherproof. CSWR Florida restored the out of service pump, installed a new weather-safe electric service box, and replaced all damaged above ground piping and valves to ensure the system can function safely and properly without leaks. The influent lift station also had a failed pump, which was replaced.

RAS/WAS pumping system before (left) and after(right) improvements, note both pumps in service, piping improvements, valve replacements, and new power supply.

At acquisition, the blower system supplying air to the Aquarina wastewater plant's aeration equipment had several notable issues that have since been addressed

by CSWR Florida. For example, there was no shade structure installed over the blowers. Blowers become very hot during operation, which can lead to equipment overheating resulting in shutdowns and early wear and tear that reduces the useful life of equipment. CSWR Florida installed a shade structure to reduce overheating, repaired and replaced portions of the aeration piping to eliminate leaks and halt corrosion, and made improvements to the wiring and conduit.


New Shade structure over Aquarina blowers before (left) and after(right) improvement.

The Aquarina facility's tanks and equipment were inspected, sanded, and recoated where appropriate. This process ensures that any need for tank and equipment repairs are identified and recoated to protect the tanks and equipment from exposure wear and corrosion to extend their useful lives.


Treatment tanks, piping, and equipment before (left) and after (right) recoating.

In addition, flood lighting has been installed at various locations at the treatment plant and lift stations. Lighting improvements ensure that operations staff can safely and effectively respond to emergency maintenance issues after dark to quickly repair items or restore service. Remote monitoring equipment has also been installed at the treatment plant and collection system lift stations. Remote monitoring equipment allows collection of data and provides continuous information on system performance over time allowing for more precise and efficient operations. Remote monitoring also provides operations staff with live information concerning system performance and equipment status. This allows for immediate identification and notification of abnormal operating conditions and emergencies, which often enables operations staff to respond and address problems before they can result in service interruptions.

Example of new flood lights installed for safety in after-hours operations activities (left). Example of remote monitoring units installed at Aquarina treatment plant and lift stations (right).

Several of the fence lines around the water and wastewater site were extremely overgrown with vegetation causing damage to the fencing. CSWR Florida has removed the nuisance vegetation and repaired the damaged fencing. Similarly, the effluent drain fields were found to be overgrown and the fencing surrounding the drain fields was

completely overgrown. Vegetation has been removed from the drain field fence and controlled in the drain field.

Fence lines damaged by vegetation overgrowth (left) and cleared fence line (right)

Fencing around drain field completely covered in overgrowth and vegetation overgrowing in drain basin (left). Fence line cleared and vegetation controlled in drain basin (right).

Other miscellaneous improvements have also been made to the Aquarina wastewater system including repairs to collection system leaks, repairs to leaking air and wastewater plumbing at the treatment plant, and other capital maintenance activities.

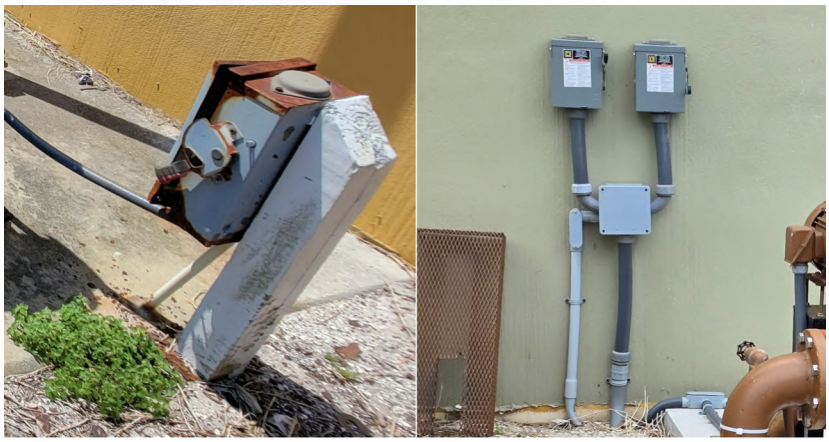
Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA PLANS TO COMPLETE IN THE FUTURE AT THE AQUARINA WASTEWATER SYSTEM.**

A. Further improvements are needed at the Aquarina wastewater system to ensure consistent compliance with regulatory requirements, to ensure the facility is in a safe and operable condition, and to ensure the facility can be properly maintained. To comply with FDEP monitoring requirements, a new monitoring well must be installed in the drain field area. Monitoring wells are wells with direct access to the upper water tables that under effect of the water that infiltrates into the ground through the drain field. Testing is periodically conducted to ensure groundwater limits are not exceeded as a result of the treated wastewater discharge. In addition, because one of the wells has been consistently dry for several years, the FDEP notified the previous ownership a new monitoring well would need to be installed. The non-functioning well caused previous ownership to consistently submit groundwater sampling results that stated "No Sample Result." Because FDEP will not accept "No Sample Result" reporting, CSWR Florida is working to install a new monitoring well as part of planned plant improvements, which will allow proper groundwater sampling to resume.

Example of monitoring well at Aquarina wastewater system requiring replacement adjacent to drain field.

Throughout the Aquarina wastewater facility, various electrical and control panels are in poor condition, risking electrical failures, operator injury, and interruption in proper operation of treatment equipment. CSWR Florida is working to replace damaged panels, where appropriate as improvement projects are undertaken, as seen in

the electrical service replacement to the RAS/WAS pumping system, which is shown below. Some electrical and control systems will also require improvement to handle new or upgraded replacement equipment.



Example of power supply replacement for RAS/WAS pumps.

Several areas around the treatment facility and lift stations have issues regarding safety grating, handrails, and catwalks. In some areas these safety measures are missing altogether and in others existing measures are in poor condition. These items ensure operator safety during operations activities and prevent accidents and injuries. Where grating, handrails, or catwalks are needed but missing or damaged, installations and repairs will be implemented to ensure operator safety.

Leading edges without edge protection handrails/chains or grating over open basins (left). Aeration basin grating is not secured to structure and lacks handrails (right).

As previously discussed in reference to the facility blowers, powered equipment should be installed under shade structures to prevent overheating and enhance operator safety when working on equipment that can become hot. While CSWR Florida has installed a new shade structure over the facility blowers, the RAS/WAS pumps still have no shade structure. A shade structure will be installed over the RAS/WAS pumps as part of the remaining construction projects and the facility.

No shade structure currently installed over RAS/WAS pumping equipment (left), and new shade structure installed over facility blowers as example (right)

The facility currently utilizes a manually cleaned bar screen, which requires operations staff to regularly rake nuisance solids into a dumpster to prevent them from entering the facility and negatively impacting treatment processes or causing damage to treatment equipment. If the screen is filled before an operator can remove nuisance solids, wastewater can overflow or nuisance solids can enter the treatment basins. Nuisance solids have been noted in the aeration basins even with daily clearing, indicating that the existing system is not suitable to manage the quantity of nuisance solids entering the facility. To prevent issues with an inability to clear the bar screen with adequate frequency, the bar screen will be replaced with a fine screening system, which automatically drops nuisance solids into a dumpster to prevent clogging,

overflowing, or the release of solids into the treatment basins. A screening system also eliminates the need to manually rake the bar screen to ensure proper facility operation.

Existing bar screen backing up due to impacted solids in photo (left), examples of Hydrosieve with automatic trash collection beneath at two CSWR affiliated facilities (center and right).

Various components of the facility's aeration system have been identified as needing improvements, repairs, or replacement. Aeration is the primary treatment process in place at the Aquarina wastewater treatment facility, working to break down wastewater by mechanically aerating it with activated sludge to mechanically break up solids that enhance or encourage biological breakdown of wastewater nutrients. It is essential that the aeration equipment operates effectively and be in a condition that can be operated and maintained in a manner that provides adequate treatment to meet permitted limits. The facility blowers at Aquarina are old and approaching the end of their useful lives. To ensure effective operation of the facility, the aging blowers will be replaced with new blowers. Some of the aeration piping, including air headers, drop pipes, and diffusers have been identified as corroding, leaking, or otherwise being in a state of poor repair. Leaking pipes and poor aeration diffusion negatively affects treatment efficacy by reducing air delivered to the aeration basins. Aeration piping and diffusers will be repaired or replaced, as appropriate, to ensure proper treatment can

occur.

Aging blowers in need of replacement (left) examples of aeration piping with rust on aeration headers, at water level, fittings and valves resulting in air leaks (center and right)

Aeration piping with missing drop pipe indicating section of aeration basin not being aerated.

The facility's clarifier regularly has issues with duckweed growth inside the interior ring of the clarifier trough. The presence of duckweed can lead to increased levels of solids, ammonia, and biochemical oxygen demand ("BOD") in discharged wastewater. Duckweed can also sometimes pass over the trough and be discharged with treated wastewater to the drain field. To prevent ongoing duckweed growth, a launder cover will be installed over the clarifier to reduce sunlight to levels so duckweed no longer will thrive.

Examples of accumulation of duckweed growth in clarifier (left and right) including duckweed passing over the trough (right).

There are two tertiary sand filters on the site that were removed from service many years ago. The out of service filters have never been fully decommissioned and should have the impacted media removed and either have the tanks removed or repurposed for other treatment processes on the site. As described previously, the disinfection system currently present at the treatment facility was not constructed to match the permitted plan submitted in the 2018 permit renewal and lacks precise chlorine dosing. To ensure proper disinfection occurs and that the facility is in line with the permitted plans the Company will either install a new chlorine contact chamber or convert the decommissioned sand filters into chlorine contact chambers and install a new chlorine dosing system utilizing sodium hypochlorite solution.

Sand filter tanks which have been out of service for an extended period and need to be properly decommissioned or repurposed.

The irrigation pumping system is also aging and its pumps should be replaced to ensure proper function moving forward. General site improvements will also continue at the wastewater treatment site, including ongoing wastewater and aeration piping replacements as leaks or damage is identified, some remaining fencing repairs, access improvements, and housekeeping improvements. Miscellaneous repairs and improvements are also being completed in the collection system as leaking or damaged collection mains are identified and replaced. Finally, the generator supplying emergency power for the water and wastewater sites has reached the end of its useful life and will require replacement.

Old generator shared by water and wastewater site which has reached the end of useful life.

L. Aquarina Utilities Water System

Q. **PLEASE DESCRIBE THE AQUARINA UTILITIES WATER SYSTEM AS IT EXISTED AT THE TIME OF ITS ACQUISITION BY CSWR FLORIDA.**

A. The Aquarina Utilities water system is a potable and irrigation water system serving 619 equivalent residential connections in Brevard County. The facility is located South of Melbourne Beach. At acquisition, the Aquarina water system consisted of two separate water systems for the Aquarina development: a potable water system serving the residential community and golf course clubhouse and a fire and irrigation water system. CSWR Florida closed on its acquisition of the Aquarina Water and Sewer systems on May 16, 2022.

Q. **PLEASE PROVIDE AN OVERVIEW OF THE CONDITION OF THE AQUARINA WATER SYSTEM WHEN IT WAS ACQUIRED.**

A. At acquisition, various components of the Aquarina system showed signs of wear and tear, with deteriorating coatings on structures and above ground piping, tanks due for maintenance activities, overgrown fence lines, poor condition access roads, and trash and debris throughout the site. Additional issues requiring repairs and improvements were identified as CSWR Florida began operating the facility and could better assess system problems and begin implementing necessary repairs and improvements.

The following were among the concerns and issues identified by CSWR Florida at acquisition:

- The electrical system needed repairs,
- Chemical system containment was inadequate, resulting in spills of chemicals in the treatment building,
- Equipment and structural coatings were deteriorating and in need of repairs or recoating,

- Tanks were overdue for full interior and exterior inspection and evaluation for potential repairs and replacements. Inspection and recoating work revealed the hydropneumatic tank and many pinhole leaks and would need to be replaced,
- The system lacked remote monitoring and proper telemetry between system components for proper operational control,
- The distribution flow meter was damaged,
- The system lacked chlorine residual monitoring,
- Three fire hydrants were out of service,
- Well flow meters had reached end of their useful lives,
- Fencing was damaged around both the water and wastewater sites.

Q. **DO YOU HAVE ANY OVERVIEW PHOTOGRAPHS OF THE AQUARINA WATER SYSTEM?**

A. Yes, please see the photographs below showing an aerial view of the Aquarina water system.

Aerial view of the Aquarina Community.

Aerial view of the Aquarina water system at acquisition(left) and currently (right). Note recoated tanks, cleared vegetation and debris, new access roads, and temporary hydropneumatic tank on site.

Q. **PLEASE DESCRIBE THE COMPLIANCE HISTORY OF THE AQUARINA WATER SYSTEM UNDER PREVIOUS OWNERSHIP.**

A. A review of the federal Safe Drinking Water Information System ("SDWIS") database shows eight monitoring and reporting violations in the five years immediately preceding the system's acquisition by CSWR Florida. The violations related to the Environmental Protection Agency's Lead and Copper Rule, the Revised Total Coliform Rule, and Groundwater Rule for E. coli sampling. These violations indicated failures to complete required testing or properly complete reporting related to sampling and do not indicate water quality issues.

A review of compliance-related documents in the FDEP database provided further detail regarding the previous owner's lead and copper sampling record. Some samples were shown to exceed action levels for lead from interior faucets within dwellings in the service area. Further investigation showed this was attributable to lead solder used in the interior piping of portions of dwellings in the development and is not related to issues with the source water or any portion of the treatment, storage, or

distribution systems that are part of the Aquarina water system. Each time lead and copper sampling are completed customers will be informed of the issue, advised to test the water in their home, and advised to consider replacing their interior plumbing to reduce lead exposure.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA HAS COMPLETED TO DATE AT THE AQUARINA WATER SYSTEM.**

A. Improvements have been made to the disinfection system, including improving chemical containment in the treatment building to address ongoing spills from the inadequate spill berm and installation of a continuous chlorine analyzer to ensure that adequate chlorine residuals are maintained to prevent bacteriological contamination issues in the drinking water.

Chemical containment before (left) and after improvement (right). Note bleaching and dried chemicals all over ground previously due to inadequately sized spill berm and lack of cleanup.

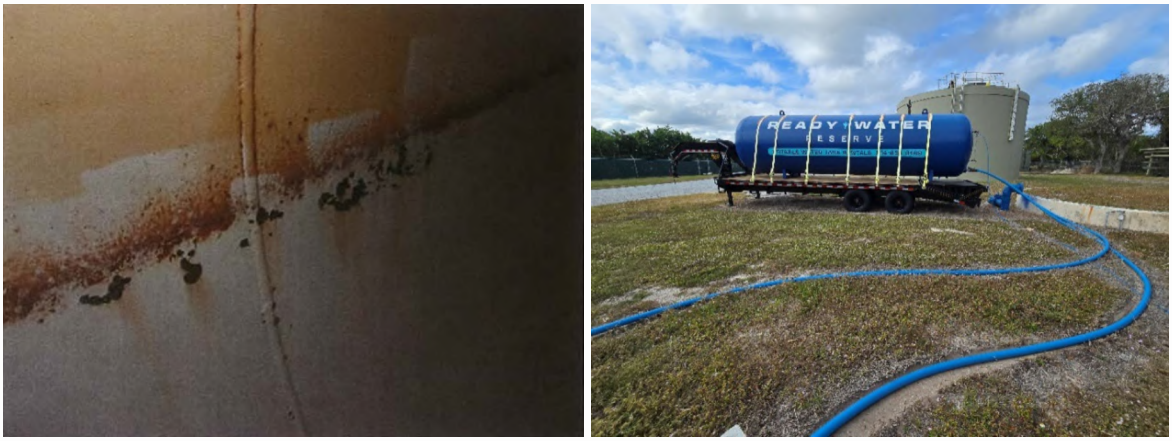
The facility's tanks were inspected, sanded, and recoated where appropriate. This process ensures that any needs for tank repairs are identified, and that recoating occurs to protect the tank structures from exposure, wear, and corrosion, which helps extend their useful lives. Both ground storage tanks (one for irrigation and fire control

tank and a separate potable water tank) were recoated to extend their useful lives, and the trash, debris, and vegetation overgrowth were removed from in and around the site. The hydropneumatic tank was inspected during the sand blasting and recoating process and multiple leaks were identified. CSWR Florida determined the hydropneumatic tank should therefore be removed from service and replaced. A temporary tank has been placed on site to maintain system pressure until the replacement tank can be designed, permitted, bid out, and installed.

Ground Storage tank before (left) and after (right) before and after inspection and recoating, note trash and debris removed from tank area as well.

Irrigation and Fire Control Ground Storage tank before (left) and after (right) before and after inspection and recoating, note vegetation overgrowth removed from tank.

Hydropneumatic tank before (left) and after (right) exterior recoating, inspection for interior recoating halted improvements on tank when numerous pinhole leaks were identified, and tank was removed from service.



Example of pinhole leaks along waterline on interior (left) and temporary tank brought in to maintain service till tank replacement can be completed (right).

In addition to recoating tanks, all exposed above ground piping at the treatment and well sites were recoated to extend their useful lives. Deteriorating coatings on piping can lead to accelerated deterioration and corrosion resulting in leaks and need for piping and equipment replacement. Where piping was damaged, segments were replaced.

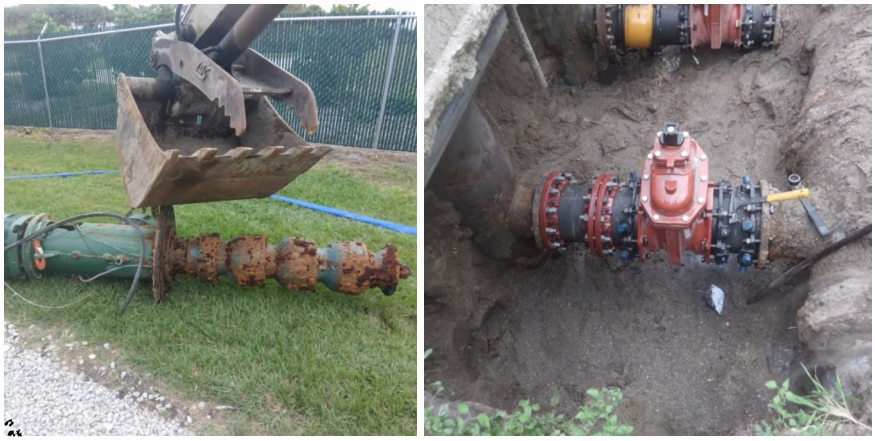
Example of before (left) and after (right) recoating of above ground piping and equipment.

Various improvements have also been made to the electrical and monitoring systems at the Aquarina water system. This includes installing new flow meters for the wells and the distribution system, improving telemetry between tank monitoring equipment and control systems, and installation of remote monitoring equipment.

Telemetry with tank levels (left) and new remote monitoring equipment (right).

In addition to improvements to water production and treatment equipment, various improvements have been made to the distribution system and overall utility site. Three out of service fire hydrants have been replaced to ensure all areas can be served by the fire protection system. Additionally, CSWR Florida's evaluation of the high-pressure valves for the fire protection system showed they were severely corroded. The valves have been replaced to ensure adequate pressure can be provided in the fire protection system. Various line leaks and breaks also have been addressed

to reduce water losses and eliminate areas vulnerable to contamination. Additional site improvements include rehabilitating the access roads, removing trash, debris, and nuisance vegetation from fence lines and throughout the site, and making repairs to site fencing throughout the water and wastewater portions of the utility site.



Rusted high pressure fire protection valves (left) removed and new valves installed (right)

Damaged fencing (left) replaced with new fencing (right)

Clearing of vegetation from facility fence line

Before (left) and after (right) access road improvements and piping and equipment recoating.

Q. **PLEASE DESCRIBE IMPROVEMENTS CSWR FLORIDA PLANS TO COMPLETE IN THE FUTURE AT THE AQUARINA WATER SYSTEM.**

A. Further improvements planned for the Aquarina water system include repairs and improvements to the distribution system. These include installation, repair, or replacement of isolation valves; replacing damaged mains; and installation, repair, or replacement of flushing hydrants. In addition, as I previously testified the facility's hydropneumatic tank was significantly rusted on both its interior and exterior leaks were noted during CSWR Florida's inspection, cleaning, and recoating efforts. As a result, we determined the tank would require replacement to prevent possible

contamination, service interruptions, or damage that would be caused if the tank failed catastrophically a (hydropneumatic tanks can explode). A temporary tank has been placed on site and a new permanent tank will be installed in the future. Finally, the generator supplying emergency power for the water and wastewater facility, which has reached the end of its useful life, will require replacement.

Old generator shared by water and wastewater site which has reached the end of useful life.

M. Tradewinds Water System

Q. **PLEASE DESCRIBE THE TRADEWINDS WATER SYSTEM AS IT EXISTED AT ACQUISITION.**

A. The Tradewinds water system serves 240 equivalent residential connections in Marion County. The drinking water system serves a subdivision and commercial customers in the northeast portion of Ocala, Florida. CSWR Florida closed on its acquisition of the Tradewinds water and wastewater systems on November 30, 2023.

Q. **PLEASE PROVIDE AN OVERVIEW OF THE CONDITION OF THE TRADEWINDS WATER SYSTEM WHEN IT WAS ACQUIRED BY CSWR FLORIDA.**

A. At acquisition, CSWR Florida identified several issues with the Tradewinds water system that would require repairs or improvements to ensure the system can provide

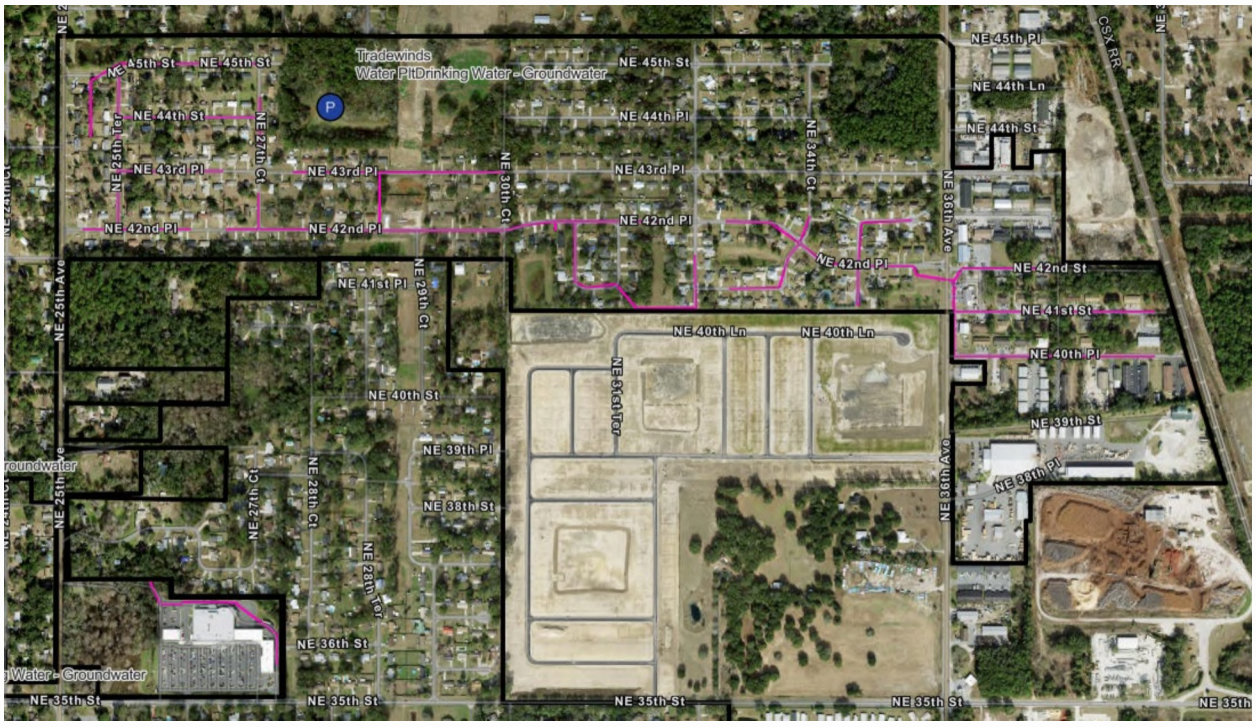
safe and reliable service and can be properly maintained and operated in the future. The issues CSWR Florida identified included the following:

- The system included no spill containment or shade structure for sodium hypochlorite
- No residual chlorine monitoring was present
- The elevated storage tank was due for inspection and cleaning and to evaluate long-term repair needs
- Piping on the elevated storage tank was corroded and in poor condition including the fill line, the supply line to system, and the overflow line.
- Coatings on the out of service hydropneumatic tanks were in poor condition requiring repair or permanent removal of the tanks
- No remote monitoring equipment was present
- Flow meters were in poor condition and not set up for live data recording or reporting through remote monitoring system
- All wells were due for evaluation and rehabilitation or reworking
- Existing backup wells were inadequate to supply system in the event of main well failure.
- Climb prevention cage damaged on the elevated storage tank ladder
- The elevated storage tank in need of repairs, improvements and recoating pending evaluation of its overall condition and fitness
- Hydropneumatic tanks needed rehabilitation to return to service
- The automatic transfer switch for the generator had failed
- Areas of fencing around the water site were damaged
- Required distribution system repairs included locating, exercising, and

repairing isolation valves and flushing hydrants; installation of additional isolation valves and flushing hydrants; leak and break repairs; and replacement of damaged segments of water mains

Q. **DO YOU HAVE ANY OVERVIEW PHOTOGRAPHS OF THE TRADEWINDS DRINKING WATER SYSTEM?**

A. Yes, the photographs below show an aerial view of the Tradewinds drinking water facility.



Aerial view of the Tradewinds Community.

Aerial view of Tradewinds elevated storage tank, disinfection, and hydropneumatic storage sites (left) and ground level views of the elevated storage tank (center) and the hydropneumatic storage tank and disinfection site (right).

Q. **PLEASE PROVIDE A SUMMARY OF THE COMPLIANCE HISTORY OF THE TRADEWINDS WATER SYSTEM UNDER PREVIOUS OWNERSHIP.**

A. A review of the compliance history of the Tradewinds drinking water system for the five years immediately preceding its acquisition by CSWR Florida shows instances of noncompliance related to monitoring and reporting requirements. A review of the EPA Safe Drinking Water Information System (SDWIS) database shows four instances of monitoring and reporting violations related to incomplete required sampling of disinfection byproducts in 2019 and 2022 with two parameters each. There was also a 2020 monitoring and reporting violation related to a follow-up sample required by the Lead and Copper rule. A review of the FDEP database showed violations consistent with what appeared in the SDWIS database, with two additional violations: one reflecting only violations of state level rules and the other reflecting federal rules violations that should have been reported to the federal database but for whatever reason was not. The state level violations related to a sanitary survey, which identified several instances of noncompliance. The survey noted that no distribution system map was available on site, no emergency preparedness plan was available, no operations and maintenance manual was available, no records were available for valve exercising or flushing, and no cross-connection control program had been developed for the system. The other violation was a file review and Compliance Assistance Offer issued in 2022 for failing to submit lead and copper sampling in 2021. There are no active compliance agreements currently in effect for the Tradewinds drinking water system.

Q. **PLEASE DESCRIBE IMPROVEMENTS CSWR FLORIDA HAS COMPLETED TO DATE AT THE TRADEWINDS DRINKING WATER SYSTEM.**

A. Various improvements have been completed to date at the Tradewinds drinking water system. First, improvements were made to the disinfection system. At acquisition, the system consisted of a single 55-gallon drum with a feed pump located in the corner of a room full of trash and spare materials. Access to the drum was difficult and no spill protection was present. Additionally, there was no venting in the room to remove chlorine gas. A new pad and shade structure were installed outside the structure and a new drum with spill protection were installed to provide better access, better ventilation, and spill containment for the disinfection system.

Disinfection system before (left) and after (right) improvement.

At acquisition, the elevated storage tank needed evaluation to determine necessary long-term repairs to the tank. To evaluate the tank, it was power-washed and an engineering inspection was completed. A damaged section of above ground piping running from the primary well to the elevated storage tank has also been replaced.

Replaced segment of above ground piping

No remote monitoring system was present at the time CSWR Florida acquired the system and the existing flow meters were in poor condition and could not communicate with a remote monitoring system. Remote monitoring equipment was installed along with new flow meters that can connect to the remote monitoring equipment. With the installation of the remote monitoring equipment, a continuous chlorine analyzer was also installed. These analyzers actively monitor to ensure that adequate chlorine residual is maintained in drinking water to prevent bacteriological contamination issues in the drinking water and reduce manual testing requirements.

New remote monitoring equipment (left) and new chlorine residual monitoring (right)

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA PLANS TO COMPLETE IN THE FUTURE AT THE TRADEWINDS DRINKING WATER**

SYSTEM.

A. Further improvements are needed at the Tradewinds drinking water system to ensure the facilities are in a safe and operable condition, that the facility can meet regulatory requirements, and to ensure the facilities can be properly and efficiently maintained moving forward. All three wells need evaluation and rehabilitation to ensure they can function effectively and to extend their useful lives. An additional concern is that while the primary well is suitable to run the system, if it were removed from service the two backup wells are not adequate to supply the system. Furthermore, with some planned developments in the area, additional well capacity will be needed. As a result, a new well is being permitted to be installed to ensure resiliency and adequate water supply.

As I previously stated, the elevated storage tank needs repairs and improvements. Several areas show steel corrosion to the structure and the tank that will require, at minimum, sanding and recoating and, in some cases, steel repair prior to recoating. The tank equipment is also in poor condition, with the potential CSWR Florida will be required to replace all piping, hatches, the access ladder, and the climb prevention cage on the lower section of the ladder. These improvements will be required to ensure the tank can function properly, that all operator safety equipment is in place, and to prevent members of the public from becoming injured by attempting to climb the tank without authorization. While the system is currently maintaining pressure utilizing the elevated storage tank, the hydropneumatic tanks should be returned to service so there are other means of maintaining system pressure in the event of maintenance on the elevated tank or other circumstances requiring the elevated tank to be removed from service. Therefore, the hydropneumatic tanks will be evaluated, any required repairs completed, and the tanks recoated to be returned to service.

The automatic transfer switch for the generator also was not functioning at

acquisition. This is a piece of equipment that automatically activates the emergency generator and switches the system from grid power to backup power in the event of a power outage. The switch should be replaced to prevent service interruption in the event of a power outage.

General site improvements are also needed. This will include clearing of vegetation, trash, debris, and unused equipment from the site and structure interiors, repairs to fencing and gates around the facility, and repairs and replacement to any wiring, conduit, and above ground piping on the site which is deteriorating or otherwise damaged.

The final area of planned improvements involves general improvements to the distribution system. Evaluation and improvements will include identification and repairs of leaks or breaks, identification, evaluation and repair of isolation valves and installation of additional valves where needed to minimize customers impacted by breaks and maintenance activities, and installation of automatic flushing units on flushing hydrants and dead-end fire hydrants to reduce accumulation of debris in the water lines.

N. Tradewinds Wastewater System

Q. **PLEASE DESCRIBE THE TRADEWINDS WASTEWATER SYSTEM AS IT EXISTED AT THE TIME OF ITS ACQUISITION BY CSWR FLORIDA.**

A. The Tradewinds wastewater system is a purchased treatment wastewater collection system serving 547 equivalent residential connections in Marion County. The wastewater system serves a subdivision and commercial customers in the Northeast portion of Ocala. CSWR Florida closed on its acquisition of the Tradewinds water and wastewater systems on November 30, 2023.

While Tradewinds once operated its own wastewater treatment facility, shortly

before acquisition by CSWR Florida the facility was connected to the Marion County Utilities wastewater system and the treatment plant was decommissioned. At acquisition, the Tradewinds wastewater system consisted of gravity collection flowing to one of five lift stations. All these lift stations conveyed wastewater to the location of the treatment facility. Since the facility was decommissioned a new lift station was constructed there which now conveys wastewater to the Marion County Utilities wastewater system for treatment.

Q. **PLEASE PROVIDE AN OVERVIEW OF THE CONDITION AND ISSUES OF THE TRADEWINDS WASTEWATER SYSTEM WHEN IT WAS PURCHASED.**

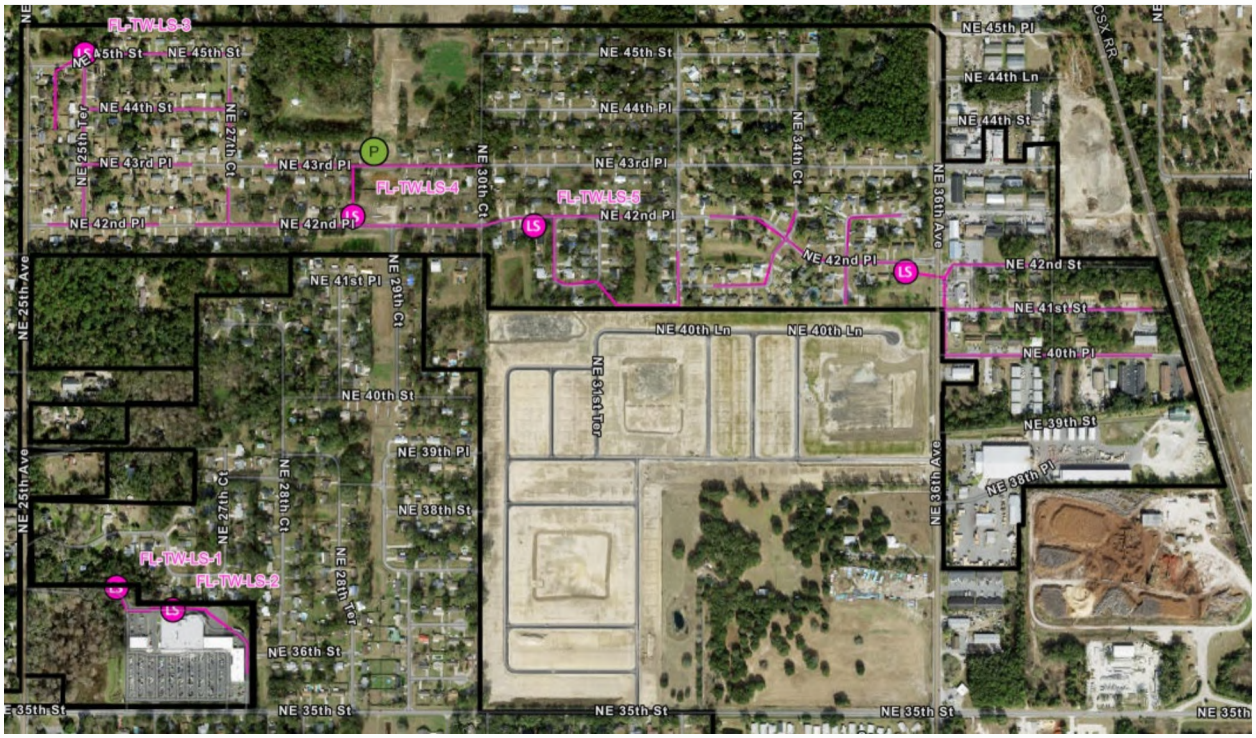
A. At acquisition, CSWR Florida identified several components of the Tradewinds facility that would require improvement. The issues CSWR Florida identified include the following:

- No remote monitoring equipment present at lift stations,
- Four of the lift stations lacked guiderail systems, which allow pumps to be easily accessed for maintenance,
- The control panel and power box at one of the lift stations was in poor condition,
- Four of the lift stations lacked means to connect emergency generators in the event of power failure,
- Lift station number 3 lacked emergency bypass pumping that would allow for a mobile pump to be connected and associated discharge piping was in poor condition,
- Trash, debris, and nuisance vegetation had built up on some of the lift station sites,
- Some of the older lift stations lacked fencing or had fencing in poor condition,

- General issues with the wastewater collection system.

Q. **DO YOU HAVE ANY OVERVIEW PHOTOS OF THE TRADEWINDS WASTEWATER SYSTEM?**

A. Yes, please see the photos below showing an aerial view of the Tradewinds wastewater system and an photos of each lift station.



Aerial view of the Tradewinds Community.

Examples of older Tradewinds collection system lift stations. Some lift stations lacked fencing, remote monitoring, and had rusting or degraded assets.

New l,ft station connecting to the Marion County Utilities wastewater system.

Q. **PLEASE DESCRIBE THE COMPLIANCE HISTORY OF THE TRADEWINDS SYSTEM UNDER PREVIOUS OWNERSHIP.**

A. The Tradewinds wastewater treatment plant had a long history of noncompliance prior to the connection to the Marion County Utilities wastewater system and the decommissioning of the wastewater treatment facility. The noncompliance involved improper reporting practices, discrepancies in permitted capacity, unaddressed issues related to the condition of the treatment facility, and a consistent struggle to comply with biochemical oxygen demand, total suspended solids, and total nitrogen permit limits. It was determined the facility was incapable of meeting these limits and that significant overhaul or total replacement would be required to ensure future compliance. Rather than taking on a project of that scope, the previous ownership elected to connect to the Marion County Utilities wastewater system. After paying several fines related to the long-term noncompliance and completing the project to convert the system to a purchased treatment system, past compliance issues with the facility resolved prior to CSWR Florida taking ownership. There are no active compliance agreements at the Tradewinds facility currently.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA HAS COMPLETED TO DATE AT THE TRADEWINDS WASTEWATER SYSTEM.**

A. The primary improvement completed to date at the Tradewinds wastewater system has been the installation of remote monitoring equipment at each lift station. As I noted earlier in my testimony, remote monitoring equipment allows live collection of data, providing continuous information on system performance and equipment status over time allowing for more precise and efficient operations, and providing operations staff with real-time information concerning system performance and equipment status. This allows for immediate identification of abnormal operating conditions and emergencies, often enabling operations staff to respond to and address problems before they can result in service interruptions.

Example of remote monitoring units installed at all lift stations.

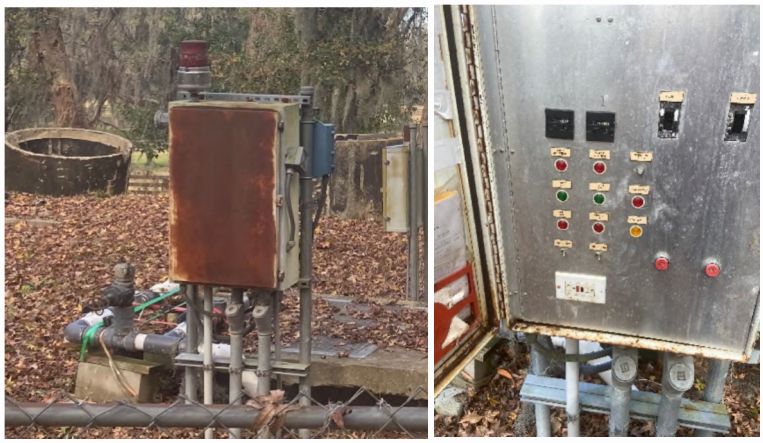
Q. **PLEASE DISCUSS IMPROVEMENTS CSWR PLANS TO COMPLETE IN THE FUTURE AT THE TRADEWINDS WASTEWATER SYSTEM.**

A. CSWR Florida has identified various additional improvements that are needed at the Tradewinds lift stations and wastewater collection system. First, four of the existing lift stations lack guiderail systems for pump maintenance. Guide rail systems allow pumps to be easily raised and lowered from the lift station wet well for maintenance or

replacement and significantly reduce the complexity of pump maintenance. Guiderail systems will be installed in the lift stations that do not currently have them.

Example of a lift station with guide rails for pump maintenance.

One of the lift stations has a control panel in poor condition with rust on the weatherproof box. This control panel and box will be replaced.



Damaged lift station control box.

Four of the lift stations lack the means to connect emergency backup power. This would typically include a generator quick connect and a manual transfer switch for switching the lift station over from grid power to emergency backup power. Quick connects and manual transfer switches will be installed at the four lift stations that do not currently have them. In addition to lacking the means to connect emergency backup power, Lift Station 3 lacks emergency bypass piping. This sort of piping allows a

mobile pump to be connected to the lift station for operation when pumps malfunction and during power outages. The discharge piping at this lift station is also in poor condition and will be replaced and bypass piping will be installed. In addition, many of the lift station sites have significant accumulation of trash, debris, discarded equipment and materials, and nuisance vegetation around the sites and site perimeters. These materials can cause damage to fencing and equipment and pose operational obstacles and hazards to operations staff. These materials are being removed from the sites. Finally, all the older lift stations have issues with fencing, either lacking fencing entirely or having areas with damaged fencing, which create issues with site security. CSWR Florida will install, repair, or replace fencing where necessary.

Damaged unused manhole rings, trash, and vegetation overgrowth at Tradewinds l.ft station site, including vegetation causing fence damage (le.fi). Tradewinds l.ft station lacking fencing (righı).

O. TKCB/Sun Lake Estates Wastewater

Q. **PLEASE DESCRIBE SUN LAKE ESTATES WASTEWATER AS IT EXISTED AT ACQUISITION.**

A. The Sun Lake Estates wastewater system is a wastewater treatment facility and collection system serving 287 equivalent residential connections in Brevard County.

CSWR Florida closed on its acquisition of the wastewater system formerly owned by TKCB, Inc. on December 27, 2023. On its FDEP domestic wastewater facility permit (FLA010353), this wastewater system is known as the Sun Lake Estates wastewater treatment facility so I will refer to it as that in my testimony.

The Sun Lake Estates wastewater system consists of a gravity collection system, one influent lift station, one approximately 150,000 gallon concrete treatment tank subdivided into six separate cells operating as an extended aeration domestic wastewater treatment plant, two separate approximately 5,000 gallon concrete tanks (one used as a digester, the other as a chlorine contact chamber), three groundwater monitoring wells, and eight rapid infiltration cells occupying approximately 12 acres.

Q. **PLEASE PROVIDE AN OVERVIEW OF THE CONDITION OF THE SUN LAKE ESTATES WASTEWATER SYSTEM WHEN IT WAS ACQUIRED.**

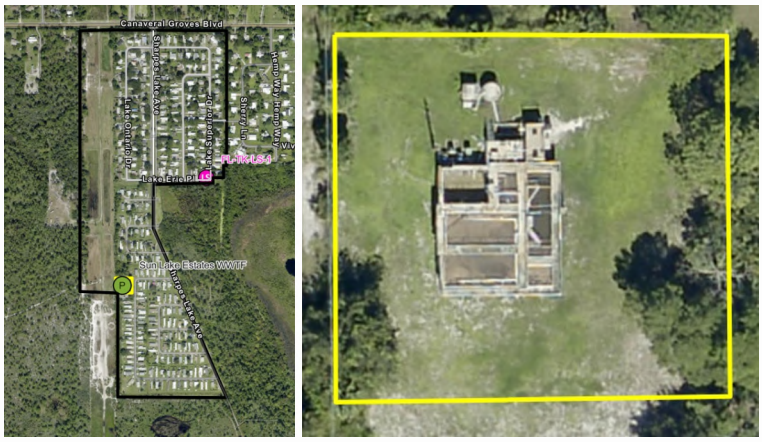
A. Several issues of concern existed with the Sun Lake Estates wastewater facility's condition when acquired by CSWR Florida. Many assets require repairs, improvements, or replacement to ensure the facility can be safely operated, can reliably complete wastewater treatment, and can be adequately maintained in the future. At acquisition, CSWR Florida identified the following conditions of concern:

- Blower electric panels were in poor condition, blower motors had reached the end of their useful lives, and blowers lacked belt shrouds and covers,
- A tank containing sodium hypochlorite lacks spill containment and no shade structure, which would accelerate breakdown of disinfection chemicals,
- The chlorine pump is reaching end of its useful life and lacks any means to vary dosing rate,
- No remote monitoring was present at lift station or the treatment facility, and the facility lacked active flow monitoring,

- Portions of the facility lacked protective covers over tank openings along catwalks, which could cause trip and fall hazards, and some handrails were loose or were installed at too low a height,
- Nuisance vegetation, trash, and debris were located around the rapid infiltration area and plant property line. In some areas this had caused damage to fencing, which contributed to poor condition fencing around treatment facility,
- Aeration piping and diffusers were deteriorating and in need of repairs, replacement, and improvements,
- Nuisance solids were entering the facility, which lacked any effective means to divert such solids from the treatment process,
- The influent/RAS splitter box was in poor condition and causing splattering of wastewater and sludge,
- Many areas with cracks and some leaks were noted on concrete treatment tanks,
- There was no emergency backup power at the treatment plant,
- Fencing was in poor condition and was missing in some locations around the rapid infiltration area,
- Various collection system deficiencies were noted, including leaks and breaks, missing or buried cleanouts and manholes, broken manhole rings, and missing manhole covers.

Q. **DO YOU HAVE ANY OVERVIEW PHOTOS OF THE SUN LAKE ESTATES WASTEWATER SYSTEM?**

A. Yes, please see the photographs below showing an aerial view of the Sun Lake Estates wastewater treatment facility and a ground level overview.



Aerial view of the Sun Lake Estates Community (left) and of the wastewater treatment facility (right).

Ground level views of the Sun Lake Estates wastewater treatment facility at acquisition.

Q. **PLEASE PROVIDE A SUMMARY OF THE COMPLIANCE HISTORY OF THE SUN LAKES ESTATES SYSTEM UNDER PREVIOUS OWNERSHIP.**

A. There is not a significant history of noncompliance at the Sun Lake Estates facility. In the five years immediately preceding the system's acquisition by CSWR Florida the only noncompliance incident noted in the FDEP database was an inspection report with findings of noncompliance resulting in a Compliance Assistance Offer. The issues noted requiring corrective action in the inspection were that the facility failed to complete items noted in the permit compliance schedule. Specifically, the facility failed to remove grit from surge tank, repair tank leaks, and register and begin using

EzDMR system within 6 months of permit effective date. While the tanks had been patched, the inspector noted that tanks had continued to leak around the new patches. The inspector also noted the facility had exceeded its design flow rate in the most recent annual average flow rate but that this was not considered to be noncompliance. The utility responded to the Compliance Assistance Offer to the satisfaction of FDEP and the CAO was closed without incident. The facility is not currently subject to any compliance agreements.

Q. **PLEASE DESCRIBE IMPROVEMENTS TO THE SYSTEM CSWR FLORIDA HAS COMPLETED TO DATE.**

A. At acquisition, the blower motors and blower control panel were reaching the end of their useful lives, and the blowers lacked belt shrouds and covers. Well-functioning blower motors ensure full power is delivered to the aeration system. Belt shrouds prevent debris from snagging in belts, which can prevent damage, and ensure operator safety. Shade covers protect the blowers from overheating and the elements and reduce ambient sound from the blower operation. These benefits extend the useful lives of the blowers and reduce the likelihood of noise complaints. A shade structure has been installed over the blowers to reduce overheating and protect the blowers from the elements, blower motors and control panel have been replaced, and belt shrouds and blower covers are in the process of being installed.


Blowers at acquisition with poor condition motors, no belt shrouds or covers.

New blower motors installed, control panel components replaced, and shade structure installed. New remote monitoring unit is also installed under shade structure.

At acquisition, disinfection chemical storage was accomplished through a 200-gallon drum and a 55-gallon drum used as a day tank. These were set on the ground next to the treatment plant with a chemical feed pump which ran continuously at a non-variable rate to add chlorine to the chlorine contact chamber. The system did not have spill containment, meaning any spilled chemicals leaked into the ground thereby potentially harming the environment and posing a hazard to operations staff. Staining was notable on the ground at acquisition showing evidence of chemical spills in the past. The system also lacked shade cover, which means the chemicals were vulnerable to sunlight exposure and premature degradation thereby reducing chemical potency and

requiring higher dosage rates to achieve effective disinfection. A new shade structure has been installed, a new chemical storage tank was brought in, and a new chemical feed pump installed. A spill basin has been ordered and will soon be added to contain any spills that occur in the future. The new feed pump has a variable rate to adjust to peak usage hours, with higher dosing while reducing the flow rate during lower usage periods, reducing overall chemical usage.

Chemical storage before (left) and after (right) improvement. Note dead grass and chemical storage around old tank indicating chemical spills and disorganized arrangement.

No remote monitoring equipment was installed at the treatment plant or lift station at the time of acquisition, and no active flow monitoring equipment was present at the treatment plant. CSWR Florida has installed remote monitoring equipment at the treatment plant and the lift station. A new flow meter has also been installed to allow for active measurement of flow through the remote monitoring system. This included adding a weir plate and ultrasonic flow meter to the chlorine contact chamber.

New remote monitoring units are installed at treatment facility and lift station.

New ultrasonic flow meter was installed in chlorine contact chamber. Top Left: contact chamber pit with ultrasonic meter pointed at water surface, Top Right: weir plate allowing for water level to be calibrated for flow rate, Bottom: meter controller.

At acquisition, there were several operator safety issues noted at the facility. Some of the handrails around the facility treatment basins were loose to the touch and

offered little or no support; some of the handrails were installed at a lower than ideal height, which created the potential for falling over the rails and making them difficult to grab for support; and the digestor and chlorine contact basins lacked covers, which created open leading edges where an operator could fall into a basin. The handrails have been secured, and handrail heights have been adjusted where necessary. Where it was possible to locate the covers for the uncovered basins, they were placed back over the open basins. Where covers were missing, new covers were fabricated and installed to ensure operator safety.

Missing covers on basins posing hazard to operations staff.

Covers replaced or added to ensure operator safety.

Finally, some general facility cleanup and maintenance activities have been completed or are underway. Trash, debris, and nuisance vegetation had accumulated

around the facility grounds, boundaries, and rapid infiltration area and its boundaries. The vegetation caused or contributed to fence damage in some locations around the plant and rapid infiltration area. In addition, some portions of the rapid infiltration area lacked fencing, potentially compromising site security. Gates were damaged or missing at several entrances, as well. Trash, debris, and vegetation have been removed, and fencing and gates around the facility have been repaired or replaced.

Examples of damaged fencing and gates at the Sun Lake Estates Facility at acquisition.

New gates and fencing installed by CSWR Florida.

Q. **PLEASE DESCRIBE IMPROVEMENTS CSWR FLORIDA PLANS TO COMPLETE IN THE FUTURE AT THE SUN LAKE ESTATES WASTEWATER SYSTEM.**

A. Further improvements are required for the Sun Lake Estates system to ensure the

facilities are in a safe and operable condition so that the facility can consistently meet regulatory requirements and comply with standards, and to ensure that the facilities can be properly maintained in the future. While much work has already been performed on the facility blowers, other improvements to the aeration system are needed. Most of the aeration piping at the facility, including portions of the air header, diffusers, drop legs, and other aeration piping, are constructed from PVC piping, which is not a good material for aeration piping or above ground piping because exposure to heat and ultraviolet light in sunlight can cause the piping to degrade over time. This leads to air leaks that reduce the treatment effectiveness and shorten the useful life of facilities and equipment. Those sections of the aeration piping constructed from PVC will be replaced with proper steel aeration piping to ensure proper function and a longer useful life.

PVC aeration piping throughout facility to be replaced with proper materials.

Issues related to influent screening, influent and return active sludge splitter box, and the sludge return splitter box also are being addressed. In the facility's current configuration, the bar screen is difficult to access, requiring operations staff to lean precariously over the influent basin making its current location problematic. In addition, operations staff must manually clean the screen to prevent nuisance solids

from entering the facility. As a result, the bar screen regularly fills with solids. The splitter box serves direct wastewater and returned active sludge from the clarifier to different portions of the aeration basins. The box's interior is in poor condition and will require replacement. CSWR Florida plans to replace existing facilities and equipment so influent flows directly into the splitter box through a new bar screen. This will allow easier cleaning of the bar screen with the splitter directing flow into the treatment basins. With these changes only excessive flows will be stored in the influent basin instead of the current design that directs all flow to the influent basin. This will improve the operational configuration of the facility.

Current configuration of splitter box and bar screen (left) and photo of bar screen filling with solids, note bar screen is not easily accessible by the protected walkways and hangs over the influent basin and frequently overfills with solids.

Condition of splitter box. Note interior rust and corrosion.

Another ongoing issue with the treatment plant is the condition of the concrete treatment tanks. There are cracks in the structures that have been repaired with exterior patching, but the tanks continue to leak into the facility. Leaking of partially treated or untreated wastewater is unacceptable because it represents unauthorized releases to the environment. Over time, it also will result in the cracks in the tank worsening. CSWR Florida will work to patch the interior and exterior of each crack, instead of relying on exterior patching alone, to ensure that the leaks are properly and permanently resolved.

Examples of leaks throughout tanks, and context for leaks along the outside of most tanks. Note that all these leaks show signs of previous repair attempts consisting of mortar patching on the exterior or steel plates mounted on the exterior and leaking continued around repairs.

As I previously testified, at acquisition no emergency backup power was present at the wastewater treatment site. An emergency generator will be installed to allow continued operation of the plant during power outages. As I also previously noted, fencing at the facility was damaged, primarily by uncontrolled overgrowth of vegetation. While new fencing and gates have been installed around the wastewater treatment facility, the fencing around the rapid infiltration area still needs to be replaced and CSWR Florida plans to do so to, among other things, prevent trespass into the

effluent dispersion area. In addition, as shown in the photos presented previously, a protected species (gopher tortoises) has been observed in the rapid infiltration area. Therefore, any work performed in the area will have to be evaluated to determine if protective measures, relocation, or permitting will be required to ensure the tortoises are not negatively impacted by the work performed. Finally, issues regarding the collection system will continue to be addressed on an ongoing basis. This includes repairing leaks and breaks as they are identified, working to locate any buried manholes and cleanouts and expose them (potentially requiring installation of new risers), repairing or replacing any missing or damaged manhole covers, and repair to any damaged manhole rings.

P. BFF Corp./Sandlin Woods Wastewater

Q. **PLEASE DESCRIBE THE SANDLIN WOODS WASTEWATER SYSTEM AS IT EXISTED AT THE TIME OF ITS ACQUISITION BY CSWR FLORIDA.**

A. The Sandlin Woods wastewater system is a purchased treatment wastewater collection system serving 113 equivalent residential connections in Marion County. The wastewater system serves a subdivision in the northwest portion of Ocala. CSWR Florida closed on its acquisition of the wastewater system formerly owned by BFF Corp. on November 30, 2023. When this system operated its own wastewater treatment facility the facility was permitted by FDEP as the "Sandlin Woods" wastewater treatment facility. The "Sandlin Woods" name is still used so that is how I will refer to the system in my testimony. Since May 2001, Sandlin Woods collects wastewater and conveys flows to the Crownwood wastewater treatment facility ("Crownwood WWTF") owned and operated by Sunshine Water Services Company (formerly known as Utilities, Inc. Of Florida). At acquisition, the Sandlin wastewater system consisted of gravity collection flowing to one of three lift stations depending on which portion of

the service area lines are located. Two of the lift stations convey wastewater via force main to the main lift station located in the Northeast portion of the service area, which then conveys wastewater flows to the Crownwood WWTF. None of the lift stations included emergency generators or quick connects for connecting a mobile emergency generator. The main lift station and the lift station located at the Forest Hill Subdivision were evaluated to be in fair condition, while the one at the Village of Ascot Health facility was evaluated to be in good condition.

Q. **PLEASE PROVIDE AN OVERVIEW OF THE CONDITION OF THE SANDLIN WOODS WASTEWATER SYSTEM WHEN IT WAS PURCHASED.**

A. Various components of the Sandlin Woods wastewater collection system were in poor condition or were otherwise in need of improvement at the time of acquisition. Issues with the system that CSWR Florida identified at the time of acquisition include the following:

- No remote monitoring systems were present at lift stations
- Security fencing was in poor condition at main lift station
- Discharge piping was in poor condition at main lift station
- The valve box cover was damaged at main lift station
- The control panel at the main lift station was in poor condition
- No bypass pump piping was present at Forest Hill lift station
- The control panel was in poor condition at Forest Hill lift station
- No security fencing was present at Forest Hill lift station
- No security fencing was present at Ascot Health lift station
- No emergency generator quick connects were present at any of the lift stations
- No guide rail systems for pump maintenance were present at any of the lift

stations

- Pumps used in the system were approaching the end of their useful lives at all lift stations

Q. **DO YOU HAVE ANY OVERVIEW PHOTOS OF THE SANDLIN WOODS WASTEWATER SYSTEM?**

A. Yes, the photos below show an aerial view of the Sandlin Woods wastewater system and of each lift station.

Aerial view of the Sandlin Woods Community.

Sandlin Woods Main Lift Station at the time of acquisition

Sandlin Woods Village of Ascot Health Lift Station at the time of acquisition, note lack of security fencing.

Sandlin Woods Village of Forest Hill Subdivision Lift Station at the time of acquisition, note lack of security fencing.

Q. **PLEASE DESCRIBE THE COMPLIANCE HISTORY OF THE SANDLIN WOODS SYSTEM UNDER PREVIOUS OWNERSHIP.**

A. The Sandlin Woods wastewater system is not subject to any compliance agreements and there is no FDEP compliance history for the system because the wastewater treatment facility was decommissioned in 2001, and the system was converted to a purchased treatment collection system conveying its wastewater to the Crownwood WWTF.

Q. **PLEASE DISCUSS IMPROVEMENTS COMPLETED TO DATE AT THE SANDLIN WOODS WASTEWATER SYSTEM.**

A. Various improvements have been made to date to the Sandlin Woods wastewater system. Remote monitoring equipment has been installed at all three lift stations.

Remote monitoring installed at lift stations (left Main Lift Station, center Ascot Health lift station, right Forest Hill lift station)

Security fencing around the main lift station site was in poor condition, so to ensure site security the fencing has been replaced.

Example of fencing damage at the main lift station site (left) and new fencing (right)

In addition, the discharge piping at the main lift station was in poor condition. To prevent leaks of wastewater and ensure proper operation, the discharge piping has been replaced.

Improper repairs to discharge piping at main lift station with PVC and rachet straps (left) and new discharge piping (right)

Other miscellaneous improvements also have been made, as needed, including maintenance of cleanouts and repairs to leaking or broken collection system lines.

Q. **PLEASE DISCUSS IMPROVEMENTS CSWR FLORIDA PLANS TO COMPLETE IN THE FUTURE AT THE SANDLIN WOODS WATER SYSTEM.**

A. Further improvements are needed at the Sandlin Woods wastewater system to ensure

the facilities are in a safe and operable condition, and to ensure the facilities can be maintained moving forward. All three lift stations require some common improvements. First, none of the lift stations included the means to connect an emergency generator. Being able to connect a generator allows lift stations to be operated during power failures with enough frequency to prevent service interruptions, backups, or overflows. None of the lift stations included guide rails for servicing lift station pumps. Rails make it safer and easier to lift pumps for service and help to extend the useful life of the pumps. Finally, the pumps in the lift stations were approaching the end of useful lives and no service records were available to enable CSWR Florida to determine if proper pump maintenance had been completed under previous ownership. To ensure the pumps are in good operable condition for the future, all pumps have been slated for replacement.

Note example of lack of guide rail lifting system for pump maintenance in the Sandlin Woods lift stations.

The main lift station has several other planned improvements. The valve box cover is damaged and in need of replacement to extend the useful life of the valves. The power and control panels were also in poor condition and did not include the means to connect a mobile backup generator.

Valve box cover allowing water infiltration (left) and poor condition power and control panels (right) at main lift station.

Several additional improvements are also needed at the Forest Hill lift station. First, the lift station lacks emergency bypass piping, which allows a mobile pump to be connected to operate the lift station in the event of a pump or power failure or outage. This ensures continuous operation during maintenance activities and emergencies, thus preventing service interruptions. The control panel at the Forest Hill lift station is also in poor condition and should be replaced to prevent failure leading to service interruption. Finally, both the Forest Hill and Ascot Health lift stations lack security fencing, which should be installed to ensure site security.

CSWR Florida has made, or has plans to make in the future, all the repairs, replacements, and upgrades to the Sandlin Woods facility I just mentioned.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes.

Public Fire Hydrants Schedule **Florida Public Service Commission**

Company: CSWR-Florida (Aquarina) **Schedule: E-6**
Docket No.: 20250052 **Page 1 of 1**
Test Year Ended: 1/31/2025 **Preparer: Todd Thomas**

Explanation: Provide a schedule of public fire hydrants (including standpipes, etc.) by size. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	4 1/2" - 5 1/4"	Mueller Super Centurion 250 Wet Barrel 3 Way	40
Total			40

Public Fire Hydrants Schedule

Florida Public Service Commission

Company: CSWR-Florida (BFF)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of public fire hydrants (including standpipes, etc.) by size. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	CSWR-Florida (BFF) provides wastewater service only, therefore		
2	this schedule is not applicable.		

Public Fire Hydrants Schedule

Florida Public Service Commission

Company: CSWR-Florida (C.F.A.T. H2O, INC.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of public fire hydrants (including standpipes, etc.) by size. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	CSWR-Florida (C.F.A.T. H2O, INC.) does not have any public fire hydrants in this area;		
2	therefore this schedule is not applicable.		

Public Fire Hydrants Schedule | **Florida Public Service Commission**

Company: CSWR-Florida (Neighborhood Utilities) | **Schedule: E-6**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: Provide a schedule of public fire hydrants (including standpipes, etc.) by size. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	4.5" - 5.25"	Standard Wet Barrel Mueller and American Darling	27
Total			27

Public Fire Hydrants Schedule | **Florida Public Service Commission**

Company: CSWR-Florida (North Peninsula) | **Schedule: E-6**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: Provide a schedule of public fire hydrants (including standpipes, etc.) by size. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	CSWR-Florida (North Peninsula) provides wastewater service only, therefore		
2	this schedules is not applicable.		

Public Fire Hydrants Schedule

Florida Public Service Commission

Company: CSWR-Florida (Rolling Oaks)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of public fire hydrants (including standpipes, etc.) by size. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	4.5" - 5.25"	Standard Wet Barrel	268
Total			268

Public Fire Hydrants Schedule | **Florida Public Service Commission**

Company: CSWR-Florida (Sebring Ridge Utilities, INC.) | **Schedule: E-6**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: Provide a schedule of public fire hydrants (including standpipes, etc.) by size. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	CSWR-Florida (Sebring Ridge Utilities, INC.) provides wastewater service only, therefore		
2	this schedule is not applicable.		

Public Fire Hydrants Schedule

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule: E-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of public fire hydrants (including standpipes, etc.) by size. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	4.5" - 5.25"	Standard Wet Barrel: Mueller and American Darling	1
2	5.25"	Standard Wet Barrel: Clow	8
3	3" - 4"	FDC Standpipe with valve and cap	1
4	3" - 4"	FDC Standpipe with valve and cap	1
5	4.5" -5.25"	Standard Wet Barrel	1
6	3" - 4"	FDC Standpipe with valve and cap	1
7	3" - 4"	FDC Standpipe with valve and cap	1
Total			14

Public Fire Hydrants Schedule

Florida Public Service Commission

Company: CSWR-Florida (TKCB, Inc.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of public fire hydrants (including standpipes, etc.) by size. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	CSWR-Florida (TKCB, Inc.) provides wastewater service only, therefore		
2	this schedule is not applicable.		

Public Fire Hydrants Schedule | **Florida Public Service Commission**

Company: CSWR-Florida (Tradewinds Utilities, Inc.) | **Schedule: E-6**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: Provide a schedule of public fire hydrants (including standpipes, etc.) by size. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	5.25"	Standard Wet Barrel Clow	15
Total			15

Public Fire Hydrants Schedule

Florida Public Service Commission

Company: CSWR-Florida (Tymber Creek)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of public fire hydrants (including standpipes, etc.) by size. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	4.5" - 5.25"	Standard Wet Barrel	27
Total			27

Public Fire Hydrants Schedule

Florida Public Service Commission

Company: CSWR-Florida (Consolidated)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of public fire hydrants (including standpipes, etc.) by size. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity

See schedule E-6 in the individual system filings

Private Fire Protection Service

Florida Public Service Commission

Company: CSWR-Florida (Aquarina)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of private fire protection service by size of connection. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	Unknown	Unknown	1
2 Total			1

3 *CSWR-Florida – Aquarina: Tidewater Condos within the
4 Aquarina service area utilizes a private fire protection system.

Private Fire Protection Service

Florida Public Service Commission

Company: CSWR-Florida (BFF)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of private fire protection service by size of connection. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	CSWR-Florida (BFF) provides wastewater service only, therefore		
2	this schedule is not applicable.		

Private Fire Protection Service

Florida Public Service Commission

Company: CSWR-Florida (C.F.A.T. H2O, INC.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of private fire protection service by size of connection. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	CSWR-Florida (C.F.A.T. H2O, INC) does not have any private fire protection in this area;		
2	therefore this schedule is not applicable.		

Private Fire Protection Service

Florida Public Service Commission

Company: CSWR-Florida (Neighborhood Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of private fire protection service by size of connection. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	CSWR-Florida (Neighborhood Utilities) does not have any private fire protection in this area;		
2	therefore this schedule is not applicable.		

Private Fire Protection Service

Florida Public Service Commission

Company: CSWR-Florida (North Peninsula)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of private fire protection service by size of connection. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	CSWR-Florida (North Peninsula) provides wastewater service only, therefore		
2	this schedule is not applicable.		

Private Fire Protection Service

Florida Public Service Commission

Company: CSWR-Florida (Rolling Oaks)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of private fire protection service by size of connection. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	CSWR-Florida (Rolling Oaks) does not have any private fire protection in this area;		
2	therefore this schedule is not applicable.		

Private Fire Protection Service | **Florida Public Service Commission**

Company: CSWR-Florida (Sebring Ridge Utilities, INC.) | **Schedule: E-7**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: Provide a schedule of private fire protection service by size of connection. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	CSWR-Florida (Sebring Ridge Utilities, INC.) provides wastewater service only, therefore		
2	this schedule is not applicable.		

Private Fire Protection Service

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule: E-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of private fire protection service by size of connection. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	This utility does not have any private fire protection; therefore this schedule is not applicable.		

Private Fire Protection Service

Florida Public Service Commission

Company: CSWR-Florida (TKCB, Inc.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of private fire protection service by size of connection. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	CSWR-Florida (TKCB, Inc.) provides wastewater service only, therefore		
2	this schedule is not applicable.		

Private Fire Protection Service

Florida Public Service Commission

Company: CSWR-Florida (Tradewinds Utilities, Inc.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of private fire protection service by size of connection. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	This utility does not have any private fire protection; therefore this schedule is not applicable.		

Private Fire Protection Service

Florida Public Service Commission

Company: CSWR-Florida (Tymber Creek)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of private fire protection service by size of connection. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity
1	This utility does not have any private fire protection; therefore this schedule is not applicable.		

Private Fire Protection Service

Florida Public Service Commission

Company: CSWR-Florida (Consolidated)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule: E-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of private fire protection service by size of connection. This schedule is not required for a wastewater only rate application.

(1) Line No.	(2) Size	(3) Type	(4) Quantity

See schedule E-7 in the individual system filings

Gallons of Wastewater Treated
In Thousands of Gallons

Company: CSWR-Florida (Aquarina)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Florida Public Service Commission

Schedule F-2
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of gallons of wastewater treated by individual plant for each month of the historical test year. Flow data should match the monthly operating reports sent to DEP.

Month/ Year	(1) Aquarina WWTP	(2) Individual Plant Flows (Name)	(3) Individual Plant Flows (Name)	(4) Individual Plant Flows (Name)	(5) Total Plant Flows	(6) Total Purch. Sewage Treatment
Feb-24	46,000.00				46,000.00	
Mar-24	58,000.00				58,000.00	
Apr-24	34,355.00				34,355.00	
May-24	45,100.00				45,100.00	
Jun-24	35,019.00				35,019.00	
Jul-24	36,230.00				36,230.00	
Aug-24	41,861.00				41,861.00	
Sep-24	44,252.00				44,252.00	
Oct-24	40,493.00				40,493.00	
Nov-24	44,000.00				44,000.00	
Des-24	37,000.00				37,000.00	
Jan-25	53,000.00				53,000.00	
Total	515,310.00				515,310.00	

Gallons of Wastewater Treated
In Thousands of Gallons

Company: CSWR-Florida (BFF)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Florida Public Service Commission

Schedule F-2
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of gallons of wastewater treated by individual plant for each month of the historical test year. Flow data should match the monthly operating reports sent to DEP.

Month/ Year	(1) CSWR-Florida (BFF)	(2) Individual Plant Flows (Name)	(3) (Name)	(4) (Name)	(5) Total Plant Flows	(6) Total Purch. Sewage Treatment
Feb-24						368,208
Mar-24						359,015
Apr-24						-
May-24						404,106
Jun-24						-
Jul-24						617,236
Aug-24						303,814
Sep-24						506,652
Oct-24						387,116
Nov-24						505,870
Dec-24						336,805
Jan-25						383,121
Total						4,171,943

Gallons of Wastewater Treated
In Thousands of Gallons

Company: CSWR-Florida (C.F.A.T. H2O, INC.)
Docket No.: 20250052 20250052
Test Year Ended: 1/31/2025

Florida Public Service Commission

Schedule F-2
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of gallons of wastewater treated by individual plant for each month of the historical test year. Flow data should match the monthly operating reports sent to DEP.

Month/ Year	(1) Landfair WWTP	(2) Individual Plant Flows (Name)	(3) (Name)	(4) (Name)	(5) Total Plant Flows	(6) Total Purch. Sewage Treatment
Feb-24	35,000.00				35,000.00	
Mar-24	33,517.00				33,517.00	
Apr-24	34,355.00				34,355.00	
May-24	45,100.00				45,100.00	
Jun-24	35,019.00				35,019.00	
Jul-24	36,227.00				36,227.00	
Aug-24	41,861.00				41,861.00	
Sep-24	44,252.00				44,252.00	
Oct-24	40,493.00				40,493.00	
Nov-24	44,000.00				44,000.00	
Dec-24	37,000.00				37,000.00	
Jan-25	35,000.00				35,000.00	
Total	461,824.00	0.00	0.00	0.00	461,824.00	

Gallons of Wastewater Treated
In Thousands of Gallons

Company: CSWR-Florida (Neighborhood Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Florida Public Service Commission

Schedule F-2
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of gallons of wastewater treated by individual plant for each month of the historical test year. Flow data should match the monthly operating reports sent to DEP.

	(1)	(2)	(3)	(4)	(5)	(6)
	Individual Plant Flows					
Month/ Year	(Name)	(Name)	(Name)	(Name)	Total Plant Flows	Total Purch. Sewage Treatment

CSWR-Florida (Neighborhood Utilities) provides water service only, therefore this schedules is not applicable.

Gallons of Wastewater Treated
In Thousands of Gallons

Company: CSWR-Florida (North Peninsula)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Florida Public Service Commission

Schedule F-2
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of gallons of wastewater treated by individual plant for each month of the historical test year. Flow data should match the monthly operating reports sent to DEP.

Month/ Year	(1) CSWR-Florida (North Peninsula)	(2) Individual Plant Flows (Name)	(3) (Name)	(4) (Name)	(5) Total Plant Flows	(6) Total Purch. Sewage Treatment
Feb-24	46,000.00				46,000.00	
Mar-24	48,000.00				48,000.00	
Apr-24	42,000.00				42,000.00	
May-24	37,000.00				37,000.00	
Jun-24	41,000.00				41,000.00	
Jul-24	43,000.00				43,000.00	
Aug-24	39,000.00				39,000.00	
Sep-24	38,100.00				38,100.00	
Oct-24	79,400.00				79,400.00	
Nov-24	106,300.00				106,300.00	
Des-24	51,500.00				51,500.00	
Jan-25	52,300.00				52,300.00	
Total	623,600.00				623,600.00	

Gallons of Wastewater Treated
In Thousands of Gallons

Florida Public Service Commission

Schedule F-2
Page 1 of 1
Preparer: Todd Thomas

Company: CSWR-Florida (Rolling Oaks)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Explanation: Provide a schedule of gallons of wastewater treated by individual plant for each month of the historical test year. Flow data should match the monthly operating reports sent to DEP.

Month/ Year	(1) Beverly Hills WWTP	(2) Individual Plant Flows (Name)	(3) (Name)	(4) (Name)	(5) Total Plant Flows	(6) Total Purch. Sewage Treatment
Feb-24	567,200.00				567,200.00	
Mar-24	516,900.00				516,900.00	
Apr-24	521,300.00				521,300.00	
May-24	538,400.00				538,400.00	
Jun-24	545,900.00				545,900.00	
Jul-24	556,800.00				556,800.00	
Aug-24	552,300.00				552,300.00	
Sep-24	557,000.00				557,000.00	
Oct-24	555,000.00				555,000.00	
Nov-24	519,600.00				519,600.00	
Dec-24	541,600.00				541,600.00	
Jan-25	568,600.00				568,600.00	
Total	6,540,600.00				6,540,600.00	

Gallons of Wastewater Treated
In Thousands of Gallons

Florida Public Service Commission

Schedule F-2
Page 1 of 1
Preparer: Todd Thomas

Company: CSWR-Florida (Sebring Ridge Utilities, INC.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Explanation: Provide a schedule of gallons of wastewater treated by individual plant for each month of the historical test year. Flow data should match the monthly operating reports sent to DEP.

	(1)	(2)	(3)	(4)	(5)	(6)
		Individual Plant Flows				
Month/ Year	Sebring Ridge	(Name)	(Name)	(Name)	Total Plant Flows	Total Purc Sewage Treatmen
Feb-24	46,000.00				46,000.00	
Mar-24	48,000.00				48,000.00	
Apr-24	42,000.00				42,000.00	
May-24	37,000.00				37,000.00	
Jun-24	41,000.00				41,000.00	
Jul-24	43,000.00				43,000.00	
Aug-24	39,000.00				39,000.00	
Sep-24	38,100.00				38,100.00	
Oct-24	79,400.00				79,400.00	
Nov-24	106,300.00				106,300.00	
Dec-24	51,500.00				51,500.00	
Jan-25	52,300.00				52,300.00	
Total	623,600.00				623,600.00	

Gallons of Wastewater Treated
In Thousands of Gallons

Florida Public Service Commission

Schedule F-2
Page 1 of 1
Preparer: Todd Thomas

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Explanation: Provide a schedule of gallons of wastewater treated by individual plant for each month of the historical test year. Flow data should match the monthly operating reports sent to DEP.

Month/ Year	(1) (Name)	(2) (Name)	(3) (Name)	(4) (Name)	(5) Total Plant Flows	(6) Total Purch. Sewage Treatment
		Individual Plant Flows				

1 CSWR-Florida (Sunshine Utilities) provides water service only, therefore
2 this schedule is not applicable.

Gallons of Wastewater Treated
In Thousands of Gallons

Company: CSWR-Florida (TKCB, Inc.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Florida Public Service Commission

Schedule F-2
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of gallons of wastewater treated by individual plant for each month of the historical test year. Flow data should match the monthly operating reports sent to DEP.

Month/ Year	(1) Sunlakes WWTP	(2) Individual Plant Flows (Name)	(3) Individual Plant Flows (Name)	(4) Individual Plant Flows (Name)	(5) Total Plant Flows	(6) Total Purch. Sewage Treatment
Feb-24	14,200.00				14,200.00	
Mar-24	21,548.00				21,548.00	
Apr-24	21,103.00				21,103.00	
May-24	22,537.00				22,537.00	
Jun-24	21,374.00				21,374.00	
Jul-24	20,134.00				20,134.00	
Aug-24	20,822.00				20,822.00	
Sep-24	20,352.00				20,352.00	
Oct-24	20,100.00				20,100.00	
Nov-24	18,600.00				18,600.00	
Des-24	15,100.00				15,100.00	
Jan-25	15,800.00				15,800.00	
Total	231,670.00				231,670.00	

Gallons of Wastewater Treated
In Thousands of Gallons

Company: CSWR-Florida (Tradewinds Utilities, Inc.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Florida Public Service Commission

Schedule F-2
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of gallons of wastewater treated by individual plant for each month of the historical test year. Flow data should match the monthly operating reports sent to DEP.

Month/ Year	(1) (Name)	(2) Individual Plant Flows (Name)	(3) (Name)	(4) (Name)	(5) Total Plant Flows	(6) Total Purch. Sewage Treatment
Feb-24						0
Mar-24						8000
Apr-24						317000
May-24						200000
Jun-24						160000
Jul-24						137000
Aug-24						125000
Sep-24						31000
Oct-24						102000
Nov-24						125000
Dec-24						0
Jan-25						0
Total						1205000

Gallons of Wastewater Treated
In Thousands of Gallons

Company: CSWR-Florida (Tymber Creek)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Florida Public Service Commission

Schedule F-2
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide a schedule of gallons of wastewater treated by individual plant for each month of the historical test year. Flow data should match the monthly operating reports sent to DEP.

Month/ Year	(1) Tymber Creek WWTP	(2) Individual Plant Flows (Name)	(3) Individual Plant Flows (Name)	(4) Individual Plant Flows (Name)	(5) Total Plant Flows	(6) Total Purch. Sewage Treatment
Feb-24	42,000.00					42,000.00
Mar-24	27,000.00					27,000.00
Apr-24	27,000.00					27,000.00
May-24	25,000.00					25,000.00
Jun-24	15,900.00					15,900.00
Jul-24	23,500.00					23,500.00
Aug-24	37,000.00					37,000.00
Sep-24	62,400.00					62,400.00
Oct-24	66,500.00					66,500.00
Nov-24	52,300.00					52,300.00
Dec-24	46,000.00					46,000.00
Jan-25	43,600.00					43,600.00
Total	424,600.00					424,600.00

Gallons of Wastewater Treated
In Thousands of Gallons

Florida Public Service Commission

Schedule F-2
Page 1 of 1
Preparer: Todd Thomas

Company: CSWR-Florida (Consolidated)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Explanation: Provide a schedule of gallons of wastewater treated by individual plant for each month of the historical test year. Flow data should match the monthly operating reports sent to DEP.

	(1)	(2)	(3)	(4)	(5)	(6)
	Individual Plant Flows					
Month/ Year	(Name)	(Name)	(Name)	(Name)	Total Plant Flows	Total Purch. Sewage Treatment

See schedule F-2 in the individual system filings

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Aquarina)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-3
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

			DATE		GPD
1.	Plant Capacity The hydraulic rated capacity. If different from that shown on the DER operating or construction permit, provide an explanation.				75,000
2.	Maximum Day The single day with the highest pumpage rate for the test year. Explain, on a separate page, if fire flow, line-breaks or other unusual occurances affected the flow this day.		2/21/2024		148,000
3.	Five-Day Max Year The five days with the highest pumpage rate from any one month in the test year. Provide an explanation if fire flow, line-breaks or other unusual occurances affected the flows on these days.	(1) (2) (3) (4) (5)	2/20/2024 2/19/2024 2/21/2024 2/18/2024 2/22/2024	 AVERAGE	107,900 107,200 107,200 91,400 80,800 98,900
4.	Average Daily Flow				38,531
5.	Required Fire Flow The standards will be those as set by the Insurance Service Organization or by a governmental agency ordinance. Provide documents to support this calculation.				N/A

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (BFF)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-3
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

	DATE	GPD

1 CSWR-Florida (BFF) provides wastewater service only, therefore
2 this schedule is not applicable.

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (C.F.A.T. H2O, INC.)
Docket No.: 20250052 20250052
Test Year Ended: 1/31/2025

Schedule F-3
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

			DATE		GPD
1.	Plant Capacity The hydraulic rated capacity. If different from that shown on the DER operating or construction permit, provide an explanation.				360,000
2.	Maximum Day The single day with the highest pumpage rate for the test year. Explain, on a separate page, if fire flow, line-breaks or other unusual occurances affected the flow this day.		2/14/2024		98,000
3.	Five-Day Max Year The five days with the highest pumpage rate from any one month in the test year. Provide an explanation if fire flow, line-breaks or other unusual occurances affected the flows on these days.	(1) (2) (3) (4) (5)	10/7/2024 7/19/2024 7/20/2024 7/21/2024 10/6/2024		53,400 53,360 53,180 52,800 52,700
				AVERAGI	53,088
4.	Average Daily Flow				34,418
5.	Required Fire Flow The standards will be those as set by the Insurance Service Organization or by a governmental agency ordinance. Provide documents to support this calculation.				N/A

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Neighborhood Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-3
Page 1 of 1
Preparer:

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

			DATE	GPD
1.	Plant Capacity The hydraulic rated capacity. If different from that shown on the DER operating or construction permit, provide an explanation.			360,000
2.	Maximum Day The single day with the highest pumpage rate for the test year. Explain, on a separate page, if fire flow, line-breaks or other unusual occurances affected the flow this day.		2/14/2024	148,000
3.	Five-Day Max Year The five days with the highest pumpage rate from any one month in the test year. Provide an explanation if fire flow, line-breaks or other unusual occurances affected the flows on these days.	(1) (2) (3) (4) (5)	5/28/2024 5/30/2024 5/29/2024 5/31/2024 6/9/2024	118,200 115,400 111,400 109,600 108,200
			AVERAGI	112,560
4.	Average Daily Flow			77,080.60
5.	Required Fire Flow The standards will be those as set by the Insurance Service Organization or by a governmental agency ordinance. Provide documents to support this calculation.			N/A

Water Treatment Plant Data | **Florida Public Service Commission**

Company: CSWR-Florida (North Peninsula) | **Schedule F-3**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

	DATE	GPD

1 CSWR-Florida (North Peninsula) provides wastewater service only, therefore this schedules is not applicable.

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Rolling Oaks)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-3
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

			DATE		GPD
1.	Plant Capacity The hydraulic rated capacity. If different from that shown on the DER operating or construction permit, provide an explanation.				5,600,000
2.	Maximum Day The single day with the highest pumpage rate for the test year. Explain, on a separate page, if fire flow, line-breaks or other unusual occurances affected the flow this day.		6/7/2024		7,843,000
3.	Five-Day Max Year The five days with the highest pumpage rate from any one month in the test year. Provide an explanation if fire flow, line-breaks or other unusual occurances affected the flows on these days.	(1) (2) (3) (4) (5)	6/3/2024 6/6/2024 6/4/2024 6/7/2024 6/5/2024		3,701,800 3,356,000 3,315,600 3,286,600 2,962,600
				AVERAGE	3,324,520
4.	Average Daily Flow				1,820,919
5.	Required Fire Flow The standards will be those as set by the Insurance Service Organization or by a governmental agency ordinance. Provide documents to support this calculation.				N/A

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Sebring Ridge Utilities, INC.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-3
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

DATE	GPD

1 CSWR-Florida (Sebring Ridge Utilities, INC.) provides wastewater service only, therefore
2 this schedule is not applicable.

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-3
Page 1 of 6
Preparer: Todd Thomas

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

		Ashley Heights Subdivision		Belleview Oaks Estates		Country Walk Subdivision		Eleven Oaks Subdivision	
		Date	GPD	Date	GPD	Date	GPD	Date	GPD
1	Plant Capacity		44000		144000		100800		39000
2	Maximum Day	7/22/2024	19500	8/10/2024	123358	8/22/2024	110000	1/27/2025	24048
3	Five-Day Max Year								
	(1)	6/2/2024	15800	8/10/2024	112499.6	8/18/2024	32760	1/26/2025	23363.8
	(2)	6/1/2024	15780	8/9/2024	110150	8/20/2024	32640	1/25/2025	23320.4
	(3)	7/19/2024	15000	8/8/2024	107800.4	8/21/2024	32620	1/24/2025	23277
	(4)	5/31/2024	14800	8/7/2024	94716.2	8/22/2024	32600	1/23/2025	22708
	(5)	6/3/2024	14700	8/11/2024	93915	8/19/2024	32400	1/22/2025	22139
4	Average Daily Flow		9448.17		30239.31		15550.83		9062.29
5	Required Fire Flow	N/A		N/A		N/A		N/A	

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-3
Page 2 of 6
Preparer: Todd Thomas

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

		Emil-Mar Subdivision		Florida Heights Subdivision		Floyd Clark Subdivision		Fore Oaks Estates	
		Date	GPD	Date	GPD	Date	GPD	Date	GPD
1	Plant Capacity		100800		129000		166770		648000
2	Maximum Day	5/25/2024	67600	5/7/2024	94200	3/30/2024	29900	9/16/2024	411000
3	Five-Day Max Year								
	(1)	5/23/2024	66480	11/8/2024	74399.6	3/28/2024	28860	9/16/2024	122000
	(2)	5/22/2024	64860	11/7/2024	65859.6	3/23/2024	28800	9/13/2024	120200
	(3)	5/24/2024	63320	11/9/2024	64846.4	3/24/2024	28740	9/14/2024	120200
	(4)	5/21/2024	63240	11/6/2024	57319.6	3/27/2024	28720	9/15/2024	118500
	(5)	5/26/2024	60340	11/10/2024	55293.2	3/26/2024	28580	9/12/2024	117400
4	Average Daily Flow		32560.77		25554.81		13058.12		53599.73
5	Required Fire Flow	N/A		N/A		N/A		N/A	

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-3
Page 3 of 6
Preparer: Todd Thomas

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

		Hilltop At Lake Weir Subdivision		Little Lake Weir Subdivision		Oak Haven Quadruplexes		Oakcrest Villas/Sun Resort	
		Date	GPD	Date	GPD	Date	GPD	Date	GPD
1	Plant Capacity		273600		172800		170200		43000
2	Maximum Day	12/17/2024	112300	1/30/2025	143500	8/11/2024	75200	6/15/2024	8600
3	Five-Day Max Year								
	(1)	12/13/2024	88820	2/1/2024	132240	7/18/2024	41507.4	6/12/2024	6660
	(2)	12/14/2024	85540	2/2/2024	131620	7/15/2024	40532.4	6/13/2024	6540
	(3)	12/12/2024	85480	1/19/2025	131460	7/19/2024	40247	6/14/2024	6340
	(4)	12/3/2024	85200	2/3/2024	131000	7/17/2024	39449.8	6/15/2024	6300
	(5)	12/2/2024	84350	1/22/2025	130700	1/17/2025	39432.8	7/3/2024	6240
4	Average Daily Flow		55918.37		94945.34		22320.23		3490.22
5	Required Fire Flow	N/A		N/A		N/A		N/A	

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-3
Page 4 of 6
Preparer: Todd Thomas

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

		Oakhurst Subdivision		Ocala Garden Apartments		Ocala Heights Subdivision		Ocklawaha Water Works (2 WTPS)	
		Date	GPD	Date	GPD	Date	GPD	Date	GPD
1	Plant Capacity		144000		43200		525600		307440
2	Maximum Day	5/8/2024	107200	2/2/2024	8800	3/22/2024	129900	6/5/2024	154300
3	Five-Day Max Year								
	(1)	5/6/2024	53460	2/2/2024	8800	11/12/2024	107690	6/7/2024	133380
	(2)	5/4/2024	51080	2/3/2024	7880	8/9/2024	103061.4	6/13/2024	128520
	(3)	5/7/2024	51040	2/1/2024	7680	8/11/2024	102734.8	6/9/2024	127820
	(4)	5/5/2024	50540	2/4/2024	6960	11/13/2024	101310.4	6/5/2024	127390
	(5)	5/8/2024	45380	2/5/2024	5560	8/10/2024	100192.6	6/6/2024	126720
4	Average Daily Flow		26010.31		2247.04		77627.66		97253.96
5	Required Fire Flow	N/A		N/A		N/A		N/A	

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-3
Page 5 of 6
Preparer: Todd Thomas

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

		Ponderosa Pines (2 WPS)		Quail Run Subdivision		Sandy Acres		Sun Ray Estates	
		Date	GPD	Date	GPD	Date	GPD	Date	GPD
1	Plant Capacity		83520		43200		230000		504000
2	Maximum Day	5/7/2024	67300	2/3/2024	45900	5/7/2024	111000	1/12/2025	242955
3	Five-Day Max Year								
	(1)	5/6/2024	61986.6	8/17/2024	36240	5/6/2024	107800	6/1/2024	203680
	(2)	5/5/2024	60693.2	8/16/2024	34360	5/5/2024	106100	6/2/2024	197040
	(3)	5/7/2024	60173.2	7/21/2024	33980	5/7/2024	105133.2	5/30/2024	194980
	(4)	1/27/2025	59733.2	8/18/2024	33780	5/25/2024	104800	6/3/2024	189780
	(5)	5/4/2024	59399.8	7/19/2024	33540	5/4/2024	104400	5/31/2024	188420
4	Average Daily Flow		38707.67		28470.49		77263.30		144714.05
5	Required Fire Flow	N/A		N/A		N/A		N/A	

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-3
Page 6 of 6
Preparer: Todd Thomas

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

		Sunlight Acres Subdivision		Whispering Sands Subdivision		Winding Waters Subdivision	
		Date	GPD	Date	GPD	Date	GPD
1	Plant Capacity		180000		144000		240000
2	Maximum Day	10/10/2024	67650	11/11/2024	86072	1/1/2025	127000
3	Five-Day Max Year						
	(1)	10/10/2024	61099.8	11/10/2024	61542.2	1/1/2025	78666.8
	(2)	10/11/2024	58821.8	11/11/2024	60698.2	12/31/2024	78233.4
	(3)	10/9/2024	57013.2	11/9/2024	60295.6	12/30/2024	77566.6
	(4)	10/12/2024	56541.8	12/6/2024	59762.8	12/29/2024	76533.2
	(5)	10/8/2024	52926.6	12/7/2024	59478.2	12/28/2024	75499.8
4	Average Daily Flow		26265.43		42391.07		58539.51
5	Required Fire Flow	N/A		N/A		N/A	

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (TKCB, Inc.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-3
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

	DATE	GPD

CSWR-Florida (TKCB, Inc.) provides wastewater service only, therefore this schedule is not applicable.

Water Treatment Plant Data | **Florida Public Service Commission**

Company: CSWR-Florida (Tradewinds Utilities, Inc.) | **Schedule F-3**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

			DATE	GPD
1.	Plant Capacity The hydraulic rated capacity. If different from that shown on the DER operating or construction permit, provide an explanation.			950,000
2.	Maximum Day The single day with the highest pumpage rate for the test year. Explain, on a separate page, if fire flow, line-breaks or other unusual occurances affected the flow this day.		6/2/2024	501,000
3.	Five-Day Max Year The five days with the highest pumpage rate from any one month in the test year. Provide an explanation if fire flow, line-breaks or other unusual occurances affected the flows on these days.	(1) (2) (3) (4) (5)	6/1/2024 6/2/2024 5/30/2024 5/31/2024 6/3/2024	351,400 349,800 347,000 342,600 289,000 AVERAGE 335960
4.	Average Daily Flow			213,328
5.	Required Fire Flow The standards will be those as set by the Insurance Service Organization or by a governmental agency ordinance. Provide documents to support this calculation.			N/A

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Tymber Creek)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-3
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

DATE	GPD

1 The CSWR-Florida (Tymber Creek) water facility is a purchased facility.
2 Therefore, this schedule is not applicable.

Water Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Consolidated)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-3
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide the following information for each water treatment plant. If the system has water plants that are interconnected, the data for these plants may be combined. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

See schedule F-3 in the individual system filings

Wastewater Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Aquarina)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-4
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide the following information for each wastewater treatment plant. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

		MONTH	GPD
1.	Plant Capacity The hydraulic rated capacity. If different from that shown on the DER operating or construction permit, provide an explanation.		99,000
2.	Average Daily Flow Max Month An average of the daily flows during the peak usage month during the test year. Explain, on a separate page, if this peak-month was influenced by abnormal infiltration due to rainfall periods.	Feb	58,000.00

Wastewater Treatment Plant Data | **Florida Public Service Commission**

Company: CSWR-Florida (BFF) | **Schedule F-4**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: Provide the following information for each wastewater treatment plant. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

	MONTH	GPD

The CSWR-Florida (BFF) wastewater treatment facility is a purchased facility that consists solely of a collection system with three lift stations and does not include an on-site treatment plant. All wastewater is conveyed off-site for treatment by a third party. Therefore, this schedule is not applicable.

Wastewater Treatment Plant Data | **Florida Public Service Commission**

Company: CSWR-Florida (C.F.A.T. H2O, INC.)
Docket No.: 20250052 20250052
Test Year Ended: 1/31/2025

Schedule F-4
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide the following information for each wastewater treatment plant. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

		MONTH	GPD
1.	Plant Capacity The hydraulic rated capacity. If different from that shown on the DER operating or construction permit, provide an explanation.		99,000
2.	Average Daily Flow Max Month An average of the daily flows during the peak usage month during the test year. Explain, on a separate page, if this peak-month was influenced by abnormal infiltration due to rainfall periods.	Apr	45,100

Wastewater Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Neighborhood Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-4
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide the following information for each wastewater treatment plant. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

MONTH	GPD

CSWR-Florida (Neighborhood Utilities) provides water service only, therefore this schedules is not applicable.

Wastewater Treatment Plant Data | **Florida Public Service Commission**

Company: CSWR-Florida (North Peninsula) | **Schedule F-4**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: Provide the following information for each wastewater treatment plant. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

		MONTH	GPD
1.	Plant Capacity The hydraulic rated capacity. If different from that shown on the DER operating or construction permit, provide an explanation.		181,000
2.	Average Daily Flow Max Month An average of the daily flows during the peak usage month during the test year. Explain, on a separate page, if this peak-month was influenced by abnormal infiltration due to rainfall periods.	Oct	106,300

Wastewater Treatment Plant Data | **Florida Public Service Commission**

Company: CSWR-Florida (Rolling Oaks) | **Schedule F-4**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: Provide the following information for each wastewater treatment plant. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

		MONTH	GPD
1.	Plant Capacity The hydraulic rated capacity. If different from that shown on the DER operating or construction permit, provide an explanation.		1,000,000
2.	Average Daily Flow Max Month An average of the daily flows during the peak usage month during the test year. Explain, on a separate page, if this peak-month was influenced by abnormal infiltration due to rainfall periods.	Jan	568,600

Wastewater Treatment Plant Data | **Florida Public Service Commission**

Company: CSWR-Florida (Sebring Ridge Utilities, INC.) | **Schedule F-4**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: Provide the following information for each wastewater treatment plant. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

		MONTH	GPD
1.	Plant Capacity The hydraulic rated capacity. If different from that shown on the DER operating or construction permit, provide an explanation.		181,000
2.	Average Daily Flow Max Month An average of the daily flows during the peak usage month during the test year. Explain, on a separate page, if this peak-month was influenced by abnormal infiltration due to rainfall periods.	OCT	106,300

Wastewater Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-4
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide the following information for each wastewater treatment plant. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

	MONTH	GPD

1 CSWR-Florida (Sunshine Utilities) provides water service only, therefore
2 this schedule is not applicable.

Wastewater Treatment Plant Data | **Florida Public Service Commission**

Company: CSWR-Florida (TKCB, Inc.) | **Schedule F-4**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: Provide the following information for each wastewater treatment plant. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

		MONTH	GPD
1.	Plant Capacity The hydraulic rated capacity. If different from that shown on the DER operating or construction permit, provide an explanation.		99,000
2.	Average Daily Flow Max Month An average of the daily flows during the peak usage month during the test year. Explain, on a separate page, if this peak-month was influenced by abnormal infiltration due to rainfall periods.	APR	22,537

Wastewater Treatment Plant Data | **Florida Public Service Commission**

Company: CSWR-Florida (Tradewinds Utilities, Inc.) | **Schedule F-4**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: Provide the following information for each wastewater treatment plant. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

MONTH	GPD

The CSWR-Florida (Tradewinds Utilities, Inc.) wastewater treatment facility is a purchased facility that consists solely of a collection system with four lift stations and does not include an on-site treatment plant. All wastewater is conveyed off-site for treatment by a third party. Therefore, this schedule is not applicable.

Wastewater Treatment Plant Data | **Florida Public Service Commission**

Company: CSWR-Florida (Tymber Creek)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-4
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide the following information for each wastewater treatment plant. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

		MONTH	GPD
1.	Plant Capacity The hydraulic rated capacity. If different from that shown on the DER operating or construction permit, provide an explanation.		131,000
2.	Average Daily Flow Max Month An average of the daily flows during the peak usage month during the test year. Explain, on a separate page, if this peak-month was influenced by abnormal infiltration due to rainfall periods.	Oct	66,500.00

Wastewater Treatment Plant Data

Florida Public Service Commission

Company: CSWR-Florida (Consolidated)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-4
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide the following information for each wastewater treatment plant. All flow data must be obtained from the monthly operating reports (MORs) sent to the Department of Environmental Protection.

See schedule F-4 in the individual system filings

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Aquarina)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-5
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

	Line No.					
	1	INPUT INFORMATION:				
	2	**Water Treatment System**				
	3	Number of Wells			1	
	4	Total Well Capacity, gpm			52	gpm
(E)	5	Firm Reliable Well pumping Capacity (largest well out), gpm			52	gpm
	6	Firm Reliable Well pumping Capacity (largest well out), gpd			50,000	gpd
	7	Peak Day Demand			148,000	gpd
(A)	8	Peak Hour Demand = 2 x Maximum Day / 1440			206	gpm
(C)	10	Fire Flow Requirement	0 gpm	2 Hours	-	gpd
	11	Fire Flow Requirement			-	gpm
	12	Unaccounted For Water	39.00%		15,025.91	gpd, avg
	13	Acceptable Unaccounted For	10.00%		3,853.06	gpd, avg
(D)	14	Excess Unaccounted for			11,173	gpd, avg
(B)	15	Property Needed to Serve			-	gpm
	16	Used and Useful Analysis, in accordance with Rule 25-30.4325:				
	17	Treatment System (Peak Demand / Firm Reliable Capacity)			100.0%	
	18	**Storage Facilities**				
	19	Ground Storage Capacity, gal.			250,000	gallons
	20	Usable Ground Storage (90%), gal			225,000	gallons
	21	Elevated Storage			-	gallons
	22	Usable Elevated Storage			-	gallons
	23	Hydropneumatic Storage Capacity, gal.			5,000	gallons
	24	Usable Hydropneumatic Storage Capacity (0%), gal.			-	gallons
	25	Total Usable Storage, gal.			225,000	gallons
	26	Used and Useful Analysis, in accordance with Rule 25-30.4325:				
	27	Storage Facilities (Peak Demand / Usable Storage)			65.8%	
	28	Please note that the used and useful percentage for the water storage facilities reflects that the facility				
	29	was constructed with excess capacity to accommodate anticipated future development.				

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (BFF)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-5
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

CSWR-Florida (BFF) provides wastewater service only, therefore this schedules is not applicable.

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (C.F.A.T. H2O, INC.)
Docket No.: 20250052 20250052
Test Year Ended: 1/31/2025

Schedule F-5
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

Line No.					
1	INPUT INFORMATION:				
2	Water Treatment System				
3	Number of Wells			3	
4	Total Well Capacity, gpm			250	gpm
5	Firm Reliable Well pumping Capacity (largest well out), gpm			250	gpm
6	Firm Reliable Well pumping Capacity (largest well out), gpd			240,000	gpd
7	Peak Day Demand			98,000	gpd
8	Peak Hour Demand = 2 x Maximum Day / 1440			136	gpm
9	Fire Flow Requirement	0 gpm	2 Hours	-	gpd
10	Fire Flow Requirement			-	gpm
11	Unaccounted For Water	27%		9,126.03	gpd, avg
12	Acceptable Unaccounted For	10%		3,441.76	gpd, avg
13	Excess Unaccounted for			5,684.28	gpd, avg
			27%		
14	Property Needed to Serve			0	gpm
15	Used and Useful Analysis, in accordance with Rule 25-30.4325:				
16	Treatment System (Peak Demand / Firm Reliable Capacity)			38%	
17	Storage Facilities				
18	Ground Storage Capacity, gal.			200,000	gallons
19	Usable Ground Storage (90%), gal			180,000	gallons
20	Elevated Storage			-	gallons
21	Usable Elevated Storage			-	gallons
22	Hydropneumatic Storage Capacity, gal.			20,000	gallons
23	Usable Hydropneumatic Storage Capacity (0%), gal.			-	gallons
24	Total Usable Storage, gal.			180,000	gallons
25	Used and Useful Analysis, in accordance with Rule 25-30.4325:				
26	Storage Facilities (Peak Demand / Usable Storage)			54%	
27	Please note that the used and useful percentage for the water storage facilities				
28	reflects that the facility was constructed with excess capacity to accomodate				
29	anticipated future development.				

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Neighborhood Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-5
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

Line No.					
1	INPUT INFORMATION:				
2	Water Treatment System				
3	Number of Wells			2	
	Total Well Capacity, gpm			250	gpm
	Firm Reliable Well pumping Capacity (largest well out), gpm			250	gpm
	Firm Reliable Well pumping Capacity (largest well out), gpd			240,000.00	gpd
	Peak Day Demand			148,000.00	gpd
	Peak Hour Demand = 2 x Maximum Day / 1440			205.5555556	gpm
	Fire Flow Requirement	0 gpm	2 Hours	0	gpd
	Fire Flow Requirement			0	gpm
	Unaccounted For Water	38%		29,022.69	gpd, avg
	Acceptable Unaccounted For	10%		7,708.06	gpd, avg
	Excess Unaccounted for			21,314.63	gpd, avg
	Property Needed to Serve			0	gpm
	Used and Useful Analysis, in accordance with Rule 25-30.4325:				
	Treatment System (Peak Demand / Firm Reliable Capacity)			53%	
	Storage Facilities				
	Ground Storage Capacity, gal.			60,000.00	gallons
	Usable Ground Storage (90%), gal			54,000.00	gallons
	Elevated Storage			0	gallons
	Usable Elevated Storage			0	gallons
	Hydropneumatic Storage Capacity, gal.			5,000.00	gallons
	Usable Hydropneumatic Storage Capacity (0%), gal.			0	gallons
	Total Usable Storage, gal.			54,000.00	gallons
	Used and Useful Analysis, in accordance with Rule 25-30.4325:				
	Storage Facilities (Peak Demand / Usable Storage)			100%	

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (North Peninsula)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-5
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

CSWR-Florida (North Peninsula) provides wastewater service only, therefore this schedules is not applicable.

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Rolling Oaks)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-5
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

Line No.					
1	INPUT INFORMATION:				
2	Water Treatment System				
3	Number of Wells			9	
4	Total Well Capacity, gpm			3,888.89	gpm
5	Firm Reliable Well pumping Capacity (largest well out), gpm			3,888.89	gpm
6	Firm Reliable Well pumping Capacity (largest well out), gpd			3,733,333.33	gpd
7	Peak Day Demand			7,843,000.00	gpd
8	Peak Hour Demand = 2 x Maximum Day / 1440			10,893.06	gpm
9	Fire Flow Requirement	0 gpm	2 Hours	-	gpd
10	Fire Flow Requirement			-	gpm
11	Unaccounted For Water	38%		697,767.17	gpd, avg
12	Acceptable Unaccounted For	10%		182,091.86	gpd, avg
13	Excess Unaccounted for			515,675.31	gpd, avg
14	Property Needed to Serve			-	gpm
15	Used and Useful Analysis, in accordance with Rule 25-30.4325:				
16	Treatment System (Peak Demand / Firm Reliable Capacity)			1.96	
17	Storage Facilities				
18	Ground Storage Capacity, gal.			600,000.00	gallons
19	Usable Ground Storage (90%), gal			540,000.00	gallons
20	Elevated Storage			-	gallons
21	Usable Elevated Storage			-	gallons
22	Hydropneumatic Storage Capacity, gal.			-	gallons
23	Usable Hydropneumatic Storage Capacity (0%), gal.			-	gallons
24	Total Usable Storage, gal.			540,000.00	gallons
25	Used and Useful Analysis, in accordance with Rule 25-30.4325:				
26	Storage Facilities (Peak Demand / Usable Storage)			100%	

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Sebring Ridge Utilities, INC.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-5
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

CSWR-Florida (Sebring Ridge Utilities, INC.) provides wastewater service only, therefore this schedule is not applicable.

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-5
Page 1 of 6
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

				Ashley Heights Subdivision	Belleview Oaks Estates	Country Walk Subdivision	Eleven Oaks Subdivision
1	INPUT INFORMATION:						
2	Water Treatment System						
3	Number of Wells			1	1	1	1
4	Total Well Capacity, gpm			30.56 gpm	100.00 gpm	70.00 gpm	27.08 gpm
5	Firm Reliable Well pumping Capacity (largest well out), gpm			30.56 gpm	100.00 gpm	70.00 gpm	27.08 gpm
6	Firm Reliable Well pumping Capacity (largest well out), gpd			29333.33 gpd	96000.00 gpd	67200.00 gpd	26000.00 gpd
7	Peak Day Demand			19500.00 gpd	123358.00 gpd	110000.00 gpd	24048.00 gpd
8	Peak Hour Demand = 2 x Maximum Day / 1440			27.08 gpm	171.33 gpm	152.78 gpm	33.40 gpm
10	Fire Flow Requirement	0 gpm	2 Hours	0 gpd	0 gpd	0 gpd	0 gpd
11	Fire Flow Requirement			0 gpm	0 gpm	0 gpm	0 gpm
12	Unaccounted For Water	33% Combined		3151.44 gpd, avg	10086.32 gpd, avg	5186.98 gpd, avg	3022.72 gpd, avg
13	Acceptable Unaccounted For	10% Combined		944.82 gpd, avg	3023.93 gpd, avg	1555.08 gpd, avg	906.23 gpd, avg
14	Excess Unaccounted for			2206.62 gpd, avg	7062.39 gpd, avg	3631.89 gpd, avg	2116.50 gpd, avg
15	Property Needed to Serve			0 gpm	0 gpm	0 gpm	0 gpm
16	Used and Useful Analysis, in accordance with Rule 25-30.4325:						
16	Treatment System (Peak Demand / Firm Reliable Capacity)			100%	100%	100%	100%
18	Storage Facilities						
19	Ground Storage Capacity, gal.			0 gallons	0 gallons	0 gallons	0 gallons
20	Usable Ground Storage (90%), gal			0 gallons	0 gallons	0 gallons	0 gallons
21	Elevated Storage			0 gallons	0 gallons	0 gallons	0 gallons
22	Usable Elevated Storage			0 gallons	0 gallons	0 gallons	0 gallons
23	Hydropneumatic Storage Capacity, gal.			5000 gallons	2000 gallons	2000 gallons	2000 gallons
24	Usable Hydropneumatic Storage Capacity (0%), gal.			0 gallons	0 gallons	0 gallons	0 gallons
25	Total Usable Storage, gal.			0 gallons	0 gallons	0 gallons	0 gallons
26	Used and Useful Analysis, in accordance with Rule 25-30.4325:						
27	Storage Facilities (Peak Demand / Usable Storage)			100%	100%	100%	100%

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-5
Page 2 of 6
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

				Emil-Mar Subdivision	Florida Heights Subdivision	Floyd Clark Subdivision	Fore Oaks Estates
1	INPUT INFORMATION:						
2	Water Treatment System						
3	Number of Wells			1	2	1	2
4	Total Well Capacity, gpm			70.00 gpm	89.58 gpm	115.81 gpm	450.00 gpm
5	Firm Reliable Well pumping Capacity (largest well out), gpm			70.00 gpm	89.58 gpm	115.81 gpm	450.00 gpm
6	Firm Reliable Well pumping Capacity (largest well out), gpd			67200.00 gpd	86000.00 gpd	111180.00 gpd	432000.00 gpd
7	Peak Day Demand			67600.00 gpd	94200.00 gpd	29900.00 gpd	411000.00 gpd
8	Peak Hour Demand = 2 x Maximum Day / 1440			93.89 gpm	130.83 gpm	41.53 gpm	570.83 gpm
10	Fire Flow Requirement	0 gpm	2 Hours	0 gpd	0 gpd	0 gpd	0 gpd
11	Fire Flow Requirement			0 gpm	0 gpm	0 gpm	0 gpm
12	Unaccounted For Water	33%	Combined	10860.64 gpd, avg	8523.80 gpd, avg	4355.53 gpd, avg	17878.18 gpd, avg
13	Acceptable Unaccounted For	10%	Combined	3256.08 gpd, avg	2555.48 gpd, avg	1305.81 gpd, avg	5359.97 gpd, avg
14	Excess Unaccounted for			7604.56 gpd, avg	5968.32 gpd, avg	3049.72 gpd, avg	12518.21 gpd, avg
15	Property Needed to Serve			0 gpm	0 gpm	0 gpm	0 gpm
16	Used and Useful Analysis, in accordance with Rule 25-30.4325:						
16	Treatment System (Peak Demand / Firm Reliable Capacity)			100%	85%	100%	102%
18	Storage Facilities						
19	Ground Storage Capacity, gal.			0 gallons	0 gallons	0 gallons	0 gallons
20	Usable Ground Storage (90%), gal			0 gallons	0 gallons	0 gallons	0 gallons
21	Elevated Storage			0 gallons	0 gallons	0 gallons	0 gallons
22	Usable Elevated Storage			0 gallons	0 gallons	0 gallons	0 gallons
23	Hydropneumatic Storage Capacity, gal.			2500 gallons	3000 gallons	5500 gallons	10000 gallons
24	Usable Hydropneumatic Storage Capacity (0%), gal.			0 gallons	0 gallons	0 gallons	0 gallons
25	Total Usable Storage, gal.			0 gallons	0 gallons	0 gallons	0 gallons
26	Used and Useful Analysis, in accordance with Rule 25-30.4325:						
27	Storage Facilities (Peak Demand / Usable Storage)			100%	100%	100%	100%

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-5
Page 3 of 6
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

				Hilltop At Lake Weir Subdivisio	Little Lake Weir Subdivision	Oak Haven Quadruplexes	Oakcrest Villas/Sun Resort
1	INPUT INFORMATION:						
2	Water Treatment System						
3	Number of Wells			2	2	1	1
4	Total Well Capacity, gpm			190.00 gpm	120.00 gpm	118.19 gpm	29.86 gpm
5	Firm Reliable Well pumping Capacity (largest well out), gpm			190.00 gpm	120.00 gpm	118.19 gpm	29.86 gpm
6	Firm Reliable Well pumping Capacity (largest well out), gpd			182400.00 gpd	115200.00 gpd	113466.67 gpd	28666.67 gpd
7	Peak Day Demand			112300.00 gpd	143500.00 gpd	75200.00 gpd	8600.00 gpd
8	Peak Hour Demand = 2 x Maximum Day / 1440			155.97 gpm	199.31 gpm	104.44 gpm	11.94 gpm
10	Fire Flow Requirement	0 gpm	2 Hours	0 gpd	0 gpd	0 gpd	0 gpd
11	Fire Flow Requirement			0 gpm	0 gpm	0 gpm	0 gpm
12	Unaccounted For Water	33%	Combined	18651.56 gpd, avg	31669.00 gpd, avg	7444.91 gpd, avg	1164.16 gpd, avg
13	Acceptable Unaccounted For	10%	Combined	5591.84 gpd, avg	9494.53 gpd, avg	2232.02 gpd, avg	349.02 gpd, avg
14	Excess Unaccounted for			13059.73 gpd, avg	22174.47 gpd, avg	5212.89 gpd, avg	815.14 gpd, avg
15	Property Needed to Serve			0 gpm	0 gpm	0 gpm	0 gpm
16	Used and Useful Analysis, in accordance with Rule 25-30.4325:						
16	Treatment System (Peak Demand / Firm Reliable Capacity)			151%	65%	100%	100%
18	Storage Facilities						
19	Ground Storage Capacity, gal.			0 gallons	0 gallons	0 gallons	0 gallons
20	Usable Ground Storage (90%), gal			0 gallons	0 gallons	0 gallons	0 gallons
21	Elevated Storage			0 gallons	0 gallons	0 gallons	0 gallons
22	Usable Elevated Storage			0 gallons	0 gallons	0 gallons	0 gallons
23	Hydropneumatic Storage Capacity, gal.			10000 gallons	5000 gallons	5000 gallons	300 gallons
24	Usable Hydropneumatic Storage Capacity (0%), gal.			0 gallons	0 gallons	0 gallons	0 gallons
25	Total Usable Storage, gal.			0 gallons	0 gallons	0 gallons	0 gallons
26	Used and Useful Analysis, in accordance with Rule 25-30.4325:						
27	Storage Facilities (Peak Demand / Usable Storage)			100%	100%	100%	100%

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-5
Page 4 of 6
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

				Oakhurst Subdivision	Ocala Garden Apartments	Ocala Heights Subdivision	Ocklawaha Water Works (2 WTPS)
1	INPUT INFORMATION:						
2	Water Treatment System						
3	Number of Wells			1	1	2	2
4	Total Well Capacity, gpm			100.00 gpm	30.00 gpm	365.00 gpm	213.50 gpm
5	Firm Reliable Well pumping Capacity (largest well out), gpm			100.00 gpm	30.00 gpm	365.00 gpm	213.50 gpm
6	Firm Reliable Well pumping Capacity (largest well out), gpd			96000.00 gpd	28800.00 gpd	350400.00 gpd	204960.00 gpd
7	Peak Day Demand			107200.00 gpd	8800.00 gpd	129900.00 gpd	154300.00 gpd
8	Peak Hour Demand = 2 x Maximum Day / 1440			148.89 gpm	12.22 gpm	180.42 gpm	214.31 gpm
10	Fire Flow Requirement	0 gpm	2 Hours	0 gpd	0 gpd	0 gpd	0 gpd
11	Fire Flow Requirement			0 gpm	0 gpm	0 gpm	0 gpm
12	Unaccounted For Water	33%	Combined	8675.74 gpd, avg	749.50 gpd, avg	25892.69 gpd, avg	32439.04 gpd, avg
13	Acceptable Unaccounted For	10%	Combined	2601.03 gpd, avg	224.70 gpd, avg	7762.77 gpd, avg	9725.40 gpd, avg
14	Excess Unaccounted for			6074.70 gpd, avg	524.79 gpd, avg	18129.93 gpd, avg	22713.64 gpd, avg
15	Property Needed to Serve			0 gpm	0 gpm	0 gpm	0 gpm
16	Used and Useful Analysis, in accordance with Rule 25-30.4325:						
16	Treatment System (Peak Demand / Firm Reliable Capacity)			100%	100%	256%	118%
18	Storage Facilities						
19	Ground Storage Capacity, gal.			0 gallons	0 gallons	0 gallons	0 gallons
20	Usable Ground Storage (90%), gal			0 gallons	0 gallons	0 gallons	0 gallons
21	Elevated Storage			0 gallons	0 gallons	0 gallons	0 gallons
22	Usable Elevated Storage			0 gallons	0 gallons	0 gallons	0 gallons
23	Hydropneumatic Storage Capacity, gal.			3000 gallons	900 gallons	10000 gallons	12500 gallons
24	Usable Hydropneumatic Storage Capacity (0%), gal.			0 gallons	0 gallons	0 gallons	0 gallons
25	Total Usable Storage, gal.			0 gallons	0 gallons	0 gallons	0 gallons
26	Used and Useful Analysis, in accordance with Rule 25-30.4325:						
27	Storage Facilities (Peak Demand / Usable Storage)			100%	100%	100%	100%

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-5
Page 5 of 6
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

				Ponderosa Pines (2 WPS)	Quail Run Subdivision	Sandy Acres	Sun Ray Estates
1	INPUT INFORMATION:						
2	Water Treatment System						
3	Number of Wells			2	1	2	2
4	Total Well Capacity, gpm			58.00 gpm	30.00 gpm	159.72 gpm	350.00 gpm
5	Firm Reliable Well pumping Capacity (largest well out), gpm			58.00 gpm	30.00 gpm	159.72 gpm	350.00 gpm
6	Firm Reliable Well pumping Capacity (largest well out), gpd			55680.00 gpd	28800.00 gpd	153333.33 gpd	336000.00 gpd
7	Peak Day Demand			67300.00 gpd	45900.00 gpd	111000.00 gpd	242955.00 gpd
8	Peak Hour Demand = 2 x Maximum Day / 1440			93.47 gpm	63.75 gpm	154.17 gpm	337.44 gpm
10	Fire Flow Requirement	0 gpm	2 Hours	0 gpd	0 gpd	0 gpd	0 gpd
11	Fire Flow Requirement			0 gpm	0 gpm	0 gpm	0 gpm
12	Unaccounted For Water	33%	Combined	12910.94 gpd, avg	9496.33 gpd, avg	25771.16 gpd, avg	48269.34 gpd, avg
13	Acceptable Unaccounted For	10%	Combined	3870.77 gpd, avg	2847.05 gpd, avg	7726.33 gpd, avg	14471.41 gpd, avg
14	Excess Unaccounted for			9040.17 gpd, avg	6649.28 gpd, avg	18044.83 gpd, avg	33797.94 gpd, avg
15	Property Needed to Serve			0 gpm	0 gpm	0 gpm	0 gpm
16	Used and Useful Analysis, in accordance with Rule 25-30.4325:						
16	Treatment System (Peak Demand / Firm Reliable Capacity)			69%	100%	122%	124%
18	Storage Facilities						
19	Ground Storage Capacity, gal.			0 gallons	0 gallons	0 gallons	0 gallons
20	Usable Ground Storage (90%), gal			0 gallons	0 gallons	0 gallons	0 gallons
21	Elevated Storage			0 gallons	0 gallons	0 gallons	0 gallons
22	Usable Elevated Storage			0 gallons	0 gallons	0 gallons	0 gallons
23	Hydropneumatic Storage Capacity, gal.			4000 gallons	3000 gallons	2000 gallons	10000 gallons
24	Usable Hydropneumatic Storage Capacity (0%), gal.			0 gallons	0 gallons	0 gallons	0 gallons
25	Total Usable Storage, gal.			0 gallons	0 gallons	0 gallons	0 gallons
26	Used and Useful Analysis, in accordance with Rule 25-30.4325:						
27	Storage Facilities (Peak Demand / Usable Storage)			100%	100%	100%	100%

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-5
Page 6 of 6
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

				Sunlight Acres Subdivision	Whispering Sands Subdivision	Winding Waters Subdivision
1	INPUT INFORMATION:					
2	Water Treatment System					
3	Number of Wells			1	2	2
4	Total Well Capacity, gpm			125.00 gpm	100.00 gpm	166.67 gpm
5	Firm Reliable Well pumping Capacity (largest well out), gpm			125.00 gpm	100.00 gpm	166.67 gpm
6	Firm Reliable Well pumping Capacity (largest well out), gpd			120000.00 gpd	96000.00 gpd	160000.00 gpd
7	Peak Day Demand			67650.00 gpd	86072.00 gpd	127000.00 gpd
8	Peak Hour Demand = 2 x Maximum Day / 1440			93.96 gpm	119.54 gpm	176.39 gpm
10	Fire Flow Requirement	0 gpm	2 Hours	0 gpd	0 gpd	0 gpd
11	Fire Flow Requirement			0 gpm	0 gpm	0 gpm
12	Unaccounted For Water	33% Combined		8760.83 gpd, avg	14139.53 gpd, avg	19525.84 gpd, avg
13	Acceptable Unaccounted For	10% Combined		2626.54 gpd, avg	4239.11 gpd, avg	5853.95 gpd, avg
14	Excess Unaccounted for			6134.29 gpd, avg	9900.43 gpd, avg	13671.89 gpd, avg
15	Property Needed to Serve			0 gpm	0 gpm	0 gpm
16	Used and Useful Analysis, in accordance with Rule 25-30.4325:					
16	Treatment System (Peak Demand / Firm Reliable Capacity)			100%	100%	115%
18	Storage Facilities					
19	Ground Storage Capacity, gal.			0 gallons	0 gallons	0 gallons
20	Usable Ground Storage (90%), gal			0 gallons	0 gallons	0 gallons
21	Elevated Storage			0 gallons	0 gallons	0 gallons
22	Usable Elevated Storage			0 gallons	0 gallons	0 gallons
23	Hydropneumatic Storage Capacity, gal.			2000 gallons	10000 gallons	10000 gallons
24	Usable Hydropneumatic Storage Capacity (0%), gal.			0 gallons	0 gallons	0 gallons
25	Total Usable Storage, gal.			0 gallons	0 gallons	0 gallons
26	Used and Useful Analysis, in accordance with Rule 25-30.4325:					
27	Storage Facilities (Peak Demand / Usable Storage)			100%	100%	100%

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (TKCB, Inc.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-5
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

CSWR-Florida (TKCB, Inc.) provides wastewater service only, therefore this schedule is not applicable.

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Tradewinds Utilities, Inc.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-5
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

Line No.					
1	INPUT INFORMATION:				
2	Water Treatment System				
3	Number of Wells			3	
4	Total Well Capacity, gpm			659.72	gpm
5	Firm Reliable Well pumping Capacity (largest well out), gpm			659.72	gpm
6	Firm Reliable Well pumping Capacity (largest well out), gpd			633,333.33	gpd
7	Peak Day Demand			501,000.00	gpd
8	Peak Hour Demand = 2 x Maximum Day / 1440			695.83	gpm
9	Fire Flow Requirement	0 gpm	2 Hours	0	gpd
10	Fire Flow Requirement			0	gpm
11	Unaccounted For Water	13%		28,319.55	gpd, avg
12	Acceptable Unaccounted For	10%		21,332.79	gpd, avg
13	Excess Unaccounted for			6,986.77	gpd, avg
14	Property Needed to Serve			0.00	gpm
15	Used and Useful Analysis, in accordance with Rule 25-30.4325:				
16	Treatment System (Peak Demand / Firm Reliable Capacity)			78%	
17	Storage Facilities				
18	Ground Storage Capacity, gal.			0	gallons
19	Usable Ground Storage (90%), gal			0	gallons
20	Elevated Storage			200,000.00	gallons
21	Usable Elevated Storage			200,000.00	gallons
22	Hydropneumatic Storage Capacity, gal.			15,000.00	gallons
23	Usable Hydropneumatic Storage Capacity (0%), gal.			-	gallons
24	Total Usable Storage, gal.			200,000.00	gallons
24	Used and Useful Analysis, in accordance with Rule 25-30.4325:				
25	Storage Facilities (Peak Demand / Usable Storage)			100%	

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Tymber Creek)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-5
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

1 The CSWR-Florida (Tymber Creek) water facility is a purchased facility.
2 Therefore, this schedule is not applicable.

Used and Useful Calculations
Water Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Consolidated)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-5
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-5,A-9,B-13

See schedule F-5 in the individual system filings

Used and Useful Calculations
Wastewater Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Aquarina)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the wastewater treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-6,A-10,B-14

Line No.		
1	Used and Useful Flow	48,600
2	Property Needed for Post Test Year Period	-
4	Permitted Capacity	99,000 gpd
5	Used and Useful Percentage	49.09%

Please note that the used and useful percentage for the wastewater treatment plant reflects that the facility was constructed with excess capacity to accommodate anticipated future development.

Used and Useful Calculations
Wastewater Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (BFF)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the wastewater treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-6,A-10,B-14

The CSWR-Florida (BFF) wastewater system is a purchased facility that consists solely of a collection system with three lift stations and does not include an on-site treatment plant. All wastewater is conveyed to a third-party regional facility for treatment. As there is no treatment plant owned or operated by CSWR - Florida (BFF), the calculation of "used and useful" percentages for a treatment plant is not applicable.

Used and Useful Calculations
Wastewater Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (C.F.A.T. H2O, INC.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the wastewater treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-6,A-10,B-14

Line No.		
1	Used and Useful Flow	38,485
2	Property Needed for Post Test Year Period	0
3	Permitted Capacity	99,000 gpd
4	Used and Useful Percentage	39%

5 Please note that the used and useful percentage for the wastewater treatment plant
6 reflects that the facility was constructed with excess capacity to accommodate
7 anticipated future development.

Used and Useful Calculations
Wastewater Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Neighborhood Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the wastewater treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-6,A-10,B-14

CSWR-Florida (Neighborhood Utilities) provides water service only, therefore this schedules is not applicable.

Used and Useful Calculations
Wastewater Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (North Peninsula)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the wastewater treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-6,A-10,B-14

Line No.			
1	Used and Useful Flow	94,300.00	
2	Property Needed for Post Test Year Period	0	
4	Permitted Capacity	181,000.00	gpd
5	Used and Useful Percentage	52%	

6 Please note that CSWR-Florida has chosen to decommission the existing facility and connect to the City of
7 Ormond Beach. However, allowing for design, permitting, bidding, and project execution, full
8 implementation of this alternative is projected to take at least several years.

Used and Useful Calculations
Wastewater Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Rolling Oaks)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the wastewater treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-6,A-10,B-14

Line No.			
1	Used and Useful Flow	545,050	
2	Property Needed for Post Test Year Period	0	
3	Permitted Capacity	1,000,000	gpd
4	Used and Useful Percentage	55%	

5 Please note that the used and useful percentage for the wastewater treatment plant
6 reflects that the facility was constructed with excess capacity to accommodate
7 anticipated future development.

Used and Useful Calculations
Wastewater Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Sebring Ridge Utilities, INC.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the wastewater treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-6,A-10,B-14

Line No.		
1	Used and Useful Flow	51,967
2	Property Needed for Post Test Year Period	0
4	Permitted Capacity	181,000 gpd
5	Used and Useful Percentage	29%

6 Please note that the used and useful percentage for the wastewater treatment plant
7 reflects that the facility was constructed with excess capacity to accommodate anticipated
8 future development.

Used and Useful Calculations
Wastewater Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the wastewater treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-6,A-10,B-14

CSWR-Florida (Sunshine Utilities) provides water service only, therefore this schedule is not applicable.

Used and Useful Calculations
Wastewater Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (TKCB, Inc.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the wastewater treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-6,A-10,B-14

Line No.		
1	Used and Useful Flow	45,000.00
2	Property Needed for Post Test Year Period	0
3	Permitted Capacity	99,000.00 gpd
4	Used and Useful Percentage	45.45%

5 Please note that the used and useful percentage for the wastewater treatment plant
6 reflects that the facility was constructed with excess capacity to accommodate anticipated
7 future development.

Used and Useful Calculations
Wastewater Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Tradewinds Utilities, Inc.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the wastewater treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-6,A-10,B-14

The CSWR-Florida (Tradewinds Utilities, Inc.) wastewater treatment facility is a purchased facility that consists solely of a collection system with four lift stations and does not include an on-site treatment plant. All wastewater is conveyed off-site for treatment by a third party. Therefore, this schedule is not applicable.

Used and Useful Calculations
Wastewater Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Tymber Creek)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the wastewater treatment plant(s) for the historical test year and the projected test year (if applicable).

Recap Schedules: A-6,A-10,B-14

Line No.			
1	Used and Useful Flow	62,300	
2	Property Needed for Post Test Year Period	0	
3	Permitted Capacity	131,000	gpd
4	Used and Useful Percentage	47.56%	
5	Please note that the used and useful percentage for the wastewater treatment plant		
6	reflects that the facility was constructed with excess capacity to accommodate anticipated		
7	future development.		

Used and Useful Calculations
Wastewater Treatment Plant

Florida Public Service Commission

Company: CSWR-Florida (Consolidated)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-6
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the wastewater treatment plant(s) for the historical test year and the projected test year (if applicable).

See schedule F-6 in the individual system filings

Used and Useful Calculations
Water Distribution and Wastewater Collection Systems

Florida Public Service Commission

Company: CSWR-Florida (Aquarina)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water distribution and wastewater collection systems for the historical and the projected test year (if applicable). The capacity should be in terms of ability to serve a designated number of connections. It should then be related to actual connected density for historical year calculations. Explain all assumptions for projected calculations. If the distribution and collection systems are entirely contributed or built-out, this schedule is not required.

Recap Schedules: A-5,A-6,A-9,A-10,B-13,B-14

The distribution/collection systems are entirely built-out and therefore this schedule is not required.

Used and Useful Calculations
Water Distribution and Wastewater Collection Systems

Florida Public Service Commission

Company: CSWR-Florida (BFF)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water distribution and wastewater collection systems for the historical and the projected test year (if applicable). The capacity should be in terms of ability to serve a designated number of connections. It should then be related to actual connected density for historical year calculations. Explain all assumptions for projected calculations. If the distribution and collection systems are entirely contributed or built-out, this schedule is not required.

Recap Schedules: A-5,A-6,A-9,A-10,B-13,B-14

The distribution/collection systems are entirely built-out and therefore this schedule is not required.

Used and Useful Calculations
Water Distribution and Wastewater Collection Systems

Florida Public Service Commission

Company: CSWR-Florida (C.F.A.T. H2O, INC.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water distribution and wastewater collection systems for the historical and the projected test year (if applicable). The capacity should be in terms of ability to serve a designated number of connections. It should then be related to actual connected density for historical year calculations. Explain all assumptions for projected calculations. If the distribution and collection systems are entirely contributed or built-out, this schedule is not required.

Recap Schedules: A-5,A-6,A-9,A-10,B-13,B-14

The distribution/collection systems are entirely built-out and therefore this schedule is not required.

Used and Useful Calculations
Water Distribution and Wastewater Collection Systems

Florida Public Service Commission

Company: CSWR-Florida (Neighborhood Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water distribution and wastewater collection systems for the historical and the projected test year (if applicable). The capacity should be in terms of ability to serve a designated number of connections. It should then be related to actual connected density for historical year calculations. Explain all assumptions for projected calculations. If the distribution and collection systems are entirely contributed or built-out, this schedule is not required.

Recap Schedules: A-5,A-6,A-9,A-10,B-13,B-14

The distribution/collection systems are entirely built-out and therefore this schedule is not required.

Used and Useful Calculations
Water Distribution and Wastewater Collection Systems

Florida Public Service Commission

Company: CSWR-Florida (North Peninsula)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water distribution and wastewater collection systems for the historical and the projected test year (if applicable). The capacity should be in terms of ability to serve a designated number of connections. It should then be related to actual connected density for historical year calculations. Explain all assumptions for projected calculations. If the distribution and collection systems are entirely contributed or built-out, this schedule is not required.

Recap Schedules: A-5,A-6,A-9,A-10,B-13,B-14

The distribution/collection systems are entirely built-out and therefore this schedule is not required.

Used and Useful Calculations
Water Distribution and Wastewater Collection Systems

Florida Public Service Commission

Company: CSWR-Florida (Rolling Oaks)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water distribution and wastewater collection systems for the historical and the projected test year (if applicable). The capacity should be in terms of ability to serve a designated number of connections. It should then be related to actual connected density for historical year calculations. Explain all assumptions for projected calculations. If the distribution and collection systems are entirely contributed or built-out, this schedule is not required.

Recap Schedules: A-5,A-6,A-9,A-10,B-13,B-14

The distribution/collection systems are entirely built-out and therefore this schedule is not required.

Used and Useful Calculations
Water Distribution and Wastewater Collection Systems

Florida Public Service Commission

Company: CSWR-Florida (Sebring Ridge Utilities, INC.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water distribution and wastewater collection systems for the historical and the projected test year (if applicable). The capacity should be in terms of ability to serve a designated number of connections. It should then be related to actual connected density for historical year calculations. Explain all assumptions for projected calculations. If the distribution and collection systems are entirely contributed or built-out, this schedule is not required.

Recap Schedules: A-5,A-6,A-9,A-10,B-13,B-14

The distribution/collection systems are entirely built-out and therefore this schedule is not required.

Used and Useful Calculations
Water Distribution and Wastewater Collection Systems

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water distribution and wastewater collection systems for the historical and the projected test year (if applicable). The capacity should be in terms of ability to serve a designated number of connections. It should then be related to actual connected density for historical year calculations. Explain all assumptions for projected calculations. If the distribution and collection systems are entirely contributed or built-out, this schedule is not required.

Recap Schedules: A-5,A-6,A-9,A-10,B-13,B-14

The distribution/collection systems are entirely built-out and therefore this schedule is not required.

Used and Useful Calculations
Water Distribution and Wastewater Collection Systems

Florida Public Service Commission

Company: CSWR-Florida (TKCB, Inc.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water distribution and wastewater collection systems for the historical and the projected test year (if applicable). The capacity should be in terms of ability to serve a designated number of connections. It should then be related to actual connected density for historical year calculations. Explain all assumptions for projected calculations. If the distribution and collection systems are entirely contributed or built-out, this schedule is not required.

Recap Schedules: A-5,A-6,A-9,A-10,B-13,B-14

The distribution/collection systems are entirely built-out and therefore this schedule is not required.

Used and Useful Calculations
Water Distribution and Wastewater Collection Systems

Florida Public Service Commission

Company: CSWR-Florida (Tradewinds Utilities, Inc.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-7
Page 1 of 1
Preparer:

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water distribution and wastewater collection systems for the historical and the projected test year (if applicable). The capacity should be in terms of ability to serve a designated number of connections. It should then be related to actual connected density for historical year calculations. Explain all assumptions for projected calculations. If the distribution and collection systems are entirely contributed or built-out, this schedule is not required.

Recap Schedules: A-5,A-6,A-9,A-10,B-13,B-14

The distribution/collection systems are entirely built-out and therefore this schedule is not required.

Used and Useful Calculations
Water Distribution and Wastewater Collection Systems

Florida Public Service Commission

Company: CSWR-Florida (Tymber Creek)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water distribution and wastewater collection systems for the historical and the projected test year (if applicable). The capacity should be in terms of ability to serve a designated number of connections. It should then be related to actual connected density for historical year calculations. Explain all assumptions for projected calculations. If the distribution and collection systems are entirely contributed or built-out, this schedule is not required.

Recap Schedules: A-5,A-6,A-9,A-10,B-13,B-14

The distribution/collection systems are entirely built-out and therefore this schedule is not required.

Used and Useful Calculations
Water Distribution and Wastewater Collection Systems

Florida Public Service Commission

Company: CSWR-Florida (Consolidated)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-7
Page 1 of 1
Preparer: Todd Thomas

Explanation: Provide all calculations, analyses and governmental requirements used to determine the used and useful percentages for the water distribution and wastewater collection systems for the historical and the projected test year (if applicable). The capacity should be in terms of ability to serve a designated number of connections. It should then be related to actual connected density for historical year calculations. Explain all assumptions for projected calculations. If the distribution and collection systems are entirely contributed or built-out, this schedule is not required.

Recap Schedules: A-5,A-6,A-9,A-10,B-13,B-14

The distribution/collection systems are entirely built-out and therefore this schedule is not required.

Margin Reserve Calculations | **Florida Public Service Commission**

Company: CSWR-Florida (Aquarina) | **Schedule F-8**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: If a margin reserve is requested, provide all calculations and analyses used to determine the amount of margin reserve for each portion of used and useful plant.

Recap Schedules: F-5,F-6,F-7

A margin reserve has not been requested and therefore this schedule is not required.

Margin Reserve Calculations | **Florida Public Service Commission**

Company: CSWR-Florida (BFF) | **Schedule F-8**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: If a margin reserve is requested, provide all calculations and analyses used to determine the amount of margin reserve for each portion of used and useful plant.

Recap Schedules: F-5,F-6,F-7

A margin reserve has not been requested and therefore this schedule is not required.

Margin Reserve Calculations | **Florida Public Service Commission**

Company: CSWR-Florida (C.F.A.T. H2O, INC.) | **Schedule F-8**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: If a margin reserve is requested, provide all calculations and analyses used to determine the amount of margin reserve for each portion of used and useful plant.

Recap Schedules: F-5,F-6,F-7

A margin reserve has not been requested and therefore this schedule is not required.

Margin Reserve Calculations | **Florida Public Service Commission**

Company: CSWR-Florida (Neighborhood Utilities) | **Schedule F-8**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: If a margin reserve is requested, provide all calculations and analyses used to determine the amount of margin reserve for each portion of used and useful plant.

Recap Schedules: F-5,F-6,F-7

A margin reserve has not been requested and therefore this schedule is not required.

Margin Reserve Calculations | **Florida Public Service Commission**

Company: CSWR-Florida (North Peninsula) | **Schedule F-8**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: If a margin reserve is requested, provide all calculations and analyses used to determine the amount of margin reserve for each portion of used and useful plant.

Recap Schedules: F-5,F-6,F-7

A margin reserve has not been requested and therefore this schedule is not required.

Margin Reserve Calculations | **Florida Public Service Commission**

Company: CSWR-Florida (Rolling Oaks)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-8
Page 1 of 1
Preparer: Todd Thomas

Explanation: If a margin reserve is requested, provide all calculations and analyses used to determine the amount of margin reserve for each portion of used and useful plant.

Recap Schedules: F-5,F-6,F-7

A margin reserve has not been requested and therefore this schedule is not required.

Margin Reserve Calculations

Florida Public Service Commission

Company: CSWR-Florida (Sebring Ridge Utilities, INC.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-8
Page 1 of 1
Preparer: Todd Thomas

Explanation: If a margin reserve is requested, provide all calculations and analyses used to determine the amount of margin reserve for each portion of used and useful plant.

Recap Schedules: F-5,F-6,F-7

A margin reserve has not been requested and therefore this schedule is not required.

Margin Reserve Calculations

Florida Public Service Commission

Company: CSWR-Florida (Sunshine Utilities)
Docket No.: 20250052
Test Year Ended: 1/31/2025
Systems: Sunshine Utilities - All Systems

Schedule F-8
Page 1 of 1
Preparer: Todd Thomas

Explanation: If a margin reserve is requested, provide all calculations and analyses used to determine the amount of margin reserve for each portion of used and useful plant.

Recap Schedules: F-5,F-6,F-7

A margin reserve has not been requested and therefore this schedule is not required.

Margin Reserve Calculations | **Florida Public Service Commission**

Company: CSWR-Florida (TKCB, Inc.) | **Schedule F-8**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: If a margin reserve is requested, provide all calculations and analyses used to determine the amount of margin reserve for each portion of used and useful plant.

Recap Schedules: F-5,F-6,F-7

A margin reserve has not been requested and therefore this schedule is not required.

Margin Reserve Calculations

Florida Public Service Commission

Company: CSWR-Florida (Tradewinds Utilities, Inc.)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-8
Page 1 of 1
Preparer: Todd Thomas

Explanation: If a margin reserve is requested, provide all calculations and analyses used to determine the amount of margin reserve for each portion of used and useful plant.

Recap Schedules: F-5,F-6,F-7

A margin reserve has not been requested and therefore this schedule is not required.

Margin Reserve Calculations

Florida Public Service Commission

Company: CSWR-Florida (Tymber Creek)
Docket No.: 20250052
Test Year Ended: 1/31/2025

Schedule F-8
Page 1 of 1
Preparer: Todd Thomas

Explanation: If a margin reserve is requested, provide all calculations and analyses used to determine the amount of margin reserve for each portion of used and useful plant.

Recap Schedules: F-5,F-6,F-7

A margin reserve has not been requested and therefore this schedule is not required.

Margin Reserve Calculations | **Florida Public Service Commission**

Company: CSWR-Florida (Consolidated) | **Schedule F-8**
Docket No.: 20250052 | **Page 1 of 1**
Test Year Ended: 1/31/2025 | **Preparer: Todd Thomas**

Explanation: If a margin reserve is requested, provide all calculations and analyses used to determine the amount of margin reserve for each portion of used and useful plant.

Recap Schedules: F-5,F-6,F-7

A margin reserve has not been requested and therefore this schedule is not required.