

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.

DOCKET NO. 20250052-WS

DATED: May 1, 2026

COMMISSION STAFF’S PREHEARING STATEMENT

Pursuant to Order No. PSC-2025-0457-PCO-WS, filed December 16, 2025, the Staff of the Florida Public Service Commission files its Prehearing Statement.

1. All Known Witnesses

<b>Witness</b>	<b>Subject Matter</b>	<b>Issues #</b>
<b>Direct</b>		
Curt Mouring	Auditing Report(s)	As needed
John F. Plescow	Consumer Complaints	As needed

2. All Known Exhibits

<b>Witness</b>	<b>Proffered By</b>	<b>Exhibit #</b>	<b>Description</b>
<b>Direct</b>			
Curt Mouring	Commission Staff	CM-1	Auditor’s Report
John F. Plescow	Commission Staff	JFP-1	PSC List(s) of Quality of Service Complaints
John F. Plescow	Commission Staff	JFP-2	PSC List(s) of Billing Complaints
John F. Plescow	Commission Staff	JFP-3	PSC List(s) of Complaints by Close Type

3. Staff’s Statement of Basic Position

Staff’s positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing.

Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

4. Staff's Position on the Issues

**Quality of Service Issues**

**ISSUE 1:** Is the overall quality of service provided by the Utility satisfactory, and, if not, what systems have quality of service issues and what action should be taken by the Commission?

**POSITION:** Staff has no position at this time.

**ISSUE 2:** Are the infrastructure and operating conditions of the Utility's water and wastewater systems in compliance with Florida Department of Environmental Protection regulations?

**POSITION:** Staff has no position at this time.

**Rate Base Issues**

**ISSUE 3:** What adjustments, if any, should be made to account for the audit adjustments related to rate base?

**POSITION:** Staff has no position at this time.

**ISSUE 4:** Should any adjustments be made to test year plant-in-service balances?

**POSITION:** Staff has no position at this time.

**ISSUE 5:** Should any adjustments be made to the Utility's pro forma plant additions?

**POSITION:** Staff has no position at this time.

**ISSUE 6:** What are the appropriate plant retirements to be made in this docket?

**POSITION:** Staff has no position at this time.

**ISSUE 7:** Do any water systems have excessive unaccounted for water and, if so, what adjustments are necessary, if any?

**POSITION:** Staff has no position at this time.

**ISSUE 8:** Do any wastewater systems have excessive infiltration and/or inflow and, if so, what adjustments are necessary, if any?

**POSITION:** Staff has no position at this time.

**ISSUE 9:** What are the appropriate used and useful percentages for the water treatment and related facilities of each water system?

**POSITION:** Staff has no position at this time.

**ISSUE 10:** What are the appropriate used and useful percentages for the water storage and related facilities of each water system?

**POSITION:** Staff has no position at this time.

**ISSUE 11:** What are the appropriate used and useful percentages for the water distribution and related facilities of each water system?

**POSITION:** Staff has no position at this time.

**ISSUE 12:** What are the appropriate used and useful percentages for the wastewater treatment and related facilities of each wastewater system?

**POSITION:** Staff has no position at this time.

**ISSUE 13:** What are the appropriate used and useful percentages for the collection lines and related facilities of each wastewater system?

**POSITION:** Staff has no position at this time.

**ISSUE 14:** Should any adjustments be made to test year accumulated depreciation?

**POSITION:** Staff has no position at this time.

**ISSUE 15:** Should any adjustments be made to test year CIAC balances?

**POSITION:** Staff has no position at this time.

**ISSUE 16:** Should any adjustments be made to test year accumulated amortization of CIAC?

**POSITION:** Staff has no position at this time.

**ISSUE 17:** Should any adjustments be made to the acquisition adjustments included in the test year?

**POSITION:** Staff has no position at this time.

**ISSUE 18:** What is the appropriate working capital allowance?

**POSITION:** Staff has no position at this time.

**ISSUE 19:** What are the appropriate rate bases for the January 31, 2025 test year?

**POSITION:** Staff has no position at this time.

**Cost of Capital Issues**

**ISSUE 20:** What amount of accumulated deferred taxes should be approved for inclusion in the capital structure for the test year?

**POSITION:** Staff has no position at this time.

**ISSUE 21:** What amount and cost rate for customer deposits should be approved for inclusion in the capital structure for the test year?

**POSITION:** Staff has no position at this time.

**ISSUE 22:** What amount and cost rate for short-term debt should be approved for inclusion in the capital structure for the test year?

**POSITION:** Staff has no position at this time.

**ISSUE 23:** What amount and cost rate for long-term debt should be approved for inclusion in the capital structure for the test year?

**POSITION:** Staff has no position at this time.

**ISSUE 24:** What equity ratio should be approved for use in the capital structure for ratemaking purposes for the test year?

**POSITION:** Staff has no position at this time.

**ISSUE 25:** What return on equity (ROE) should be approved for use in establishing the utility's revenue requirement for the test year?

**POSITION:** Staff has no position at this time.

**ISSUE 26:** What capital structure and weighted average cost of capital should be approved for use in establishing the utility's revenue requirement for the test year?

**POSITION:** Staff has no position at this time.

**Net Operating Income Issues**

**ISSUE 27:** What are the appropriate test year revenues?

**POSITION:** Staff has no position at this time.

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**ISSUE 28:** What adjustments, if any, should be made to account for the audit adjustments related to net operating income?

**POSITION:** Staff has no position at this time.

**ISSUE 29:** What is the appropriate amount of rate case expense?

**POSITION:** Staff has no position at this time.

**ISSUE 30:** Should any adjustment be made to the Utility's proposed pro forma expenses?

**POSITION:** Staff has no position at this time.

**ISSUE 31:** Should any adjustment be made to the Utility's proposed management expenses?

**POSITION:** Staff has no position at this time.

**ISSUE 32:** Should any further adjustments be made to the Utility's test year O&M expenses?

**POSITION:** Staff has no position at this time.

**ISSUE 33:** Should any adjustments be made to test year taxes other than income?

**POSITION:** Staff has no position at this time.

**ISSUE 34:** Should any adjustments be made to test year depreciation expense?

**POSITION:** Staff has no position at this time.

**ISSUE 35:** Should any adjustments be made to test year amortization of CIAC expense?

**POSITION:** Staff has no position at this time.

**ISSUE 36:** Should any adjustments be made to the acquisition adjustment amortization expense included in the test year?

**POSITION:** Staff has no position at this time.

**ISSUE 37:** Should net operating losses be used to lower income tax expense?

**POSITION:** Staff has no position at this time.

**ISSUE 38:** What is the appropriate amount of test year income taxes?

**POSITION:** Staff has no position at this time.

**Revenue Requirement Issues**

**ISSUE 39:** What are the appropriate revenue requirements for the January 31, 2025 test year?

**POSITION:** Staff has no position at this time.

**Rates and Rate Structure Issues**

**ISSUE 40:** What, if any, limits should be imposed on subsidy values that could result if stand alone rates are converted to consolidated rate structure for the water and wastewater systems?

**POSITION:** Staff has no position at this time.

**ISSUE 41:** Which water systems, if any, should be consolidated into a single rate structure?

**POSITION:** Staff has no position at this time.

**ISSUE 42:** What are the appropriate rate structures and rates for the water systems?

**POSITION:** Staff has no position at this time.

**ISSUE 43:** Which wastewater systems, if any, should be consolidated into a single rate structure?

**POSITION:** Staff has no position at this time.

**ISSUE 44:** What are the appropriate rate structures and rates for the wastewater systems?

**POSITION:** Staff has no position at this time.

**Other Issues**

**ISSUE 45:** What are the appropriate miscellaneous service charges?

**POSITION:** Staff has no position at this time.

**ISSUE 46:** What are the appropriate service availability charges?

**POSITION:** Staff has no position at this time.

**ISSUE 47:** Should any portion of the interim revenue increases granted be refunded?

**POSITION:** Staff has no position at this time.

**ISSUE 48:** What is the appropriate amount by which rates should be reduced after the established effective date to reflect the removal of the amortized rate case expense?

**POSITION:** Staff has no position at this time.

**ISSUE 49:** Should the Utility be required to notify, within 90 days of an effective order finalizing this docket, that it has adjusted its books for all the applicable National Association of Regulatory Utility Commissioners (NARUC) Uniform System of Accounts (USOA) associated with the Commission approved adjustments?

**POSITION:** Staff has no position at this time.

**ISSUE 50:** Should this docket be closed?

**POSITION:** Staff has no position at this time.

### **Contested Issues**

**ISSUE A:** Is the overall value to a customer provided by the Utility satisfactory, and, if not, what systems have value issues and what action should be taken by the Commission?

**POSITION:** Staff has no position at this time.

**ISSUE B:** Should any adjustment be made to industry association dues?

**POSITION:** Staff has no position at this time.

**ISSUE C:** Are the resulting rates affordable within the meaning of fair, just, and reasonable pursuant to Sections 367.081 and 367.121 Florida Statutes?

**POSITION:** Staff has no position at this time.

### 5. **Stipulated Issues**

There are no stipulated issues at this time.

### 6. **Pending Motions**

Staff has no pending motions.

### 7. **Pending Confidentiality Claims or Requests**

Staff has no pending confidentiality claims or requests.

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8. Objections to Witness Qualifications as an Expert

Staff has no objections to any witness qualifications as an expert.

9. Compliance with Order No. PSC-2025-0457-PCO-WS

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 1st day of May, 2026.

*/s/ Daniel Dose*

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DANIEL DOSE

Senior Attorney, Office of the General Counsel

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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.

DOCKET NO. 20250052-WS

DATED: May 1, 2026

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that STAFF'S PREHEARING STATEMENT has been filed with the Office of Commission Clerk and that a true copy has been furnished to the following by electronic mail this 1st day of May, 2026:

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*/s/ Daniel Dose*

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