



PHONE (850) 425-6654 FAX (850) 425-6694 WEB WWW.RADEYLAW.COM
MAIL POST OFFICE BOX 10967 | TALLAHASSEE, FL 32302 OFFICE 301 SOUTH BRONOUGH ST. | STE. 200 | TALLAHASSEE, FL 32301
tcrabb@radeylaw.com

May 12, 2026

VIA Electronic Filing to the Office of Commission Clerk

Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Attn: Daniel Dose, Senior Attorney

Re: Docket 20250130-WS – Petition for an acquisition adjustment for a non-viable utility, by CSWR-Florida Utility Operating Company, LLC.

Dear Mr. Dose:

CSWR-Florida Utility Operating Company, LLC (“CSWR-Florida”) submits the following responses to Staff’s April 21, 2026 Third Data Request.

1. Refer to CSWR’s response to Staff’s Second Data Request, No. 1. Please provide the estimated in-service dates and estimated costs for the Well 2 Maintenance Work, Tank Inspections, Tank 2/Aeration Unit Exterior Recoating, Flood Lighting Installation, and Safety Equipment Installation projects. If not available, explain why in detail and indicate if the in-service dates and/or estimated costs are incorporated within other projects.

Response: CSWR-Florida misinterpreted Staff’s Second Data Request, number 1. Please see Attachment “DR 3.1 – Neighborhood Completed Projects.”

2. Refer to CSWR’s response to Staff’s Second Data Request No. 1, Attachment DR 1.1 – Completed Projects Support – NBH.
 - a. Please explain why there are two in-service dates listed for the Emergency Generator Replacement project that was completed, and explain the difference in costs.

Response: The Emergency Generator Replacement project reflects two in-service dates because the individual assets associated with the project were placed in service at different times. In-service dates are based on when CSWR-Florida received

confirmation of completion. The difference in costs reflects the separate assets recorded under the project.

- b. Please explain why there are three in-service dates listed for the Hydropneumatic Tank Interior/Exterior Recoating/Rehabilitation project that was completed, and explain the difference in costs.

Response: The Hydropneumatic Tank Interior/Exterior Recoating/Rehabilitation project reflects three in-service dates because the individual assets associated with the project were placed in service at different times, based on when CSWR-Florida received confirmation of completion. The difference in costs reflects the separate assets recorded under the project.

- c. Please explain why there are two in-service dates listed for the New Air Compressor Installation project that was completed, and explain the difference in costs.

Response: The New Air Compressor Installation project reflects two in-service dates because the individual assets associated with the project were placed in service at different times, based on when CSWR-Florida received confirmation of completion. The difference in costs reflects the separate assets recorded under the project.

- d. Please explain why there are three in-service dates listed for the Well Pump Replacement Well project that was completed, and explain the difference in costs.

Response: The Well Pump Replacement Well project reflects three in-service dates because the individual assets associated with the project were placed in service at different times, based on when CSWR-Florida received confirmation of completion. The difference in costs reflects the separate assets recorded under the project.

3. Refer to CSWR's responses to Staff's Second Data Request, No. 2. Please provide the estimated in-service dates and estimated costs for the Well 1 Decommissioning, Replacement of Both Ground Storage Tanks, Tanks 1 and 2/Aeration Treatment Replacements, Variable Frequency Drive Installations on Booster Pump Control System, and JEA Emergency Interconnection Improvements projects. If not available, explain why in detail.

Response: CSWR-Florida continues to evaluate the most feasible long-term improvement alternative for the Neighborhood system. The Company estimates that the identified plant upgrades would cost approximately \$1,250,000, with completion anticipated by May 1, 2028. In addition, CSWR-Florida is coordinating with the City of Jacksonville (JEA) to assess applicable capacity impact fees associated with converting the Neighborhood system to a purchased water system. Based on preliminary assessments, CSWR-Florida believes that an interconnection with JEA

may represent the more practical and cost-effective alternative. However, the Company is awaiting final cost information before making a definitive determination.

4. Refer to CSWR's response to Staff's Second Data Request, No. 2, Attachment DR 2.1 – Long Term Options Support – NBH.
 - a. The projects listed on the attachment appear to have been completed. Are these ongoing projects? If so, when will future projects occur, and what are the estimated costs?

Response: Please refer to the response provided in Data Request 3.

- b. Please explain why there are two in-service dates listed for the Booster Pump Replacements project that appears to be completed, and explain the difference in costs.

Response: The Booster Pump Replacements project reflects two in-service dates because the individual assets associated with the project were placed in service at different times, based on when accounting received confirmation of completion. The difference in costs reflects the separate assets recorded under the project.

- c. Please explain why there are four in-service dates listed for the General Distribution System Repairs project that appears to be completed, and explain the difference in costs.

Response: The General Distribution System Repairs project reflects four in-service dates because the individual assets associated with the project were placed in service at different times, based on when accounting received confirmation of completion. The difference in costs reflects the separate assets recorded under the project.

5. Refer to CSWR's responses to Staff's Second Data Request, Nos. 1 and 2, Attachments DR 1.1 – Completed Projects Support – NBH, and DR 2.1 – Long Term Options Support – NBH.
 - a. The Well Pump Replacement (Well 2) project has an in-service date of February 1, 2024, which appears to be completed on the same date and for the same cost as the Well 2 Additional Rehabilitation project. Indicate if this is the same project.

Response: These are the same project. CSWR-Florida misinterpreted Staff's Second Data Request, number 2 and included the project on both Attachments.



- b. Please explain in detail how CSWR prioritized the completed projects included in the Water System Assessment as compared to the completed projects that were not included in the assessment. As part of this response, identify the resulting project order, along with their in-service dates.

Response: The completed projects included in the Water System Assessment were prioritized based on the operational needs and system conditions identified at the time the assessment was prepared. Since CSWR-Florida later acquired the water system, operational priorities and system considerations changed, resulting in some completed projects not being included in the original assessment. Please see Attachment “DR 3.1 – Neighborhood Completed Projects” for in-service dates.

6. Refer to CSWR’s responses to Staff’s Second Data Request, No. 4, Attachment DR 4 – Operating Expenses Detail – NBH. Please explain why there are two items listed for Water – Mowing and Lawn Maintenance that were completed on December 1, 2023, and why there is a difference in cost.

Response: The two December 1, 2023, entries are separate invoices (24170 and 26648) from ClearWater Solutions, LLC. Each invoice reflects different services performed, and the cost difference is due to the varying scope of work under each invoice.

Thank you for the opportunity to provide additional information in support of the application. Please feel free to contact our office at your convenience with any additional questions or concerns.

Sincerely,

/s/ Thomas A. Crabb

Thomas A. Crabb
Attorney for CSWR-Florida

cc: Aaron Silas
Walt Trierweiler, Esq.
Austin Watrous, Esq.
Patricia Christensen, Esq.
Daniel Dose, Esq.
Jennifer Crawford, Esq.
Zachary Bloom, Esq.
discovery-gcl@psc.state.fl.us

DR 3.1 – Neighborhood Completed Projects

Neighborhood 20250130

3.1

Project	Cost
Chlorine Analyzer Installation	1,915.00
1/1/2024	760.00
4/1/2024	1,155.00
Emergency Generator Replacement	82,681.56
5/31/2023	2,089.16
1/1/2025	80,592.40
Hydropneumatic Tank interior/Exterior Recoating/Rehabilitation	28,409.40
5/31/2023	8,813.03
1/1/2024	7,602.91
3/1/2024	2,397.87
4/1/2024	9,595.59
New Air Compressor Installation	10,048.30
4/1/2024	990.00
6/1/2024	9,058.30
Remote Monitoring	11,756.79
5/31/2023	5,583.19
6/1/2024	3,182.45
6/1/2025	2,991.15
Safety Equipment Installation	10,837.72
4/1/2024	6,356.15
6/1/2024	2,191.48
7/1/2024	2,290.09
Well 2 Maintenance	10,673.90
1/1/2024	6,127.11
5/1/2024	4,546.79
Well Pump Replacement (Well 2)	81,898.94
2/1/2024	48,146.38
4/1/2024	21,979.72
1/1/2026	11,772.84
Grand Total	238,221.61