

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

STATE OF FLORIDA



DIVISION OF ENGINEERING
TOM BALLINGER
DIRECTOR
(850) 413-6910

Public Service Commission

November 20, 2025

Ms. Cortney Young
7232 Knoll Drive
New Port Richey, FL 34653
Cortney.erny@me.com

VIA EMAIL & CERTIFIED MAIL
CERTIFIED MAIL No. 9590 9402 8838 4005 2357 87

Re: Docket No. 20250131-WU - Letter of intent to petition for revocation of water Certificate of Authorization No. 288-W of Orange Land Utilities, LLC, in Pasco County, by Cortney Young, pursuant to Section 367.072, F.S. - Instructions for Petitioning for Revocation of Water Certificate

Dear Ms. Young:

This is to acknowledge receipt of your notice of intent to petition for revocation of water Certificate of Authorization No. 288-W of Orange Land Utilities, LLC (Utility), filed October 24, 2025, with the Florida Public Service Commission (Commission) pursuant to Section 367.072, Florida Statutes (F.S.). Enclosed you will find a copy of the Statute, Rule 25-30.091, Florida Administrative Code (F.A.C.), the Department of Environmental Protection's primary and secondary drinking water standards (Rule 62-550.828, F.A.C.), and the Petition Form that must be copied and used for the submission of signatures.

Please read the attached Statute carefully and note the deadlines and requirements established by the Legislature for the petition process. The Commission does not have authority to waive or amend these deadlines, or alter the requirements. Please be advised that an individual signing a petition may be asked to testify under oath before the Commission and be subject to cross-examination by the Utility and parties.

Petitioner(s) have 90 calendar days from the date these instructions are received to obtain the signatures of at least 65 percent of the customer accounts of the Utility. The enclosed Statute provides guidance on how to count customers serviced by a master meter.

The Commission staff has contacted the Utility and the Utility has certified that, as of November 10, 2025, there are 74 customers of record.¹ Therefore, you will need at least 49 customers to complete, sign, and file the Petition Form to meet the 65 percent threshold.

¹ See Document No.15024-2025, filed November 10, 2025, and Document No. 15173-2025, filed November 19, 2025.

Ms. Courtney Young

Page 2

November 20, 2025

Once the petitions are submitted, Commission staff will review each Petition Form for sufficiency. For petitions to be sufficient, the Petition Form must state with specificity each issue each customer has relating to water quality service, each time the customer reported the issue to the Utility, and how long each issue has existed. The staff review for sufficiency will take no more than 10 calendar days to complete. If staff identifies deficiencies, you will be notified and will have 30 calendar days to cure the deficiencies. If you fail to meet the 30 calendar day deadline or elect not to refile, the Commission must dismiss the petition at a publicly noticed meeting, and the customers will be barred from filing a petition for one year.

Petition Forms must be filed with the Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850, by the deadline set by the Statute. Petition Forms and other documents may be filed electronically. Instructions for electronic filing are available on the Commission's website: <https://www.floridapsc.com/filing-documents-electronically>. In addition, the Petition Form and Instructions will be available on the Commission's website, under Hot Topics, after confirmation that the Petitioner has received these documents.

If you obtain the required signatures and the petition is deemed sufficient, the Commission will determine if a reasonable likelihood exists that the Utility is failing to provide quality water services. The Commission's subsequent action on the petition will be subject to the requirements of Sections 120.569, 120.57, 120.60(5), and 367.072(5), F.S. Customers with technical questions may contact Clayton Lewis with the Division of Engineering by phone at (850) 413-6578 or by email at clewis@psc.state.fl.us. Customers with legal questions may contact Major Thompson with the Office of General Counsel by phone at (850) 413-6076 or by email at major.thompson@psc.state.fl.us.

Sincerely,

s/ Clayton Lewis

Clayton Lewis
U S Engineering Specialist
Division of Engineering

CL:da

Attachments

cc: Office of Commission Clerk (DN 20250131-WU)
Mr. Michael Smallridge (mike@fus1llc.com)
Marty Friedman, Esq. (mfriedman@deanmead.com)
John Wharton, Esq. (jwharton@deanmead.com)

WATER AND WASTEWATER SYSTEMS

367.072 Petition to revoke certificate of authorization.—The Legislature finds that it is in the public interest that water service be of good quality and consistent with the standards set forth in this chapter. Therefore, a utility's certificate of authorization to provide water service may be revoked if, after its customers file a petition with the commission, the commission finds that revocation is in the best interest of the customers in accordance with this section. As used in this section, the term "customer" means an individual whose property is serviced by a single meter or a person whose name appears on the bill for a master meter.

(1)(a) If the commission receives a letter from the customers of a utility stating their intent to file a petition pursuant to this section, the commission staff, within 10 days after receipt of the letter, shall notify the utility of the customers' intent to file a petition.

(b) Commission staff shall send to the customers instructions regarding the information required on the petition and the subsequent process the commission will follow. The petition must be filed within 90 days after the receipt of the instructions. Commission staff shall review the petition and notify the customers within 10 days after receipt of the petition that the petition is sufficient for the commission to act or that additional information is necessary. The customers must file a cured petition within 30 days after receipt of the notice to cure and provide a copy of the petition to the utility. If the customers fail to file or refile a petition within the allotted time, the commission shall dismiss the petition with prejudice, and the customers may not file another petition for 1 year after the dismissal.

(2) A petition must:

(a) State with specificity each issue that customers have with the quality of water service, each time the issue was reported to the utility, and how long each issue has existed; and

(b) Be signed by at least 65 percent of the customers of the service area covered under the certificate of authorization. A person whose name appears on the bill for a master meter may sign a petition if at least 65 percent of the customers, tenants, or unit owners served by the master meter support the petition, in which case documentation of such support must be included with the petition.

(3) If the petition is in compliance with this section and the issues identified within the petition support a reasonable likelihood that the utility is failing to provide quality of water service, the utility shall thereafter be prohibited from filing a rate case until the commission has issued a final order addressing the issues identified in the petition. The utility shall use the following criteria in preparing a response to the commission, addressing the issues identified

within the petition and defending the quality of its water service:

(a) Federal and state primary water quality standards or secondary water quality standards pursuant to s. 367.0812; and

(b) The relationship between the utility and its customers, including each complaint received regarding the quality of water service, the length of time each customer has been complaining about the service, the resolution of each complaint, and the time it has taken to address such complaints.

(4) The commission shall evaluate the issues identified in the petition, the utility's response as to whether it is providing quality of water service, and any other factor the commission deems relevant.

(5) Based upon its evaluation, the commission shall:

(a) Dismiss the petition, in which case the decision must be supported by clear and convincing evidence and is subject to ss. 120.569 and 120.57;

(b) Require the utility to take the necessary steps to correct the quality of water service issues identified in the petition. The commission shall set benchmarks within a timeframe, not to exceed 3 years, and may require the utility to provide interim reports describing its progress in meeting such benchmarks. The commission may extend the term 3 years for circumstances that delay the project which are not in the control of the utility, such as natural disasters and obtaining permits necessary for meeting such benchmarks; or

(c) Notwithstanding s. 367.045, revoke the utility's certificate of authorization, in which case a receiver must be appointed pursuant to s. 367.165 until a sale of the utility system has been approved pursuant to s. 367.071.

(6) The commission shall adopt by rule the format of and requirements for a petition and may adopt other rules to administer this section.

History.—s. 1, ch. 2014-68.

PUBLIC SERVICE COMMISSION
WATER AND WASTEWATER UTILITY RULES

25-30.091 Petition to Revoke Water Certificate of Authorization.

(1) Purpose. The purpose of this rule is to establish a process by which customers of investor-owned drinking water utilities may petition the Commission to revoke a utility's certificate of authorization pursuant to Section 367.072, F.S.

(2) Pursuant to Section 367.0812(3), F.S., customers may not petition the Commission to revoke a utility's water certificate of authorization if the utility is the subject of a proceeding under Chapter 367, F.S. For the purposes of this rule, a proceeding under Chapter 367, F.S., means any rate proceeding in which quality of water service is addressed, such as a general rate proceeding under Section 367.081, F.S., a staff assisted rate proceeding under Section 367.0814, F.S., or a limited proceeding under Section 367.0822, F.S. A general rate proceeding under Chapter 367, F.S., is initiated upon the utility's filing of a request for approval of a test year pursuant to Rule 25-30.430, F.A.C. Other rate proceedings under Chapter 367, F.S., are initiated upon the utility's filing of an application for rate relief.

(3) Letter of Intent. Utility customers who intend to petition the Commission for revocation of their utility's certificate of authorization pursuant to Section 367.072, F.S., shall notify the Commission in writing of their intent to file a petition for revocation of certificate. In the letter of intent, the customers shall advise the Commission of the name and address of their water utility. The letter of intent shall be filed with the Office of Commission Clerk.

(4) Within 10 days after receipt of the letter of intent, the Commission staff will notify the utility of the customers' intent to file a petition for revocation of its certificate of authorization.

(5) In the notification letter to the utility, the Commission staff will request that the utility certify, within 30 days after receipt of the notification letter, the number of water customers the utility serves by counting its service connections, and provide staff with a list of its customers' names and addresses.

(6) If the utility fails to certify the number of customers it serves by the date requested in the notification letter, Commission staff will utilize the number of customers reported by the utility in its most recent annual report on file with the Commission to evaluate the sufficiency of the petition pursuant to Section 367.072(1)(b), F.S.

(7) Upon receipt of the utility's response to the

Commission staff's request to certify the number of customers the utility serves, or, if the utility fails to respond to the Commission staff's request to certify the number of customers the utility serves, upon the expiration of 30 days from the utility's receipt of the Commission staff's request, the Commission staff will send the following materials to customers who file a letter of intent pursuant to subsection (3) of this rule:

(a) "Instructions for Petitioning for Revocation of Water Certificate," (EFF. 12/14), which are incorporated herein by reference and are available at <http://www.flrules.org/Gateway/reference.asp?No=R ef-04971>;

(b) Form PSC 1000 (12/14), entitled "Florida Public Service Commission: Petition to Revoke the Certificate of Authorization of [Utility Name]," which petition form the customers must copy and use for the collection of signatures to be submitted to the Commission. A sample of Form PSC 1000 (12/14) is incorporated herein by reference for informational purposes only, and is available at <http://www.flrules.org/Gateway/reference.asp?No=R ef-04972>. The sample petition form incorporated herein must not be used for the collection of signatures;

(c) A copy of Section 367.072, F.S.;

(d) A copy of this rule; and

(e) A copy of the state primary and secondary drinking water standards, as contained in Rule 62-550.828, F.A.C.

(8) For a petition for revocation to be deemed sufficient, the following criteria must be met:

(a) Each petition form must include the printed name, signature, service address, and telephone number of the customer-signatory;

(b) Each petition form must state with specificity each issue that the customer-signatory has with the quality of water service provided, each time the issue was reported to the utility, and how long the issue has existed; and

(c) Petition forms must be completed by at least 65 percent of the utility's customers, as that term is defined in Section 367.072, F.S.

(9) The customers must file the completed petition forms with the Office of Commission Clerk within 90 days after receipt of the staff's instructions.

(10) Within 10 days after receipt of the petition, the staff will provide notice to the customers who filed the letter of intent or their designated representative

by letter as to whether the petition is sufficient for the Commission to act, and will provide a copy of the notice to the utility. If the petition is deficient, the notice will specify what additional information is required.

(11) If the notice identifies deficiencies in the petition, the customers must file a corrected petition with the Office of Commission Clerk curing the noticed deficiencies within 30 days after receipt of the notice, and must provide a copy of the cured petition to the utility. The staff will notify the customers who file a corrected petition or their designated representative by letter as to whether the corrected petition has cured the deficiencies specified in the notice provided under subsection (10), and will provide a copy of the letter to the utility. If the customers fail to timely cure the noticed deficiencies, the petition will be dismissed pursuant to Section 367.072(1)(b), F.S.

(12) The utility may file a response to a sufficiently filed petition with the Office of Commission Clerk within 14 days from the staff letter notifying the customers that the petition is sufficient for the Commission to act.

(13) The staff will file a recommendation for the Commission to determine at a scheduled agenda conference whether the issues identified in a sufficiently filed petition support a reasonable likelihood that the utility is failing to provide quality water services.

(14) If the Commission determines that the issues identified in the petition do not support a reasonable likelihood that the utility is failing to provide quality water services, the Commission's order dismissing the petition will be issued as a proposed agency action. The notice of proposed agency action will give substantially affected persons an opportunity to request a Section 120.569 or 120.57, F.S., hearing on the matter within 21 days after issuance of the notice, pursuant to Rule 25-22.029, F.A.C.

(15) If the Commission determines that the issues identified in the petition support a reasonable likelihood that the utility is failing to provide quality water services, the Commission will order the utility to show cause as to why its water certificate of authorization should not be revoked, and will set the matter for hearing pursuant to Sections 120.569, 120.57, 120.60(5), and 367.072(5), F.S. The utility's response to the show cause order shall use the criteria set forth in Sections 367.072(3)(a) and (b), F.S., in addressing the issues identified within the petition.

Rulemaking Authority 350.127(2), 367.072, 367.0812 FS. Law Implemented 367.072, 367.0812 FS. History--New 2-10-15.

TABLE 1
MAXIMUM CONTAMINANT LEVELS FOR INORGANIC COMPOUNDS

FEDERAL CONTAMINANT ID NUMBER	CONTAMINANT	MCL (mg/L)
1074	Antimony	0.006
1005	Arsenic	0.05 through 12/31/2004 0.010 on and after 01/01/2005
1094	Asbestos	7 MFL
1010	Barium	2
1075	Beryllium	0.004
1015	Cadmium	0.005
1020	Chromium	0.1
1024	Cyanide (as free Cyanide)	0.2
1025	Fluoride	4.0
1030	Lead	0.015
1035	Mercury	0.002
1036	Nickel	0.1
1040	Nitrate	10 (as N)
1041	Nitrite	1 (as N)
	Total Nitrate and Nitrite	10 (as N)
1045	Selenium	0.05
1052	Sodium	160
1085	Thallium	0.002

Abbreviations Used: MCL = maximum contaminant level;
MFL = million fibers per liter (longer than 10 micrometers);
mg/L = milligrams per liter.

TABLE 2
MAXIMUM RESIDUAL DISINFECTANT LEVELS

FEDERAL CONTAMINANT ID NUMBER	DISINFECTANT RESIDUAL	MRDL (mg/L)
1012	Chlorine	4.0 (as Cl ₂)
1006	Chloramines	4.0 (as Cl ₂)
1008	Chlorine Dioxide	0.8 (as ClO ₂)

Abbreviations Used: mg/L = milligrams per liter;
MRDL = maximum residual disinfectant level.

TABLE 4
MAXIMUM CONTAMINANT LEVELS FOR VOLATILE ORGANIC CONTAMINANTS

FEDERAL CONTAMINANT ID NUMBER	CONTAMINANT & (CAS NUMBER)	MCL (mg/L)
2977	1,1-Dichloroethylene (75-35-4)	0.007
2981	1,1,1-Trichloroethane (71-55-6)	0.2
2985	1,1,2-Trichloroethane (79-00-5)	0.005
2980	1,2-Dichloroethane (107-06-2)	0.003
2983	1,2-Dichloropropane (78-87-5)	0.005
2378	1,2,4-Trichlorobenzene (120-82-1)	0.07
2990	Benzene (71-43-2)	0.001
2982	Carbon tetrachloride (56-23-5)	0.003
2380	cis-1,2-Dichloroethylene (156-59-2)	0.07
2964	Dichloromethane (75-09-2)	0.005
2992	Ethylbenzene (100-41-4)	0.7
2989	Monochlorobenzene (108-90-7)	0.1
2968	o-Dichlorobenzene (95-50-1)	0.6
2969	para-Dichlorobenzene (106-46-7)	0.075
2996	Styrene (100-42-5)	0.1
2987	Tetrachloroethylene (127-18-4)	0.003
2991	Toluene (108-88-3)	1
2979	trans-1,2-Dichloroethylene (156-60-5)	0.1
2984	Trichloroethylene (79-01-6)	0.003
2976	Vinyl chloride (75-01-4)	0.001
2955	Xylenes (total) (1330-20-7)	10

Abbreviations used: CAS Number = Chemical Abstract System Number;
MCL = maximum contaminant level;
mg/L = milligrams per liter.

TABLE 5
MAXIMUM CONTAMINANT LEVELS FOR SYNTHETIC ORGANIC CONTAMINANTS

FEDERAL CONTAMINANT ID NUMBER	CONTAMINANT & (CAS NUMBER)	MCL (mg/L)	Regulatory Detection Limit (mg/L)
2063	2,3,7,8-TCDD (Dioxin) (1746-01-6)	3 X 10 ⁻⁸	5 x 10 ⁻⁹
2105	2,4-D (94-75-7)	0.07	0.0001
2110	2,4,5-TP (Silvex) (93-72-1)	0.05	0.0002
2051	Alachlor (15972-60-8)	0.002	0.0002
2050	Atrazine (1912-24-9)	0.003	0.0001
2306	Benzo(a)pyrene (50-32-8)	0.0002	0.00002
2046	Carbofuran (1563-66-2)	0.04	0.0009
2959	Chlordane (57-74-9)	0.002	0.0002
2031	Dalapon (75-99-0)	0.2	0.001
2035	Di(2-ethylhexyl)adipate (103-23-1)	0.4	0.0006
2039	Di(2-ethylhexyl)phthalate (117-81-7)	0.006	0.0006
2931	Dibromochloropropane (DBCP) (96-12-8)	0.0002	0.00002
2041	Dinoseb (88-85-7)	0.007	0.0002
2032	Diquat (85-00-7)	0.02	0.0004
2033	Endothall (145-73-3)	0.1	0.009
2005	Endrin (72-20-8)	0.002	0.00001
2946	Ethylene dibromide (EDB) (106-93-4)	0.00002	0.00001
2034	Glyphosate (1071-83-6)	0.7	0.006
2065	Heptachlor (76-44-8)	0.0004	0.00004
2067	Heptachlor epoxide (1024-57-3)	0.0002	0.00002
2274	Hexachlorobenzene (118-74-1)	0.001	0.0001
2042	Hexachlorocyclopentadiene (77-47-4)	0.05	0.0001
2010	Lindane (58-89-9)	0.0002	0.00002
2015	Methoxychlor (72-43-5)	0.04	0.0001
2036	Oxamyl (vydate) (23135-22-0)	0.2	0.002
2326	Pentachlorophenol (87-86-5)	0.001	0.00004
2040	Picloram (1918-02-1)	0.5	0.0001
2383	Polychlorinated biphenyls (PCBs)	0.0005	0.0001
2037	Simazine (122-34-9)	0.004	0.00007
2020	Toxaphene (8001-35-2)	0.003	0.001

Abbreviations used: CAS Number = Chemical Abstract System Number;
MCL = maximum contaminant level;
mg/L = milligrams per liter.

NOTE: The Detection Limits listed in this table become effective January 22, 2004.

TABLE 6
SECONDARY DRINKING WATER STANDARDS

FEDERAL CONTAMINANT ID NUMBER	CONTAMINANT	SMCL (mg/L)*
1002	Aluminum	0.2
1017	Chloride	250
1022	Copper	1
1025	Fluoride	2.0
1028	Iron	0.3
1032	Manganese	0.05
1050	Silver	0.1
1055	Sulfate	250
1095	Zinc	5
1905	Color	15 color units
1920	Odor**	3 (threshold odor number)
1925	pH	6.5 - 8.5
1930	Total Dissolved Solids	500
2905	Foaming Agents	0.5

Abbreviations Used:

SMCL = maximum contaminant level;
mg/L = milligrams per liter.

* Except color, odor, and pH.

** For purpose of compliance with ground water quality secondary standards, as referenced in Chapter 62-520, F.A.C., levels of ethylbenzene exceeding 30 micrograms per liter, toluene exceeding 40 micrograms per liter, or xylenes exceeding 20 micrograms per liter shall be considered equivalent to exceeding the drinking water secondary standard for odor.

Florida Public Service Commission: Petition to Revoke the Certificate of Authorization of Orange Land Utilities, LLC

Docket No: 20250131-WU

The undersigned requests the Florida Public Service Commission to revoke the certificate of authorization of the utility that is the subject of the docket referenced above.

State with specificity each issue you have with the quality of your water service.	Indicate each time you reported the issue to the utility, including the date(s) of contact.	Indicate how long each issue has existed.
<u>Issue 1:</u>		<input type="checkbox"/> 0-6 months <input type="checkbox"/> 6 months-1 year <input type="checkbox"/> 1 year or more
<u>Issue 2:</u>		<input type="checkbox"/> 0-6 months <input type="checkbox"/> 6 months-1 year <input type="checkbox"/> 1 year or more
<u>Issue 3:</u>		<input type="checkbox"/> 0-6 months <input type="checkbox"/> 6 months-1 year <input type="checkbox"/> 1 year or more

Printed Name of Customer

Signature _____

Customer's Service Address (Street, City, Zip Code)

Contact Number

Alternate Contact Number
(If Applicable)

Date _____

You must identify at least one issue. If you have more than three issues or need more space to state your issue(s), you may add additional pages as needed. You may attach supporting documentation for the issue(s) identified. Only one customer for each service address may sign the petition. By signing this petition form, you may be called to testify before the Commission to confirm your signature and verify the issue(s) you list above. You may be questioned by the utility or the Commission about your statements and you will be asked to answer truthfully under oath.