

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application of Sun)
Communities Finance, LLC)
d/b/a Water Oak Utility for)
Revenue Neutral Water Rate)
Restructuring in Lake County.)

Docket No.

080295-

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COMMISSION CLERK

APPLICATION FOR REVENUE NEUTRAL RATE RESTRUCTURING

COMES NOW Sun Communities Finance, LLC d/b/a Water Oak Utility in accordance with the requirements and the provisions of Section 25-22.036 and 25-30.446, Florida Administrative Code, and Section 367.091, Florida Statutes, and files this Application for restructuring of its water rates and in support thereof states as follows:

1. The name and address of the Applicant as it appears on the Applicant's certificate and its principle place of business are as follows:

Sun Communities Finance, LLC d/b/a Water Oak Utility
The American Center 27777 Franklin Road, Suite 200
Southfield, MI 48034-8205

2. The Applicant is a separate division of a Limited Liability Corporation incorporated in florida. The date of formation of that Limited Liability Corporation is June 9, 1999. The name and address of the owners of the Applicant are as follows:

Sun Communities Finance, LLC
The American Center 27777 Franklin Road, Suite 200
Southfield, MI 48034-8205

3. The Applicant currently utilizes rates and a rate structure established for the Utility by Commission Order No. PSC-00-1165-PAA-WS, issued on June 27, 2000 and subsequently

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adjusted through indexes filed in 2003 through 2005.

4. The address within the service area where the Application is available for customer inspection during the time the Rate Application is pending is as follows:

Sun Communities Finance, LLC d/b/a Water Oak Utility
106 Evergreen Lane
Lady Lake, Florida 32159

5. Attached as **Exhibit "A"** is a statement signed by an officer that the Utility will comply with the noticing requirements of Rule 25-30.446, Florida Administrative Code.

6. The St. Johns River Water Management District has informally informed the Utility that implementing a conservation oriented rate structure will be a requirement when the existing Consumptive Use Permit is up for renewal in 2010. They have been informed of our intent to go ahead and seek PSC approval for such a change and the staff of the District have expressed support for this Application and a desire for us to do so as quickly as possible. Attached as **Exhibit "C"** is a recent letter requested from the District to memorialize their previously expressed support of this proposed rate structure change.

7. Since the Applicant herein is not seeking an increase in rates, but rather a revenue neutral rate restructuring, an estimate by a professional engineer or other knowledgeable person, to establish a projected cost related to such requirement, is not applicable.

8. Since the Applicant herein is not seeking an increase in rates, but rather a revenue neutral rate restructuring, a schedule

that provides specific rate base components for which the Utility seeks recovery and the other requirements under Section 25-30.445(4)(c), (d), (e), (f), (g), (h), (i), and (l) are inapplicable and have not been provided.

9. Schedules which depict the information required by Section 25-30.445(4)(j), (k), and (m), including a calculation of annualized revenues for the most recent 12 month period using the rates in effect at the time the Utility is filing its Application; the schedule reflecting this by customer class and meter size; a schedule of current and proposed rates for all classes of customers; and a copy of all workpapers and calculations used to calculate the requested rates and allocations between each customer class, are included in the attached four accounting schedules included as part of **Exhibit "B"** hereto.

10. A consolidated billing analysis is included as part of **Exhibit "B"** as Schedule E-14.

11. The Utility's rate base has not declined since its most recent rate proceeding and in fact, has increased substantially. No additional expenses are sought for recovery pursuant to this Application and, therefore, the statement required by Section 25-30.445(7), Florida Administrative Code, is not applicable.

12. Attached hereto in accordance with the requirements of Rule 25-30.020(2)(g) is a filing fee in the amount of \$1,000 for utilities with the existing capacity to serve between 501 and 2,000 ERCs.

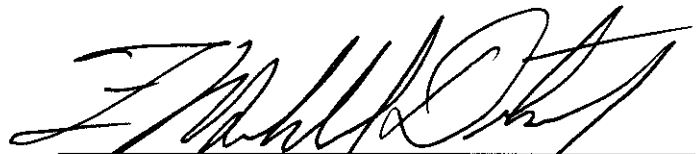
WHEREFORE the Utility requests that the Florida Public Service

Commission do the following:

1. Accept jurisdiction to grant a revenue neutral rate restructuring for Sun Communities Finance, LLC d/b/a Water Oak Utility; and
2. Approve the requested rates in order to implement an inclining block rate structure for the water system of Sun Communities Finance, LLC d/b/a Water Oak Utility.

Respectfully submitted on this
30th day of May 2008, by:

ROSE, SUNDSTROM & BENTLEY
2548 Blairstone Pines Drive
Tallahassee, Florida 32301
(850) 877-6555



F. MARSHALL DETERDING

STATE OF ~~FLORIDA~~ Michigan
COUNTY OF Oakland

Affidavit

BEFORE ME, personally appeared Karen J. Deary who is the CFO
of Sun Communities Finance, LLC d/b/a Water Oak Utility, who states that Sun Communities
Finance, LLC d/b/a Water Oak Utility will comply with the noticing requirements of Rule 25-
30.446, Florida Administrative Code.

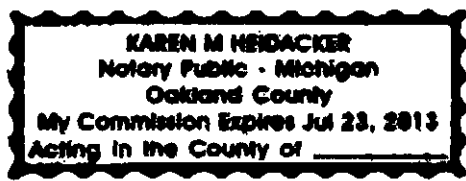
Karen J. Deary

Michigan
STATE OF ~~FLORIDA~~
COUNTY OF Oakland

The foregoing instrument was acknowledged before me this 7 day of May
2008, by Karen J. Deary, who is personally known to me or who has produced _____
as identification.

Karen M. Heidacker

Print Name: _____
Notary Public
State of ~~Florida~~ Michigan at Large
My Commission Expires:



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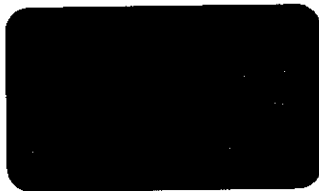


**Sun Communities Finance LLC D/B/A Water Oak Utility
Limited Proceeding For Revenue Neutral
Water Conservation Rate Structure
Special Report
April 22, 2008**

DOCUMENT NUMBER - DATE

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Carlstedt, Jackson, Nixon & Wilson
CERTIFIED PUBLIC ACCOUNTANTS, P.A.

James L. Carlstedt, C.P.A.
Paul E. DeChario, C.P.A.
Katherine U. Jackson, C.P.A.
Robert H. Jackson, C.P.A.
Cheryl T. Losee, C.P.A.
Robert C. Nixon, C.P.A.
Jeanette Sung, C.P.A.
Holly M. Towner, C.P.A.
James L. Wilson, C.P.A.

April 22, 2008

To the Member
Sun Communities Finance, LLC d/b/a Water Oak Utility

In accordance with your request, we have prepared the accompanying Special Report of Sun Communities Finance, LLC d/b/a Water Oak Utility consisting of the schedules listed in the preceding Index.

This report is intended solely for use as part of a Limited Proceeding application for revenue neutral restructuring of present water rates to conservation rates, to be filed with the Florida Public Service Commission and should not be used for any other purpose.

Because this Special Report was not audited by us, we do not express an opinion or any other form of assurance on it.

Carlstedt, Jackson, Nixon & Wilson

CARLSTEDT, JACKSON, NIXON & WILSON

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Sun Communities Finance, LLC D/B/A Water Oak Utility
Limited Proceeding
Revenue Neutral Water Conservation Rate Restructuring
Special Report

Index

Schedule		
<u>No.</u>	<u>Page(s)</u>	
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3	3-4	Actual and Proforma Water Revenue Requirement and Rate Calculations
4	5	Schedule of Factored Gallons and ERC's

Appendix I

E - 14	1-10	Consolidated Billing Analysis
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Sun Communities Finance, LLC D/B/A Water Oak Utility
 Schedule of Present and Proposed Water Conservation Rates
 Year Ended December 31, 2007

Line No.		Present Rates	Proposed Conservation Rates
1	<u>Residential</u>		
2	Base facility charges:		
3	5/8 x 3/4"	\$ 6.88	\$ 6.92
4	3/4"	10.70	10.38
5	1"	17.26	17.30
6	1-1/2"	34.50	34.60
7	2"	55.22	55.36
8	3"	110.43	110.72
9	4"	172.56	173.00
10	6"	345.12	346.00
11	Gallonge charge per 1,000 gallons	0.56	
12	Gallonge charges per 1,000 gallons:		
13	Block 1 - zero to 7,000 gallons usage		0.43
14	Block 2 - 7000 to 12,000 gallons usage		0.86
15	Block 3 - over 12,000 gallons usage		1.29
16	<u>Residential Irrigation</u>		
17	Base facility charge - 5/8 x 3/4"	3.46	3.46
18	Gallonge charge per 1,000 gallons	0.56	
19	Gallonge charges per 1,000 gallons:		
20	Block 1 - zero to 7,000 gallons usage		0.43
21	Block 2 - 7000 to 12,000 gallons usage		0.86
22	Block 3 - over 12,000 gallons usage		1.29
23	<u>General Service</u>		
24	Base facility charges:		
25	5/8 x 3/4"	6.88	6.92
26	3/4"	10.70	10.38
27	1"	17.26	17.30
28	1-1/2"	34.50	34.60
29	2"	55.22	55.36
30	3"	110.43	110.72
31	4"	172.56	173.00
32	6"	345.12	346.00
33	Gallonge charge per 1,000 gallons	0.56	0.68

Sun Communities Finance, LLC D/B/A Water Oak Utility
Schedule of Water Revenue at Existing and Proposed Conservation Rates
Year Ended December 31, 2007

Line No.		No. Bills / Gallons Sold (000)	Existing Rates	Existing Annual Revenue	Proposed Conservation Rates	Proposed Revenue
1	<u>Residential</u>					
2	Base facility charges - 5/8 x 3/4"	11,851	\$ 6.88	\$ 81,535	\$ 6.92	\$ 82,009
3	Gallonge charges - existing rates	94,100	0.56	<u>52,696</u>		
4	Gallonge charges - proposed rates:					
5	Block 1 - zero to 7,000 gallons usage	54,546			0.43	23,455
6	Block 2 - 7000 to 12,000 gallons usage	23,802			0.86	20,470
7	Block 3 - over 12,000 gallons usage	<u>11,047</u>			1.29	<u>14,251</u>
8		<u>89,395</u>				<u>58,176</u>
9	Total residential revenue			<u>134,231</u>		<u>140,185</u>
10	<u>Residential Irrigation</u>					
11	Base facility charges - 5/8 x 3/4"	74	3.46	256	3.46	<u>256</u>
12	Gallonge charges - existing rates	627	0.56	<u>351</u>		
13	Gallonge charges - proposed rates:					
14	Block 1 - zero to 7,000 gallons usage	332			0.43	143
15	Block 2 - 7000 to 12,000 gallons usage	156			0.86	134
16	Block 3 - over 12,000 gallons usage	<u>108</u>			1.29	<u>139</u>
17		<u>596</u>				<u>416</u>
18	Total residential irrigation revenue			<u>607</u>		<u>672</u>
19	<u>General Service</u>					
20	Base facility charges:					
21	5/8 x 3/4"	152	6.88	1,046	6.92	1,052
22	1"	9	17.26	155	17.30	156
23	1-1/2"	39	34.50	1,346	34.60	1,349
24	2"	144	55.22	7,952	55.36	7,972
25	3"	24	110.43	<u>2,650</u>	110.72	<u>2,657</u>
26				<u>13,149</u>		<u>13,186</u>
27	Gallonge charges	7,358	0.56	<u>4,120</u>	0.68	<u>5,003</u>
28	Total general service revenue			<u>17,269</u>		<u>18,189</u>
29	Total annual revenue at existing / proposed rates			152,107		159,046
30	Total annual revenue per books / proforma revenue requirement			<u>151,854</u>		<u>159,184</u>
31	Immaterial difference			<u>\$ 253</u>		<u>\$ (138)</u>

Sun Communities Finance, LLC D/B/A Water Oak Utility
Actual and Proforma Revenue Water Requirement and Rate Calculations
Year Ended December 31, 2007

Line No.	NARUC Account	Revenue Components	2007 Total Revenue	Base Facility Charge %	Gallonage Charge %	Base Facility Charge Revenue	Gallonage Revenue
1		O&M Expense:					
2	601	Salaries & wages	\$ 18,840	60.00%	40.00%	\$ 11,304	\$ 7,536
3	604	Employee pensions & benefits	2,160	60.00%	40.00%	1,296	864
4	615	Purchased power	20,161	60.00%	40.00%	12,097	8,064
5	618	Chemicals	3,068	60.00%	40.00%	1,841	1,227
6	620	Materials & supplies	1,581	60.00%	40.00%	949	632
7	632	Contractual services - accounting	5,222	60.00%	40.00%	3,133	2,089
8	633	Contractual services - legal	842	60.00%	40.00%	505	337
9	634	Contractual services - mgt. fees	29,000	60.00%	40.00%	17,400	11,600
10	635	Contractual services - testing	16,616	60.00%	40.00%	9,970	6,646
11	636	Contractual services - other	8,939	60.00%	40.00%	5,363	3,576
12	658	Insurance - workmans comp.	720	60.00%	40.00%	432	288
13	675	Miscellaneous	1,762	60.00%	40.00%	1,057	705
14		Total O&M	<u>108,911</u>			<u>65,347</u>	<u>43,564</u>
15	403	Depreciation	19,984	60.00%	40.00%	11,990	7,994
16		Amortization of CIAC	<u>(5,913)</u>	60.00%	40.00%	<u>(3,548)</u>	<u>(2,365)</u>
17		Net depreciation	<u>14,071</u>			<u>8,443</u>	<u>5,628</u>
18	408	Taxes other than income:					
19		Regulatory Assessment Fees	6,833	60.00%	40.00%	4,100	2,733
20		Property taxes	3,686	60.00%	40.00%	2,212	1,474
21		Payroll taxes	<u>1,530</u>	60.00%	40.00%	<u>918</u>	<u>612</u>
22		Total taxes other than income	<u>12,049</u>			<u>7,229</u>	<u>4,820</u>
23		Operating income	<u>16,823</u>	60.00%	40.00%	<u>10,094</u>	<u>6,729</u>
24		Total 2007 revenue - actual	151,854			91,112	60,742
25		Add estimated rate case expense					
26		(28,000 amortized over 4 years)	7,000	60.00%	40.00%	4,200	2,800
27		Regulatory Assessment Fees	<u>330</u>	60.00%	40.00%	<u>198</u>	<u>132</u>
28		Total revenue requirement - proforma	<u>\$ 159,184</u>			<u>\$ 95,510</u>	<u>\$ 63,674</u>
29		Percentages - total revenue	<u>100.00%</u>			<u>60.00%</u>	<u>40.00%</u>
30		<u>Rates before conservation rate calculations</u>					
31		Factored ERC's				<u>13,794</u>	
32		Base facility charge				<u>\$ 6.92</u>	
33		Gallons sold (000)					<u>102,085</u>
34		Gallonage charge					<u>\$ 0.62</u>
35		Rounding to eliminate immaterial difference applied to general service rate					<u>0.06</u>
36		Adjusted gallonage charge					<u>\$ 0.68</u>

Sun Communities Finance, LLC D/B/A Water Oak Utility
 Actual and Proforma Water Revenue Requirement and Rate Calculations
 Year Ended December 31, 2007

Line No.	<u>Commercial Revenue at Calculated Rates</u>	<u>Bills/ Gallons</u>	<u>Calculated Rates</u>	<u>Revenue</u>
1	Base facility charges:			
2	5/8 x 3/4"	152	\$ 6.92	\$ 1,052
3	1"	9	17.30	156
4	1-1/2"	39	34.60	1,349
5	2"	144	55.36	7,972
6	3"	<u>24</u>	110.72	<u>2,657</u>
7	Base facility charge revenue	<u>368</u>		<u>13,186</u>
8	Gallonge charge revenue	<u>7,358</u>	0.68	<u>5,003</u>
9	Total commercial revenue			<u>\$ 18,189</u>
10		<u>Base Charge</u>	<u>Gallonge</u>	<u>Total</u>
11	<u>Revenue for Residential Conservation Rates</u>	<u>Revenue</u>	<u>Revenue</u>	<u>Revenue</u>
12	Total 2007 revenue per above	\$ 95,510	\$ 63,674	\$ 159,184
13	Less commercial revenue per above	<u>(13,186)</u>	<u>(5,003)</u>	<u>(18,189)</u>
14	Residential revenue for conservation rates	<u>\$ 82,324</u>	<u>\$ 58,671</u>	<u>\$ 140,995</u>
15	<u>Residential Conservation Rate Calculation</u>			
16	Block 1 - zero to 7,000 gallons:			
17	Total residential gallonge revenue requirement			<u>\$ 58,671</u>
18	Divide by total factored residential gallons			<u>136,259</u>
19	Gallonge rate for block 1			<u>\$ 0.43</u>
20	Block 2 - 7,000 to 12,000 gallons:			
21	Gallonge rate for block 1			\$ 0.43
22	Factor for Block 2			<u>2</u>
23	Gallonge charge block 2			<u>\$ 0.86</u>
24	Block 3 - 7,000 to 12,000 gallons:			
25	Gallonge rate for block 1			\$ 0.43
26	Factor for Block 3			<u>3</u>
27	Gallonge charge block 3			<u>\$ 1.29</u>

Sun Communities Finance, LLC D/B/A Water Oak Utility
 Factored ERC's & Gallons
 Year Ended December 31, 2007

Line No.	No. Bills	ERC Factor	Factored ERC's	Gallons Sold		
1	<u>Factored ERC's & Gallons</u>					
2	11,851	1.0	11,851	94,100		
3	<u>74</u>	0.5	<u>37</u>	<u>627</u>		
4	<u>11,925</u>		<u>11,888</u>	<u>94,727</u>		
5	General Service:					
6	152	1.0	152	437		
7	9	2.5	23	13		
8	39	5.0	195	1,535		
9	144	8.0	1,152	4,264		
10	<u>24</u>	16.0	<u>384</u>	<u>1,109</u>		
11	<u>368</u>		<u>1,906</u>	<u>7,358</u>		
12	<u>12,293</u>		<u>13,794</u>	<u>102,085</u>		
13	Block	Consolid.	Repression	Repressed	Block	Factored
14	Level (000)	Gallons (000)	Factor 5%	Gallons	Factor	Gallons (000)
15	6	57,766	95.00%	54,878	1	54,878
16	12	25,219	95.00%	23,958	2	47,916
17	Over 12	<u>11,742</u>	95.00%	<u>11,155</u>	3	<u>33,465</u>
18	Total	<u>94,727</u>		<u>89,991</u>		<u>136,259</u>
19	Note (1): Consolidated & factored gallons include both residential & residential irrigation gallons.					

Appendix I

Billing Analysis Schedules

Florida Public Service Commission

Company: Water Oak Utility
 Test Year Ended: December 31, 2007
 Water [X] of Sewer []
 Customer Class: Residential
 Meter Size: 5/8" X 3/4"

Schedule: E-14
 Page 1 of 10
 Preparer: CJNW

Explanation: Provide a billing analysis for each class of service by meter size. For applicants having master metered multiple dwellings, provide the number of bills at each level by meter size or number of bills categorized by the number of units. Round consumption to nearest 1,000 gallons & begin at zero. If a rate change occurred during the test year, provide a separate billing analysis which coincides with each period.

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Consumpt. Level	Number of Bills	Cumulative Bills	Gallons Consumed (1)x(2)	Cumulative Gallons	Reversed Bills	Consolidated Factor [(1)x(6)]+(5)	Percentage of Total
0	579	579	0	0	11,272	0	0.00%
1	410	989	410	410	10,862	11,272	11.98%
2	651	1,640	1,302	1,712	10,211	22,134	23.52%
3	887	2,527	2,661	4,373	9,324	32,345	34.37%
4	957	3,484	3,828	8,201	8,367	41,669	44.28%
5	986	4,470	4,930	13,131	7,381	50,036	53.17%
6	983	5,453	5,898	19,029	6,398	57,417	61.02%
7	1,002	6,455	7,014	26,043	5,396	63,815	67.82%
8	885	7,340	7,080	33,123	4,511	69,211	73.55%
9	857	8,197	7,713	40,836	3,654	73,722	78.34%
10	808	9,005	8,080	48,916	2,846	77,376	82.23%
11	596	9,601	6,556	55,472	2,250	80,222	85.25%
12	474	10,075	5,688	61,160	1,776	82,472	87.64%
13	357	10,432	4,641	65,801	1,419	84,248	89.53%
14	271	10,703	3,794	69,595	1,148	85,667	91.04%
15	221	10,924	3,315	72,910	927	86,815	92.26%
16	161	11,085	2,576	75,486	766	87,742	93.24%
17	138	11,223	2,346	77,832	628	88,508	94.06%
18	102	11,325	1,836	79,668	526	89,136	94.72%
19	77	11,402	1,463	81,131	449	89,662	95.28%
20	59	11,461	1,180	82,311	390	90,111	95.76%
21	50	11,511	1,050	83,361	340	90,501	96.18%
22	54	11,565	1,188	84,549	286	90,841	96.54%
23	35	11,600	805	85,354	251	91,127	96.84%
24	22	11,622	528	85,882	229	91,378	97.11%
25	30	11,652	750	86,632	199	91,607	97.35%
26	23	11,675	598	87,230	176	91,806	97.56%
27	11	11,686	297	87,527	165	91,982	97.75%
28	23	11,709	644	88,171	142	92,147	97.92%
29	17	11,726	493	88,664	125	92,289	98.08%
30	16	11,742	480	89,144	109	92,414	98.21%
31	11	11,753	341	89,485	98	92,523	98.32%
32	9	11,762	288	89,773	89	92,621	98.43%

Billing Analysis Schedules

Florida Public Service Commission

Company: Water Oak Utility
Test Year Ended: December 31, 2007
Water [X] of Sewer []
Customer Class: Residential
Meter Size: 5/8" X 3/4"

Schedule: E-14
Page 2 of 10
Preparer: CJNW

Explanation: Provide a billing analysis for each class of service by meter size. For applicants having master metered multiple dwellings, provide the number of bills at each level by meter size or number of bills categorized by the number of units. Round consumption to nearest 1,000 gallons & begin at zero. If a rate change occurred during the test year, provide a separate billing analysis which coincides with each period.

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Consumpt. Level	Number of Bills	Cumulative Bills	Gallons		Reversed Bills	Consolidated Factor [(1)x(6)]+(5)	Percentage of Total
			Consumed (1)x(2)	Cumulative Gallons			
33	7	11,769	231	90,004	82	92,710	98.52%
34	6	11,775	204	90,208	76	92,792	98.61%
35	1	11,776	35	90,243	75	92,868	98.69%
36	7	11,776	252	90,243	75	92,943	98.77%
37	1	11,784	37	90,532	67	93,011	98.84%
38	5	11,789	190	90,722	62	93,078	98.91%
39	4	11,793	156	90,878	58	93,140	98.98%
40	4	11,797	160	91,038	54	93,198	99.04%
41	4	11,801	164	91,202	50	93,252	99.10%
42	7	11,808	294	91,496	43	93,302	99.15%
43	2	11,810	86	91,582	41	93,345	99.20%
44	5	11,815	220	91,802	36	93,386	99.24%
45	3	11,818	135	91,937	33	93,422	99.28%
46	5	11,823	230	92,167	28	93,455	99.31%
47	1	11,824	47	92,214	27	93,483	99.34%
48	3	11,827	144	92,358	24	93,510	99.37%
50	1	11,828	50	92,408	23	93,558	99.42%
51	1	11,829	51	92,459	22	93,581	99.45%
52	1	11,830	52	92,511	21	93,603	99.47%
54	1	11,831	54	92,565	20	93,645	99.52%
56	1	11,832	56	92,621	19	93,685	99.56%
58	1	11,833	58	92,679	18	93,723	99.60%
59	1	11,834	59	92,738	17	93,741	99.62%
62	1	11,835	62	92,800	16	93,792	99.67%
63	1	11,836	63	92,863	15	93,808	99.69%
65	2	11,838	130	92,993	13	93,838	99.72%
67	1	11,839	67	93,060	12	93,864	99.75%
69	1	11,840	69	93,129	11	93,888	99.77%
70	1	11,841	70	93,199	10	93,899	99.79%
74	1	11,842	74	93,273	9	93,939	99.83%
75	1	11,843	75	93,348	8	93,948	99.84%
78	1	11,844	78	93,426	7	93,972	99.86%
80	1	11,845	80	93,506	6	93,986	99.88%

Billing Analysis Schedules

Florida Public Service Commission

Company: Water Oak Utility
Test Year Ended: December 31, 2007
Water [X] of Sewer []
Customer Class: Residential
Meter Size: 5/8" X 3/4"

Schedule: E-14
Page 3 of 10
Preparer: CJNW

Explanation: Provide a billing analysis for each class of service by meter size. For applicants having master metered multiple dwellings, provide the number of bills at each level by meter size or number of bills categorized by the number of units. Round consumption to nearest 1,000 gallons & begin at zero. If a rate change occurred during the test year, provide a separate billing analysis which coincides with each period.

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Consumpt. Level	Number of Bills	Cumulative Bills	Gallons Consumed (1)x(2)	Cumulative Gallons	Reversed Bills	Consolidated Factor [(1)x(6)]+(5)	Percentage of Total
81	1	11,851	81	93,587	0	93,587	99.45%
84	1	11,847	84	93,671	4	94,007	99.90%
88	1	11,848	88	93,759	3	94,023	99.92%
97	1	11,849	97	93,856	2	94,050	99.95%
103	1	11,850	103	93,959	1	94,062	99.96%
141	1	11,851	141	94,100	0	94,100	100.00%

Billing Analysis Schedules

Florida Public Service Commission

Company: Water Oak Utility
 Test Year Ended: December 31, 2007
 Water [X] of Sewer []
 Customer Class: Irrigation
 Meter Size: 5/8" X 3/4"

Schedule: E-14
 Page 4 of 10
 Preparer: CJNW

Explanation: Provide a billing analysis for each class of service by meter size. For applicants having master metered multiple dwellings, provide the number of bills at each level by meter size or number of bills categorized by the number of units. Round consumption to nearest 1,000 gallons & begin at zero. If a rate change occurred during the test year, provide a separate billing analysis which coincides with each period.

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Consumpt. Level	Number of Bills	Cumulative Bills	Gallons Consumed (1)x(2)	Cumulative Gallons	Reversed Bills	Consolidated Factor [(1)x(6)]+(5)	Percentage of Total
0	6	6	0	0	68	0	0.00%
1	2	8	2	2	66	68	10.85%
2	2	10	4	6	64	134	21.37%
3	7	17	21	27	57	198	31.58%
4	9	26	36	63	48	255	40.67%
5	2	28	10	73	46	303	48.33%
6	2	30	12	85	44	349	55.66%
7	8	38	56	141	36	393	62.68%
8	5	43	40	181	31	429	68.42%
9	8	51	72	253	23	460	73.37%
10	5	56	50	303	18	483	77.03%
11	6	62	66	369	12	501	79.90%
12	1	63	12	381	11	513	81.82%
13	3	66	39	420	8	524	83.57%
15	2	68	30	450	6	540	86.12%
17	1	69	17	467	5	552	88.04%
18	1	70	18	485	4	557	88.84%
20	2	72	40	525	2	565	90.11%
43	1	73	43	568	1	611	97.45%
59	1	74	59	627	0	627	100.00%

Billing Analysis Schedules

Florida Public Service Commission

Company: Water Oak Utility
Test Year Ended: December 31, 2007
Water [X] of Sewer []
Customer Class: General Service
Meter Size: 5/8" X 3/4"

Schedule: E-14
Page 5 of 10
Preparer: CJNW

Explanation: Provide a billing analysis for each class of service by meter size. For applicants having master metered multiple dwellings, provide the number of bills at each level by meter size or number of bills categorized by the number of units. Round consumption to nearest 1,000 gallons & begin at zero. If a rate change occurred during the test year, provide a separate billing analysis which coincides with each period.

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Consumpt. Level	Number of Bills	Cumulative Bills	Gallons Consumed (1)x(2)	Cumulative Gallons	Reversed Bills	Consolidated Factor [(1)x(6)]+(5)	Percentage of Total
0	49	49	0	0	103	0	0.00%
1	28	77	28	28	75	103	23.57%
2	19	96	38	66	56	178	40.73%
3	15	111	45	111	41	234	53.55%
4	6	117	24	135	35	275	62.93%
5	6	123	30	165	29	310	70.94%
6	5	128	30	195	24	339	77.57%
7	3	131	21	216	21	363	83.07%
8	5	136	40	256	16	384	87.87%
9	5	141	45	301	11	400	91.53%
10	2	143	20	321	9	411	94.05%
11	3	146	33	354	6	420	96.11%
12	2	148	24	378	4	426	97.48%
13	1	149	13	391	3	430	98.40%
14	1	150	14	405	2	433	99.08%
16	2	152	32	437	0	437	100.00%

Billing Analysis Schedules

Florida Public Service Commission

Company: Water Oak Utility
Test Year Ended: December 31, 2007
Water [X] of Sewer []
Customer Class: General Service
Meter Size: 1"

Schedule: E-14
Page 6 of 10
Preparer: CJNW

Explanation: Provide a billing analysis for each class of service by meter size. For applicants having master metered multiple dwellings, provide the number of bills at each level by meter size or number of bills categorized by the number of units. Round consumption to nearest 1,000 gallons & begin at zero. If a rate change occurred during the test year, provide a separate billing analysis which coincides with each period.

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Consumpt.	Number	Cumulative	Gallons	Cumulative	Reversed	Consolidated	Percentage
Level	of Bills	Bills	Consumed	Gallons	Bills	Factor	of Total
			(1)x(2)			[(1)x(6)]+(5)	
0	1	1	0	0	8	0	0.00%
1	5	6	5	5	3	8	61.54%
2	2	8	4	9	1	11	84.62%
4	1	9	4	13	0	13	100.00%

Billing Analysis Schedules

Florida Public Service Commission

Company: Water Oak Utility
Test Year Ended: December 31, 2007
Water [X] of Sewer []
Customer Class: General Service
Meter Size: 1 1/2"

Schedule: E-14
Page 7 of 10
Preparer: CJNW

Explanation: Provide a billing analysis for each class of service by meter size. For applicants having master metered multiple dwellings, provide the number of bills at each level by meter size or number of bills categorized by the number of units. Round consumption to nearest 1,000 gallons & begin at zero. If a rate change occurred during the test year, provide a separate billing analysis which coincides with each period.

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Consumpt. Level	Number of Bills	Cumulative Bills	Gallons Consumed (1)x(2)	Cumulative Gallons	Reversed Bills	Consolidated Factor [(1)x(6)]+(5)	Percentage of Total
0	0	0	0	0	39	0	0.00%
1	1	1	1	1	38	39	2.54%
2	2	3	4	5	36	77	5.02%
5	1	4	5	10	35	185	12.05%
6	2	6	12	22	33	220	14.33%
7	2	8	14	36	31	253	16.48%
8	3	11	24	60	28	284	18.50%
9	5	16	45	105	23	312	20.33%
10	2	18	20	125	21	335	21.82%
11	2	20	22	147	19	356	23.19%
12	1	21	12	159	18	375	24.43%
13	2	23	26	185	16	393	25.60%
15	2	25	30	215	14	425	27.69%
17	1	26	17	232	13	453	29.51%
21	2	28	42	274	11	505	32.90%
22	1	29	22	296	10	516	33.62%
25	1	30	25	321	9	546	35.57%
27	2	32	54	375	7	564	36.74%
31	1	33	31	406	6	592	38.57%
35	1	34	35	441	5	616	40.13%
39	1	35	39	480	4	636	41.43%
62	1	36	62	542	3	728	47.43%
193	1	37	193	735	2	1,121	73.03%
364	1	38	364	1,099	1	1,463	95.31%
436	1	39	436	1,535	0	1,535	100.00%

Billing Analysis Schedules

Florida Public Service Commission

Company: Water Oak Utility
 Test Year Ended: December 31, 2007
 Water [X] of Sewer []
 Customer Class: General Service
 Meter Size: 2"

Schedule: E-14
 Page 8 of 10
 Preparer: CJNW

Explanation: Provide a billing analysis for each class of service by meter size. For applicants having master metered multiple dwellings, provide the number of bills at each level by meter size or number of bills categorized by the number of units. Round consumption to nearest 1,000 gallons & begin at zero. If a rate change occurred during the test year, provide a separate billing analysis which coincides with each period.

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Consumpt. Level	Number of Bills	Cumulative Bills	Gallons Consumed (1)x(2)	Cumulative Gallons	Reversed Bills	Consolidated Factor [(1)x(6)]+(5)	Percentage of Total
0	16	16	0	0	128	0	0.00%
1	6	22	6	6	122	128	3.00%
4	1	23	4	10	121	494	11.59%
5	3	26	15	25	118	615	14.42%
6	1	27	6	31	117	733	17.19%
7	5	32	35	66	112	850	19.93%
8	3	35	24	90	109	962	22.56%
10	6	41	60	150	103	1,180	27.67%
11	2	43	22	172	101	1,283	30.09%
12	3	46	36	208	98	1,384	32.46%
13	2	48	26	234	96	1,482	34.76%
14	2	50	28	262	94	1,578	37.01%
15	4	54	60	322	90	1,672	39.21%
16	4	58	64	386	86	1,762	41.32%
17	4	62	68	454	82	1,848	43.34%
18	9	71	162	616	73	1,930	45.26%
19	7	78	133	749	66	2,003	46.97%
20	3	81	60	809	63	2,069	48.52%
22	4	85	88	897	59	2,195	51.48%
23	1	86	23	920	58	2,254	52.86%
24	1	87	24	944	57	2,312	54.22%
25	1	88	25	969	56	2,369	55.56%
26	2	90	52	1,021	54	2,425	56.87%
27	3	93	81	1,102	51	2,479	58.14%
29	4	97	116	1,218	47	2,581	60.53%
30	4	101	120	1,338	43	2,628	61.63%
31	1	102	31	1,369	42	2,671	62.64%
32	4	106	128	1,497	38	2,713	63.63%
33	1	107	33	1,530	37	2,751	64.52%
35	1	108	35	1,565	36	2,825	66.25%
36	2	110	72	1,637	34	2,861	67.10%
39	4	114	156	1,793	30	2,963	69.49%
40	1	115	40	1,833	29	2,993	70.19%
41	1	116	41	1,874	28	3,022	70.87%

Billing Analysis Schedules

Florida Public Service Commission

Company: Water Oak Utility
 Test Year Ended: December 31, 2007
 Water [X] of Sewer []
 Customer Class: General Service
 Meter Size: 2"

Schedule: E-14
 Page 9 of 10
 Preparer: CJNW

Explanation: Provide a billing analysis for each class of service by meter size. For applicants having master metered multiple dwellings, provide the number of bills at each level by meter size or number of bills categorized by the number of units. Round consumption to nearest 1,000 gallons & begin at zero. If a rate change occurred during the test year, provide a separate billing analysis which coincides with each period.

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Consumpt. Level	Number of Bills	Cumulative Bills	Gallons Consumed (1)x(2)	Cumulative Gallons	Reversed Bills	Consolidated Factor [(1)x(6)]+(5)	Percentage of Total
42	2	118	84	1,958	26	3,050	71.53%
43	1	119	43	2,001	25	3,076	72.14%
44	1	120	44	2,045	24	3,101	72.73%
47	1	121	47	2,092	23	3,173	74.41%
48	1	122	48	2,140	22	3,196	74.95%
49	3	125	147	2,287	19	3,218	75.47%
58	1	126	58	2,345	18	3,389	79.48%
62	2	128	124	2,469	16	3,461	81.17%
63	1	129	63	2,532	15	3,477	81.54%
70	1	130	70	2,602	14	3,582	84.01%
71	1	131	71	2,673	13	3,596	84.33%
74	1	132	74	2,747	12	3,635	85.25%
77	1	133	77	2,824	11	3,671	86.09%
79	3	136	237	3,061	8	3,693	86.61%
88	1	137	88	3,149	7	3,765	88.30%
94	1	138	94	3,243	6	3,807	89.28%
102	1	139	102	3,345	5	3,855	90.41%
104	1	140	104	3,449	4	3,865	90.64%
148	1	141	148	3,597	3	4,041	94.77%
180	1	142	180	3,777	2	4,137	97.02%
229	1	143	229	4,006	1	4,235	99.32%
258	1	144	258	4,264	0	4,264	100.00%

Billing Analysis Schedules

Florida Public Service Commission

Company: Water Oak Utility
Test Year Ended: December 31, 2007
Water [X] of Sewer []
Customer Class: General Service
Meter Size: 3"

Schedule: E-14
Page 10 of 10
Preparer: CJNW

Explanation: Provide a billing analysis for each class of service by meter size. For applicants having master metered multiple dwellings, provide the number of bills at each level by meter size or number of bills categorized by the number of units. Round consumption to nearest 1,000 gallons & begin at zero. If a rate change occurred during the test year, provide a separate billing analysis which coincides with each period.

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Consumpt. Level	Number of Bills	Cumulative Bills	Gallons Consumed (1)x(2)	Cumulative Gallons	Reversed Bills	Consolidated Factor [(1)x(6)]+(5)	Percentage of Total
0	0	0	0	0	24	0	0.00%
7	1	1	7	7	23	168	15.15%
8	1	2	8	15	22	191	17.22%
15	1	3	15	30	21	345	31.11%
29	1	4	29	59	20	639	57.62%
38	1	5	38	97	19	819	73.85%
41	1	6	41	138	18	876	78.99%
42	1	7	42	180	17	894	80.61%
44	1	8	44	224	16	928	83.68%
45	1	9	45	269	15	944	85.12%
46	1	10	46	315	14	959	86.47%
49	1	11	49	364	13	1,001	90.26%
50	2	13	100	464	11	1,014	91.43%
51	1	14	51	515	10	1,025	92.43%
52	1	15	52	567	9	1,035	93.33%
53	2	17	106	673	7	1,044	94.14%
57	1	18	57	730	6	1,072	96.66%
58	2	20	116	846	4	1,078	97.20%
60	1	21	60	906	3	1,086	97.93%
61	1	22	61	967	2	1,089	98.20%
69	1	23	69	1,036	1	1,105	99.64%
73	1	24	73	1,109	0	1,109	100.00%



St. Johns River Water Management District

Kirby B. Green III, Executive Director • David W. Fisk, Assistant Executive Director
David Dewey, Altamonte Springs Service Center Director

975 Keller Road • Altamonte Springs, FL 32714-1618 • (407) 659-4800
On the Internet at www.sjrwmd.com.

Mr. Brian W. Fannon, CPM,
President
Sun Communities, Inc.
The American Center
27777 Franklin Rd. Suite 200
Southfield, MI 48034

Re: Consumptive Use Permit Application No. 282
Water Oak Utilities Rate Case

Dear Mr. Fannon

You have requested a letter of support in obtaining an inclined block rate structure for Water Oaks subdivision through the Public Service Commission (PSC). Please note that the District does not have any authority to set rates. Although the District does not have any authority to set rates, the Water Use Permitting Applicant's Handbook, Paragraph 12.2.5.1(f), A.H. does require a public supply applicant for a consumptive use permit (CUP) to submit a written proposal and implement a water conservation promoting rate structure, unless the applicant demonstrates that the cost of implementing such a rate structure is not justified because it will have little or no effect on reducing water use. In most cases, an inclined block rate structure is considered a water conservation promoting rates structure and thus would help the utility in demonstrating compliance with CUP permitting criteria in future permit renewals.

Sincerely,

Mike McGovern, P.G.
Hydrologist
Department of Resource Management

cc: RIM/PC, James Hollingshead,

Mr. David H. Kincaid, P.G.
Devo Engineering
5500 Alhambra Drive
Orlando, Florida 32808

David G. Graham, CHAIRMAN
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