

Tristan Davis

From: Tristan Davis on behalf of Records Clerk
Sent: Tuesday, December 30, 2025 8:11 AM
To: 'Noralee Fyler'
Cc: Consumer Contact
Subject: RE: DOCKET NO. 20250137-SU

Good Morning,

We will be placing your comments below in consumer correspondence in Docket No. 20250137, and forwarding them to the Office of Consumer Assistance.

Thank you!

Tristan Davis
Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
Phone: (850) 413-6121

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From: Noralee Fyler <55neele55@gmail.com>
Sent: Tuesday, December 30, 2025 8:06 AM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: DOCKET NO. 20250137-SU

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for Limited Proceeding Rate Increase by Sunshine Water Services Company DOCKET NO. 20250137-SU

FORMAL OBJECTION AND REQUEST FOR HEARING

COMES NOW, the undersigned Customer of Record ("Objector"), and files this Formal Objection to the Application for a Limited Proceeding filed by Sunshine Water Services Company ("Utility"). In support thereof, Objector states as follows:

1. IMPROPER USE OF LIMITED PROCEEDING MECHANISM The Utility seeks to recover roughly \$28 million for a total replacement of the Mid-County Wastewater Treatment Plant through a Limited Proceeding pursuant to Rule 25-30.446, F.A.C. The Objector argues that a capital project of this magnitude, which constitutes a fundamental reconstruction of utility infrastructure, effectively restructures the Utility's rate base. Such massive capital outlays require the holistic scrutiny of a General Rate Case to ensure the investments

are not offset by reductions in other operating expenses or accumulated depreciation. Bifurcating this expense into a "Limited Proceeding" immediately following the Utility's recent rate consolidation constitutes "single-issue ratemaking" that prejudices the consumer by isolating costs without reviewing offsetting revenues.

2. IMPRUDENCE AND FAILURE TO FORECAST (VIOLATION OF STATUTORY DUTY) The Utility admits in its Notice that the subject plant is "decades old" and facing "increasing difficulty." Under Florida law, a utility has an affirmative duty to maintain its assets and forecast capital replacements.

- **Lack of Prudence:** The sudden emergency nature of this \$28 million request suggests imprudent management and a failure to engage in proper long-term capital planning. The need for replacement was foreseeable.
- **Intergenerational Inequity:** Current ratepayers are being asked to fund a total replacement that should have been addressed through gradual depreciation reserves funded by past ratepayers. Imposing the full burden of this "deferred maintenance" on current customers violates the principle of Intergenerational Equity.

3. UNJUST AND UNREASONABLE CROSS-SUBSIDIZATION The Objector resides in Seminole County, approximately 120 miles from the Pinellas County "Mid-County" facility. While the Commission has allowed rate consolidation, the "Used and Useful" standard requires a tangible nexus between the cost incurred and the service rendered.

- The Utility has failed to demonstrate how a \$28 million expenditure in Pinellas County provides any benefit, redundancy, or environmental protection to the watershed or ratepayers in Seminole County.
- Absent such evidence, forcing Seminole County ratepayers to shoulder the capital costs of a geographically isolated system constitutes a rate that is unjust, unreasonable, and unfairly discriminatory pursuant to Section 367.081, Florida Statutes.

4. REQUEST FOR RELIEF WHEREFORE, the Objector respectfully requests that the Florida Public Service Commission: A. **SUSPEND** the proposed rate implementation pending a full evidentiary review; B. **CONSOLIDATE** this Docket with a full review of the Utility's earnings to ensure no double-recovery of maintenance costs; C. **DENY** the request for a Limited Proceeding and compel the Utility to file a General Rate Case where all revenues and expenses can be audited simultaneously; and D. **CONVENE** a Service Hearing within Seminole County to allow testimony regarding the inequity of this cross-subsidization.

Respectfully Submitted,

____Noralee Fyler____

Signature

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Date: 12/29/2025

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