

From: Tristan Davis on behalf of Records Clerk
Sent: Friday, January 9, 2026 8:08 AM
To: 'Jeffrey Perillo'
Cc: Consumer Contact
Subject: RE: Docket No. 20250084-SU

Good Morning,

We will be placing your comments below in consumer correspondence in Docket No. 20250084, 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: Jeffrey Perillo <jeffreyperillo5319@gmail.com>
Sent: Thursday, January 8, 2026 9:59 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: Docket No. 20250084-SU

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January 7, 2026

Office of the Commission Clerk
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket No. 20250084-SU, Gulfstream Utility, LLC

Dear Commissioners,

The Gulfstream Harbor 55+ Manufactured Home community, is serviced by Gulfstream Utility, LLC for our water and sewer. Our community contains three parcels developed as homesites (plus undeveloped property, the wastewater treatment plant, etc.) identified as Park 1, Park 2, and Park 3. Each "park" has its own Prospectus. Although they are all very similar, there are important differences, most importantly the percentage of the real property tax passed through to residents. Each "Park" has its own Homeowners Association (HOA) which represents the residents in each respective neighborhood. The three separate HOAs collectively meet and work together for the benefit of and to protect the rights of the residents.

I am the President of the Gulfstream Harbor Park 1 HOA which represents 382 homesites. The following are comments that we request the Commissioners consider when preparing their recommendation on Gulfstream Utility, LLC's request to raise rates.

1. The Notice of Customer meeting was issued December 18, 2025 with a cutoff date for comments of January 9, 2026. This is 16 business days for the USPS to deliver the notice to affected residents, for residents to understand the issue, prepare comments and submit them. The comments included here-in are based upon our limited time to research and discussion with a small percentage of our residents. We ask the Commissioners to consider scheduling a second customer meeting to allow for more comments to be received due to the following:
 - a. Some residents traveled to be with family during the holidays and have only returned home in the last few days and have not had time to pick up and go through their mail.
 - b. Our community demographics are quite diverse with many residents having very limited understanding of the English language. The notice was only sent in English which ultimately excludes input/comments from our non-English speaking residents.

- c. We are a “senior” community. A large percentage of our residents are challenged with technology, many do not even own a computer, and only a tiny percentage even know what GoToMeeting is.
- d. The 16-day window for delivery of the notice and to respond is severely restrictive to get resident input due to the above. Our three community HOAs could overcome these challenges but we only hold meetings once a month and our HOA publication is only published monthly (January issue was already printed prior to the issuance of the Notice of Customer Meeting). We would need 45 to 60 days to work with residents, assisting them with understanding the proposed rate increases and how to submit comments.

2. Gulfstream Utility LLC's billing is based on the assumption that every gallon of potable water used becomes wastewater. One thousand gallons of water used equals one thousand gallons of wastewater produced.

- a. Water used for irrigation, pressure-washing our homes/cars, etc. does not become wastewater for treatment.
- b. Several years ago, the water meters in our community were changed to ones that can be remotely read. Two years ago, many residents noticed drastic decreases in their water/wastewater bills (some from over \$30/month to less than \$10/month). Management was aware of the problem and updates to the HOA's has been that they were working with the meter supplier/installation vendor to resolve the issue. It has been 2 years or more and the issue has yet to be resolved. Management will not tell the HOAs how many meters are not properly functioning, but talking with residents, there are a significant number. The result is unrealized income that Gulfstream Utility should have collected which would reduce the deficit between Operating Costs and Income. The deficit reported by Gulfstream Utility should be adjusted for this underbilling.
- c. Based upon some preliminary research we believe that Gulfstream Utility has been billing at a lower rate than what has been previously approved by the Commission. This underbilling should be considered and the reported deficit between the Operating Costs and Income adjusted accordingly.

3. As mentioned in the first paragraph of this letter, our community has three developed parcels. Some of the homesites are tied directly into Orange County's sewer system, with others tied to the wastewater treatment facility in our community. When application was first made to the Florida Public Service Commission for licensing the wastewater treatment plant to Gulfstream Utility in 2020, Sun Communities originally declared that it was unknown what areas were connected to Orange County and which were connected to the wastewater plant as records were not found in the documents available when they purchased the community. A map was later produced and submitted to the commission.

- a. Part of Park 1 (identified as Park 1 Phase 1) and all of Park 2 is connected to Orange County's sewer system, while the rest of Park 1 and all of Park 3 is connected to the wastewater plant per the submitted documentation. Our residents would like assurance that due diligence was used (researching permitting records and documents, etc.) to verify that the submitted map is accurate.
- b. In the PSC Audit the auditors requested mapping of the homesites serviced by Gulfstream Utility LLC. Sun Communities provided said map and description of the homesites serviced by the utility clearly identifying Gulfstream Harbor I (Phase 1) and

Gulfstream Harbor II as NOT utilizing the utility for wastewater treatment. Ref. PSC Audit Staff Report Issue 10: Identified the utility has 965 residential customers. The combined Prospectus' for all three properties that comprise Gulfstream Harbor Manufactured Home Community identify 976 sites. The map of homesites provided by Sun Communities identifies 519 homes to the utility and 455 homes to the county. It is unclear how the audit determined 965 customers while the mapping provided by Sun Communities provides the number of customers to the utility and the number to Orange County. This discrepancy (976 sites vs. 965 vs 974 (519 to utility + 455 to county) raises concerns as to which homes are really on what system. Homesites on the Orange County System should be charged Orange County sewer rate, while those on the wastewater plant should be subject to the requested rate increases.

- c. Homes in Park 1 (Phase 1) are connected to Orange County's sewer system and therefore should be billed at the current Orange County resident rate, not the rate Gulfstream Utility is requesting. The remainder of the homes are connected to the wastewater treatment plant and would be subject to any rate increase approved by the Commission.
- 4. As identified in the PSC Auditor's Report, October 7, 2025. Land and Land Rights & Taxes Other than Income: The audit identified a warranty deed for the land Gulfstream Utility LLC owns. The auditors determined the land does belong to the utility. The audit evidenced a property tax bill for utility related property. The Orange County Tax Appraiser website does not indicate any change in the description for parcel id 12-23-30-0000-00-008 which currently includes the property owned by Gulfstream Utility via the warranty deed. Also searching Orange County Tax Appraiser and Orange County Tax Collector sites, determined there is no property id that is identified as being owned by Gulfstream Utility LLC. Without such official documentation, it is unclear where the property tax bill the utility provided to the auditors came from.
 - a. As homesites in Gulfstream Harbor I pay the pass on property tax per the terms of their Prospectus for property id 12-23-30-0000-00-008 which includes the parcel now owned by Gulfstream Utility LLC, homesites would pay twice, once as a "pass on" charge and another as a portion of the monthly wastewater rate.
 - b. Gulfstream Utility LLC should have a property ID and receive a tax bill for the parcel they occupy.
 - c. The cost of property taxes should only be an expense included in the rate calculations for those homesites serviced through the wastewater treatment plant. As the percentage of pass-through tax varies between parks (as mentioned in paragraph 1 of this letter) "one rate for all" appears to result in unequal distribution of costs. We request the Commission to take a hard look at this.
 - d. Again, homes in Park 1 (Phase 1) are connected to Orange County's sewer system and therefore should be billed at the current Orange County resident rate, not the rate Gulfstream Utility is requesting. The remainder of the homes are connected to the wastewater treatment plant and would be subject to any rate increase approved by the Commission.
- 5. The Directors of all three HOAs, together, meet with Gulfstream Harbor/SUN Communities management 3 – 4 times each year. The three HOAs also appoint a Statutory Committee, per F.S. 723 to meet with SUN Communities management every year to discuss rent increases. Over

the last 2 years a point brought up by management has been upcoming costs for repairs/replacement of the wastewater treatment plant. Are residents being double charged? Are both our lot rent and utility rates going up as a result of both SUN Communities and Gulfstream Utilities expensing the needed wastewater replacement upgrades? We request the Commission to consider our concerns and provide the HOAs with the result of any inquiries.

- a. Those residents who reside in Park 1 (Phase 1) are not connected to the wastewater treatment plant, and should not be paying for any of the costs involved to repair/replace the plant.
6. As identified in the PSC Auditor's Report, October 7, 2025. Account 731 Contractual Services – Professional. The audit staff was unable to obtain supporting cost or contract documentation for lawn mowing services. Residents, as part of their rental agreement as described in the Prospectus, pay for lawn mowing services as part of the monthly rent. This cost includes the portion of Gulfstream Harbor I, now owned by Gulfstream Utility. Without a separate contract, the cost of lawn care for the utility is unknown and a false expense charge. Lawn service expenses should only include the cost of services performed on the parcel occupied by Gulfstream Utility, LLC. We believe the contract for lawn mowing includes all parcels owned by SUN Communities, lawn mowing of resident lots (some residents opt out), the non-developed areas, the common areas (clubhouses, island preserve, recreation areas, etc.). A separate contract for lawn mowing of the parcel occupied by Gulfstream Utility must be obtained to allow it as an expense as the cost of services may vary (residential lots require the lawn service company to blow off streets and driveways, etc.).

In summary, we request denial of Gulfstream Utility, LLC rate increases for the homesites within Gulfstream Harbor 1 (Phase 1). Gulfstream Utility, LLC does not provide service to these homesites for wastewater collection or treatment. The remainder of the homes in Park 1, will be subject to any approved rate increase approved by the Commission after consideration of our comments.

Sincerely,



Jeffrey Perillo
2025/2026 President of Gulfstream Harbor Park 1 Homeowners Association
5502 Bonita Road
Orlando, FL 32822
407-739-6030