



January 9, 2026

**VIA ELECTRONIC FILING**

Adam Teitzman, Commission Clerk  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**Re: Docket No. 20250122-WS – Application for staff-assisted rate case in Highlands County, by Sun Communities Acquisitions, LLC d/b/a Buttonwood Bay Utilities.**

Dear Mr. Teitzman:

On behalf of Buttonwood Bay Utilities (“Utility”), this letter is the response to Staff’s First Data Request dated November 24, 2025.

1. Purchased Water and/or Wastewater: All Utility related bills from the beginning of the test year to present, which include meter number and location, gallons used, dollars paid, and the Utility’s account numbers.

*RESPONSE: The Utility does not purchase water or wastewater for this location.*

2. Purchased Power: All Utility related electricity bills from the beginning of the test year to present, which include meter number and location, kilowatts used, dollars paid, and the electric company's account numbers.

*RESPONSE: Please reference the file BUT 2024 Electric Bills.*

3. Chemicals: A list of all chemicals used in the treatment of water, amounts purchased, quantity purchased, unit prices paid and dosage rates utilized.

*RESPONSE: Please see W-3 618; 6200-306; Total expense for the year was \$27,488.22; Please reference on the attached BUT – 2024 Workbook for a breakdown of invoices on tab W-3 618 – Lines 8-47. Please reference invoices in folder: 618*

4. Sludge Removal Expenses: Provide a schedule showing the total cost and quantity of removing the sludge, if persons other than owners, stockholders, and employees of the Utility perform such work during the test year.

*RESPONSE: S-3 711; 6200-307; Total expense for the year was \$22,341.41; Please reference on the attached BUT – 2024 Workbook for a breakdown of invoices on tab S-3 711 – Lines 8-20. Please reference invoices in folder: 711*

5. Contractual Services – Testing: A list of tests along with costs paid to outside laboratories for testing the water during the test year.

*RESPONSE: S-3 730 Test; Total expense for the test year was \$12,465.52; Please reference the attached BUT – 2024 Workbook for a breakdown of invoices on tab S-3 730 pro – Lines 8-39. W-3 630 Test; Total expense for the test year was \$5,194.90; Please reference the attached BUT – 2024 Workbook for a breakdown of invoices on tab W-3 630 Test – Lines 8-16.*

*Please reference invoices in folder: 630 Test and 730 Test*

6. Contractual Services – Other: The costs of operation and maintenance work not performed by Utility employees with an explanation of the type of work performed. These costs include the operator's fee, mowing and grounds keeping, and contracted repair for the water system.

*RESPONSE: Total expense for the test year was \$136,729.22; Please reference the attached BUT – 2024 Workbook for a breakdown of invoices. Please reference invoices in folder: 630 NUBS, 630 Professional, 730 NUBS, and 730 Pro.*

7. Transportation Expenses: A schedule of all vehicles by serial number and description owned or leased by the Utility, original cost or lease documents, whom the vehicles are assigned to, and an explanation of how they are allocated to the Utility, or a copy of the log book showing miles on personal vehicles associated with Utility business. All vehicles are to be available for inspection.

*RESPONSE: Please see the **Buttonwood Bay Active Vehicles** file. Please note that vehicles are allocated to the community itself and not allocated to the utility in any way. We do not allocate any miles from the community vehicles and do not allow personal vehicles to be utilized for any purpose regarding the community or utility. The vehicles on the list provided are utilized in case of emergency but not allocated to the utility.*

8. Copies of Buttonwood's most recent Primary and Secondary Water Quality test results.

*RESPONSE: Please reference the file Buttonwood Bay RV Resort, 628-4075, Highlands, Primary, Secondary, VOCs, SOCs, 3-24.*

9. Copies of monthly operation reports for water from January 1, 2024, to December 31, 2024, (test year) in Microsoft Excel format, if available, which includes:

FOR WASTEWATER – Total treated, total wash water, total of each chemical in points, chemical dosage rates (average).

FOR WATER – Total water purchased or pumped, total wash water, total of each chemical in points, chemical dosages rates (average).

*RESPONSE: Please reference the folders titled MORs and DMRs.*

10. Copy of monthly totals of metered water sold for each month of the test year.

*RESPONSE: Please see below for monthly totals of metered water sold for each month of the test year.*

| Month | Sum of Water Usage |
|-------|--------------------|
| 1     | 4,099,796          |
| 2     | 4,129,290          |
| 3     | 4,369,410          |
| 4     | 4,200,949          |
| 5     | 4,573,360          |
| 6     | 4,778,988          |
| 7     | 4,835,772          |
| 8     | 3,515,990          |
| 9     | 3,617,790          |
| 10    | 3,396,546          |
| 11    | 2,640,923          |
| 12    | 3,279,409          |

11. A written summary, by permit number, of all Department of Environmental Protection, Water Management District, and/or County Health Department permits.

*RESPONSE: Please reference the documents 10-03\_Buttonwood Bay Utilities WWTP and Buttonwood Bay WTP WUP expires 5-6-2042*

12. If any plant addition has been made or will be required due to a written order from a governmental agency, please provide a copy of that order.

*RESPONSE: Not applicable.*

13. A list of all service complaints received during the test year and four years prior to the test year. Please include an explanation of how each complaint was resolved.

*RESPONSE: A complaint was received related to the color of the water. This complaint was resolved by switching from Green Sand to a Micro Z Median inside of the filters.*

14. A listing of all water and wastewater assets owned by the Utility, including distribution piping, pumping stations, fire hydrants, etc.

Example:       200' – 8" PVC (Sewer)  
              250' – 6" PVC Pipe (Water)  
              50' – 6" PVC Fire Hydrants (Water)

*RESPONSE:*

*2" PVC - 28,384'*

*3" PVC - 4,390'*

*4" PVC – 798'*

*6" PVC - 1,976'*

*8" PVC – 128'*

*Fire hydrant – 1*

15. Number of customers classified as to meter size and class (commercial or residential) for the following points in time:

a. A minimum of 4 years prior to the beginning of the test (or calendar last) year.

2021– **757 Occupied Sites**

2022– **789 Occupied Sites**

2023 – **815 Occupied Sites**

2024 - **853 Occupied Sites**

b. The beginning of the last calendar year

Beginning of 2025 – **854 Occupied Sites**

c. The end of the last calendar year

End of 2025 – **848 Occupied Sites**

d. Present

Present – **847 Occupied Sites as of 1.8.2026**

*RESPONSE: Please see above for customer numbers. All customer lots are residential, and all meters are 5/8 x 3/4.*

16. Please provide a copy of the Utility's engineering maps for water and wastewater, showing location and size of water and wastewater mains throughout the service area, and customer location and classification. On each map, please identify vacant customer lots, customer meter sizes, flush points, fire hydrants, and pumping stations.

*RESPONSE: Please see the folder labeled "Maps".*

17. In the Water Operating Section of the Utility's 2024 Annual Report (page W-4), please verify if the total water pumped/purchased was 73,582,000 gallons, the total used for Utility purposes was 0 gallons, and the water sold to customers was 50,199,000 gallons. If not, please provide the correct values. In addition, please explain why there was a discrepancy between the two values, and what actions, if any, the Utility has taken to address unaccounted for water.

*RESPONSE: The difference in usage is resulting from our irrigation, clubhouses, transient RV sites, pools, and other common areas. Utility purposes should have included main line flushing, backwashing of the filters, and fire hydrant exercising.*

18. In the Wastewater Operating Section of the Utility's 2024 Annual Report (page S-5), please confirm that the total gallons of wastewater treated was 14,261,000 gallons. If not, please provide the correct values. In addition, please explain why there was a discrepancy between the amount of water sold and wastewater treated, such as irrigation or other uses, or customer-owned septic systems.

*RESPONSE: The difference in usage is resulting from our irrigation, clubhouses, transient rv sites, pools, and other common areas. Utility purposes should have included main line flushing, backwashing of the filters, and fire hydrant exercising.*

19. Per the Utility's 2024 annual report, there appears to be a significant difference between the volume of water produced and the volume of wastewater processed, with the latter being approximately 20 percent of the former. Please provide an explanation for this discrepancy. If the Utility has irrigation customers, please specify the number of irrigation customers and the total irrigation water monthly usage of those customers. If the Utility has customers with alternative wastewater systems (septic), please specify the number of customers and the total water monthly usage of those customers.

*RESPONSE: Main line flushing goes to storm drains, 426 MH lots and common area irrigation throughout the property are not run through wastewater, and recycling of pool water does not go into the wastewater system. There is no alternative wastewater systems on property.*

20. Please provide the estimated or actual in-service or work completion dates for the pro forma items listed on the last page of Buttonwood's application.

*RESPONSE*  
*Install diffuser in Stillwell – 7/29/2025*

*Install new triplex Skimmer – 8/4/2025*  
*Install New Surface Aerator Motor – 8/29/2025*  
*Install new blower at Waste Water Plant – 8/29/2025*  
*Splitter Box Install – 11/10/2025*

21. Please fill out the attached spreadsheet concerning any pro forma items the Utility is requesting. Please include any bid proposals or estimates for the pro forma items. If less than three bid proposals were requested for each pro forma item, please explain why.

*RESPONSE: Spring protection act area may require additional upgrades to the wastewater plant. Discovery is currently underway for that. At this time no estimates have been received.*

*Currently Underway:*

*Install new surge tank air line and diffuser - \$18,605.84*  
*Install new surge tank electrical control panel - \$6,279.90*  
*New filter media - \$80,000 – not yet bid*  
*New generator - \$180,000 – not yet bid*  
*High service pump - \$12,000 – not yet bid*  
*Electrical upgrades - \$80,000 – not yet bid*

Should you or Staff have any questions regarding this response, please do not hesitate to contact me.

Sincerely,

/s/ Daniel McGinn

Daniel J. McGinn

DJM:

cc: Greg Davis (via email - GDavis@psc.state.fl.us)  
discovery-gcl@psc.state.fl.us (via email)