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October 21, 2016

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

**Re: Wastewater Permit Application of Sunny Shores Water Co.
Docket No. 160219-SU**

To whom it may concern:

Manatee County, a political subdivision of the State of Florida, hereby submits comments on the above-referenced application by and through its undersigned attorney.

As noted in the Wastewater Permit Application submitted by Sunny Shores Water Co. ("Application"), the potable water system in Sunny Shores and Sagamore Estates is privately owned and maintained behind a master meter. The wastewater system, on the other hand, is owned and maintained by Manatee County. Manatee County submits these comments to clarify the record, but does not object to the Application. Manatee County's comments relate to the need for service summary provided in Exhibit D of the Application.

First, Sunny Shores Water Co. is not and never has been billed wholesale rates for wastewater by Manatee County. Sunny Shores Water Co. is billed the retail master meter per unit rate for mobile homes. Attached is the 2016 Manatee County Water and Wastewater Monthly Base Charge by Meter Size, which delineates rates between individual meters and master meters.

Second, Manatee County did not request Sunny Shores Water Co. to handle its billing for wastewater services. After wastewater lines were constructed and installed by the County as part of an assessment project within Sunny Shores and Sagamore Estates, Manatee County presented resident representatives with available options for charging and billing of wastewater services. Because Sunny Shores Water Co. paid Manatee County for potable water used in its service area

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based on the retail master meter rate for mobile homes, Manatee County permitted Sunny Shores Water Co. to pay for wastewater service in its service area based on the corresponding master meter rate for mobile homes, which represented the lowest cost option for the residents. As Sunny Shores Water Co. already billed its residents for potable water, and would continue to do so, Sunny Shores Water Co. indicated it could also include the corresponding wastewater charges.

Finally, notwithstanding the conclusion in the PSC Memorandum dated April 4, 1996, Sunny Shores Water Co. has never acted as a billing agent on behalf of Manatee County. As correctly noted in Exhibit D, there is no and there never has been any contractual relationship between Manatee County and Sunny Shores Water Co. whereby Sunny Shores Water Co. performs services on behalf of the County. As undersigned counsel informed the PSC during a conference call convened at the PSC's request on May 26, 2016, Sunny Shores Water Co. is a retail customer of Manatee County. Manatee County is unaware of the basis for the conclusion in the 1996 memorandum stating that Sunny Shores Water Co. is a billing agent on behalf of Manatee County.

If there are any questions regarding the relationship between Manatee County and Sunny Shores Water Co., please do not hesitate contact me.

Respectfully submitted,



Katharine M. Zamboni
Assistant County Attorney

Enclosure

cc: Meghan O. Serrano, Esq.
Shumaker, Loop & Kendrick, LLP
260 South Pineapple Ave., 10th Floor
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2016 Manatee County Water and Wastewater Monthly Base Charge by Meter Size

(as adopted in 2014)

Individual Meter

Meter Size	Water	Wastewater	Private Fire Service
5/8" x 3/4"	\$8.73	\$20.84	\$N/A
3/4"	11.82	29.86	N/A
1"	17.98	47.83	3.30
1 1/2"	33.41	92.83	4.40
2"	51.92	146.80	5.75
3"	95.11	272.78	8.85
4"	156.80	452.74	13.25
6"	311.04	902.62	24.30
8"	496.14	1442.51	37.55
10"	712.06	2072.37	53.00
12"	1329.03	3871.94	97.15

Master Meter (Per Unit)

Service	Water	Wastewater
Detached Single Family	\$ 6.57	\$ 18.81
Condo / Apt	4.70	12.59
Mobile Home / Travel Trailer	3.60	10.06