

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for increase in water and wastewater rates in Charlotte, Highlands, Lake, Lee, Marion, Orange, Pasco, Pinellas, Polk, and Seminole Counties, by Sunshine Water Services Company.

DOCKET NO. 20240068-WS

DATED: December 20, 2024

COMMISSION STAFF'S MOTION FOR LEAVE TO
AMEND STAFF WITNESS TESTIMONY

COMES NOW Commission Staff of the Florida Public Service Commission (Commission Staff), by and through undersigned counsel, pursuant to Section 367.081, Florida Statutes, and Rule 28-106.204, Florida Administrative Code, and hereby moves the Prehearing Officer, Commissioner Andrew Giles Fay, for leave to amend the Commission Staff Testimony of Angela L. Calhoun. Commission Staff states the following in support thereof:

1. On July 23, 2024, by Order No. PSC-2024-0259-PCO-WS (OEP), hearing procedures were established to govern this docket, including setting a schedule for the filing of witness testimony. On October 2, 2024, by Order No. PSC-2024-0437-PCO-WS, the schedule for filing witness testimony was modified.
2. Pursuant to Order No. PSC-2024-0437-PCO-WS, Staff Testimony and Exhibits were due to be filed on December 2, 2024.
3. Testimony and exhibits of Commission Staff witness Angela L. Calhoun (Ms. Calhoun) were filed on December 2, 2024.
4. After it was filed, an inadvertent error was discovered in Ms. Calhoun's testimony on page 3, line 9.
5. As filed, Ms. Calhoun's testimony read:

Staff determined that, of the eight complaints logged against Sunshine Water Services during the period of July 1, 2020 to June 30, 2024, there was one service quality complaint and seven billing complaints that appear to demonstrate a violation of Commission Rules.

6. Instead, Ms. Calhoun's testimony should read:

Staff determined that, of the 107 complaints logged against Sunshine Water Services during the period of July 1, 2020 to June 30, 2024, there was one service quality complaint and seven billing complaints that appear to demonstrate a violation of Commission Rules.

7. A copy of Ms. Calhoun's Amended testimony is attached hereto as Exhibit A.
8. Commission staff has consulted with the parties to this docket and they do not object to granting this motion.

RESPECTFULLY SUBMITTED, this 20th day of December, 2024:

/s/ Ryan Sandy

RYAN SANDY

Senior Attorney, Office of the General Counsel
FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
(850) 413-6199
rsandy@psc.state.fl.us
discovery-gcl@psc.state.fl.us

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**
2 **AMENDED COMMISSION STAFF DIRECT TESTIMONY OF**
3 **ANGELA L. CALHOUN**
4 **DOCKET NO. 20240068-WS**
5 **DECEMBER 2, 2024**
6 **Q. Please state your name and address.**
7 A. My name is Angela L. Calhoun. My address is 2540 Shumard Oak Boulevard;
8 Tallahassee, Florida 32399-0850.
9 **Q. By whom are you employed and in what capacity?**
10 A. I am employed by the Florida Public Service Commission (FPSC or Commission) as
11 Chief of the Bureau of Consumer Assistance in the Office of Consumer Assistance &
12 Outreach.
13 **Q. Please give a brief description of your educational background and professional**
14 **experience.**
15 A. I graduated from Florida State University in 1993 with a Bachelor of Arts degree. I
16 have worked for the Commission for more than 24 years, and I have experience in
17 consumer complaints and consumer outreach. I work in the Bureau of Consumer
18 Assistance within the Office of Consumer Assistance & Outreach where I manage
19 consumer complaints and inquiries.
20 **Q. What is the function of the Bureau of Consumer Assistance?**
21 A. The Bureau's function is to resolve disputes between regulated companies and their
22 customers as quickly, effectively, and inexpensively as possible.
23 **Q. Do all consumers that have a dispute with their regulated company contact the**
24 **Bureau of Consumer Assistance?**
25 A. No. Consumers may initially file their complaint with the regulated company and reach

1 a resolution without the Bureau's intervention. In fact, consumers are encouraged to
2 allow the regulated company the opportunity to resolve the dispute prior to any
3 Commission involvement.

4 **Q. What is the purpose of your testimony?**

5 A. The purpose of my testimony is to discuss/outline the number of consumer complaints
6 logged with the Commission against Sunshine Water Services under Rule 25-22. 032,
7 Florida Administrative Code, Consumer Complaints, from July 1, 2020 to June 30,
8 2024. My testimony will also provide information on the type of complaints logged
9 and those complaints that appear to be rule violations.

10 **Q. What do your records indicate concerning the number of complaints filed for**
11 **Sunshine Water Services?**

12 A. From July 1, 2020 to June 30, 2024 the Commission logged 107 complaints against
13 Sunshine Water Services.

14 **Q. What have been the most common types of complaints logged against Sunshine**
15 **Water Services during the period of July 1, 2020 to June 30, 2024?**

16 A. During the specified time period, approximately Sixty-eight (68%) percent of the
17 complaints logged with the Commission concerned billing issues, while approximately
18 Thirty-two (32%) percent of the complaints involved quality of service issues.

19 **Q. Do you have any exhibits attached to your testimony?**

20 A. Yes. I am sponsoring ALC-1 and ALC-2, which are listings of consumer complaints
21 logged with the Commission against Sunshine Water Services under Rule 25-22.032,
22 Florida Administrative Code. The complaints listed were received between July 1,
23 2020 to June 30, 2024, and were captured in the Commission's Consumer Activity
24 Tracking System (CATS). Exhibit ALC-1 lists quality of service complaints and
25 Exhibit ALC-2 lists billing complaints. Both exhibits group the complaints by Close

1 Type.

2 **Q. What is a Close Type?**

3 A. A Close Type is an internal categorization code. It is assigned to each complaint once
4 staff completes its investigation, and a proposed resolution is provided to the
5 consumer.

6 **Q. Do you have any additional exhibits?**

7 A. Yes. Exhibit ALC-3 is a listing of complaints by system.

8 **Q. How many of the complaints summarized on your exhibit has staff determined
9 may be a violation of Commission rules for Sunshine Water Services?**

10 A. Staff determined that, of the 107 complaints logged against Sunshine Water Services
11 during the period of July 1, 2020 to June 30, 2024, there was one service quality
12 complaint and seven billing complaints that appear to demonstrate a violation of
13 Commission Rules.

14 **Q. Does that conclude your testimony?**

15 A. Yes.

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DATED: DECEMBER 20, 2024

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the MOTION FOR LEAVE TO AMEND STAFF

WITNESS TESTIMONY has been filed with the Office of Commission Clerk and a copy has been furnished to the following by electronic mail, this 20th day of December, 2024:

<p>Martin S. Friedman Dean Law Firm 420 S. Orange Avenue Suite 700 Orlando, Florida 32801 mfriedman@deanmead.com</p> <p>Walt Trierweiler Charles J. Rehwinkel Octavio Simoes-Ponce Austin Watrous Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Suite 812 Tallahassee, Florida 32399-1400 Trierweiler.walt@leg.state.fl.us Rehwinkel.charles@leg.state.fl.us Ponce.octavio@leg.state.fl.us Watrous.austin@leg.state.fl.us</p>	<p>Sean Twomey Jacquee Sillitoe Sunshine Water Services 200 Weathersfield Avenue Altamonte Springs, Florida 32714-4027 Sean.twomey@sunshinewater.com Jacquee.sillitoe@sunshinewater.com</p>
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/s/ Ryan Sandy

RYAN SANDY
Senior Attorney, Office of the General Counsel
FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
(850) 413-6199
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discovery-gcl@psc.state.fl.us