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STATE OF FLORIDA



DIVISION OF
ACCOUNTING AND FINANCE
MARK A. CICHETTI
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Public Service Commission

October 31, 2025

Mr. Martin Friedman
Dean Mead Law Firm
420 South Orange Avenue, Suite 700
Orlando, FL. 3280
mfriedman@deanmead.com

STAFFS THIRD DATA REQUEST VIA EMAIL

Re: Docket No. 20250088-WU - Application for staff-assisted rate case in Lake County by Sun Communities Finance, LLC d/b/a Water Oak Utility.

Dear Mr. Friedman:

Staff requests the following information to ensure the accurate treatment of the above-referenced rate case for Sun Communities Finance, LLC d/b/a Water Oak Utility ("Water Oak" or "Utility") for the test year ended December 31, 2024 (the test year), unless otherwise specified. Please submit the Utility's response no later than **Wednesday, November 19, 2025**.

1. General Ledger - Please explain in detail the reason for any summarized or incomplete general ledger entries between 2022 and 2024.

2. Land and Land Rights – According to Water Oak's 2024 Annual Report, the Utility reported a land balance increase of \$70,365. Please explain the reason for this increase and provide the supporting documentation for the related transaction.

3. Bad Debt – According to Water Oak's Annual Reports for the years 2022, 2023, and 2024, the Utility recorded \$0 of bad debt expense.

- a. Please confirm whether this reported amount is accurate.
- b. If not, please provide the historical bad debt expense for the years 2022, 2023, and 2024 as well as any supporting documentation.

4. Utility Plant in Service – Please refer to staff's audit report Audit Finding No. 1 for the following questions.

- a. Please explain the \$66,662 difference between the invoices and the testing transactions in plant additions.
- b. Audit staff was unable to track the invoice for one plant addition. Please provide supporting documentation to any unsupported plant additions, if any, or explain why documentation is unavailable.

5. Purchased Power – Please refer to staff’s audit report Audit Finding No. 4 for the following questions.

- a. Please briefly explain why the Utility was unable to provide the 12-month bills for each meter.
- b. Since the time of the audit, has the Utility been able to locate any purchase power invoices that were previously unavailable. If so, please provide the available documentation.

6. Pro Forma – Please explain how the Utility intends to finance the proposed pro forma amount of \$211,131. Please identify whether the funding will be obtained through debt, equity, or other financing sources. If funding has already been received for the pro forma, please provide any supporting documentation.

Please file all responses electronically via the Commission’s website at www.floridapsc.com, by selecting the Clerk’s Office tab and Electronic Filing Web Form (reference Docket No. 20250088-WU) and also please email the filed response to discovery-gcl@psc.state.fl.us. Please contact me by phone at (850) 413-6068 or by email jcohn@psc.state.fl.us if you have any questions.

Sincerely,
Josh Cohn

s/ Joshua Cohn

Public Utility Analyst

JMC:lg

Cc: Office Commission Clerk (Docket No. 20250088-WU)