

COMMISSIONERS:
MIKE LA ROSA, CHAIRMAN
ART GRAHAM
GARY F. CLARK
ANDREW GILES FAY
GABRIELLA PASSIDOMO SMITH

STATE OF FLORIDA



DIVISION OF ENGINEERING
TOM BALLINGER
DIRECTOR
(850) 413-6910

Public Service Commission

December 17, 2025

Mr. Martin Friedman
Dean Law Firm
420 South Orange Avenue, Suite 700
Orlando, FL 32801
mfriedman@deanmead.com

STAFF'S FOURTH 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:

By this letter, the Commission staff requests that Sun Communities Finance, LLC d/b/a Water Oak Utility (Water Oak or Utility) provide responses to the following data request:

- 1.) Provide a copy of all paid invoices for the following pro-forma projects and confirm the listed in-service dates are correct. If the in-service dates are not correct, please provide the correct date.
 - a. Generator and ATS: September 1, 2025
 - b. 24 - 5/8 by 3/4 inch Meters and Transmitters: December 31, 2025
 - c. Replace pipe (10ft): March 13, 2025
 - d. Replace Pipe (15ft): April 18, 2025
 - e. New 100 HP Well Pump: March 31, 2025
- 2.) Please refer to page 40 of the Utility's application for a staff-assisted rate case and answer the following questions regarding the 24 meters and 24 transmitters pro forma project:
 - a. Explain why the Utility is requesting cost recovery for these items. As part of your response, indicate whether these are to replace existing meters and transmitters. If not, please explain.

- b. Please explain why the Utility chose Accustream meters rather than any other available alternative.
 - c. If these are replacements, provide the estimated service life and in-service dates for the meters that were replaced.
 - d. The Utility serves approximately 1,265 residential customers. As part of this proceeding, the Utility only requested cost recovery for 24 meters and transmitters. Explain whether the meters for the Utility's remaining 1,241 customers have already been replaced or if the Utility intends to replace them in the future.
- 3.) Refer to Water Oak's response to staff's second data request, No. 8.
 - a. Please provide the total number of generators Water Oak has for its system.
 - b. Does the Florida Department of Environmental Protection (DEP) require a back-up generator for the system?
- 4.) Explain if the replacement pipe projects of 10 and 15 feet are classified as emergency replacements or regular maintenance.
- 5.) Provide the total number of fire hydrants in Water Oak's service area.
- 6.) Pursuant to Rule 25-30.110, Florida Administrative Code (F.A.C.), Records and Reports; Annual Report, provide any recorded water lost through flushing or other uses. If none, please explain why.
- 7.) A review of the Utility's 2024 monthly operating reports on file with the DEP indicates that Water Oak produced 117,276,285 gallons of water during the test year. An examination of the Utility's billing records indicates that 67,673,649 gallons of treated water was sold to its customers. The calculation $(117,276,285 + 0 - 67,673,649 - 0) / (117,276,285 + 0)$ results in 42.3 percent unaccounted for water. Pursuant to Rule 25-30.4325, F.A.C., the Commission allows for a 10 percent margin; therefore, there is 32.3 percent excessive unaccounted for water (EUW). Explain in detail what steps Water Oak is currently taking, or is planning to take, to address the 32.3 percent EUW calculated by staff.

Mr. Martin Friedman

Page 3

December 17, 2025

Please file all responses no later than **Wednesday, January 14, 2026**, 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) 413-6974 or by email aramirez@psc.state.fl.us, if you have any questions.

Sincerely,

s/ Ailynee Ramirez-Abundez

Ailynee Ramirez-Abundez
Public Utility Analyst
Division of Engineering

ARA:da

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