

**Antonia Hover**

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**From:** Antonia Hover on behalf of Records Clerk  
**Sent:** Monday, December 22, 2025 1:12 PM  
**To:** 'Yossi Edelkopf'  
**Cc:** Consumer Contact  
**Subject:** RE: Docket No. 20250023-WS – Public Statement Opposing Rate Relief

Good Afternoon,

We will be placing your comments below in consumer correspondence in Docket No. 20250023, and forwarding them to the Office of Consumer Assistance.

Thank you!

*Toni Hover*

*Commission Deputy Clerk I  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399  
Phone: (850) 413-6467*

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**From:** Yossi Edelkopf <ye@alyaequities.com>  
**Sent:** Monday, December 22, 2025 1:04 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Subject:** Docket No. 20250023-WS – Public Statement Opposing Rate Relief

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**Commissioners:**

I submit this statement to formally object to any rate relief in this docket at this time and to request continued heightened scrutiny of the utility's operations, representations, and management.

The record demonstrates ongoing operational failures, inadequate controls, and inconsistent substantiation of claimed improvements. These deficiencies go to the core question before the Commission: whether this utility has demonstrated the competence, credibility, and prudence required to justify imposing additional costs on existing customers.

**First, the utility has not substantiated its claims regarding valve replacements or improved system isolation.**

While the utility has asserted that valve work is underway and will materially improve reliability, the record does not establish the scope, completion, or operational effectiveness of such work. The need for staff to request invoices and proof of completion confirms that these claims remain unverified. Until the utility produces paid invoices, completion dates, valve locations, and evidence of operational testing, assertions of improved reliability should be afforded no weight in support of rate relief.

**Second, recordkeeping failures undermine the reliability of all operational claims.**

PSC rules require accurate outage logs for interruptions affecting a material portion of customers. Staff's demand for historical outage records dating back to 2022 indicates that required logs were incomplete or missing. A utility that cannot demonstrate basic compliance with recordkeeping requirements has not met the threshold necessary for favorable ratemaking treatment.

**Third, extreme unaccounted-for water reflects a lack of operational control.**

The docket reflects unaccounted-for water at levels consistent with systemic leakage, metering inaccuracies, or data integrity failures. These conditions reflect internal control deficiencies, not unavoidable external factors. Rate increases should not precede demonstrated control of losses and verified remediation progress.

**Fourth, employee cost allocation and internal controls remain unresolved.**

Filings reflect overlapping employee roles across affiliated entities without contemporaneous time tracking or clear cost allocation. Absent documented segregation of duties and costs, the Commission cannot determine whether expenses proposed for recovery were prudently incurred by the regulated utility. This alone warrants denial or deferral of any rate relief.

**Fifth, the current proposals conflict with the sworn affidavit executed at acquisition.**

At the time control of the utility was obtained, the owner executed a sworn affidavit representing that necessary funding would be secured to address capital and operational needs. The practical effect of the utility's current requests is to shift financial risk to existing customers before operational competence and controls are demonstrated. This undermines the reliance interests created by that affidavit and the regulatory expectations attendant to a transfer of control.

**Sixth, customer testimony has been inadequately addressed.**

I personally testified at the customer meeting and raised specific concerns regarding service reliability, management practices, and cost controls. The response received was generic and failed to address the substance of those concerns. This pattern of dismissing customer input further erodes confidence in management and reinforces the need for Commission oversight.

**Finally, continued heightened oversight is necessary.**

Customers and associations must continue dealing with this operator on an ongoing basis. Given unresolved documentation gaps, persistent service disruptions, high water losses, cost allocation questions, and credibility concerns, the Commission should defer any rate relief until the utility demonstrates sustained operational competence, accurate recordkeeping, and full compliance.

**Request for Commission Intervention**

Based on the record developed to date, this matter now extends beyond a routine request for rate relief. The filings and staff inquiries reveal broader concerns regarding operational competence, internal controls, recordkeeping, and adherence to representations made under oath at acquisition. Accordingly, I respectfully request not only that the Commission deny or defer any rate increase at this time, but that it exercise its oversight authority to ensure this utility is capable of meeting its obligations to customers on an ongoing basis. Continued Commission involvement is necessary to protect the public interest, ensure accountability, and restore confidence that this system is being managed in a prudent and reliable manner.

**Respectfully submitted,**

**Yossi Edelkopf  
Grenelefe Condo President (Utilities Largest Customer)**

**Yossi Edelkopf**

Principal

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