

January 20, 2026

**Via Electronic Filing**

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

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. Teitzman:

On behalf of Sun Communities Finance, LLC d/b/a Water Oak Utility (“Water Oak” or “Utility”) this letter contains the responses to Staff’s Fourth Data Request dated December 17, 2025.

- 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

***RESPONSE: The dates provided are correct, and supporting invoices are being provided concurrently with this response to Commission staff.***

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.

**RESPONSE:** *These were to replace existing meters and transmitters that were not working properly and could not be reset or repaired.*

- b. Please explain why the Utility chose Accustream meters rather than any other available alternative.

**RESPONSE:** *At the time of purchase and based on research conducted by the Utility, these meters were known for their accuracy, durability, and low maintenance requirements and costs. They were competitively priced and met the Utility's budget thresholds.*

- c. If these are replacements, provide the estimated service life and in-service dates for the meters that were replaced.

**RESPONSE:** *The new meters have been in place since June of 2025. Meters typically have a service life of 10-15 years based on water quality and conditions.*

- 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.

**RESPONSE:** *Meters are replaced on an as-needed basis, and only in instances when they cannot be repaired.*

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.

**RESPONSE:** *Two generators, one for each system.*

b. Does the Florida Department of Environmental Protection (DEP) require a back-up generator for the system?

**RESPONSE:** Yes. FDEP requires public water treatment plants to have backup power pursuant to the agency's administrative rules. An example of such regulation is the Department's decision to require utilities to have Power Outage Contingency Plans (POCPs) for domestic wastewater facilities, thereby ensuring critical equipment remains operational.

4.) Explain if the replacement pipe projects of 10 and 15 feet are classified as emergency replacements or regular maintenance.

**RESPONSE:** These were emergency repairs resulting from unexpected line breaks.

5.) Provide the total number of fire hydrants in Water Oak's service area.

**RESPONSE:** 57.

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.

**RESPONSE:** Please see the file titled "2024 water loss log", provided to Commission staff in conjunction with this response.

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.

**RESPONSE:** Water Oak acknowledges the excessive unaccounted-for water (EUW) identified for the 2024 test year and is actively investigating the discrepancy between water produced and water sold. The Utility is reviewing production and billing data, evaluating master and customer meter accuracy, and assessing the distribution system for potential leaks and data inconsistencies.

To address EUW going forward, the Utility is implementing enhanced monitoring of production versus billed consumption, targeted meter testing and replacement, and periodic leak detection efforts. Internal review procedures are also being strengthened to identify and address discrepancies in a timely manner.

Water Oak remains committed to reducing water loss and maintaining compliance with rule 25-30.4325, F.A.C.

Should you or Staff have any questions regarding this response please do not hesitate to contact me.

Sincerely,

/s/ Daniel McGinn

Daniel J. McGinn

DJM:

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