

Tristan Davis

From: Tristan Davis on behalf of Records Clerk
Sent: Wednesday, January 21, 2026 8:37 AM
To: 'JOHN GARVEY'
Cc: Consumer Contact
Subject: RE: Water Oaks water rate increase

Good Morning,

We will be placing your comments below in consumer correspondence in Docket No. 20250088, and forwarding them to the Office of Consumer Assistance.

Thank you!

Tristan Davis
Commission Deputy Clerk I
Florida Public Service Commission
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Tallahassee, FL 32399
Phone: (850) 413-6121

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From: JOHN GARVEY <johngarvey2844@comcast.net>
Sent: Tuesday, January 20, 2026 5:59 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: Water Oaks water rate increase

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thank you for your attention to this matter

DOCKET NO 20250088-WU, Sun Communities Finance LLC d/b/a/ Water Oak Utility

To: Florida Public Services Commission Clerk

Subject: Concerns, Comments and Objections

We are residents of Water Oak Country Club Estates and a Customer of Water Oak Utility in Lake County. After reviewing the information letter received from the FPSC regarding the proposed rate structure, we have several questions and comments:

Comment:

Base rate increase is approximately 58% (excessive for an initial rate increase)

Residents are charged on a tier basis by gallons used. That tiered rate is increased by 770% up to 1100% - again extremely aggressive increase.

Question:

General services – the audit conducted indicates 18 General Services, the letter we received states 17.

Who are the 17 or 18 General Services Customers?

Why are their rates only charged by the 1,000 gallons and not tiered up as the residents are? They are only paying \$0.47 more per 1,000 gallons than residents up to 3,000 gallons usage.

How many gallons **each** per month do the General Services use? If they use over 6,000 gallons per month, should they not pay a higher rate per 1,000 gallons as well?

We understand there are 2 wells on property. Is one well for the golf course and the other for the community residents? Does this rate increase include water for

the entire community – pools, golf course, gym showers, etc? Or is it just for the residents private home usage?

Comment:

In reviewing the 10/7/2025 Audit report for Utility, there are some areas which raises concerns and which also prompted the FPSC to request a second, third and fourth requests for further information from Utility.

Page 2, books and records. Utility provided summarized general ledger from 2022-2024. Staff noticed accounting irregularities observed – due to system change and staff coding errors.

Page 5 – Net operating revenue, test on 4 customers, Finding 3. The finding showed that the there was an error in the GL and the audit showed that the General Service was **NOT** billed.

Question:

Why is there incomplete and inaccurate information in Utilities Books?

Why were some of the entries “summarized”?

How can a proposal be submitted with so much incorrect and incomplete information?

Comment:

A second request was sent out on 10/22/2026 for more information on the audit which indicated upgrades and replacements in the infrastructure at Water Oak.

Question:

In these findings, it was noted that 3 bids were not obtained for these jobs.

There also appears to be a lot of missing documentation in responding to these questions.

Is this proposed rate increase to cover the upgrades and additional infrastructure?

Shouldn't capital expenditures be covered by Sun Communities overall budget and not be included in "water usage" of the residents?

Comment:

A third request was sent out 10/31/2025 for further information from Utilities. Once again regarding the summary information and the fact that documentation was not available to back up the GL data that was summarized.

There was also a \$66,662 variance between the annual report and test transactions without any back up documentation. This variance also leads me to question the recordkeeping and actual usage indicated below.

The Utility response regarding the pro forma invoice of \$211,131 indicates that they are going to be funding this amount **through equity contributions from its parent company.**

Comment:

A fourth request went out on 12/17/25 for further information. **No response has been received yet.**

This requests information on 24 meters and 24 transmitters and the fact Utility is requesting cost recovery regardless of the parent company financing the proforma as indicated above.

IMPORTANT: This request indicates that the **test year of 2024 used 117,276,285** gallons of water, customers used **67,673,649**, leaving **49,602,636** unaccounted for, or 42.3%.

With a 10% percent margin allowed by the Commission, the concern is that they are proposing an increase in rates, when it is unexplained as to where the 49,602,636 gallons were used.

How can a rate increase be justified until they have a firm handle on both the financials as well as the water usage.

I would strongly suggest another year be audited with the usage for 2025. They year 2024 has too many inconsistencies and inaccurate information to be relied upon for the rate increase. 43% of the water usage is too high of a variable to be unaccounted for and is not in compliance with the Commission.

The unbilled and “unknown” 17 general services is a question that has not be answered either.

Sun Communities, the Utilities parent company, has 72 Communities in Florida alone. The residents are Senior citizens, mostly living on a fixed income already contending with the following:

- *Lot rent increase of 5% minimum

- *Home insurances being cancelled or greatly increased

And their Social Security only increased by 2.8%

We would greatly appreciate your consideration in doing another test year for the rate setting process.