

**Tristan Davis**

**From:** Tristan Davis on behalf of Records Clerk  
**Sent:** Wednesday, January 21, 2026 8:56 AM  
**To:** 'ktbrady'  
**Cc:** Consumer Contact  
**Subject:** RE: Docket # 20250088-WU

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  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399  
Phone: (850) 413-6121

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**From:** ktbrady <ktbrady@hibernianeducation.com>  
**Sent:** Tuesday, January 20, 2026 6:25 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Subject:** Docket # 20250088-WU

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Office of the Commission Clerk  
Florida Public Service Commission  
via [clerk@psc.state.fl.us](mailto:clerk@psc.state.fl.us)  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**RE: Application for Staff-Assisted Rate Case in Lake County by Sun Communities Finance LLC d/b/a Water Oak Utility**  
**Docket No. 20250088-WU**

Dear Sir or Madam,

I write as a resident of Water Oak Country Club Estates in Lady Lake, Florida. I respectfully submit this formal objection to the proposed water and wastewater rate increase under Docket No. 20250088-WU and request that

the Commission require a comprehensive, transparent, and verifiable accounting of the utility's operational and financial claims prior to any determination on this matter.

From an analytical perspective, a rate adjustment of the proposed magnitude warrants a clear demonstration of causal necessity, supported by documented system performance, accurate metering, and auditable cost attribution. At present, there is a significant discrepancy between these standards and the conditions observed within the community. To my knowledge, more than 250 residential water meters have remained broken or nonfunctional for a period exceeding two years. This condition compromises the integrity of consumption data, undermines billing accuracy, and renders any statistical or financial model used to justify a system-wide rate increase unreliable.

When consumption is not accurately measured at the point of use, unaccounted-for water is necessarily redistributed across the remaining metered population. This practice introduces a structural inequity, effectively transferring the financial burden of system losses and unmetered consumption onto residents who do, in fact, maintain functioning meters and comply with their billing obligations. Such a framework is inconsistent with both basic principles of cost causation and the Water Oak Estates prospectus, which clearly establishes that residents' financial responsibility for utilities begins at the individual water meter, not at the wellhead or system source.

Public records and materials associated with this proceeding further indicate that approximately 32.3 percent of the water processed and pumped by the system is classified as Excessive Unaccounted-for Water. In addition, documentation reflects that 17 general service accounts were not billed during the test year. These findings raise substantive questions regarding the measurement, allocation, and financial responsibility for corporate and common-area water usage, including facilities and infrastructure that remain the property and obligation of Sun Communities Finance LLC.

The lack of a clear distinction between irrigation water and residential consumption further distorts wastewater billing. From a technical and economic standpoint, wastewater charges should correspond to indoor, return-flow usage rather than to outdoor irrigation. The present structure, therefore, imposes sewage costs on residents for water that does not enter the wastewater system, creating a misalignment between the service provided and the fees assessed.

Equally concerning is the lack of transparency regarding water usage in common areas, including the sports complex, golf course, and other shared or corporate facilities. There is no publicly available, verifiable accounting of how this usage is metered, monitored, or allocated between the utility and its residential customers.

While I recognize the regulatory importance of routine water quality testing, I am informed that this function is currently performed by external personnel at substantial recurring cost. From an operational efficiency standpoint, the Commission may wish to evaluate whether on-site staff training could achieve compliance at significantly lower expense, thereby mitigating the need for downstream rate increases.

In light of these issues, I respectfully request that the Commission require the utility to produce a detailed, auditable accounting that includes:

- Verified water usage data for each residential meter
- Verified water usage data for each common-area and corporate facility
- Documentation substantiating the necessity of a rate increase exceeding eight times prior levels
- A corrective plan to reduce Excessive Unaccounted-for Water and restore system integrity
- An explanation of the treatment of unbilled general service accounts during the test year

I also respectfully request that the Commission consider granting a brief extension of the public comment and hearing timeline. The complexity and scope of this proposal warrant sufficient time for residents to review technical documentation, assemble evidence-based responses, and participate meaningfully in the regulatory process.

Any adjustment to rates should be predicated solely on demonstrable, reasonable, and efficiently incurred costs of providing service to the entire system, including the utility's own facilities and operations. Absent transparent data, verifiable measurement, and equitable allocation of costs, approval of such an increase would lack a sound evidentiary foundation.

Thank you for your consideration of this matter and for your continued commitment to regulatory integrity and public accountability.

Respectfully submitted,

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