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FPSC - COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In 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 ORDER NO. PSC-2026-0232-PAA-WU ISSUED: June 22, 2026

The following Commissioners participated in the disposition of this matter:

GABRIELLA PASSIDOMO SMITH, Chairman
GARY F. CLARK
MIKE LA ROSA
BOBBY PAYNE
ANA ORTEGA

NOTICE OF PROPOSED AGENCY ACTION
ORDER APPROVING RATE INCREASE FOR SUN COMMUNITIES FINANCE, LLC

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission (Commission) that the action discussed herein is preliminary in nature—except with regard to (1) the reduction of rates after four years based upon the recovery of rate case expense, (2) the granting of temporary rates in the event of protest, and (3) the requirement for proof of adjustment of books and records—and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code (F.A.C.). The reduction of rates after four years, the granting of temporary rates in the event of protest, and the requirement for proof of adjustment of books and records are procedural agency actions and subject to reconsideration and appeal as described in the attached “Notice of Further Proceedings or Judicial Review.”

Background

Sun Communities Finance, LLC d/b/a Water Oak Utility (Water Oak or Utility) is a Class C water-only utility providing service to 1,265 residential customers and 50 general service customers in Lake County. The Utility is a wholly-owned subsidiary of Asset Investors Operating Partnership, LP.

The Utility's rates were last established by Order No. PSC-1997-0034-FOF-WS using a rate base as of November 30, 1993.[1] That order also transferred the Utility's water and wastewater certificates to Sun Communities Finance Limited Partnership from the seller. In 2000, the Utility changed the name on its certificate to Sun Communities Finance, LLC d/b/a Water Oak Utility. On March 12, 2020, the Utility's wastewater certificate was cancelled by Order No. PSC-2020-0074-PAA-WS.[2] It has been over 25 years since the Utility's last rate case.

Although Water Oak has not had a rate case in many years, it has received 25 index increases since 1988, with the most recent index increase approved in 2023. While these adjustments provided limited rate relief between rate proceedings, they were not intended to address comprehensive changes in the Utility's revenue requirement.

On October 16, 2023, Water Oak filed an application for a staff-assisted rate case (SARC) which was assigned Docket No. 20230119-WU.[3] That application was withdrawn on June 5, 2024.[4]

On June 23, 2025, the Utility filed an application for a SARC.[5] Pursuant to Section 367.0814(2), Florida Statutes (F.S.), the official date of filing the SARC was established as August 8, 2025. Commission staff selected the test year ended December 31, 2024. According to the Utility's 2024 Annual Reports, total gross revenues were $179,227 and operating expenses were $342,931.

This matter came before us on April 7, 2026, but was deferred to the June 2, 2026 Commission Conference to permit Commission staff to further investigate. Following the deferral, Commission staff determined that the Utility appears to be serving customers outside of its Commission-approved service territory. As a result, Commission staff sent a letter to the Utility instructing it to file an Application for an Amendment to its Certificate pursuant to Rule 25-30.036, F.A.C., by August 18, 2026.[6]

We have jurisdiction over this matter pursuant to Sections 367.011, 367.081, 367.0812, 367.0814, 367.091, and 367.121, F.S.

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[1] Order No. PSC-1997-0034-FOF-WS, issued January 7, 1997, in Docket No. 960040-WS, *In re: Application for transfer of Certificates Nos. 454-W and 388-S in Lake County from Water Oak Utilities Co., Inc. to Sun Communities Finance Limited Partnership*.
[2] Order No. PSC-2020-0074-PAA-WS, issued March 12, 2020, *In re: Request for cancellation of Certificate No. 388-S by Sun Communities Finance, LLC. d/b/a Water Oak Utility*.
[3] Document No. 05692-2023, filed on October 16, 2023.
[4] Document No. 04603-2024, filed on June 5, 2024.
[5] Document No. 05141-2025, filed on June 23, 2025.
[6] Document No. 02980-2026, filed on May 19, 2026.

Review and Decision

I. Quality of Service

Pursuant to Section 367.081(2)(a)(l.), F.S., and Rule 25-30.433(1), F.A.C., in water rate cases, this Commission shall determine the overall quality of service provided by the utility. This determination is made from an evaluation of the quality of the utility's product and the utility's attempt to address customer satisfaction. The rule further states that the most recent chemical analyses for the water system, outstanding citations, violations, and consent orders on file with the Department of Environmental Protection (DEP) and the county health department, and any DEP and county health department officials' testimony concerning quality of service shall be considered. In addition, any customer testimony, comments, or complaints received by us are also reviewed. The operating condition of the water system is addressed in Section II.

A. *Quality of the Utility's Product*

In evaluating Water Oak's product quality, Commission staff reviewed the Utility's compliance with the DEP's primary and secondary drinking water standards. Primary standards protect public health while secondary standards regulate contaminants that may impact the taste, odor, and color of drinking water. In the DEP's last Sanitary Survey Report dated March 14, 2023, no chemical or bacteriological exceedances were noted for the previous 12 months, and the Utility was determined to be in compliance with the DEP standards. In the Utility's last Consumer Confidence Report dated June 26, 2025, no violations of contaminant levels were noted for the testing period.

B. *The Utility's Attempt to Address Customer Satisfaction*

Commission staff reviewed the complaints recorded by our Consumer Activity Tracking System (CATS), received by the Utility, and filed with the DEP for the test year and four years prior. There was one complaint filed in CATS regarding improper billing, where the customer reported inconsistent water bills. In response, the Utility explained that the customer's meter was installed incorrectly and a new meter was installed. Water Oak also credited the customer's account based on their average historical usage. While the Utility did respond, it failed to respond within 15 working days and failed to provide a full and accurate report in violation of Rule 25-22.032, F.A.C. The Utility reported that it did not receive any complaints during this timeframe. The DEP responded that it received one complaint during this timeframe regarding the quantity of Boil Water Notices (BWN) the Utility issued.

A customer meeting was held on January 21, 2026, where eight customers provided comments. The majority of the comments focused on the overall rate increase. Customers also voiced their concerns about improperly functioning meters and the amount of unaccounted for water identified in the Staff Report. Following the customer meeting, Commission staff asked Water Oak if it was aware of the customer concerns regarding improperly functioning meters as well as how it would address each customer that spoke at the meeting. Water Oak stated that it was not aware of these meter concerns prior to the customer meeting and has no record of any ongoing or open complaints.[7] Water Oak further explained that it met with several residents after the customer meeting to explain the general ratemaking process and how the Utility addresses customer concerns.[8]

There were approximately 308 customer comments in the docket file as of May 6, 2026. However, Table 1 shows a total of 484 customer comments because a single customer comment that relates to several different categories is counted multiple times (one time in each category). While the majority of these comments expressed concerns with the overall rate increase, concerns were also raised regarding improperly functioning meters, the amount of unaccounted water identified in the Staff Report, and quality of service such as fluctuating water pressure. For reference, the Utility serves approximately 1,265 residential customers.

Table 1
Number of Rate Case Comments Received by Source and Subject

Subject of Comment	Oral Comments	Written Comments	Total*
Other	3	73	76
Quality of Service	-	3	3
Meter Issues	1	55	56
Improper Billing	-	17	17
Outages (Service interruption/BWN)	-	18	18
Rate Increase Concerns	8	306	314
Total	12	472	484

*A single customer comment or complaint may be counted multiple times if it is associated with multiple categories.

As shown in Table 1, there were 18 comments regarding service interruptions and BWNs. Commission staff requested the Utility provide its service interruption records pursuant to Rule 25-30.251(1)–(2), F.A.C. The rule states that each utility is required to maintain a record of all interruptions in service which affect 10 percent or more of its customers, and to notify us of these interruptions. Rule 25-30.251(1), F.A.C., specifically provides that "[t]he record shall show the cause of the interruption, its date, time, duration, remedy, and steps taken to prevent recurrence." Water Oak did not file any such reports with us and also stated that it has not had an outage affecting 10 percent or more of its customers. Rather, the Utility asserted that its highest impact experience was roughly 4 percent per outage and that the community uses valves to limit outages to only the affected section.[9]

On February 17, 2026, the Office of Public Counsel (OPC) filed an observation letter regarding the customer correspondence in this docket, BWNs, and service interruptions based on

[7] Document No. 01125-2026, filed February 17, 2026.
[8] *Id*.
[9] Document No. 01428-2026, filed March 5, 2026.

DEP records. OPC's letter identified three service interruptions that affected 10 percent or more of the Utility's customers: two in 2020 and one in 2021. Upon reviewing OPC's observation letter, the Utility confirmed the three service interruptions (9/21/20; 12/2/20; 9/22/21) that exceeded the 10 percent or greater threshold, but which were not reported to us. In addition, Commission staff analyzed OPC's letter and the DEP documentation and identified one additional instance (5/6/21) affecting 10 percent or more of the Utility's customers. The Utility stated that since that time, it has improved its infrastructure and practice of isolating outages to those areas that require repair, thus preventing other disruptions from meeting or exceeding the reporting threshold. Going forward, Water Oak shall maintain its service interruption records as outlined in Rule 25-30.251(1), F.A.C., and shall notify us of any such qualifying interruption.

On April 17, 2026, OPC filed an additional observation letter recommending that we find Water Oak's quality of service to be marginal and impose a 15 basis point reduction to the Utility's return on equity (ROE) because of the number of unplanned service interruptions that have occurred since 2019. OPC also recommended a 15 percent reduction to Contractual Services – Professional expense related to management fees.[10]

On June 2, 2026, following the oral comments of an interested person, the Utility confirmed that it had received an influx of approximately 450 complaints from customers relating to water meter accuracy beginning about five to six days after our April 7, 2026 Agenda Conference.

C. *Managerial Concerns*

The diligent work performed by Commission staff in this case has made apparent to us the existence of several Utility managerial issues related to poor recordkeeping and reporting. Such actions negatively impact the customer service provided by Water Oak as well as the Utility's obligation to provide timely and accurate information to us in a transparent manner.

The information presented has raised concerns amongst us regarding the adequacy of Water Oak's managerial capabilities. Water Oak should possess a greater familiarity with its system, including its approved service area and customer base, than was presented here. For example, since our April 7, 2026 Agenda Conference, and as discussed in Section VI, our staff discovered 34 additional general service customers whose usage/gallons needed to be imputed in order to capture water consumption data. These are customers the Utility should have previously been aware of and informed our staff about. When managerial operations are not well run, and Commission staff uncovers important facts, we cannot but wonder what other inadequate utility practices are occurring in the background. In light of these concerns, Water Oak shall submit to a management audit conducted by Commission staff. Operational changes are needed to, among other things, determine the cause of water loss and better account for the number of customers within Water Oak's service territory.

[10] Document No. 02230-2026, filed April 17, 2026.

In addition, an interested person brought to our attention requests submitted to the Department of Business and Professional Regulation's (DBPR's) Office of Inspector General (Case No. 2026-518-REF) and to the St. Johns River Water Management District (District) for regulatory review of actions allegedly related to Water Oak. After a report is finalized by the DBPR or District regarding either of these two pending investigations, the Utility shall file those reports with this Commission. In addition, the Utility shall communicate information regarding the associated findings of the DBPR and District to all customers so that customers are fully aware. If these investigations are not closed within a year, Water Oak shall report that fact to this Commission as well as any other findings made by DBPR and the District up to that point in time. The Utility shall also provide customers with this information.

Finally, to further help remedy the quality of service deficiencies we have identified, Water Oak shall arrange and hold at least one formal customer meeting in each calendar year of 2027 and 2028. At those times the Utility shall provide an overview of general system occurrences, an overview of the DBPR and District investigations, and provide customers an opportunity to speak with Utility representatives. Within one month of the conclusion of each such meeting, Water Oak shall file a report in this docket to summarize to us topics discussed and any results of the meetings.

D. *Conclusion*

The Utility is in compliance with the DEP standards. In addition, there were few customer complaints filed during the test year and four years prior, and the majority of the comments provided during the course of this proceeding regarded the overall rate increase. To address customer concerns identified at the customer meeting and throughout this proceeding, the Utility indicated that it attempted to reach the customers who spoke at the customer meeting, has taken steps to mitigate service interruptions, and has taken steps to evaluate meter accuracy on an ongoing basis.

It is the degree of our managerial concerns, however, that outweighs all other considerations in this particular case. The Utility's poor recordkeeping and reporting negatively impact the customer service provided by Water Oak as well as the Utility's obligation to provide timely and accurate information to us in a transparent manner. For the reasons set forth above, we find Water Oak's quality of service to be unsatisfactory. Accordingly, pursuant to Section 367.0812(4), F.S., there shall be: (1) a 30 percent penalty to Account 601 – Salaries and Wages – Employees; (2) a 30 percent penalty to Account 631 – Contractual Services – Professional; and (3) a 75 basis point reduction to ROE.

II. Infrastructure and Operating Conditions

Rule 25-30.225(2), F.A.C., requires each water utility to maintain and operate its plant and facilities by employing qualified operators in accordance with the rules of the DEP. Rule 25-30.433(2), F.A.C., requires consideration of whether the infrastructure and operating conditions of the plant and facilities are in compliance with Rule 25-30.225, F.A.C. In making this determination, we must consider testimony of the DEP and county health department officials, sanitary surveys for water systems, citations, violations, consent orders issued to the utility, customer testimony, comments, complaints, utility testimony, and responses to the aforementioned items.

A. *Water System Operating Conditions*

Water Oak's water system has a permitted capacity of 334,000 gallons per day (gpd). The Utility's water system has two 10-inch diameter wells and four hydropneumatic storage tanks. Well No. 1 has a pumping capacity of 1,000 gallons per minute (gpm). Well No. 2 has a pumping capacity of 750 gpm. Two of the hydropneumatic storage tanks have a capacity of 20,000 gallons each and two additional hydropneumatic storage tanks have a capacity of 25,000 gallons each. Groundwater is treated through hypochlorination. The DEP conducted an inspection of Water Oak's water treatment plant (WTP) on March 2, 2023. The resulting Sanitary Survey Report indicated the facility was in compliance with the DEP's rules and regulations.

B. *Conclusion*

Therefore, we find that the Water Oak water system is currently in compliance with DEP regulations.

III. Used and Useful

Water Oak's water system is served by two 10-inch diameter wells rated at 1,000 gpm and 750 gpm. The Utility is permitted by the DEP to withdraw an average of 334,000 gpd. The distribution system is a composite network of 2- to 3-inch Cross Linked Polyethylene pipe and 4- to 8-inch Polyvinyl Chloride (PVC) pipe. The distribution system has 15 fire hydrants.

A. *Used and Useful Percentages*

Rule 25-30.4325, F.A.C., addresses the method by which the used and useful (U&U) percentage of a water system is determined. Rule 25-30.4325(4), F.A.C., states that a water treatment system is considered 100 percent U&U if the service territory the system is designed to serve is built out and there is no apparent potential for expansion of the service territory or the system is served by a single well. Based on a review of Water Oak's service territory and Annual Report, the service territory appears to be built out. In its last limited proceeding increase and overearning investigation, the water distribution system and storage were found to be 100 percent U&U.[6] Therefore, the U&U percentage for Water Oak's WTP, storage, and distribution system should be considered 100 percent.

B. *Excessive Unaccounted for Water*

Rule 25-30.4325, F.A.C., provides factors to be considered in determining whether adjustments to operating expenses are necessary for excessive unaccounted for water (EUW).

EUW is defined as "unaccounted for water in excess of 10 percent of the amount produced." Unaccounted for water is all water that is not sold, metered, or accounted for in the records of the utility.

EUW is calculated by subtracting both the gallons sold to customers and the gallons used for other services, such as flushing, from the total gallons pumped and purchased for the test year, and dividing by the sum of the gallons pumped and purchased. The amount in excess of 10 percent, if any, is the EUW percentage. 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. In response to data requests from Commission staff, the Utility indicated that it does not purchase any water.[11] An examination of the Utility's billing records indicated 92,272,981 gallons of treated water was sold to its customers. The Utility documented 2,998,514 gallons of other water usages for line and hydrant flushing along with water loss due to line breaks.[12] The resulting calculation ([117,276,285 + 0 – 92,272,981 – 2,998,514] / [117,276,285 + 0]) for unaccounted for water is 18.8 percent. The rule allows a 10 percent margin; therefore, there is 8.8 percent EUW. Regarding the cause, the Utility stated that it is evaluating master and customer meter accuracy, and assessing the distribution system for potential leaks and data inconsistencies.[13]

C. *Conclusion*

Water Oak's WTP and distribution system shall both be considered 100 percent U&U. Additionally, an 8.8 percent adjustment for EUW shall be made to operating expenses for chemicals and purchased power.

IV. <u>Average Test Year Rate Base</u>

The appropriate components of the Utility's rate base include utility plant in service (UPIS), land and land rights, accumulated depreciation, contributions-in-aid of construction (CIAC), accumulated amortization of CIAC, and working capital. Our staff selected the test year ended December 31, 2024, for the current rate case. A summary of each component and our approved adjustments are discussed below.

A. *Pro Forma Plant Additions*

Water Oak requested recovery of five pro forma plant projects which are depicted in Table 2. It is Commission practice for our staff to ascertain whether a minimum of three bids were solicited for each project or evaluate the Utility's reasoning as to why three could not be obtained.[14] Water Oak stated that it did not solicit multiple bids for each project due to

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[11] Document No. 14962-2025, filed November 6, 2025.
[12] Document No. 00410-2026, filed January 20, 2026.
[13] Document No. 00410-2026, filed January 20, 2026.
[14] *E.g.*, Order No. PSC-2022-0335-PAA-WS, issued September 28, 2022, in Docket No. 20220066-WS, *In re: Application for increase in water rates in Washington County, by Sunny Hills Utility Company*; Order No. PSC-2021-0206-FOF-WS, issued June 4, 2021, in Docket No. 20200139-WS, *In re: Application for increase in water*

emergency circumstances or limited vendor availability. The Utility believed the project requirements to be specialized, and few contractors in the area possess the necessary qualification, resources, or capacity to perform the work.[15]

Table 2
Pro Forma Plant Projects

	Project	In-Service Date	Account Number	Amount	Retirement
1.	Generator and Automatic Transfer Switch Installation (ATS)	May 2026	310	$148,330	$111,248
2.	24 - 5/8 by 3/4 inch Meters and Transmitters	December 2025	334	$7,545	$5,659
3.	Water Main Leak - 10 feet (ft.) of pipe replacement	March 2025	309	$5,500	$4,125
4.	Water Main Leak - 15 ft. of pipe replacement	April 2025	309	$13,260	$9,945
5.	New 100 Horse Power (HP) Well Pump Replacement	March 2025	311	$36,619	$27,464
	Total			$211,254	$158,441

Source: Responses to Commission staff data requests.

1. Project No. 1 – Generator and ATS Installation

Project No. 1 is the installation of a new 250 kilowatt, 480 volt, diesel driven Generac generator and automatic transfer switches. Water Oak stated that this project was necessary because the existing generator was outdated, undersized, and no longer capable of supporting the facility's full electrical load.[16] Also, the DEP requires public WTPs to have backup power. The Utility provided its contract for this project which totals $148,330 with an in-service date of May 2026.

Water Oak stated that the new generator provides sufficient capacity to maintain all critical plant functions, including pumps, controls, and safety systems, during power failures. Furthermore, the addition of automatic transfer switches facilitates the transition between Utility and generator power, which should reduce downtime, prevent equipment damage, and ensure continuous treatment and distribution of safe water.[17] Therefore, we find this project to be reasonable and prudent and approve the $148,330 expense.

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and wastewater rates in Charlotte, Highlands, Lake, Lee, Marion, Orange, Pasco, Pinellas, Polk, and Seminole Counties, by Utilities, Inc. of Florida.
[15] Document No. 14962-2025, filed November 6, 2025.
[16] Document No. 14962-2025, filed November 6, 2025.
[17] *Id*.

2. Project No. 2 – Twenty-four 5/8 by 3/4 Inch Meters and Transmitters

Project No. 2 is for the purchase and replacement of 24 residential 5/8 by 3/4 inch Accustream meters and end point transmitters. The Utility stated that the existing meters and transmitters were not working properly and could not be reset or repaired. Water Oak selected these meters based on their price, accuracy, durability, low maintenance, and cost.[18] The new Accustream meters have an expected manufacturer's service life of 10 to 15 years. The Utility provided an invoice totaling $7,545 for this project, which was completed in December 2025.

As discussed in Section I, several customers raised concerns regarding improperly functioning meters. In Commission staff's Fourth Data Request, our staff asked the Utility to explain why it proposed replacing only 24 meters despite serving approximately 1,265 residential customers, and to clarify whether the remaining meters had already been replaced or were planned for future replacement. The Utility responded that meters are replaced on an as-needed basis, specifically when repairs are not feasible. We find that this project is reasonable and necessary, especially given the customer concerns. Thus we approve $7,545 for the replacement of 24 residential meters. Should the Utility determine that additional meter replacements are warranted, it may seek our approval for cost recovery in a future proceeding.

3. Project No. 3 – Water Main Leak – 10 ft. of Pipe Replacement

Project No. 3 is the replacement of 10 feet of C900 pipe and two 8-inch mechanical joints due to a water main break in February 2025. The Utility provided an invoice reflecting total project costs of $5,500. The project was completed in March 2025. This repair was necessary to restore and maintain service to customers. Based on the documentation provided, we find that this project was necessary and, therefore, approve the total cost of $5,500.

4. Project No. 4 – Water Main Leak – 15 ft. of Pipe Replacement

Project No. 4 is the replacement of 15 feet of PVC pipe and fittings due to a water main leak on March 14, 2025. The cost of this project also included the costs to replace a customer's driveway that was removed in the process of accessing the water main leak. The Utility provided invoices reflecting total project costs of $13,260, consisting of $8,500 for pipe replacement and $4,760 for driveway restoration. This project was completed April 2025.

The repair was necessary to restore service and maintain system reliability. Additionally, the driveway restoration costs were directly related to the repair and are appropriately included as part of the total project expense. Therefore, we find this project to be reasonable and necessary and approve the total cost of $13,260.

[18] Document No. 00410-2026, filed January 20, 2026.

5. Project No. 5 – New 100 Horse Power Well Pump Replacement

Project No. 5 included assessing the existing pump, and the purchase, and installation of a new 100 horsepower (HP) pump. The Utility stated that the existing pump had reached the end of its useful service life and was operating inefficiently, resulting in frequent repairs, increased maintenance costs, and reduced system reliability due to downtime.[19]

This project consists of $5,140 for pulling the old 100HP deep well pump to assess, gather information, and specifications to quote a replacement, and $31,478 for the installation of the new pump, for a total project cost of $36,619. The Utility provided supporting invoices for these costs. Given these circumstances, we find the pump replacement to be necessary to maintain reliable service. Accordingly, we approve the total project cost of $36,619.

B. *Utility Plant in Service*

Water Oak recorded UPIS of $2,925,041. Based on invoices provided in response to Commission staff's Third Data Request, Commission staff increased plant by $70,365 to reclassify plant additions identified as "Site Work – Grading, Fence, Restoration, Driveway" from Account 303 – Land and Land Rights to Account 304 Structures and Improvements.[20] Commission staff further increased UPIS by $211,254 to reflect pro forma additions. Commission staff then made subsequent adjustments to reflect pro forma retirements, reducing UPIS by $158,441. Additionally, Commission staff reduced this amount by $570,871 to reflect averaging adjustments, resulting in a net reduction to UPIS of $447,693. Therefore, we approve an average UPIS of $2,477,349.

C. *Land and Land Rights*

The Utility recorded a test year land and land rights balance of $73,415. Commission staff reclassified $70,365 from Account 303 – Land and Land Rights to Account 304 – Structures and Improvements to reflect the invoiced amounts provided in Commission staff's Third Data Request, which identified the costs as "Site Work – Grading, Fence, Restoration, Driveway."[21] Therefore, we approve a land and land rights balance of $3,050.

D. *Accumulated Depreciation*

The Utility recorded accumulated depreciation of $1,092,623. Commission audit staff determined that the Utility used incorrect depreciation rates for Accounts 301, 304, 307, 311, and 330. Additionally, the Utility did not include net salvage for Account 341. Because of this, our audit staff reduced accumulated depreciation by $11,585 to reflect the use of the correct depreciation rates per Rule 25-30.140, F.A.C., and to include the net salvage. Commission staff then decreased accumulated deprecation by $155,463 to reflect pro forma additions and retirements. Commission staff also increased accumulated depreciation by $1,302 to reflect the

[19] Document No. 14962-2026, filed November 6, 2025.
[20] Document No. 15081-2025, filed November 14, 2025.
[21] *Id*.

additional accumulated depreciation resulting from the reclassification of $70,365 of site work from land to Account 304 – Structures and Improvements. Additionally, Commission staff decreased accumulated depreciation by $60,070 to reflect averaging adjustments. In total, Commission staff's adjustments result in a total decrease to accumulated depreciation of $225,816. We agree with these adjustments and thus approve an average accumulated depreciation balance of $866,807.

E. *Contributions-in-Aid of Construction*

Water Oak recorded CIAC of $174,916. On May 6, 2026, OPC submitted a letter of additional observations and recommendations.[22] Commission staff reviewed OPC's letter and agreed that certain prior-year meter installation fees and service availability charges were either not charged or recorded as directed in Order Nos. PSC-2000-1165-PAA-WS and PSC-2002-1831-TRF-WS.[23] Although customer growth occurred, for the majority of the years from 2000 to 2024, no meter installation fees or service availability charges were shown on the Utility's books even though we directed the Utility to "reinstate" these charges in 2000.[24] Thus, additional (estimated) CIAC shall be included in this instance.

Broadly speaking, these charges are intended to shield existing customers from the cost impacts associated with adding new customers to the system. We intended that new growth fund the infrastructure it requires by ordering the reinstatement of these charges in Order No. PSC-2000-1165-PAA-WS. Therefore, we increase CIAC by $103,929 based on Commission staff's calculations and approve an average CIAC balance of $278,845.

F. *Accumulated Amortization of Contributions-in-Aid of Construction*

The Utility recorded accumulated amortization of CIAC of $174,916. In response to OPC's May 6, 2026 letter, Commission staff decreased accumulated amortization of CIAC by $40,325 to reflect the recording of CIAC-related fees and charges. Pursuant to Rule 25-30.140(9)(b), F.A.C., the expense associated with the CIAC was recalculated and this changed the level of accumulated amortization of CIAC. Therefore, we approve an average accumulated amortization of CIAC balance of $134,591.

G. *Working Capital Allowance*

Working capital is defined as the short-term investor-supplied funds that are necessary to meet operating expenses. Consistent with Rule 25-30.433(3), F.A.C., and our practice, Commission staff used the one-eighth operation and maintenance (O&M) expense (less rate case

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[22] Document No. 02623-2026, filed May 6, 2026.
[23] *See* Order No. PSC-2000-1165-PAA-WS, issued June 27, 2000, in Docket No. 19990243-WS, *In re: Application for limited proceeding increase and restructuring of water rates by Sun Communities Finance Limited Partnership in Lake County, and overearnings investigation*; Order No. PSC-2002-1831-TRF-WS, issued December 20, 2002, in Docket No. 20020388-WS, *In re: Request for approval to increase meter installation fees to conform to current cost in Lake County by Sun Communities Finance, LLC d/b/a Water Oak Utility*.
[24] Order No. PSC-2000-1165-PAA-WS.

expense) formula for calculating the working capital allowance.[25] As such, Commission staff removed the rate case expense of $5,535. This resulted in an adjusted O&M expense balance of $148,704. Applying this formula, we approve a working capital allowance of $18,588.

H. *Conclusion and Rate Base Summary*

Based on the foregoing, we find that the appropriate average test year rate base is $1,487,925. Rate base is shown on Schedule No. 1-A. The related adjustments are shown on Schedule No. 1-B.

V. Rate of Return

Water Oak's capital structure consists of common equity. The Utility's capital structure has been reconciled to our approved rate base. The ROE is 7.76 percent based on the Commission-approved leverage formula currently in effect[26] and our imposed 75 basis point reduction to ROE from the Utility's unsatisfactory quality of service, as discussed in Section I. Therefore, we approve an ROE of 7.76 percent with a range of 6.76 percent to 8.76 percent, and an overall rate of return of 7.76 percent. The ROE and overall rate of return are shown on Schedule No. 2.

VI. Test Year Revenues

The Utility recorded total test year operating revenues of $191,134 for water. The water revenues included $191,134 of service revenues and no miscellaneous revenues. Commission staff's review of the audit indicated that the Utility's general ledger consisted of duplicate bills for the residential class. Commission staff removed the duplicate bills and adjusted the billing data to reflect the appropriate billing determinants for residential. In addition, the general service customers were not billed during the test year. During Commission audit staff's review, the Utility indicated there were 17 general service customers and usage was 190,283 gallons. In the preliminary analysis, the general service customers were all classified as having a 5/8 inch x 3/4 inch meter size when determining the appropriate test year service revenues.

On February 17, 2026, OPC submitted an observation letter and therein raised a concern regarding the appropriate number of unbilled general service customers as well as their water consumption.[27] OPC noted that the Utility's 2024 Annual Report indicated there were 19 general service customers at various meter sizes; therefore, based on OPC's analysis, the general service revenues are understated.

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[25] Order No. PSC-2025-0359-PAA-WU, issued September 24, 2025, in Docket No. 20240168-WU, *In re: Application for staff-assisted rate case in Highlands County, by Country Walk Utilities, Inc.*

[26] Order No. PSC-2025-0213-PAA-WS, issued on June 18, 2025, in Docket No. 20250006-WS, *In re: Water and wastewater industry annual reestablishment of authorized range of return on common equity for water and wastewater utilities pursuant to Section 367.081(4)(f), F.S.*

[27] Document No. 01137-2026, filed on February 17, 2026.

Commission staff contacted Water Oak to confirm the billing determinants and meter sizes for each general service customer.[28] Based on information provided by the Utility, there had been 17 general service customers, among them a model home. The model home had recently sold and was reclassified from general service to residential. As a result, there were then 16 general service customers. Fifteen of those customers have a 5/8 inch x 3/4 meter size and one customer has a two inch meter. According to the Utility, all of the general service consumption is for irrigation purposes only, with the exception of a pool. In response to Commission staff's initial inquiry, the Utility reevaluated the general service gallon total and indicated it should be 197,780. Based on the above, our staff recommended test year revenues at the April 7, 2026 Commission Conference were $168,055.

At our April 7, 2026 Commission Conference, we voted to defer this case so Commission staff could gather additional information. Commission staff later discovered that the Utility had more general service customers than initially reported. In a response to Commission staff's data request, the Utility provided a revised list of general service customers which included meter sizes but did not provide associated water usage.[29] The list of general service customers represented the water service provided to common areas and amenities located throughout Water Oak Country Club Estates. Commission staff then contacted the Utility again and requested the consumption data for the additional general service customers. The Utility provided consumption data for its residential and some of its general service customers.[30] Commission staff reviewed the data and discovered that the Utility had not provided usage for the majority of the service provided to the common areas and amenities. Commission staff attempted to obtain the consumption data for all the general service customers, but the Utility failed to respond. Therefore, in this case, we find that it is necessary to impute usage/gallons to capture the appropriate amount of water consumption for all residential and general service customers.[31] Such an approach is analogous to prior dockets where we have imputed revenues when the billing data was not complete.[32]

As mentioned in Section III, in 2024, the Utility reported that it produced a total of 117,276,285 gallons during the test year. To determine the appropriate number of total gallons sold, Commission staff calculated an average of the percentage of gallons sold to gallons pumped based on the last five years of the Utility's Annual Reports filed with this Commission, which resulted in an average of 78.68 percent. Table 3 shows Commission staff's calculation.

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[28] Document No. 01273-2026, filed on February 25, 2026.
[29] Document No. 02469-2026, filed on April 29, 2026.
[30] Document No. 02857-2026, filed on May 13, 2026.
[31] *See* Order No. PSC-02-1739-PAA-WS, issued December 10, 2002, in Docket No. 020010-WS, *In re: Application for staff-assisted rate in Highlands County by the The Woodlands of Lake Placid, L.P.*; Order No. PSC-08-0548-PAA-WS, issued August 19, 2008, *In re: Application for staff-assisted rate case in Polk County by Plantation Landings, Ltd*.
[32] *Id.*

Table 3
Percentage Difference in Total Gallons Pumped and Sold

Years	Total Gallons Pumped	Total Gallons Sold	% of Gallons Sold
2020	117,676,000	92,845,000	78.90%
2021	112,823,000	96,010,000	85.10%
2022	113,051,000	85,575,000	75.70%
2023	120,739,000	91,394,000	75.70%
2024	117,170,000	91,394,000	78.00%
Average			78.68%

Source: 2020–2024 Annual Reports and Commission staff calculations.

Commission staff applied the average percentage of 78.68 to the 117,276,285 gallons produced during the test year. This results in 92,272,981 gallons (117,276,285 x 78.68%) sold to residential and general service customers during the test year. Based on Commission staff's analysis of the Utility's billing data, the residential gallons sold during the test year were 67,483,366. Therefore, we find that the appropriate number of general service gallons should be 24,789,615 gallons (92,272,981 - 67,483,366). Based on all the subsequent information provided by Water Oak, our staff determined that there are a total of 50 general service customers during the test year, as shown in Schedule No. 5 of this Order. Additionally, Commission staff increased the test year bills to reflect the appropriate general service customers.

Finally, to determine the appropriate test year operating revenues, Commission staff applied the adjusted billing determinants to the Utility's current rates. As a result, Commission staff determined test year operating revenues should be $208,330. This results in an increase to test year operating revenues of $17,196 ($208,330 - $191,134) in relation to the Utility's booked test year operating revenues.

Based on the above, we approve test year operating revenues of $208,330 for Water Oak's water system.

VII. Operating Expenses

Water Oak recorded an operating expense of $342,547. The test year O&M expenses were reviewed by our staff, including invoices and other supporting documentation. Commission staff made several adjustments to the Utility's operating expenses as described below.

A. *Operation and Maintenance Expenses*

1. Salaries and Wages – Employees (601)

The Utility recorded salaries and wages – employees expense of $51,843, which included payroll tax. Commission staff reduced this account by $3,669 to reclassify payroll taxes to Taxes Other Than Income (TOTI), bringing the balance to $48,174. We further reduce this amount by 30 percent due to the Utility's unsatisfactory quality of service, as discussed in Section I. Therefore, we approve a salaries and wages – employees expense of $33,722.

2. Purchased Power (615)

The Utility recorded a purchased power expense of $13,574. Commission audit staff increased this amount by $529 to correct a formula error in the Utility's supporting documentation. Additionally, Commission staff decreased this account by $1,241 to reflect the 8.8 percent EUW discussed in Section III. Commission staff's adjustments to purchased power result in a total decrease of $712. Therefore, we approve a purchased power expense of $12,862.

3. Chemicals (618)

The Utility recorded a chemicals expense of $16,019. Commission staff decreased this amount by $1,410 to account for the 8.8 percent EUW discussed in Section III. Therefore, we approve a chemicals expense of $14,609.

4. Materials and Supplies (620)

The Utility recorded materials and supplies expense of $294. Commission audit staff reduced this amount by $60 due to a lack of supporting documentation. Therefore, we approve a materials and supplies expense of $234.

5. Contractual Services – Billing (630)

The Utility recorded contractual services – billing expense of $10,785. Commission staff made no adjustments to this account. Therefore, we approve a contractual services – billing expense of $10,785.

6. Contractual Services – Professional (631)

The Utility recorded contractual services – professional expense of $95,324. Commission audit staff reduced this amount by $15,870 to remove expenses related to the Utility's 2023 SARC. In addition, staff reduced this amount by $8,574 to amortize non-reoccurring U.S. Environmental Protection Agency related expenses over five years pursuant to Rule 25-30.433(9), F.A.C. Commission staff's adjustments result in a total reduction to contractual services – professional of $24,444. We further reduce this amount by 30 percent due to the Utility's unsatisfactory quality of service, as discussed in Section I. Therefore, we approve a contractual services – professional expense of $49,616.

7. Contractual Services – Testing (635)

The Utility recorded a contractual services – testing expense of $3,629. Commission staff made no adjustments to this account. Therefore, we approve a contractual services – testing expense of $3,629.

8. Contractual Services – Other (636)

The Utility recorded contractual services – other expense of $24,421. Commission audit staff removed $2,175 of non-recoverable wastewater-related expenses. Therefore, we approve a contractual services – other expense of $22,246.

9. Regulatory Commission Expense (665)

Water Oak did not record any rate case expense for this docket. The Utility is required by Rule 25-22.0407, F.A.C., to mail notices of the rate case overview, interim rates, final rates, and four-year rate reduction. Commission staff calculated noticing costs to be $4,589.

Under Section 367.0814(3), F.S., this Commission may allow rate case expense for attorney fees or fees of other outside consultants if such fees are incurred after the initial Staff Report. On February 17, 2026, the Utility filed documentation to support $5,368 in additional rate case expense including actual legal expenses and consulting fees incurred to that date and estimated through the end of the proposed agency action process.[33]

On April 23, 2026, the Utility filed further documentation to support $10,484 in additional rate case expense including actual legal expenses and consulting fees incurred to that date and estimated expenses through the end of the proposed agency action process.[34] We reviewed the supporting documentation and we find the Utility's requested rate case expense totaling $15,852 to be reasonable.

Commission staff calculated the distance from the Utility representative's office in Orlando, Florida, to Tallahassee, Florida as 261 miles. Based on the 2026 Internal Revenue Service business mileage rate of $0.725, our staff calculated round trip travel and lodging expense to the Commission Conference of $578.[35] However, because the same Utility representative attended the April 7, 2026 Commission Conference on behalf of this and two sister utilities, Commission staff allocated only 33.3 percent of the total travel expense, or $193, to Water Oak.

Furthermore, due to the deferral of this matter to the June 2, 2026 Commission Conference, Commission staff included an additional travel expense of $506, for a total travel expense to both Commission Conferences of $699. Additionally, the Utility paid a filing fee of $1,000 for its SARC application.

We therefore approve a total rate case expense, consisting of noticing costs, travel, lodging expenses and filing fee of $22,140, which amortized over four years is $5,535. Thus we approve total annual rate case expense of $5,535.

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[33] Document No. 01118-2026, filed on February 17, 2026.
[34] Document No. 02345-2026, filed on April 23, 2026.
[35] https://www.irs.gov/newsroom/irs-sets-2026-business-standard-mileage-rate-at-725-cents-per-mile-up-25-cents (last visited March 19, 2026).

10. Bad Debt Expense (670)

The Utility recorded $0 of bad debt expense. It is this Commission's practice to calculate bad debt expense using a three-year average when the information is available.[36] In its three most recent Annual Reports (2022, 2023, and 2024), the Utility recorded bad debt expenses of $0 for all three years. In response to Commission staff's Third Data Request, the Utility confirmed that it recorded no bad debt and that any uncollectible accounts are handled and absorbed by the parent company.[37] Therefore, we approve a bad debt expense of $0.

11. Miscellaneous Expenses (675)

Water Oak recorded a miscellaneous expense of $1,001. Commission staff made no adjustments to this account. Therefore, we approve a miscellaneous expense of $1,001.

12. Operation and Maintenance Conclusion and Expense Summary

The Utility recorded a test year O&M expense of $216,890. Based on the above adjustments, we find that O&M expenses shall be reduced by $62,651. This results in a total O&M expense of $154,239. Our approved adjustments to O&M are shown on Schedule No. 3-C.

B. *Depreciation Expense*

The Utility recorded depreciation expense of $107,275. Using the depreciation rates prescribed in Rule 25-30.140, F.A.C., Commission audit staff decreased this amount by $39. Commission staff increased depreciation expense by $2,606 to reflect the additional depreciation expense resulting from the reclassification of $70,365 of site work from land to Account 304 – Structures and Improvements. Additionally, Commission staff increased this amount by $2,977 to reflect the addition of pro forma items. Commission staff's adjustments result in an increase to depreciation expense of $5,544. Therefore, we approve a depreciation expense of $112,819.

C. *Amortization of Contributions-in-Aid of Construction*

The Utility recorded no CIAC amortization expense. However, as a result of our adjustments to CIAC discussed in Section IV of this Order, we approve a CIAC amortization expense of $6,421.

D. *Taxes Other Than Income*

The Utility recorded TOTI of $18,382, which includes payroll tax, property tax, and regulatory assessment fees (RAF). Commission staff increased this amount by $3,669 to reflect

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[36] Order No. PSC-2025-0285-PAA-WU, issued July 22, 2025, in Docket No. 20240119-WU, *In re: Application for staff-assisted rate case in Polk County, by Alturas Water, LLC*; Order No. PSC-2025-0284-PAA-SU, issued July 22, 2025, in Docket No. 20250105-SU, *In re: Application for staff-assisted rate case in Polk County, by West Lakeland Wastewater, LLC.*
[37] Document No. 15081-2025, filed November 14, 2025.

the reclassification of payroll tax expense that had been recorded to Account 601 – Salaries and Wages. In response to Commission staff's Fifth Data Request, the Utility stated that it paid $4,297 in property taxes.[38] As such, Commission staff decreased property taxes by $5,484 to reflect the accurate property taxes the Utility paid in the test year. Additionally, Commission staff increased TOTI by $794 to reflect property taxes associated with pro forma plant additions.

Furthermore, based on revenues discussed in Section VI, TOTI shall be increased by $774 to reflect a RAF rate of 4.5 percent applied to the change in test year revenues. As such, we find that the appropriate amount of test year RAFs are $9,375.

As discussed later in Section IX, we find that revenues should be increased by $194,618 to reflect the change in revenue required to cover expenses and allow an opportunity to earn the recommended rate of return. As a result, TOTI shall be increased by $8,758 to reflect RAFs of 4.5 percent of the change in revenues. Therefore, we approve a test year TOTI of $26,893.

E. *Conclusion and Total Operating Expenses Summary*

Water Oak recorded an operating expense of $342,547. The cumulative impact of our approved adjustments to the Utility's operating expense results in a total operating expense of $287,530. Operating expenses are shown on Schedule No. 3-A, and the related adjustments are shown on Schedule No. 3-B.

VIII. Operating Ratio Methodology

Rule 25-30.4575(2), F.A.C., provides that in rate cases processed under Rule 25-30.455, F.A.C., we will use the operating ratio methodology to establish the utility's revenue requirement when its rate base is not greater than 125 percent of O&M expenses, less regulatory Commission expense, and the use of the operating ratio methodology does not change the utility's qualification for a SARC.

With respect to Water Oak, we approved a rate base of $1,487,925. After removal of rate case expense, Commission staff calculated an adjusted O&M expense of $148,704. Based on our approved amounts, the Utility's rate base is 1000.60 percent of its adjusted O&M expense. Therefore, the Utility does not qualify for application of the operating ratio methodology.

IX. Revenue Requirement

Water Oak shall be allowed an annual increase of $194,618 (93.42 percent). This will allow the Utility the opportunity to recover expenses and earn 7.76 percent return on its rate base. The calculations of revenue requirement are shown below on Table 4.[39]

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[38] Document No. 00833-2026, filed February 3, 2026.
[39] We note that the calculations presented in Table 4 may not sum due to rounding.

Table 4
Water Revenue Requirement

Water Rate Base	$1,487,925
Rate of Return	× 7.76%
Return on Rate Base	$115,418
Water O&M Expense	$154,239
Depreciation Expense	112,819
Amortization	(6,421)
Taxes Other Than Income	26,893
Revenue Requirement	$402,948
Less Test Year Revenues	$208,330
Annual Increase	$194,618
Percent Increase	93.42%

Source: Commission staff calculations.

X. Rate Structure

Water Oak is located in Lake County within the District. The Utility provides water service to 1,265 residential customers and 50 general service customers. A review of the billing data indicates approximately 13 percent of the residential customer bills during the test year had zero gallons, which reflects a non-seasonal customer base. The average residential water demand was 4,540 gallons per month during the test period. Currently, the rate structure for the residential class consists of a base facility charge (BFC) and a three-tier inclining block gallonage charge. The general service class consists of a BFC and uniform gallonage charge.

Commission staff performed an analysis of the Utility's billing in order to evaluate the appropriate rate structure for the residential water customers. The goal of the evaluation was to select the rate design parameters that: (1) produce the recommended revenue requirement; (2) equitably distribute cost recovery among the Utility's customers; (3) establish the appropriate discretionary usage threshold for restricting repression; and (4) implement, where appropriate, water conserving rate structures consistent with Commission practice.

For this case, due to the non-seasonal customer base, Commission staff allocated 30 percent of the water revenues to be generated from the BFC, which will provide sufficient revenues to design gallonage charges that will send the appropriate pricing signals to customers using above the non-discretionary level. The average number of people per household is 1.87;[40] therefore, based on the number of people per household, 50 gpd per person, and the number of days per month, the discretionary usage threshold shall be 3,000 gallons per month. Commission staff's review of the billing data indicates that discretionary usage above 3,000 gallons represents approximately 46 percent of the bills, which accounts for approximately 57 percent of water demand. This indicates that there is some high discretionary usage above 3,000 gallons.

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[40] Average persons per household may be found by following: https://data.census.gov/table/ACSDP5Y2023.DP02?q=Lady+Lake+town,+Florida+dp02 (last visited March 20, 2026).

We find that a continuation of the three-tier inclining block rate structure, which includes separate gallonage charges for non-discretionary and discretionary usage for residential water rates, is reasonable. Due to the fairly high usage above 3,000 gallons per month demonstrated, we find that it is appropriate to use rate factors of 1.50 in the second tier and 1.75 in the third tier because it will target those customers with higher levels of consumption. General service customers shall continue to be billed a BFC and uniform gallonage charge.

Based on our approved revenue increase of 93.42 percent, residential consumption can be expected to decline by 18,070,000 gallons resulting in an anticipated average residential demand of 3,325 gallons per month. Thus, we find that a 26.8 percent reduction in test year residential gallons for ratesetting purposes is appropriate. The corresponding reductions for purchased power expense is $2,519, $2,861 for chemicals expense, and $253 for RAFs to reflect the anticipated repression, which results in a post repression revenue requirement of $397,315.

Furthermore, in its application for a SARC, the Utility indicated a preference to implement rates in three phases, but "reserve[d] the right to implement full compensatory rates . . . in its sole discretion . . . ." We find that a rate phase-in is not needed in this docket. Rate phase-ins have typically been considered when pro forma items were requested but not completed, thus allowing for incremental increases upon completion. No such circumstance exists in the case before us. Pursuant to Section 367.081(1), F.S., "a utility may only charge rates and charges that have been approved by the [C]ommission," except as provided in Subsections (4) and (6). Those Subsections deal with price adjustment indices and the file-and-suspend provision, respectively, and neither of which are at issue here. Therefore, Water Oak may only charge the rates approved by us.

Based on the above, our approved rate structure and monthly water rates are shown on Schedule No. 4. The Utility shall file revised tariff sheets and a proposed customer notice to reflect our approved rates. The approved rates shall be effective for service rendered on or after the stamped approval date on the tariff sheets pursuant to Rule 25-30.475(1), F.A.C. In addition, the approved rates shall not be implemented until Commission staff has approved the proposed customer notice and the notice has been received by the customers. The Utility shall provide proof of the date notice was given by affidavit within 10 days of the date of the notice.

XI. Four-Year Rate Reduction

Section 367.081(8), F.S., requires that the rates be reduced immediately following the expiration of the four-year recovery period by the amount of the rate case expense previously included in rates. The reduction shall reflect the removal of revenue associated with the amortization of rate case expense and the gross-up for RAFs. The total reduction is $5,796.

We find that the rates should be reduced as shown on Schedule No. 4, to remove rate case expense grossed-up for RAFs and amortized over a four-year period. Pursuant to Section 367.081(8), F.S., the decrease in rates shall become effective immediately following the expiration of the rate case expense recovery period. Water Oak shall file revised tariffs and a proposed customer notice setting forth the lower rates and rationale no later than one month prior to the effective date of the new rates. If the Utility files revised tariffs reflecting this reduction in conjunction with a price index, or pass-through rate adjustment, separate data shall be filed for the price index and/or pass-through increase and the reduction in the rates due to the amortized rate case expense.

XII. Temporary Rates

This Order proposes an increase in rates. A timely protest might delay a rate increase resulting in an unrecoverable loss of revenue to the Utility. Therefore, pursuant to Section 367.0814(7), F.S., in the event of a protest filed by a party other than the Utility, our proposed rates herein shall go into effect on a temporary basis. Water Oak shall file revised tariff sheets and a proposed customer notice reflecting our approved rates. These temporary rates shall be effective for service rendered on or after the stamped approval date on the tariff sheets, pursuant to Rule 25-30.475(1), F.A.C. In addition, the temporary rates shall not be implemented until Commission staff has approved the proposed notice, and the notice has been received by the customers. The additional revenue produced by the temporary rates collected by the Utility shall be subject to the refund provisions discussed below.

Water Oak shall be authorized to collect the temporary rates upon Commission staff's approval of an appropriate security for the potential refund and cost of the proposed customer notice. Security shall be in the form of either a bond or letter of credit in the amount of $132,894. Alternatively, the Utility may establish an escrow agreement with an independent financial institution.

If the Utility chooses a bond for securing the potential refund, the bond shall contain wording to the effect that it will be terminated only under the following conditions:

1. The Commission approves the rate increase; or
2. If the Commission denies the increase, the Utility shall refund the amount collected that is attributable to the increase.

If the Utility chooses a letter of credit for securing the potential refund, the letter of credit shall contain the following conditions:

1. The letter of credit is irrevocable for the period it is in effect.
2. The letter of credit will be in effect until a final Commission order is rendered, either approving or denying the rate increase.

If security is provided through an escrow agreement, the following conditions shall be part of the agreement:

1. The Commission Clerk, or his or her designee, must be a signatory to the escrow agreement.
2. No monies in the escrow account may be withdrawn by the Utility without the prior written authorization of the Commission Clerk, or his or her designee.

3. The escrow account shall be an interest bearing account.
4. If a refund to the customers is required, all interest earned by the escrow account shall be distributed to the customers.
5. If a refund to the customers is not required, the interest earned by the escrow account shall revert to the Utility.
6. All information on the escrow account shall be available from the holder of the escrow account to a Commission representative at all times.
7. The amount of revenue subject to refund shall be deposited in the escrow account within seven days of receipt.
8. This escrow account is established by the direction of the Florida Public Service Commission for the purpose(s) set forth in its order requiring such account. Pursuant to *Cosentino v. Elson*, 263 So. 2d 253 (Fla. 3d DCA 1972), escrow accounts are not subject to garnishments.
9. The account must specify by whom and on whose behalf such monies were paid.

In no instance shall the maintenance and administrative costs associated with the refund be borne by the customers. These costs are the responsibility of, and should be borne by, the Utility. Irrespective of the form of security chosen by the Utility, an account of all monies received as a result of the rate increase shall be maintained by the Utility. If a refund is ultimately required, it shall be paid with interest calculated pursuant to Rule 25-30.360(4), F.A.C.

The Utility shall maintain a record of the amount of the bond, and the amount of revenues that are subject to refund. In addition, after the increased rates are in effect, pursuant to Rule 25-30.360(6), F.A.C., the Utility shall file reports with the Commission Clerk's office no later than the 20th of every month indicating the monthly and total amount of money subject to refund at the end of the preceding month. The report filed shall also indicate the status of the security being used to guarantee repayment of any potential refund.

XIII. Adjustment to Books

Water Oak shall be required to notify this Commission, in writing, that it has adjusted its books in accordance with our decision. The Utility shall submit a letter within 90 days of our final order in this docket, confirming that the adjustments to all applicable National Association of Regulatory Commissioners (NARUC) Uniform System of Accounts (USOA) primary accounts have been made to the Utility's books and records. In the event the Utility needs additional time to complete the adjustments, a notice providing good cause and requesting an extension shall be filed not less than seven days prior to the deadline. Upon providing a notice of good cause, Commission staff shall have administrative authority to grant an extension of up to 60 days.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that Sun Communities Finance, LLC d/b/a Water Oak Utility's quality of service is unsatisfactory. Account 601 – Salaries and

Wages – Employees and Account 631 – Contractual Services – Professional shall each be reduced by 30 percent. Return on equity shall be reduced by 75 basis points. It is further

ORDERED that Sun Communities Finance, LLC d/b/a Water Oak Utility shall submit to a management audit conducted by Commission staff. It is further

ORDERED that after a report is finalized by the Department of Business and Professional Regulation or the St. Johns River Water Management District with respect to either of the pending investigations referenced herein, Sun Communities Finance, LLC d/b/a Water Oak Utility shall file a copy of those reports with this Commission. Sun Communities Finance, LLC d/b/a Water Oak Utility shall also communicate information regarding any associated findings of the Department of Business and Professional Regulation or the St. Johns River Water Management District to all customers. It is further

ORDERED that if the investigations by the Department of Business and Professional Regulation or the St. Johns River Water Management District are not closed within a year, Sun Communities Finance, LLC d/b/a Water Oak Utility shall report those facts to this Commission as well as any other findings made by those agencies up to that point in time. Sun Communities Finance, LLC d/b/a Water Oak Utility shall also provide customers with a copy of this information. It is further

ORDERED that Sun Communities Finance, LLC d/b/a Water Oak Utility shall arrange and hold at least one formal customer meeting in each calendar year of 2027 and 2028. At those times, Sun Communities Finance, LLC d/b/a Water Oak Utility shall provide an overview of general system occurrences, an overview of the two agency investigations, and provide customers an opportunity to speak with utility representatives. Within one month of the conclusion of each such meeting, Sun Communities Finance, LLC d/b/a Water Oak Utility shall file a report in this docket to summarize to us the topics discussed and any results of the meetings. It is further

ORDERED that the infrastructure and operating conditions of the Sun Communities Finance, LLC d/b/a Water Oak Utility water system is in compliance with DEP regulations. It is further

ORDERED that the water treatment plant, storage, and distribution system of Sun Communities Finance, LLC d/b/a Water Oak Utility shall both be considered 100 percent U&U. Additionally, an 8.8 percent adjustment for excessive unaccounted for water shall be made to operating expenses for chemicals and purchased power. It is further

ORDERED that the appropriate average test year rate base for Sun Communities Finance, LLC d/b/a Water Oak Utility is $1,487,925. It is further

ORDERED that the appropriate return on equity for Sun Communities Finance, LLC d/b/a Water Oak Utility is 7.76 percent with a range of 6.76 percent to 8.76 percent. The appropriate overall rate of return is 7.76 percent. It is further

ORDERED that the appropriate test year operating revenues for the water system of Sun Communities Finance, LLC d/b/a Water Oak Utility are $208,330. It is further

ORDERED that the appropriate amount of operating expense for Sun Communities Finance, LLC d/b/a Water Oak Utility is $287,530. It is further

ORDERED that Sun Communities Finance, LLC d/b/a Water Oak Utility does not meet the criteria for application of the operating ratio methodology for calculating the revenue requirement. It is further

ORDERED that the appropriate revenue requirement for Sun Communities Finance, LLC d/b/a Water Oak Utility is $402,948, resulting in an annual increase of $194,618. It is further

ORDERED that the rate structure and monthly water rates shown on Schedule No. 4 are approved. Sun Communities Finance, LLC d/b/a Water Oak Utility shall file revised tariff sheets and a proposed customer notice to reflect the Commission-approved rates. The approved rates shall be effective for service rendered on or after the stamped approval date on the tariff sheets, pursuant to Rule 25-30.475(1), F.A.C. In addition, the approved rates shall not be implemented until Commission staff has approved the proposed customer notice and the notice has been received by the customers. Sun Communities Finance, LLC d/b/a Water Oak Utility shall provide proof of the date notice was given by affidavit within 10 days of the date of the notice. It is further

ORDERED that the rates shall be reduced as shown on Schedule No. 4, to remove rate case expense grossed-up for regulatory assessment fees and amortized over a four-year period. Pursuant to Section 367.081(8), F.S., the decrease in rates shall become effective immediately following the expiration of the rate case expense recovery period. Sun Communities Finance, LLC d/b/a Water Oak Utility shall file revised tariffs and a proposed customer notice setting forth the lower rates and rationale no later than one month prior to the effective date of the new rates. If Sun Communities Finance, LLC d/b/a Water Oak Utility files revised tariffs reflecting this reduction in conjunction with a price index or pass-through rate adjustment, separate data shall be filed for the price index and/or pass-through increase and the reduction in the rates due to the amortized rate case expense. It is further

ORDERED that in the event of a protest filed by a party other than Sun Communities Finance, LLC d/b/a Water Oak Utility, the proposed rates shall be approved on a temporary basis, subject to refund with interest, pursuant to Section 367.0814(7), F.S. Sun Communities Finance, LLC d/b/a Water Oak Utility shall file revised tariff sheets and a proposed customer notice reflecting the Commission-approved rates. The temporary rates shall be effective for service rendered on or after the stamped approval date on the tariff sheets, pursuant to Rule 25-30.475(1), F.A.C. In addition, the temporary rates shall not be implemented until Commission staff has approved the proposed notice and the notice has been received by the customers. Further, prior to implementation of any temporary rates, Sun Communities Finance, LLC d/b/a Water Oak Utility shall provide appropriate financial security as set forth herein. The approved temporary rates collected by Sun Communities Finance, LLC d/b/a Water Oak Utility shall be subject to refund provisions. It is further

ORDERED that after the increased temporary rates are in effect, pursuant to Rule 25-30.360(6), F.A.C., Sun Communities Finance, LLC d/b/a Water Oak Utility shall file reports with the Commission's Office of Commission Clerk no later than the 20th of each month indicating both the current monthly and total amount of money subject to refund at the end of the preceding month. The report filed shall also indicate the status of the security being used to guarantee repayment of any potential refund. It is further

ORDERED that Sun Communities Finance, LLC d/b/a Water Oak Utility shall notify this Commission, in writing, that it has adjusted its books in accordance with our decision. Sun Communities Finance, LLC d/b/a Water Oak Utility shall submit a letter within 90 days of this Commission's final order in this docket, confirming that the adjustments to all applicable National Association of Regulatory Commissioners Uniform System of Accounts primary accounts were made to the books and records of Sun Communities Finance, LLC d/b/a Water Oak Utility. In the event that Sun Communities Finance, LLC d/b/a Water Oak Utility needs additional time to complete the adjustments, a notice providing good cause and requesting an extension shall be filed not less than seven days prior to the deadline. Upon providing a notice of good cause, Commission staff shall have administrative authority to grant an extension of up to 60 days. It is further

ORDERED that if no person whose substantial interests are affected by the proposed agency action files a protest within 21 days of the issuance of the Proposed Agency Action Order, a consummating order shall be issued. The docket shall remain open for Commission staff's verification that the revised tariff sheets and customer notice have been filed by Sun Communities Finance, LLC d/b/a Water Oak Utility and approved by Commission staff, and that Sun Communities Finance, LLC d/b/a Water Oak Utility submitted its letter confirming all adjustments to applicable National Association of Regulatory Utility Commissioners Uniform System of Accounts primary accounts were made. Once these actions are complete, this docket shall be closed administratively. It is further

ORDERED that all matters contained in the attachments and schedules appended hereto are incorporated by reference.

By ORDER of the Florida Public Service Commission this 22nd day of June, 2026.

ADAM TEITZMAN
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
(850) 413-6770
www.floridapsc.com

Copies furnished: A copy of this document is provided to the parties of record at the time of issuance and, if applicable, interested persons.

CMM

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission (Commission) is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

As identified in the body of this order, our actions are preliminary in nature, except for (1) the reduction of rates after four years based upon the recovery of rate case expense, (2) the granting of temporary rates in the event of protest, and (3) the requirement for proof of adjustment of books and records. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Office of Commission Clerk, at 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on July 13, 2026. If such a petition is filed, mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing. In the absence of such a petition, this order shall become effective and final upon the issuance of a Consummating Order.

Any objection or protest filed in this docket before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

Any party adversely affected by the Commission’s procedural action in this matter may request: (1) reconsideration of the decision by filing a motion for reconsideration with the Office of Commission Clerk, within fifteen (15) days of the issuance of this order in the form prescribed by Rule 25-22.060, Florida Administrative Code; or (2) judicial review by the First District Court of Appeal in the case of a water or wastewater utility by filing a notice of appeal with the Office of Commission Clerk and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days after the issuance of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

Schedule No. 1-A

SUN COMMUNITIES FINANCE, LLC D/B/A WATER OAK UTILITY **SCHEDULE NO. 1-A**
TEST YEAR ENDED 12/31/2024 **DOCKET NO. 20250088-WU**
SCHEDULE OF WATER RATE BASE

	DESCRIPTION	BALANCE PER UTILITY	COMM. ADJUST.	BALANCE PER COMM.
1.	UTILITY PLANT IN SERVICE	$2,925,041	($447,693)	$2,477,349
2.	LAND & LAND RIGHTS	73,415	(70,365)	3,050
3.	ACCUMULATED DEPRECIATION	(1,092,623)	225,816	(866,807)
4.	CIAC	(174,916)	(103,929)	(278,845)
5.	ACCUMULATED AMORTIZATION OF CIAC	174,916	(40,325)	134,591
6.	WORKING CAPITAL ALLOWANCE	$0	$18,588	$18,588
	WATER RATE BASE	$1,905,833	($417,908)	$1,487,925

 Schedule No. 1-B

SUN COMMUNITIES FINANCE, LLC D/B/A WATER OAK UTILITY	SCHEDULE NO. 1-B
TEST YEAR ENDED 12/31/2024	DOCKET NO. 20250088-WU
ADJUSTMENTS TO RATE BASE	
	WATER
UTILITY PLANT IN SERVICE	
1. To reclassify plant additions from Land Account.	$70,365
2. To reflect averaging adjustments.	(570,871)
3. To reflect pro forma additions.	211,254
4. To reflect pro forma retirements.	(158,441)
Total	($447,693)
LAND & LAND RIGHTS	
1. To reflect an auditing adjustment.	($70,365)
ACCUMULATED DEPRECIATION	
1. To reflect auditing adjustments.	$11,585
2. To reflect a staff adjustment.	(1,302)
3. To reflect an averaging adjustment.	60,070
4. To reflect pro forma adjustments.	155,463
Total	$225,816
CIAC	
1. To reflect an staff adjustment.	($103,929)
ACCUMULATED AMORTIZATION OF CIAC	
1. To reflect an staff adjustment	($40,325)
WORKING CAPITAL ALLOWANCE	
To reflect 1/8 of test year O&M expenses.	$18,588

Schedule No. 2

SUN COMMUNITIES FINANCE, LLC D/B/A WATER OAK UTILITY **SCHEDULE NO. 2**
TEST YEAR ENDED 12/31/2024 **DOCKET NO. 20250088-WU**
SCHEDULE OF CAPITAL STRUCTURE

	CAPITAL COMPONENT	PER UTILITY	ADJUST- MENTS	BALANCE PER COMM.	PERCENT OF TOTAL	COST	WEIGHTED COST
1.	COMMON EQUITY	$1,905,833	($417,908)	$1,487,925	100.00%	7.76%	7.76%
	TOTAL CAPITAL	$1,905,833	($417,908)	$1,487,925	100.00%	7.76%	7.76%
			RANGE OF REASONABLENESS			**LOW**	**HIGH**
			RETURN ON EQUITY			6.76%	8.76%
			OVERALL RATE OF RETURN			6.76%	8.76%

Schedule No. 3-A

SUN COMMUNITIES FINANCE, LLC D/B/A WATER OAK UTILITY **SCHEDULE NO. 3-A**
TEST YEAR ENDED 12/31/2024 **DOCKET NO. 20250088-WU**
SCHEDULE OF WATER OPERATING INCOME

	TEST YEAR PER UTILITY	COMM. ADJUST-MENTS	COMM. ADJUSTED TEST YEAR	ADJUST FOR INCREASE	REVENUE REQUIREMENT
1. **TOTAL OPERATING REVENUES**	$191,134	$17,196	$208,330	$194,618	$402,948
				93.42%	
OPERATING EXPENSES:					
2. OPERATION & MAINTENANCE	$216,890	($62,651)	$154,239		$154,239
3. DEPRECIATION (NET)	107,275	5,544	112,819		112,819
4. AMORTIZATION	0	(6,421)	(6,421)		(6,421)
5. TAXES OTHER THAN INCOME	18,382	(247)	18,135	$8,758	26,893
TOTAL OPERATING EXPENSES	$342,547	($63,775)	$278,772	$8,758	$287,530
6. **OPERATING INCOME / (LOSS)**	($151,413)		($70,442)		$115,418
7. **WATER RATE BASE**	$1,905,833	($417,908)	$1,487,925		$1,487,925
8. **RATE OF RETURN**					7.76%

SUN COMMUNITIES FINANCE, LLC D/B/A WATER OAK UTILITY		SCHEDULE 3-B
TEST YEAR ENDED 12/31/2024		DOCKET NO. 20250088-WU
ADJUSTMENTS TO OPERATING INCOME		
		WATER
	OPERATING REVENUES	
1.	To reflect an auditing adjustment to Service Revenues.	($23,571)
2.	To reflect the appropriate test year Service Revenues.	40,767
	Total	$17,196
	OPERATION AND MAINTENANCE EXPENSE	
1.	Salaries and Wages - Employees (601 / 701)	
	a. To reflect Commission ordered adjustment.	($14,452)
	b. To reflect reclassification of payroll taxes to TOTI.	(3,669)
	Subtotal	($18,121)
2.	Purchased Power (615 / 715)	
	a. To reflect an auditing adjustment.	$529
	b. To reflect EUW and I&I adjustment.	(1,241)
	Subtotal	($712)
3.	Chemicals Expense (618 / 718)	
	To reflect EUW and I&I adjustment.	($1,410)
4.	Materials and Supplies (620 / 720)	
	To reflect an auditing adjustment.	($60)
5.	Contractual Services - Professional (631 / 731)	
	a. To reflect an auditing adjustment.	($15,870)
	b. To reflect amortization of EPA costs over a 5-year period.	(8,574)
	c. To reflect Commission ordered adjustment.	(21,264)
	Subtotal	($45,708)
6.	Contractual Services - Other (636 / 736)	
	To reflect an auditing adjustment.	($2,175)
7	Rate Case Expense (665 / 765)	
	To reflect 1/4 rate case expense.	$5,535
	TOTAL OPERATION AND MAINTENANCE ADJUSTMENTS	($62,651)
	DEPRECIATION EXPENSE	
1.	To reflect an auditing adjustment.	($39)
2.	To reflect a staff adjustment.	2,606
3.	To reflect pro forma additions.	2,977
	Total	$5,544
	AMORTIZATION EXPENSE (NET)	
1.	To reflect an staff adjustment.	($6,421)
	TAXES OTHER THAN INCOME	
1.	To reflect the reclassification of payroll taxes.	$3,669
2.	To reflect appropriate test year property tax expense.	(5,484)
3.	To reflect appropriate test year RAFs.	774
4.	To reflect revenue requirement RAFs.	8,758
5.	To reflect property taxes associated with pro forma plant additions.	794
	Total	$8,511
	TOTAL OPERATING EXPENSE ADJUSTMENTS	($55,016)

Schedule No. 3-C

SUN COMMUNITIES FINANCE, LLC D/B/A WATER OAK UTILITY **SCHEDULE NO. 3-C**
TEST YEAR ENDED 12/31/2024 **DOCKET NO. 20250088-WU**
ANALYSIS OF WATER O&M EXPENSE

ACCT. #	DESCRIPTION	TOTAL PER UTILITY	COMM. ADJUST-MENT	TOTAL PER COMM.
601	Salaries and Wages - Employees	$51,843	($18,121)	$33,722
615	Purchased Power	$13,574	(712)	$12,862
618	Chemicals	$16,019	(1,410)	$14,609
620	Materials and Supplies	$294	(60)	$234
630	Contractual Services - Billing	$10,785	0	$10,785
631	Contractual Services - Professional	$95,324	(45,708)	$49,616
635	Contractual Services - Testing	$3,629	0	$3,629
636	Contractual Services - Other	$24,421	(2,175)	$22,246
665	Rate Case Expense	$0	5,535	$5,535
670	Bad Debt Expense	$0	0	$0
675	Miscellaneous Expenses	$1,001	$0	$1,001
	Total O&M Expense	$216,890	($62,651)	$154,239
	Working Capital is 1/8 of O&M Less RCE			$18,588

Schedule No. 4

SUN COMMUNITIES FINANCE, LLC D/B/A WATER OAK UTILITY — **SCHEDULE NO. 4**
TEST YEAR ENDED DECEMBER 31, 2024 — **DOCKET NO. 20250088-WU**
MONTHLY WATER RATES

	UTILITY CURRENT RATES	COMMISSION APPROVED RATES	4-YEAR RATE REDUCTION
Residential & General Service			
Base Facility Charge by Meter Size			
5/8" x 3/4"	$5.74	$6.95	$0.10
3/4"	$8.61	$10.43	$0.15
1"	$14.35	$17.38	$0.25
1-1/2"	$28.70	$34.75	$0.51
2"	$45.92	$55.60	$0.81
3"	$91.84	$111.20	$1.62
4"	$143.50	$173.75	$2.54
6"	$287.00	$347.50	$5.07
Charge per 1,000 gallons - Residential Service			
0 - 3,000 gallons	$1.07	$2.99	$0.04
3,001 - 6,000 gallons	$1.11	$4.48	$0.07
Over 6,000 gallons	$1.43	$5.23	$0.08
Charge per 1,000 gallons - General Service	$1.17	$3.75	$0.05
Typical Residential 5/8" x 3/4" Meter Bill Comparison			
3,000 Gallons	$8.95	$15.92	
6,000 Gallons	$12.28	$29.36	
8,000 Gallons	$15.14	$39.82	

 Schedule No. 5

SCHEDULE NO. 5 NUMBER OF GENERAL SERVICE CUSTOMERS DURING THE TEST YEAR				
	ACCOUNT NUMBER	LOCATION	CUSTOMER TYPE	METER SIZE
1	9001 A	Guard Shack	Potable	5/8" x 3/4"
2	9010	Administration Office - 216 Magnolia	Potable	5/8" x 3/4"
3	9011	Old Office - 106 Evergreen	Potable	5/8" x 3/4"
4	9016	Park Maintenance Shop	Potable	5/8" x 3/4"
5	1885-001624	409 Fowler Lane - Bathroom	Potable	5/8" x 3/4"
6	9009 A	Ball Park Bathrooms	Potable	1"
7	9005 A	MCH - Right of Lobby	Potable	1 1/2"
8	9005 C	MCH - Bath Houses	Potable	1 /12"
9	9003 A	Pro Shop/Restaurant	Potable	2"
10	9004	Satellite Clubhouse - 814 E. Norman	Potable	2"
11	9005 D	MCH - Kitchen	Potable	2"
12		Swimming Pool	Potable	2"
13	9004 A	Satellite Clubhouse	Irrigation	5/8" x 3/4"
14	9010 A	Administration Office	Irrigation	5/8" x 3/4"
15	9010 B	Administration Office	Irrigation	5/8" x 3/4"
16	9011 B	Old Office Front - 216 Magnolia	Irrigation	5/8" x 3/4"
17	9013	Back Gate East	Irrigation	5/8" x 3/4"
18	9014	Back Gate West	Irrigation	5/8" x 3/4"
19	9015	Water Oak Blvd.	Irrigation	5/8" x 3/4"
20	9018	Lift Station 2	Irrigation	5/8" x 3/4"
21	9019	Palmer Mail Center	Irrigation	5/8" x 3/4"
22	9017	Sewer Plant	Irrigation	1"
23	9022	Willow Way	Irrigation	1 1/2"
24	9005 B	MCH - Pool Pump Room	Irrigation	1 1/2"
25	9001	Front Entrance	Irrigation	2"
26	9002	Front Entrance	Irrigation	2"
27	9006	Main Clubhouse	Irrigation	2"
28	9020	Tennis Courts	Irrigation	2"
29	9021	Water Oak Blvd.	Irrigation	2"
30	9006	Main Clubhouse	Irrigation	2"
31	9007	Water Oak Blvd.	Irrigation	2"
32	9008	Water Oak Blvd.	Irrigation	2"
33	9009	Ball Park	Irrigation	2"
34	9012	Front Entrance	Irrigation	2"
35	9005	Main Clubhouse - 415 Water Oak	Irrigation	3"
36	11	225 Sakura Ct (Residential)	Irrigation	5/8" x 3/4"
37	1885-000132	123 Willow Way	Irrigation	5/8" x 3/4"
38	1885-000180	116 Evergreen Lane	Irrigation	5/8" x 3/4"
39	1885-000259	210 Birch St.	Irrigation	5/8" x 3/4"
40	1885-000292	637 Hickory Hill	Irrigation	5/8" x 3/4"
41	1885-000864	207 Littler Lane	Irrigation	5/8" x 3/4"
42	1885-001287	905 Nelson Lane	Irrigation	5/8" x 3/4"
43	1885-001623	402 Palmer Dr.	Irrigation	5/8" x 3/4"
44	2985	530 Rahm Way	Irrigation	5/8" x 3/4"
45	2987	797 Zacharias Ct	Irrigation	5/8" x 3/4"
46	3006	801 Stewart Dr	Irrigation	5/8" x 3/4"
47	3014	879 Stewart Dr	Irrigation	5/8" x 3/4"
48	3027	816 Stewart Dr	Irrigation	5/8" x 3/4"
49	3029	806 Stewart Dr	Irrigation	5/8" x 3/4"
50	1885-001625	409 Fowler Lane	Irrigation	5/8" x 3/4"