

Tristan Davis

From: Tristan Davis on behalf of Records Clerk
Sent: Monday, November 17, 2025 3:41 PM
To: 'greneleferesidentcoalition'
Cc: Consumer Contact
Subject: RE: SUBMISSION FOR THE RECORD — DOCKET 20250023-WS (GRENELEFE UTILITY)

Good Afternoon,

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

Thank you!

Tristan Davis
Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
Phone: (850) 413-6121

PLEASE NOTE: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are considered to be public records and will be made available to the public and the media upon request. Therefore, your email message may be subject to public disclosure.

From: greneleferesidentcoalition <greneleferesidents@gmail.com>
Sent: Monday, November 17, 2025 3:33 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: SUBMISSION FOR THE RECORD — DOCKET 20250023-WS (GRENELEFE UTILITY)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To the Florida Public Service Commission:

I submit the following issues for the record, based on the Utility's most recent filings (Document Nos. 15043–15044, 14623–2025, and others):

1. No employee time records or cost allocation

The Utility admits it keeps *no time logs* for any employee, including Mr. House.

Without time allocation, there is no evidence that salaries and overhead attributed to the Utility are, in fact, utility-exclusive. PSC rules require proof that costs are “prudent, necessary, and utility-related.”

2. Utility-paid workers appear to serve multiple affiliated companies

Despite filings that employees are “utility-only,” residents observe these same workers mowing and maintaining lands owned by **Grenelefe Resort Development LLC**.

The filing claims this land needs “3 hours per month,” which is inconsistent with the visible labor required. This raises the risk that ratepayers are subsidizing private development expenses.

3. Extreme water loss (46–56%) constitutes gross inefficiency

The Utility acknowledges EUW of 46% and historical losses of 56%. Under *North Florida Water Co. v. Bevis (1974)*, the PSC may deny a rate increase when a utility demonstrates “gross inefficiency.”

These losses result from decades of deferred maintenance and cannot be charged to ratepayers.

4. No financing secured despite prior promises

The Utility now admits banks will not lend without PSC-approved rates. This contradicts its earlier affidavit promising to “provide or secure” capital independently, without exposing customers to funding instability.

5. No developer cost-sharing agreements exist

The Utility claims developers will pay most costs, but confirms **no agreements of any kind exist**.

Under Rule 25-30.580, growth must pay for growth; without agreements, the burden shifts improperly to current customers.

6. Upgrades are sized for future development, not existing customers

The Utility states upgrades are based on “full five-year buildout.”

Current ratepayers cannot be required to fund future developer capacity.

7. Inflated payroll with no verification

OPC found salaries significantly above benchmark levels, and the Utility provides no documentation to justify them. Rates cannot include undocumented compensation.

8. Inconsistent bad-debt claims

After reporting 0% bad debt for years, the Utility now claims delinquencies to inflate revenue requirements. OPC has already recommended reducing this allowance.

9. Conflict of interest affecting cost allocation

The same individual controls the utility, the development company, and the landholding company.

Without strict segregation of labor and expenses, there is a substantial risk that ratepayers are subsidizing private development operations.

Conclusion

Given the issues above, the requested rate increase cannot be deemed just, reasonable, or properly supported.

I respectfully request the Commission require complete employee time records, cost allocation data, verified developer contributions, and proof of utility-exclusive expenses before approving any increase.

Respectfully submitted,

David Siegel

Property Owner / Grenelefe