

Tristan Davis

From: Tristan Davis on behalf of Records Clerk
Sent: Wednesday, December 31, 2025 9:27 AM
To: 'John & Paula Oliver'
Cc: Consumer Contact
Subject: RE: Docket No. 20250137-SU)

Good Morning,

We will be placing your comments below in consumer correspondence in Docket No. 20250137, 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: John & Paula Oliver <jkopvo@gmail.com>
Sent: Wednesday, December 31, 2025 9:25 AM
To: Records Clerk <CLERK@PSC.STATE.FL.US>; opc_website@leg.state.fl.us
Subject: Docket No. 20250137-SU)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for Limited Proceeding Rate Increase by Sunshine Water Services Company
DOCKET NO. 20250137-SU

FORMAL OBJECTION AND REQUEST FOR HEARING

COMES NOW, the undersigned Customer of Record ("Objector"), and files this Formal Objection to the Application for a Limited Proceeding filed by Sunshine Water Services Company ("Utility"). In support thereof, Objector states as follows:

1. IMPROPER USE OF LIMITED PROCEEDING MECHANISM The Utility seeks to recover roughly \$28 million for a total replacement of the Mid-County Wastewater Treatment Plant. The Objector argues that a capital project of this magnitude constitutes a fundamental reconstruction of utility infrastructure and requires the holistic scrutiny of a General Rate Case. Bifurcating this expense immediately following the Utility's recent

rate consolidation constitutes "single-issue ratemaking" that prejudices the consumer by isolating costs without reviewing offsetting revenues.

2. IMPRUDENCE AND FAILURE TO FORECAST The Utility admits in its Notice that the subject plant is "decades old" and facing "increasing difficulty". Under Florida law, a utility has an affirmative duty to maintain its assets and forecast capital replacements. The sudden nature of this \$28 million request suggests imprudent management; current ratepayers should not fund a total replacement that should have been addressed through gradual depreciation reserves funded by past ratepayers.

3. UNJUST AND UNREASONABLE CROSS-SUBSIDIZATION The Objector resides in Seminole County, approximately 120 miles from the Pinellas County facility. Forcing Sanford ratepayers to shoulder the capital costs of a geographically isolated system—which provides no benefit to our local service area—is unjust and unreasonable pursuant to Section 367.081, Florida Statutes.

4. FAILURE TO ACCOUNT FOR SYSTEM GROWTH AND REVENUE WINDFALLS Over the past five years, the Utility has experienced a significant housing expansion and an influx of new customers across all counties it serves. This growth has generated substantial new revenue through monthly base charges and one-time Connection/Impact Fees (CIAC) intended specifically to fund system infrastructure. The Utility has failed to demonstrate why these increased revenue streams from massive statewide expansion are insufficient to cover the replacement of outdated facilities. To impose a **permanent** rate increase on all customers—rather than utilizing the capital provided by this growth—constitutes unjust enrichment at the expense of the ratepayer.

WHEREFORE, the Objector respectfully requests that the Commission: A. **SUSPEND** the proposed rate implementation pending a full evidentiary review; B. **DENY** the request for a Limited Proceeding and compel a General Rate Case to audit all revenues, including recent growth-related gains; and C. **CONVENE** a Service Hearing in **Seminole County** to allow testimony regarding the inequity of this permanent increase.

Respectfully Submitted,

____Paula Oliver_____
Signature

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Sunshine Water Account No: 4315530274
Date:12/31/25

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clerk@psc.state.fl.us
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