

Nickalus Holmes

From: noreply@psc.state.fl.us
Sent: Monday, March 09, 2026 09:15 AM
To: dinamcarstens@gmail.com
CC: Consumer Contact
Subject: Docket Number - 20250137-SU

Good Morning, Dina Carstens,

We will be placing your comments below in docket correspondence in Docket No. 20250137-SU, and forwarding them to the Office of Consumer Assistance.

Sincerely,

Nickalus Holmes
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
850-413-6770

PLEASE NOTE: Florida has a very broad public record 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 comments may be subject to public disclosure.

From: dinamcarstens@gmail.com
Sent: Sunday, March 08, 2026 06:05 PM
To: Florida Public Service Commission
Subject: Docket Number - 20250137-SU

Description:

Customer Comment Id: 70

Are you a customer of Sunshine Water Services Company d/b/a Sunshine Water Services: Y

Name: Dina Carstens

Phone: 3058018481

Email: dinamcarstens@gmail.com

Address: 410 Tangelo Drive, Sanford, , FL 32771

Submit Date: Sunday, March 08, 2026 06:05 PM

Comment: 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.