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# Public Service Commission

March 27, 2026

J. Wahlen/V. Ponder/M. Jones  
Ausley McMullen  
123 S. Calhoun Street  
Tallahassee, FL 32301  
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VIA EMAIL

**Re: Docket No: 20260033-WS - Application for authority to transfer assets of exempt entity in Highlands County by the Placid Lakes Utilities, Inc. to Sunshine Water Services Company, and amendment of Certificate No. 347-S, by Sunshine Water Service Company.**

Dear Mr. Wahlen:

Staff has reviewed Sunshine Water Services Company (Sunshine or Buyer) application for amendment of Certificate No. 347-S from Placid Lakes Utilities, Inc. (Seller or Utility) to Sunshine. After reviewing this information, we find the application to be deficient. The specific deficiencies are identified as:

- 1. Need Demonstration.** Rule-30.036(2)(d)(1) and (2)(d)(2), Florida Administrative Code, (F.A.C.), require the applicant to demonstrate the need for service in the proposed area by providing: 1. The number of customers currently being served and proposed to be served, by customer class and meter size, including a description of the types of customers anticipated to be served, i.e., single family homes, mobile homes, duplexes, golf course clubhouse, or commercial; and 2. A copy of all requests for service from property owners or developers in areas not currently served. Please provide the information required by the rule.
- 2. Legal Descriptions.** Rule 25-30.036(2)(f), F.A.C., requires that the applicant provide a legal description of the territory proposed to be served, in the format prescribed in Rule 25-30.029, F.A.C. In addition, if the extension of territory is adjacent to existing territory, a legal description of the resulting territory including both existing and expanded portions in the format prescribed in Rule 25-30.029, F.A.C., is to be provided. The information provided in Exhibit G of Sunshine's application describes the Seller's water territory instead of the wastewater territory to be served, and does not delineate between the existing territory, the proposed territory extension, and the resultant proposed service territory. Please provide legal descriptions for the existing territory, the proposed territory extension, and the resultant wastewater service territory as required.

3. **System Map.** Rule 25-30.036(2)(g), F.A.C., requires that the applicant provide a detailed system map showing the proposed lines and treatment facilities, with the territory proposed to be served plotted thereon, consistent with the legal description provided in Rule 25-30.036(2)(f), F.A.C., as referenced above. In addition, if the territory to be served is adjacent to the utility's existing territory, a complete map showing both existing and expanded territories is to be provided. Please provide a detailed system map showing the location of proposed lines and treatment facilities throughout the Utility's collection system. The map should be of sufficient scale and detail to enable correlation with the description of the territory.
4. **Territory Maps.** Rule 25-30.036(2)(h), F.A.C., requires that the applicant provide an official county tax assessment map or other map showing township, range, and section, with a scale such as 1" = 200' or 1" = 400', with the proposed territory plotted thereon, consistent with the legal description provided in Rule 25-30.036(2)(f), F.A.C., as referenced above. The maps provided by Sunshine in Exhibit M of the application are not of sufficient scale to verify the legal descriptions. Please provide territory maps of sufficient size and scale that, together, clearly show the perimeter of the entire territory being requested, consistent with the requirements of Rule 25-30.036(2)(f), F.A.C., as referenced above, and that meet all of the requirements of Rule 25-30.036(2)(h), F.A.C.
5. **Commitments and Obligations.** Rule 25-30.037(2)(j)(6), F.A.C., requires a statement that the buyer will fulfill the commitments, obligations and representations of the seller with regard to utility matters. The applicant indicates that the Buyer does not intend to assume certain pre-closing debts, liabilities, or service-related obligations of the Seller. This does not satisfy the rule requirement, as the rule requires an affirmative statement that the Buyer will fulfill the Seller's commitments, obligations, and representations related to utility operations.
6. **Tariff Sheets.** Rule 25-30.037(2)(u), F.A.C., requires the applicant to provide tariff sheets that reflect any changes resulting from the transfer. In its application, Sunshine filed tariff sheets only indicating the proposed rates and charges. Sunshine should have provided tariff pages in Exhibit L, which describe the service territory that is being added, and identify what service type is being provided by Sunshine. Please provide tariff sheets showing the newly added service territory, and indicating whether the service provided is water or wastewater.

Your application will not be deemed filed until the deficiencies identified in this letter have been corrected. These corrections should be submitted no later than **Monday, April 27, 2026**, to the following address:

Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Mr. J. Jeffry Wahlen

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In addition, please email the filed response to [discovery-gcl@psc.state.fl.us](mailto:discovery-gcl@psc.state.fl.us). Please include the docket number on all submissions to the Commission Clerk. Should you have any questions concerning the information in this letter, please feel free to contact Clayton Lewis by phone at (850) 413-6578 or email at [clewis@psc.state.fl.us](mailto:clewis@psc.state.fl.us) for technical questions, or Suzanne Brownless by phone at (850) 413-6218 or email at [sbrownle@psc.state.fl.us](mailto:sbrownle@psc.state.fl.us) for legal questions.

Sincerely,

*s/ Clayton Lewis*

Clayton Lewis  
U.S. Engineering Specialist  
Division of Engineering

CL:da

cc: Office of Commission Clerk (Docket No. 20260033-WS)

Sean Twomey – [Sean.Twomey@nexuswg.com](mailto:Sean.Twomey@nexuswg.com)

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