

Tristan Davis

From: Office of Commissioner Payne
Sent: Tuesday, March 31, 2026 12:43 PM
To: Commissioner Correspondence
Subject: FW: Water Supply Rate Increase SARC, Docket No. 20250088
Attachments: D O C K E T 20250088 Communication.docx

Please place the email below and attachment in Docket No. 20250088

Thanks

From: william shaul <wshaul2@gmail.com>
Sent: Monday, March 30, 2026 10:49 AM
To: Office of Chairman Smith <Chairman.Smith@psc.state.fl.us>
Cc: Office of Commissioner Clark <Commissioner.Clark@psc.state.fl.us>; Office of Commissioner Payne <Commissioner.Payne@psc.state.fl.us>; Office of Commissioner Ortega <Commissioner.Ortega@psc.state.fl.us>; Office of Commissioner La Rosa <Commissioner.LaRosa@psc.state.fl.us>
Subject: Water Supply Rate Increase SARC, Docket No. 20250088

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Dear Chairman Gabriella Passidomo Smith,

I have attached a letter that I have prepared to send you as well as the other Commissioners and cc Ron Desantis.

I am a resident of Water Oak Estate, a Sun Communities community located in Lady Lake, Florida. This letter is in response to the recommendation of S.A.R.C. rate increase of 400% to the water rate for our community.

Here is an AI summary of my letter with concerns, observations and a humble plea to halt the implementation of this increase until and unless Water Oak Utility can explain accounting of their 35,000,000 gallon EUW.

- **Accountability for Missing Water:** The utility (Water Oak) has not explained nearly **35 million gallons of unaccounted-for water use**, which raises concerns about poor management or possible cost-shifting. Holding them accountable protects residents from paying for water that benefits others.
- **Prevention of Improper Cost-Sharing:** The letter argues that **Sun Communities' own facilities use metered water but are not billed**, meaning the utility's costs are being **passed on to residents instead of the property owner**, contrary to the residents' lease agreements and Florida Statute 723.
- **Protection from Excessive Rate Increases:** The resident highlights that due to errors and unverified data, the Commission's proposed rate jump of **400%** (from \$8.95 to \$37.01 per 1,000 gallons) is unjustified. If proper accounting were done, the increase could be far lower (around 132%).
- **Defense of Resident Rights and Fair Rates:** The communication urges the Public Service Commission to **delay or deny any rate increase** until the utility provides full transparency about unaccounted water losses and Sun Communities' own usage, ensuring residents only pay for **their fair share** of service costs.

Thank you!

Sincerely,

Bill Shaul
615 Hickory Hill,
Lady Lake, FL
586 360-0185

Dear Florida Public Service Commission...

I hereby submit an AI Summary of my written concerns, observations and sincere plea.

- **Accountability for Missing Water:** The utility (Water Oak) has not explained nearly **35 million gallons of unaccounted-for water use**, which raises concerns about poor management or possible cost-shifting. Holding them accountable protects residents from paying for water that benefits others.
- **Prevention of Improper Cost-Sharing:** The letter argues that **Sun Communities' own facilities use metered water but are not billed**, meaning the utility's costs are being **passed on to residents instead of the property owner**, contrary to the residents' lease agreements and Florida Statute 723.
- **Protection from Excessive Rate Increases:** The resident highlights that due to errors and unverified data, the Commission's proposed rate jump of **400%** (from \$8.95 to \$37.01 per 1,000 gallons) is unjustified. If proper accounting were done, the increase could be far lower (around 132%).
- **Defense of Resident Rights and Fair Rates:** The communication urges the Public Service Commission to **delay or deny any rate increase** until the utility provides full transparency about unaccounted water losses and Sun Communities' own usage, ensuring residents only pay for **their fair share** of service costs.

D O C K E T # 20250088 – W U

On June 23, 2025, Sun Communities Finance, LLC d/b/a Water Oak Utility (Water Oak) filed an application with the Florida Public Service Commission (Commission or FPSC) for a staff-assisted rate case. Water Oak provides water service to 1,265 residential and 17 general service customers in Lake County.

Dear Public Service Chairman, Gabriella Passidomo Smith

On June 23, 2025, Sun Communities Finance, LLC d/b/a Water Oak Utility (Water Oak) could not explain how to account for 39.7% of 117,276,285 gallons of water pumped and processed (test year 2024). That's 46,558,685 gallons of water, about 40% unaccounted for.

As of today, March 30, 2026, (even after a 10% EUW allowance and numerous requests by Staff), Sun Communities Finance, LLC d/b/a Water Oak Utility (Water Oak) will not explain even ONE GALLON of the 34,831,056 gallons of EUW.

Nearly 35 MILLION gallons pumped but not a single dollar received and no explanation provided. Yet nine months have passed and Water Oak Utility is still 'investigating'... Is this lack of responsibility and disregard of your specific questions really acceptable to the Commission?

Bart Fletcher, OPC Legislative Analyst and author of Doc # 01137-2026 posted Feb 17, did a deep dive analysis and made recommendations to the Commission. He found General Service revenue was underreported by Water Oak Utility. Instead of \$1,393, his analysis determined it should have been reported as \$36,124. A difference of \$34,731.

And this amount is just for IRRIGATION on the property, not all of Water Oak Estate owned facilities usage. The commission did not accept this analysis and gave leeway to the Utility on a promise they haven't fulfilled since the SARC began... explain a 35 MILLION Gallon EUW.

If the Commission had accepted Mr. Fletcher's analysis, this would have lowered the proposed revenue increase requirement to \$269,893 rather than \$306,017 (offering a 132% increase in the target revenue instead of 182.55% increase).

Yet, the March 26, 2026 PSC Document No. 01789-2026 M-E-M-O-R-A-N-D-U-M is recommending implementation of a Rate Increase of 400% – from \$8.95 to \$35.49 per 1,000 gallons (residents use rate up to 3,000 gallons per month).

On this square mile of property called Water Oak Estate & Country Club, each spicket, faucet, sprinkler head, sink, toilet and shower not owned by a resident is the property of Water Oak Estate and employed to provide the Amenities guaranteed and outlined in our Prospectus.

All Water Oak Estate/Sun Communities facilities here are supplied by metered water but Water Oak Utility does not send a bill to the user/customer, therefore is no revenue is received. Is it showing up as EUW?

The purpose of this rate increase is "to recover the cost of operating the Utility and allow the company an opportunity to earn a fair rate of return on its investment" (FPSC RATE CASE OVERVIEW, January 2026); not to cost-shift from Water Oak Estate expense to individual residents.

Our Water Oak Estate Prospectus specifies that the Park Owner, [Water Oak Estate/Sun Communities], is responsible for Common Areas including maintenance and functionality of those Amenities. Utilities like water, sewer and electrical services used by Water Oak Estate are part their bargain under our Perspective. **If Water Oak Estate/Sun Communities does not pay for their water use but rather treats it as an Individual Resident expense, aren't they effectively implementing a Rent Increase through the back door and violating FL 723 Statute regulating Land-Lease Property Rental.?**

In addition, transferring the cost of Water Oak Estate water usage to individual residents by not paying for this utility as they use it, allows Sun Communities to receive a guaranteed 8.51% return on the money residents are paying on their behalf!

35 MILLION GALLONS pumped shows no revenue... so who's paying to sustain the Revenue Requirement increase? Not Sun Communities/Water Oak Estate use of this utility. It's only the Residents.

I love this community and I think Water Oak Estate/Sun Communities, Inc., is an excellent landlord. This issue is very important for the future of our residents.

Water Oak Utility LLC., must be denied any adjustment until they provide an honest accounting of Water Oak Estate & Country Club cost of the Water Oak Utility LLC's water use & its EUW.

Thank you.

Sincerely,

William Shaul, Resident
615 Hickory Hill,
Lady Lake, Florida 32159

(586) 360-0185
wshaul2@gmail.com

cc. Governor Ron Desantis