

April 14, 2026

**VIA ELECTRONIC FILING**

Adam Teitzman, Commission Clerk  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**Re: Docket No. 2026-0022WS – Proposed Amendments to Rules**

Dear Mr. Teitzman:

On behalf of Sun Communities Acquisitions, LLC, Sun Communities Finance, LLC, Sunlake Estates Utilities, L.L.C., Gulfstream Utility LLC, and GCP Plantation Landings, LLC, this letter is the response to Staff's First SERC Data Request dated April 13, 2026.

- (1) Referring to draft rule 25-30.115, F.A.C., lines 15-20 states that a copy of the updated version of USOA can be purchased online via NARUC's website. The NARUC website indicates the publication cost is \$30. If your utility is a small business as defined in Section 288.703, F.S. would the cost of obtaining the latest version of USOA have an adverse impact on your utility?

*Response: The cost for obtaining the most recent version of the USOA would not have an adverse impact on any of the utilities operated by these respondents.*

- (2) Would the proposed revisions to the nine rules listed in paragraphs 1 and 2 of [the original request letter] increase regulatory costs, including any transactional costs, in excess of \$1 million in the aggregate within 5 years after the implementation of the rule? Please discuss.

*Response: No, the proposed revisions to the rules would not increase regulatory costs in excess of \$1 million in the aggregate within 5 years after the implementation of the rule.*

- (3) If the response is in the positive to question 2, please provide an estimate of the transactional costs likely to be incurred by your utility required to comply with the requirements of the rules.

*Response: N/A*

- (4) Would the compliance of the proposed rule changes result in changes to customer charges for goods or services, goods and services produced, provided, or sold, or changes to costs resulting from the purchase of substitute or alternative goods or services?

*Response: No, the rule changes would not result in changes to customer charges for goods and services provided, produced, or sold, nor changes to costs resulting from the purchase of substitute or alternative goods or services.*

- (5) What is the reasonable value of time to be spent by the utility owners, officers, operators, and managers to understand and comply with each of the proposed rules, including, but not limited to, time to be spent completing requiring education, training, or testing?

*Response: Ninety days.*

- (6) Please provide any regulatory alternatives you may have.

*Response: None at this time.*

Should you or Staff have any questions regarding this response, please do not hesitate to contact me.

Sincerely,  
/s/ Daniel McGinn  
Daniel J. McGinn

DJM:

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