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DANIEL PEREZ
Speaker of the House of Representatives

April 17, 2026

VIA: ELECTRONIC FILING

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

Docket No. 20250088-WU – Application for staff-assisted rate case in Lake County by Sun Communities Finance, LLC d/b/a Water Oak Utility.

Dear Mr. Teitzman:

The intent of this letter is to advise the Commission, its staff, and Sun Communities Finance, LLC d/b/a Water Oak Utility (Water Oak or Utility) of the Office of Public Counsel's (OPC) observations and recommendations, based on a review of the Staff Recommendation filed March 26, 2026, and the discussion at the April 7, 2026, Commission Agenda Conference. At the outset, the OPC would like to express its appreciation for and acknowledgement of all the hard work put into the Staff Recommendation.

In light of the points covered in detail below, the OPC recommends that the Commission delay its decision in this SARC until an investigation is completed by Commission Staff into the appropriate billing determinants to establish test year revenues and to determine the appropriate rates for Water Oak. Further, The OPC recommends the Commission find a marginal quality of service determination with an ROE penalty of 15-basis points which equates to a revenue requirement impact of \$2,570. Alternatively, like the Commission's recent decision in the Grenelefe SARC, the OPC offers that the Commission could assess a 15% reduction to Contractual

Services - Professional related to Management Fees, which equates to a revenue requirement impact of \$2,822.¹

Speaking to the proposed delay in the Commission's decision until an investigation is completed by Staff, the OPC would note that the 15-Month Effective Date for this SARC is November 8, 2026, as indicated on page one of the Staff Recommendation filed March 26, 2026, and reiterated by Staff to the Commissioners at the April 7, 2026, Agenda Conference. Although Staff expressed some hesitation for the deferral of this item at the April 7, 2026, Agenda Conference because it would go beyond the intended 7-month PAA portion of the 15-Month Statutory timeframe, the OPC would point out the Commission Staff has recently gone beyond the PAA portion of the 15-Month Statutory timeframe in the Grenelefe SARC. For the Grenelefe SARC, the Commission Staff was supposed to initially file its recommendation on October 23, 2025, for the November 4, 2025, Agenda Conference. The Commission Staff later revised the CASR for that docket and changed the recommendation filing date to December 19, 2025, for the January 6, 2026, Agenda Conference. Then, subsequently, the Commission revised the CASR for that docket and ultimately filed its recommendation on January 22, 2026, for the February 3, 2026, Agenda Conference. From the initially planned November 4, 2025, Agenda Conference to the February 3, 2026, Agenda Conference, this represents a delay of approximately three months.

Another example of Commission Staff going beyond the intended 7-month PAA portion of the 15-Month Statutory timeframe is the 2014 SARC docket for Crestridge Utilities, LLC, wherein the 15-Month Effective Date was February 8, 2016. The official filing date for the Crestridge SARC was November 7, 2014, and the Commission made its PAA decision at its December 3, 2015, Agenda Conference. For that SARC, the PAA portion took approximately 13 months for the Commission's PAA decision from the official filing date.

¹ By Order No. PSC-2026-0054-PAA-WS, issued February 25, 2026, the Commission found that "NC Real Estate Projects, LLC d/b/a Grenelefe Utility's quality of service shall be considered marginal, and the salaries of the owner shall be reduced by 25 percent to \$32,245 for water and \$19,432 for wastewater." Water Oak does not reflect an owner's salary in its operations and maintenance expenses. Thus, the affiliate-management fees recorded in Contractual Services – Professional expense is a surrogate for an owner's salary.

The OPC is very cognizant of potential rate case expense if it were to intervene in a SARC because that level of involvement puts additional upward pressure on rates that the customers would face. This very concern was expressed in an email to the Commission on January 19, 2026, whereby a Water Oak customer stated the following, in pertinent part: “OPC attorneys won’t engage with us initially because of the ‘Rate Case Expense’. [This refers to the legal expenses chargeable to the residents]. Often, what benefit they may provide is more expensive than doing nothing because of legal expenses incurred.”² It is this very reason why it is imperative to take the extra time for the Commission to consider the major concerns with all information to make an informed PAA decision. With that said, the OPC suggests that Commissioner La Rosa was correct at the April 7, 2026, Agenda Conference, that there is about six months for the Commissioners to render its decision given the 15-Month Effective Date for this SARC is November 8, 2026. Lastly, on the Commission’s website, the OPC would point out that there is an Agenda Conference scheduled for November 3, 2026, with a corresponding Staff Recommendation filing date of October 22, 2026.

History of Water Oak

Based on the discussion at the Agenda Conference, the OPC will provide a history of the Utility under Sun Communities Finance, LLC’s ownership and operation of the water system only, as the Wastewater Certificate No. 388-S was cancelled by the Commission in 2020.³

By Order No. PSC-1997-0034-FOF-WS, issued January 7, 1997, the Commission approved the transfer of Certificate No. 454-W in Lake County from Water Oak Utilities Co., Inc. to Sun Communities Finance Limited Partnership but denied the requested positive acquisition adjustment of \$525,305.

By Order No. PSC-2000-1165-PAA-WS, issued June 27, 2000, the Commission found the following: 1) determined water over earnings of \$25,851 or 21.24%; 2) ordered the Utility to

² Document No. 00372-2026, filed January 20, 2026.

³ See Order No. PSC-2020-0074-PAA-WS, issued March 12, 2020. Consummating Order PSC-2020-0101-CO-WS, issued April 13, 2020, made the PAA Order effective and final.

implement the conservation program as set forth in the body of this order, and at a minimum spend the approved amounts for the first and second years; 3) ordered the Utility to file a reuse project plan pursuant to Section 367.0817, Florida Statutes, within six months of the final order issued in that docket; 4) ordered the Utility to prepare monthly reports detailing the number of bills rendered, the consumption billed and the revenue billed;⁴ 5) declined to order the Utility to show cause in writing for its apparent violation of Rule 25-30.120, Florida Administrative Code, for failure to remit its Regulatory Assessment Fees (RAFs); 6) declined to order the Utility to show cause in writing for its apparent violation of Rule 25-30.115, Florida Administrative Code, and Section 367.091; (4), Florida Statutes, for failure to maintain its accounts and records in conformance with the NARUC USOA; 7) ordered the Utility to remit the RAFs associated with the unreported 1999 revenue; 8) ordered the Utility to immediately remit outstanding regulatory assessment fees in the amount of \$4,484, plus penalties of \$1,121 and interest of \$627.76; and 9) ordered the Utility to include the revenue associated with the unbilled customers in its 1999 annual report. According to Schedule No. 1 on page 67 of this Order, Water Oak acquired the water system that was 68.07% depreciated (Accumulated Depreciation of \$253,775 divided by Plant In Service of \$372,808), based on the simple average test year ended December 31, 1998.

By Order No. PSC-2000-1852-FOF-WS, issued October 10, 2000, the Commission approved the request of Sun Communities Finance Limited Partnership to change its name to Sun Communities Finance, LLC d/b/a Water Oak Utility.

By Order No. PSC-2002-0907-PAA-WS, issued July 8, 2002, in Docket No. 20010616-WS, *Complaint by Dr. William F. Weir against Sun Communities Finance, LLC d/b/a Water Oak Utility in Lake County regarding present method of charging customers*, the Commission approved a proposed settlement agreement, wherein the Commission found the following:

Our staff continued its discussions with both parties in order to facilitate a fair compromise and a mutually acceptable resolution to

⁴ “These reports shall be filed, by customer class and meter size, on a quarterly basis for a period of two years, beginning with the first billing period after the approved rates go into effect. The provision of this reporting requirement applies to all customers receiving service.” Order No. PSC 2000-1165-PAA-WS, p. 54.

this complaint. Following numerous telephone conversations with both parties exchanging ideas and opinions and after extensive negotiation, Sun Communities proposed the following for purposes of calculating and providing irrigation service to customers:

1. The utility will provide irrigation service through a separate meter split off from the utility's existing service line, all of which are 3/4" or larger.
2. The charges imposed for such separate irrigation service will be available to old customers with the payment of a meter installation fee at the then approved rate, payment of an initial setup fee, payment of 1/2 of the standard service availability charge, a deposit, and monthly payment of 1/2 of the standard water base facility charge and the full standard gallonage charge.
3. As with all base facility and other charges, the customer will be responsible, (at a minimum), for base charges during the customer's absence, even if a turnoff is requested.

Our staff explained the utility's proposal to Dr. Weir, and discussed with him the options and outcomes. Dr. Weir was assured that, in our staff's opinion, the proposal was a fair compromise to both parties. Dr. Weir agreed to accept the settlement proposal to resolve the dispute.

(Pages 4-5.)

By Order No. PSC-2002-1831-TRF-WS, issued December 20, 2002, in Docket No. 20020388-WS, the Commission approved an increase in meter installation fees from \$100 to \$190.

By Order No. PSC-2010-0219-PAA-WS, issued April 6, 2010, in Docket No. 20080295-WS, *Request by Sun Communities Finance LLC d/b/a Water Oak Utility for a revenue-neutral rate restructuring to implement conservation rates in Lake County*, the Commission ordered the Utility to implement the conservation rate structure, and authorized the Utility to recover the regulatory commission expenses through amortization over a four-year period.

History of Price Index Increases Granted

Following up on Madam Chairman’s inquiry about price index applications by Water Oak, the following table reflects the grant price index revenue increases for the Utility which totals a collective revenue increase of \$48,064 for 14 price indices since 2010. The table also reflects a limited proceeding revenue increase of \$5,848 in 2010.

WS No. or Docket No.	Type	Amount Granted	Effective Date
WS-03-0064	INDEX	\$1,265	08/11/2003
WS-04-0098	INDEX	\$1,729	12/03/2004
WS-06-0062	INDEX	\$2,481	10/02/2006
WS-08-0069	INDEX	\$2,221	08/19/2008
080295-WS	LIMP -Rate Case Exp	\$5,848	05/04/2010
WS-09-0102	INDEX	\$2,986	05/28/2010
WS-11-0067	INDEX	\$1,319	08/28/2011
WS-12-0054	INDEX	\$3,654	09/25/2012
WS-13-0061	INDEX	\$2,628	07/14/2013
WS-14-0022	INDEX	\$2,155	05/31/2014
WS-14-0040	INDEX	\$2,140	06/05/2015
WS-16-0078	INDEX	\$1,694	09/05/2016
WS-17-0073	INDEX	\$1,934	09/25/2017
WS-2018-0093	INDEX	\$2,559	10/23/2018
WS-2019-0059	INDEX	\$3,627	07/14/2019
WS-2020-0053	INDEX	\$2,552	07/31/2020
WS-2021-0069	INDEX	\$1,179	08/21/2021
WS-2022-0078	INDEX	\$5,627	7/25/2022
WS-2023-0094	INDEX	\$14,010	10/1/2023

Issue 1 - The Utility’s Attempt to Address Customer Satisfaction

On page 6 of the Staff Recommendation, it states the following, in pertinent part:

On February 17, 2026, the Office of Public Counsel (OPC) filed an observation letter regarding the customer correspondence in the docket file, BWNs, and service interruptions based on DEP records. OPC’s letter identified three service interruptions that affected 10 percent or more of the Utility’s customers: two in 2020 and one in

2021. Upon reviewing OPC's observation letter, the Utility also identified three service interruptions (9/21/20; 12/2/20; 9/22/21) that exceeded the 10 percent or greater threshold, but were not reported to the Commission. Since that time, the Utility stated that it has improved its infrastructure and practice of isolating outages to those areas that require repair, which has prevented other disruptions from meeting or exceeding the report threshold.⁹ However, staff analyzed OPC's letter and the DEP documentation and found one additional instance (5/6/21) affecting 10 percent or more of the Utility's customers. As such, staff recommends that the Utility maintain its service interruption records as outlined in Rule 25-30.251(1), F.A.C., and notify the Commission of any such interruption on a going-forward basis.

(Footnote 9 was omitted in Document No. 20250088-WU, page 6.)

Rule 25-30.251, Florida Administrative Code (F.A.C.), entitled "Record and Report of Interruptions," states:

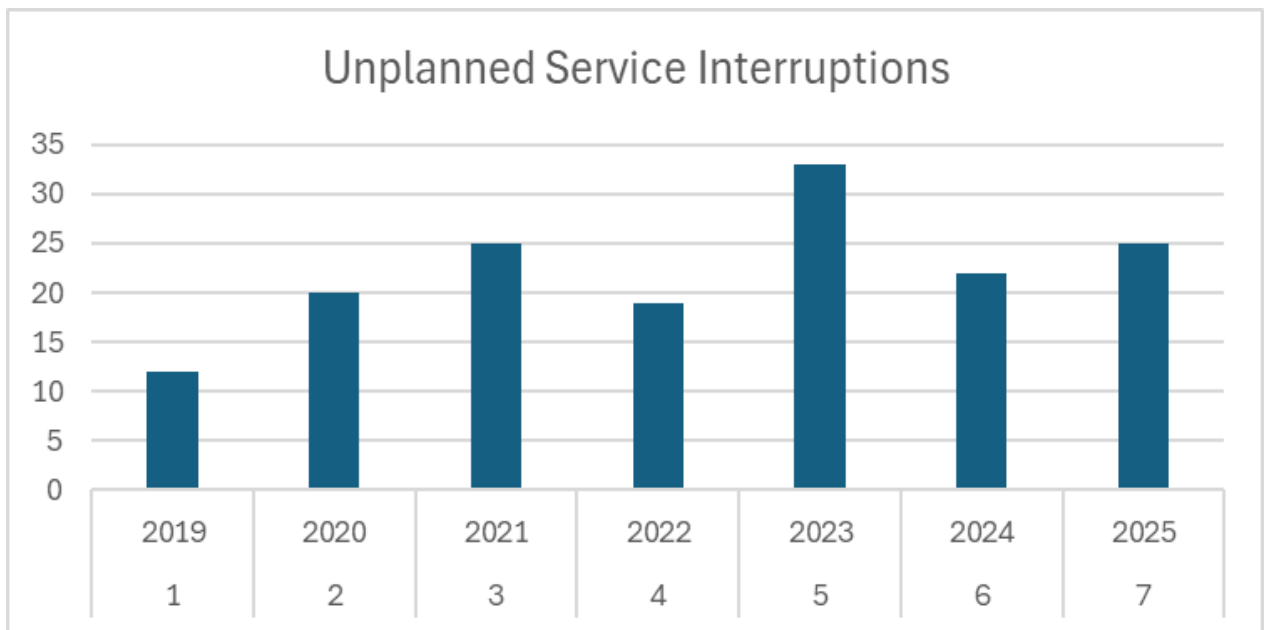
- (1) Each utility shall maintain a record of all interruptions in service which affect 10 percent (10%) or more of its customers. The record shall show the cause of the interruption, its date, time, duration, remedy, and steps taken to prevent recurrence.
- (2) The utility shall notify the Commission of any interruptions in service which affect ten percent (10%) or more of its customers. Notification to the Commission shall be made within one work day of notification to the utility that such an interruption has occurred, and within one work week after service has been restored. The utility shall file a complete report of the record to the Commission regarding the interruption.

(Underline emphasis added.)

On page 10 of its February 17, 2026, observation letter, the OPC compiled the following table to reflect the unplanned service interruptions from 2019 through 2026.⁵

⁵ The OPC would note that the last boil water notice (BWN) in its review of the DEP's Oculus database for 2026 was on February 3, 2026.

2019-2026 Unplanned Service Interruptions		
Line No.	Year	Unplanned Service Interruptions
1	2019	12
2	2020	20
3	2021	25
4	2022	19
5	2023	33
6	2024	22
7	2025	25
8	2026	4



Since the Agenda Conference on April 7, 2026, the OPC performed another search of the FDEP Oculus database (see Attachment A) and found the following BWNs for Water Oak from 2007 to 2018, which revealed one more service interruption affecting the entire community in 2012 of which the Utility failed to notify the Commission, pursuant to Rule 25-30.251, F.A.C.

2007-2018 Service Interruptions			
<u>Line No.</u>	<u>Year</u>	<u>Unplanned Service Interruptions</u>	<u>Planned Service Interruptions</u>
1	2007	0	1
2	2008	0	0
3	2009	0	0
4	2010	3	1
5	2011	10	7
6	2012	22	12
7	2013	18	8
6	2014	16	4
7	2015	2	1
8	2016	4	6
9	2017	11	7
10	2018	6	8

Based on the tables above, there have been 248 unplanned service interruptions on top of the 80-plus planned service interruptions from 2007-2025. On page 11 of its February 17, 2026, observation letter, the OPC stated that “[t]he 299 customer comments provided represent 23.29% of the Utility’s 1,284 customer base.” Since that time, 10 additional, non-repeat customer comments were filed, bringing the total to 309 comments. This represents 24.07% of the Utility’s 1,284 customer base. Given that the Commission has the responsibility to determine the quality of service provided by the Water Oak Utility, including the Utility’s attempts to address customer satisfaction, the OPC recommends the Commission find a marginal quality of service determination and assess a ROE penalty 15-basis point which equates to revenue requirement impact of \$2,570. Alternatively, like the Commission’s recent decision in the Grenelefe SARC,

the OPC offers that the Commission should assess a 15% reduction to Contractual Services - Professional related to Management Fees which equates to revenue requirement impact of \$2,822.

Issue 6 – Test Year Operating Revenues

In its observation letter dated February 17, 2026, the OPC expressed concerns that test year revenues were understated. The unbilled general service customers were of great concern from many customers that spoke at the January 21, 2026, virtual customer meeting and who submitted customer correspondence placed in the docket. This concern was addressed on page 15 of Staff recommendation filed March 26, 2026, wherein it states, in pertinent part, the following:

. . . . In addition, the general service customers were not billed during the test year. During staff's audit review, the Utility indicated there were 17 general service customers and usage was 190,283 gallons. In the preliminary analysis, the general service customers were all classified as having a 5/8 inch x 3/4 inch meter size when determining the appropriate test year service revenues.

On February 17, 2026, the OPC submitted an observation letter and therein raised a concern regarding the appropriate number of unbilled general service customers as well as their water consumption.⁶ OPC noted that the Utility's 2024 Annual Report indicated there were 19 general service customers at various meter sizes; therefore, based on OPC's analysis, the general service revenues are understated.

Staff contacted the Utility to confirm the billing determinants and meter sizes for each general service customer.⁷ Based on information provided by the Utility, there had been 17 general service customers, among them a model home. The model home had recently sold and was reclassified from general service to residential. As a result, there are currently 16 general service customers. Fifteen of those customers have a 5/8 inch x 3/4 meter size and one customer has a two inch meter. All of the general service consumption is for irrigation purposes only. In response to

⁶ Document No. 01137-2026, filed on February 17, 2026.

⁷ Document No. 01273-2026, filed on February 25, 2026.

staff's inquiry, the Utility reevaluated the general service gallon total and indicated it should be 197,780. . . .

However, the information regarding 16 general service customers, 15 with 5/8" x 3/4" meters and one with a 2" meter size (provided to Staff in Document No. 01273-2026) does not reconcile with the owner's numerous Annual Reports filed with the Commission, nor does it comport with the general service customer meter sizes determined by the Commission in Order No. PSC-2000-1165-PAA-WS. The following table reflects the Utility's general service customers as reflected in its 2000 through 2024 Annual Reports.

Line No.	Source	General Service Customers	General Service Customer Growth	
			#	%
1	Pg. 4 of Order No. PSC-00-1165-PAA-WS	14		
2	2000 Annual Report Schedule W-3	15	1	7.14%
3	2000 Annual Report Schedule W-3	29	14	93.33%
4	2001 Annual Report Schedule W-3	29	0	0.00%
5	2002 Annual Report Schedule W-3	30	1	3.45%
6	2003 Annual Report Schedule W-3	31	1	3.33%
7	2004 Annual Report Schedule W-3	32	1	3.23%
8	2005 Annual Report Schedule W-3	37	5	15.63%
9	2006 Annual Report Schedule W-9	37	0	0.00%
10	2007 Annual Report Schedule W-9	37	0	0.00%
11	2008 Annual Report Schedule W-9	36	-1	-2.70%
12	2009 Annual Report Schedule W-9	37	1	2.78%
13	2010 Annual Report Schedule W-9	37	0	0.00%
14	2011 Annual Report Schedule W-9	39	2	5.41%
15	2012 Annual Report Schedule W-9	39	0	0.00%
16	2013 Annual Report Schedule W-9	39	0	0.00%
17	2014 Annual Report Schedule W-9	39	0	0.00%
18	2015 Annual Report Schedule W-9	39	0	0.00%
19	2016 Annual Report Schedule W-9	39	0	0.00%
20	2017 Annual Report Schedule W-9	39	0	0.00%
21	2018 Annual Report Schedule W-9	39	0	0.00%
22	2019 Annual Report Schedule W-9	39	0	0.00%
23	2020 Annual Report Schedule W-3	19	-20	-51.28%
24	2021 Annual Report Schedule W-3	19	0	0.00%
25	2022 Annual Report Schedule W-3	19	0	0.00%
26	2023 Annual Report Schedule W-3	19	0	0.00%
26	2024 Annual Report Schedule W-3	19	0	0.00%

On page 92 of Order No. PSC-2000-1165-PAA-WS, the Commission imputed \$38,791 of revenues for unbilled residential and general service customers. The following table reflects the OPC’s calculations of \$16,375 imputed revenues for unbilled general service customers.

Line No.	Meter Size	No. of GS Customers	No. of Months Received Service	GS Gallons (1)	Water BFC	Water Gal Chrg	Unbilled GS Revenues
1	GS 5/8"	4	12		\$6.37		\$305.76
2	GS 2"	10	12		\$6.37		764
3				30009997		\$0.51	<u>15,305</u>
4							<u>\$16,375</u>
5	Note:						
6	(1) The general service gallons were derived by subtracting the RS unbilled gallons of 9,560,536 from the total						
7	RS & GS gallons attributed to Unmetered customers of 39,570,533.						

The OPC reviewed the workpapers for the Staff Recommendation. The portion of revenues from unbilled general service customers included in the recommended total test year revenues of \$168,055 was determined based on total general service ERCs of 276 and gallons of 190,000. The 276 ERCs was determined by 15 5/8” x 3/4” meters times 12 months (or 180 ERCs) and one 2” meter times a factor of 8 times 12 months (or 96 ERCs). Using the Utility’s current rates, it only produced test year revenues of \$1,807 for the 16 unbilled general service customers which is much lower than the Commission imputed revenues of \$16,375 for 14 unbilled general service customers in Order No. PSC-2000-1165-PAA-WS. This begs the question: what caused the Utility to lose nine 2” meter general service customers? The OPC would point out that the recommended 190,000 gallons for the 16 unbilled general service customers in this case is 29,819,997 million gallons, or less than the Commission-imputed gallons of 30,009,997 in Order No. PSC-2000-1165-PAA-WS.

The OPC recognizes that the Utility reflected approximately \$1.1 million in plant additions in its 2024 Annual Report, as well as the \$211,254 of pro forma plant projects reflected on page 10 of the Staff Recommendation. However, if test year revenues are understated, the effect magnifies the revenue increase and resulting rates that customers must bear. It could be that as new homes are added that they are temporarily classified as general service customers⁸ but the

⁸Based on Water Oak’s annual reports, the Utility had 30-plus general service customers from 2002 with 30 to 2019 with 39, and then dropped to 19 general service customers in 2020 which remained at that amount through 2024.

Utility has and continues to expand its customer base; however, it is the Utility's burden to reconcile and address these concerns of possible understated test year revenues in order for the Commission to make a more informed decision, given the customers are facing a proposed 175.17% revenue increase.

Another concern that could impact test year revenues are non-working, non-functioning, or slow-registering meters. Many customers have raised this concern throughout the case. Staff followed up on the customers' concerns with Staff's Sixth Data Request Question 1. The Utility's response is as follows:

Response: No, Water Oak was not aware of ongoing customer concerns regarding improperly functioning meters prior to the customer meeting.

In a community of this size, the most common cause of meter-related concerns is failure to transmit consumption data to the gateway system. When this occurs, the maintenance team assesses the meter to determine whether the transponder can be repaired or needs to be replaced. If transmission cannot be restored, the meter is read manually to ensure accurate billing.

Water Oak believed that all concerns regarding improperly functioning meters were previously addressed, and has no record of ongoing or open concerns. Meters readings are collected either automatically, or manually in cases where Water Oak suspects there may be an issue with the meter's automatic reporting, and Water Oak continuously audits their functionality.

However, in light of the Utility's response, the OPC is compelled to point out a customer correspondence to the Commission on January 20, 2026,⁹ wherein the customer stated the following:

To whom it may concern

I am writing to you today as a resident of Water Oak Country Club Estates in Lady Lake Florida owned by Sun Communities to

⁹ See Document No 00426-2026.

formally protest the proposed 400 percent increase in my water and sewer bill. I am also representing my 92 year old mother who, I believe is now the longest living resident of this community as she has been here over 39 years. When my parents moved here the water and sewer was included in the lot rent. Every year all residents pay an increase in lot rent of at least 5%, that increase alone should be able to cover these water expenses. Sun Communities records record profits every year! I am also a full time resident as of August 2019. I myself was a previous employee here at Water Oak and I have experienced first hand this corporation's excessive greed. I started in the maintenance department then was promoted to administration to prepare me to join their sales team. In November of 2023 Sun Communities decided to outsource the sales office to save money and that failed miserably. I still sell homes here for an outside agency. With that being said I can confidently tell you some things pertaining to the water bills here. I believe in 2020 or 2021, if my memory serves me, all the water meters were replaced by an outside agency. I was working in the maintenance department at the time and we did assist. Multiple meters failed or were incorrectly installed at the wrong address. This led to some residents paying a water bill for a neighbor. Some of these have been corrected but some have not. I also know that many residents here receive a water bill with a minimum amount due which is between \$6 and \$7 monthly, because the meter is inoperable. If that resident does not bring that to the attention of the community, then it continues and the water costs are spread out over all the other residents. The community irrigates all common areas such as the sports complex, all the amenities and surrounding areas, as well as the 18 hole golf course. There is no accountability about the costs to irrigate these areas and no proof has been provided by the community to show that the residents are not paying to irrigate these areas. This increase will create hardships for many residents, including my mom who lives solely on \$1,750 monthly from social security. Manufactured homes on leased land, was always designed to be a less expensive alternative to real estate properties. Many residents here are on a fixed income and this will immediately cause undue hardship. I frequently see and I am currently working with two residents here that are being evicted from the community because Sun communities will not work with someone if they get behind on lot rent. After one month they start the eviction process. This is not the only reason they evict. If a person does not keep the property up to

the community standards, they can face eviction, I have personally seen this happen. This includes the condition of the grass. The average lot here is about 5,000 to 7,000 square feet which computes to about 700 to 1,000 gallons of water to irrigate the lawn one time! The average two person household uses approximately 80 to 100 gallons of water a day for all other uses not including irrigation for the property. All that water is run through the same meter. Sewage cannot be measured so they use a percentage formula to determine how much waste to charge for. Irrigating the lawn directly affects the sewer portion of that bill and already raises it significantly. Many residents will walk the line on irrigating their lawn and facing the stress of possibly being evicted. When a person is evicted, Sun Communities takes possession of the home and any contents. This increase will devastate most residents and the evictions will increase. As a resident myself and a son of a 92 year old resident I can tell you the cost of living can be stressful and myself and my wife already pitch in financially for my mom to make ends meet. I am far from rich so this affects our household as well. We understand that things go up but this is an extreme abuse by Sun communities to their residents. Thank you for taking the time to address my concerns.

(Highlight emphasis added)

To explore this customers' concern regarding allegations of stuck meters, the OPC examined Schedule W-4 of the Utility's 2000 and 2020-2024 Annual Reports which reflected the following in the table below.

Pumping and Purchased Water Statistics						
Line No.	Year	Finished Water From Wells (Omit 000s)	Records Accounted For Loss Through Line Flushing Etc. (Omit 000s)	Water Sold to Customers (Omit 000s)	Unaccounted For Gallons (Omit 000s)	Unaccounted For Gallons %
1	2000	110,572	0	93,483	17,089	15.46%
2	2020	117,676	0	92,845	24,831	21.10%
3	2021	112,823	0	96,010	16,813	14.90%
4	2022	113,051	0	85,575	27,476	24.30%
5	2023	120,739	0	91,394	29,345	24.30%
6	2024	117,170	0	91,394	25,776	22.00%

There are several observations to make regarding the Utility's reported data in its annual reports for this time period. First, on page 92 of Order No. PSC-2000-1165-PAA-WS, the

Commission including imputed gallons determined that the gallons of water sold to customers for the test year ended December 31, 1998, was 116,718, 978 gallons (67,587,909 gallons for Residential Billed Gallons plus 9,560,536 gallons for Residential Unbilled Gallons plus 39,570,533 for Unmetered Customers). The OPC acknowledges the Commission-approved conservation program in 1998. However, the OPC suggests that it defies logical reasoning that the Utility can add 566 customers to its customer base, representing a 75.97% customer base increase from 1998 to 2024, and the gallons of water sold to customers in 1998 of 116,718,978 gallons drops to 67,673,000 gallons in 2024. This represents a reduction of 49,045,978 gallons or 42.02%.

Second, the OPC believes it is significant to note that the Utility reflected the same amount of water sold to customers in 2023 and 2024. The certification of each annual report was signed by the Utility's CFO which certifies among other things that "[t]he annual report fairly represents the financial condition and results of operations of the respondent for the period presented and other information and statements presented in the report as to the business affairs of the respondent are true, correct, and complete to the period for which it represents." The certification of each annual report also provides a notice that "[s]ection 837.06, Florida Statutes, provides that any person who knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his duty shall be guilty of a misdemeanor of the second degree."

Third, on page 8 of the Staff Recommendation, it states, in pertinent part, the following: "[a] review of the Utility's 2024 monthly operating reports on file with the DEP indicates that Water Oak produced 117,276,285 gallons of water during the test year." As such, the 117,170,000 gallons reflected on Schedule W-4 of the 2024 Annual Report do not match the total gallons of 117,276,285 for 2024 as reported on its monthly operating reports on file with the DEP. This discrepancy on these two certified/sworn reports to Florida government agencies are unexplained.

Fourth, on page 8 of the Staff Recommendation, it states, in pertinent part, the following: "[a]n examination of the Utility's billing records indicated 67,673,649 gallons of treated water was sold to its customers." Notably, the gallons of water sold to customers of 91,394,000 reported on Schedule W-4 of the 2024 Annual Report do not match the gallons of water sold to customers as

reported on Water Oak's billing records. This discrepancy on these two certified/sworn reports to Florida government agencies are unexplained.

Fifth, on page 8 of the Staff Recommendation, it states, in pertinent part, the following: “[t]he Utility documented 2,998,514 gallons of other water usages for line and hydrant flushing along with water loss due to line breaks.”¹⁰ As such, the zero gallons reflected on Schedule W-4 of the 2024 Annual Report do not match 2,998,514 gallons of other usages for flushing and loss due to line breaks. The OPC would point out the, on page 5 of Order No. PSC-2005-0621-PAA, issued June 6, 2005, it states, in pertinent part, the following: “[i]n order to allow for a reasonable amount of non-revenue producing water caused by stuck meters, line flushing, etc., we usually allow 10% of the total water treated as an acceptable amount of unaccounted for water. . . . It appears that a large portion of the unmetered water is because of old meters and inaccurate metering.” As previously mentioned, the effect of any stuck meters is that test year revenues are understated, and the resulting rates are overstated.

The possible reduction, based on this new information, of the recommended revenue increase of \$294,379 or 175.17% ,attributable to a revised determination of greater test year revenues, could be far greater than the recommended EUW adjustments to purchased power expense of \$3,660 and chemicals of \$4,758. On page 8 of Order No. PSC-2007-0129-SC-WS, the OPC would point out that it states the following, in pertinent part:

There are two possible scenarios with respect to the flawed data. If the test year kgal sold data is too low, then the resulting rates will, all other things being equal, be overstated. This may possibly cause the utility to overearn in subsequent years. Conversely, if the test year kgal sold data is too high, then the resulting rates will be less than compensatory, which would probably result in a shorter period before the utility files another request for a rate increase. There have been numerous customer complaint letters in this case that specifically mentioned displeasure with Labrador's request for rate relief because it was granted an increase within the past two years. If we were to set noncompensatory rates, we believe this would

¹⁰ Document No. 00410-2026, filed January 20, 2026.

further perpetuate the frequency of rate case filings by the utility. Therefore, we find that setting rates based on flawed data would be neither fair nor reasonable to the customers or the utility.

Due to the number and nature of the defective meters found during the test year, as well as the timing of the test year coincident with the period when rates from the last rate case went into effect, we are unable to determine the appropriate number of kgal sold by the utility during the test year. This renders us unable to see the entire test year ratemaking picture, both with respect to: a) how many kgal were actually sold (affecting whether the current rates are, in fact, noncompensatory, and, if so, by what magnitude); and b) the appropriate number of kgal to use in the design of rates. In Section 367.081, F.S., we are charged with the statutory responsibility of setting rates which are fair and reasonable. It is neither our nor our staff's responsibility to make the utility's case. The burden of proof is upon the utility to show that its present rates are unreasonable, fail to compensate the utility for its prudently incurred expenses, and fail to produce a reasonable return on its investment. Based on the foregoing, we find the utility has failed to meet its burden of proof in this case, in that Labrador has not presented credible evidence regarding the number of kgal actually sold during the 2005 test year, and its 2005 and 2006 kgal sold data are irreparably flawed.

(Underline emphasis added and footnote 5 omitted)

The OPC acknowledges that the Labrador was a file-and-suspend PAA rate case while the instant case is a SARC. However, it does not relieve wholesale of Water Oak's burden of proof in this case.

Given the concerns raised by many customers regarding stuck meters and/or unbilled customer account and the numerous inconsistencies of the Utility-reported data noted above, the OPC recommends that the Commission should delay its PAA decision on this docket. This recommended delay can allow time for Commission Staff to investigate and conduct a more comprehensive audit and billing analysis, including a service territory site visit which would be analogous to Commission Staff's engineering site visits for the lot-to-lot count performed in the past for U&U analysis purposes. The additional time would allow Commission Staff to determine

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the magnitude of any stuck meters or unbilled customer accounts via transponder (or other) meter issues and any resulting effects on test year revenues.

Conclusion

In conclusion, the OPC respectfully requests the Staff and the Commission to consider these further observations and recommendations.

Respectfully submitted,

/s/ *Bart Fletcher*

Bart Fletcher
Legislative Analyst

Attachment

ATTACHMENT A

File Type (Click to view)	Document Date	Document Type	Document 5487461-D481-067
View Document (.pdf)	07-09-2007	INCIDENT OR MALFUNCTION REPORTING RELATED	2010 03 03 - WATER OAK CC ESTATES INC. BWN. BACTS & RESC CEDAR LN
View Document (.pdf)	03-03-2010	INCIDENT OR MALFUNCTION REPORTING RELATED	WATER OAK - BACTS & RESC - STADLER ST
View Document (.pdf)	05-19-2010	INCIDENT OR MALFUNCTION REPORTING RELATED	WATER OAK - INCIDENT & BWN - STADLER ST
View Document (.pdf)	05-19-2010	INCIDENT OR MALFUNCTION REPORTING RELATED	100810 - INC RPT (REVISED) - MAGNOLIA DR
View Document (.MSG)	08-10-2010	INCIDENT OR MALFUNCTION REPORTING RELATED	100810 - INC RPT & BWN - 2' WM BREAK
View Document (.PDF)	8/10/2010	INCIDENT OR MALFUNCTION REPORTING RELATED	100810 - BACTS & RESC - MAGNOLIA DR
View Document (.PDF)	08-10-2010	INCIDENT OR MALFUNCTION REPORTING RELATED	100901 - INC RPT - WTP WATER METER CHANGE
View Document (.MSG)	09-01-2010	INCIDENT OR MALFUNCTION REPORTING RELATED	101026 - INC RPT & BWN - OAK BLVD & CEDAR LN.
View Document (.MSG)	10-26-2010	INCIDENT OR MALFUNCTION REPORTING RELATED	101026 - BACT (REPEAT) - EVERGREEN LN.
View Document (.PDF)	10-26-2010	INCIDENT OR MALFUNCTION REPORTING RELATED	101026 - INC RPT, BWN BACTS +TC & RESC - TANK INSPECTION.
View Document (.pdf)	10-26-2010	INCIDENT OR MALFUNCTION REPORTING RELATED	110208 - E-MAIL - FLOW METER REFURBISHED.
View Document (.MSG)	02-08-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110208 - E-MAIL - NEW WELL METER.
View Document (.MSG)	02-08-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110416 - E-MAIL - BWN HAND DELIVERY AGREEMENT.
View Document (.MSG)	04-16-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110416 - INC RPT & BWN - EMERGENCY GENERATOR
View Document (.PDF)	04-16-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110416 - BACTS & RESC - EMERGENCY GENERATOR
View Document (.PDF)	04-16-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110416 - LTR - BWN DELIVERY
View Document (.pdf)	04-16-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110523 - INC RPT (REV.) - W NORMAN.
View Document (.MSG)	05-23-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110523 - INC RPT & BWN - W NORMAN
View Document (.pdf)	05-23-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110523 - BACTS & RESC - W NORMAN.
View Document (.pdf)	05-23-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110527 - INC RPT & BWN - WATSON DR.
View Document (.MSG)	05-27-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110527 - BACTS & RESC - WATSON DR.
View Document (.pdf)	05-27-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110531 - INC RPT & BWN - CEDAR LN.
View Document (.MSG)	05-31-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110531 - BACTS & RESC - CEDAR LN.
View Document (.pdf)	05-31-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110620 - INC RPT & BWN - EVERGREEN & HICKORY.
View Document (.MSG)	06-20-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110620 - BACTS & RESC - EVERGREEN & HICKORY
View Document (.pdf)	06-20-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110821 - INC RPT & BWN - STUTTON & STADLER
View Document (.MSG)	06-21-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110821 - BACTS & RESC - STUTTON & STADLER
View Document (.pdf)	06-21-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110829 - INC RPT & BWN - WILLOW WAY
View Document (.MSG)	06-29-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110829 - BACTS & RESC - WILLOW WAY
View Document (.pdf)	06-29-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110725 - INC RPT & BWN - STADDLER AVE.
View Document (.MSG)	07-25-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110725 - RESC - STADDLER TO NORMAN.
View Document (.MSG)	07-25-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110802 - INC RPT & BWN - STADLER TO NELSON
View Document (.MSG)	08-02-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110802 - BACTS & RESC - STADLER & NELSON
View Document (.pdf)	08-02-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110805 - INC RPT & BWN - LOTS 0154 THRU 0122.
View Document (.MSG)	08-05-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110805 - BACTS - LOTS 0154 THRU 0122
View Document (.pdf)	08-05-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110805 - BACTS & RESC - LOTS 0154
View Document (.pdf)	08-05-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110822 - INC RPT & BWN - LOTS 2765-2814, ETC.
View Document (.MSG)	08-22-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110822 - BACTS & RESC - NORMAN ST.
View Document (.pdf)	08-22-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110901 - RESC - BISHOP & TREVINO
View Document (.MSG)	09-01-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110901 - INC RPT & BWN - BISHOP & TREVINO
View Document (.MSG)	09-01-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110901 - BACTS - BISHOP DR.
View Document (.MSG)	09-06-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110906 - INC RPT & BWN - WAVE REPLACEMENT PROJECT (2 DAYS).
View Document (.MSG)	09-12-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110913 - INC RPT & BWN - STADLER ST.
View Document (.pdf)	09-12-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110913 - BACTS & RESC - STADLER & SUTTON ST.
View Document (.MSG)	09-13-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110913 - E-MAIL - VALVE REPAIRS
View Document (.MSG)	09-13-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110913 - INC RPT & BWN - TREVINO DR.
View Document (.MSG)	09-13-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110913 - BWN - BWN'S 3, 4 & 6.
View Document (.pdf)	09-13-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110913 - BACTS & RESC - TREVINO DR.
View Document (.pdf)	09-13-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110913 - BACTS & RESC - BISHOP DR.
View Document (.MSG)	09-14-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110914 - BWN - BWN'S 1 VALVE REPAIRS
View Document (.pdf)	09-14-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110914 - BACTS & RESC - CEDAR LN.
View Document (.MSG)	09-29-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110929 - INC RPT & BWN (REVISED) - ZOELLER ST.
View Document (.MSG)	09-29-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110929 - INC RPT & BWN - ZOELLER ST.
View Document (.pdf)	09-29-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110929 - BACTS & RESC - ZOELLER ST.
View Document (.pdf)	09-29-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110929 - BACTS - ZOELLER ST.
View Document (.pdf)	10-01-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111001 - BACTS & RESC - WATER OAK BLVD.
View Document (.MSG)	10-10-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111010 - INC RPT & BWN - EVERGREEN
View Document (.MSG)	10-10-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111010 - BACTS & RESC - EVERGREEN, WILLOW WAY, SANDERS LN., CEDAR LN.
View Document (.MSG)	10-10-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111010 - BACTS - EVERGREEN
View Document (.MSG)	10-11-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111011 - INC RPT & BWN - WILLOW WAY, LOT 0023
View Document (.MSG)	10-11-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111011 - BACTS - WILLOW WAY
View Document (.MSG)	10-12-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111012 - INC RPT & BWN - SANDERS LN.
View Document (.MSG)	10-12-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111012 - BACTS - SANDERS LN.
View Document (.MSG)	10-13-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111013 - INC RPT & BWN - CEDAR LN & PALMER DR.
View Document (.MSG)	10-13-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111013 - BACTS - CEDAR LN.
View Document (.MSG)	10-24-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111024 - INC RPT & BWN - PALM DR, CHESTNUT LN, ELM WAY, ETC.
View Document (.MSG)	10-24-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111024 - RESC - PALM DR, CHESTNUT LN, ETC.
View Document (.MSG)	10-24-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111024 - INC RPT, BWN - SANDERS LN, LITTLER LN & PALMER DR.
View Document (.pdf)	10-24-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111024 - BACTS - PALM DR.
View Document (.MSG)	10-24-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111024 - BACTS & RESC - SANDERS LN.
View Document (.MSG)	10-31-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111031 - BWN - LITTLER & BRADLEY LN.
View Document (.MSG)	10-31-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111031 - BWN - PALMER DR, LOT 2057
View Document (.MSG)	10-31-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111031 - E-MAIL - LITTLER LN, BRADLEY LN.
View Document (.MSG)	10-31-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111031 - E-MAIL - LITTLER & BRADLEY LN.
View Document (.pdf)	10-31-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111031 - INC RPT - LITTLER LN.
View Document (.pdf)	10-31-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111031 - INC RPT - PALMER DR.
View Document (.pdf)	10-31-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111031 - BACTS & RESC - BRADLEY LN.
View Document (.pdf)	10-31-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111031 - BACTS & RESC - LITTLER LN.
View Document (.MSG)	10-31-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111031 - BACTS - PALMER DR.
View Document (.MSG)	11-01-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111101 - BWN - WATER OAK BLVD.
View Document (.MSG)	11-01-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	110901 - E-MAIL - WATER OAK BLVD ADDITIONAL BACTEES.
View Document (.pdf)	11-01-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111101 - BACTS - WATER OAK BLVD & BRADLEY LN (COMBINED).
View Document (.pdf)	11-01-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111101 - BACTS - WATER OAK BLVD & BRADLEY LN (COMBINED).
View Document (.pdf)	11-01-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111101 - BACTS - WATER OAK BLVD
View Document (.pdf)	11-01-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111101 - BACTS - WATER OAK BLVD
View Document (.pdf)	11-01-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111101 - INC RPT - WATER OAK BLVD.
View Document (.MSG)	11-08-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111108 - INC RPT - BRADLEY LN & TREVINO
View Document (.MSG)	11-11-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111111 - INC RPT, BWN - SYCAMORE SQUARE
View Document (.pdf)	11-11-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111111 - BACTS & RESC - SYCAMORE SQUARE
View Document (.MSG)	11-16-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111116 - INC RPT & BWN - COUPLES ST.
View Document (.pdf)	11-16-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111116 - BACTS & RESC - COUPLES ST.
View Document (.MSG)	11-29-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111129 - INC RPT & BWN - TREVINO DR & SUTTON ST.
View Document (.MSG)	11-29-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111129 - BACT + - TREVINO & SUTTON DR.
View Document (.pdf)	11-29-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111129 - BACTS + - TREVINO & SUTTON
View Document (.pdf)	11-29-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111129 - BACTS & RESC - TREVINO DR.
View Document (.pdf)	12-26-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111226 - INC RPT, BWN, BACTS & RESC - CHESTNUT LN.
View Document (.pdf)	12-29-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111226 - BACTS & RESC - LOTS 0117-0154, ETC.
View Document (.pdf)	12-30-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111230 - INC REP BWN - MAPLE DRIVE
View Document (.pdf)	12-30-2011	INCIDENT OR MALFUNCTION REPORTING RELATED	111230 - BACT, RESC - MAPLE DR.
View Document (.MSG)	01-09-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120109 - INC RPT, BWN - CEDAR LN.
View Document (.pdf)	01-09-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120109 - BACTS & RESC - CEDAR LN.
View Document (.MSG)	01-17-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120117 - INC RPT, BWN - BISHOP DR, LOTS 2710-2716, ETC.
View Document (.pdf)	01-17-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120117 - BACTS & RESC - LOTS 2710-2716
View Document (.MSG)	01-31-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120131 - INC RPT & BWN - BEMAN DR, LOT 2001
View Document (.MSG)	01-31-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120131 - E-MAIL - BEMAN DR REQ. ADDITIONAL DOCS.
View Document (.MSG)	01-31-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120131 - E-MAIL - BEMAN DR UPDATE REQUEST.
View Document (.pdf)	01-31-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120131 - BACTS & RESC - BEMAN DR.

ATTACHMENT A

View Document (.msg)	03-01-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120326 - BACTS & RESC - SNEAD RD.
View Document (.msg)	03-05-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120305 - INC RP,BWN - MAPLE DR.
View Document (.pdf)	03-05-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120305 - BACTS & RESC - MAPLE DR.
View Document (.msg)	03-15-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120315 - E-MAIL - MAPLE DR., LOT 265, ETC.
View Document (.msg)	03-15-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120315 - BWN - MAPLE DR, LOT 265
View Document (.pdf)	03-15-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120315 - E-MAIL - MAPLE DR, LOT 265
View Document (.msg)	03-23-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120315 - BACTS & RESC - MAPLE DR.
View Document (.pdf)	03-23-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120323 - INC RPT & BWN - TIE IN NEW SERVICES.
View Document (.msg)	03-26-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120323 - MAP - NEW SERVICES
View Document (.msg)	03-28-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120323 - BACTS & RESC - LOTS 2724-2735, ETC.
View Document (.msg)	03-28-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120326 - INC RPT, BWN - SNEAD & BEMEN DR.
View Document (.msg)	03-28-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120328 - E-MAIL - JUNIPER CIR.
View Document (.msg)	03-28-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120328 - BWN (ADD) - JUNIPER CIR.
View Document (.msg)	04-02-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120328 - BACTS & RESC - JUNIPER CIR CUL DE SAC.
View Document (.msg)	04-02-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120402 - BWN - SNEAD DR.
View Document (.pdf)	04-02-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120402 - BACTS & RESC - SNEAD DR.
View Document (.msg)	04-03-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120402 - E-MAIL - SNEAD DR.
View Document (.msg)	04-03-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120402 - BACTS & RESC - SNEAD DR.
View Document (.msg)	04-03-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120403 - BACTS & RESC (CORR) - NELSON AVE.
View Document (.msg)	04-03-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120403 - INC RPT , BWN - HICKORY HILL.
View Document (.msg)	04-03-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120403 - RESC - NELSON DR.
View Document (.msg)	04-03-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120403 - RESC - HICKORY HILL.
View Document (.pdf)	04-03-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120403 - E-MAIL - NELSON DR.
View Document (.msg)	04-03-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120403 - E-MAIL - CORR. NELSON DR.
View Document (.pdf)	04-03-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120403 - INC RPT & BWN - NELSON DR.
View Document (.msg)	04-23-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120403 - BACTS - NELSON DR.
View Document (.msg)	04-23-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120403 - BACTS - HICKORY HILL.
View Document (.msg)	04-23-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120423 - BWN - 4 LOG WTP MODIFICATION
View Document (.msg)	04-24-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120423 - EM - PLANT MODIFICATIONS, 4-LOG
View Document (.msg)	04-25-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120423 - BACTS & RESC - WTP MODIFICATIONS, 4-LOG
View Document (.msg)	05-24-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120424 - BACTS, RESC - WILLOW WAY
View Document (.msg)	05-24-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120425 - INC RPT - WILLOW WAY
View Document (.msg)	05-24-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120524 - BWN(CORR) - CEDAR LN.
View Document (.msg)	05-24-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120524 - INC RPT, BWN - CEDAR LN.
View Document (.msg)	05-28-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120524 - EM - CEDAR LN.
View Document (.msg)	06-02-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120524 - BACTS (REVISED) - CEDAR LN.
View Document (.msg)	06-03-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120602 - BWN - W NORMAN
View Document (.pdf)	06-03-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120603 - INC RPT, BWN - WTP PRESSURE LOSS
View Document (.PDF)	06-06-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120603 - BACTS, RESC - W NDRMAN
View Document (.msg)	06-08-2012	CONSUMER CONFIDENCE REPORT RELATED	120603 BACTS, RESC - HICKORY HILL
View Document (.msg)	06-08-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	2013-CCR 4 CDD
View Document (.msg)	06-08-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120608 - INC RPT, BWN - EVERGREEN
View Document (.msg)	07-02-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120608 - BACTS(FC) - EVERGREEN LN.
View Document (.msg)	07-02-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120608 - BACTS, RESC - EVERGREEN LN.
View Document (.msg)	07-11-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120702 - BACTS, RESC - PINE ST.
View Document (.msg)	07-11-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120702 - INC RPT, BWN - 105 PINE ST.
View Document (.msg)	08-16-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120711 - INC RPT, BWN - MAPLE DR.
View Document (.msg)	08-16-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120711 - BACTS, RESC - MAPLE DR.
View Document (.msg)	08-16-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120812 - INC RPT, BWN - LOT # 2092
View Document (.msg)	08-16-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120816 - INC RPT, BWN - 201 SANDERS LN.
View Document (.msg)	08-20-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120816 - BACTS, RESC - 201 SANDERS LN.
View Document (.msg)	08-20-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120816 - BACTS, RESC - LOT # 2092
View Document (.msg)	08-20-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120820 - BACTS, RESC - WILLOW WAY
View Document (.msg)	08-22-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120820 - INC RPT, BWN - WILLOW WAY
View Document (.msg)	08-22-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120822 - BACTS, RESC - TREVINO DR
View Document (.msg)	08-30-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120822 - INC RPT, BWN - TREVINO DR
View Document (.msg)	08-30-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120830 - INC RPT, BWN - LITTLER LN.
View Document (.msg)	09-07-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120830 - BACTS, RESC - LITTLER LN.
View Document (.msg)	09-07-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120907 - RESC (CORR) - WILLOW WAY
View Document (.msg)	09-07-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120907 - INC RPT, BWN - WILLOW WAY
View Document (.msg)	09-19-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120907 - BACTS, RESC - WILLOW WAY
View Document (.msg)	09-19-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120919 - INC RPT, BWN - 918 E NORMAN ST, LOT 2845
View Document (.msg)	09-19-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120919 - BWN - W NORMAN ST, LOT 2753
View Document (.msg)	09-19-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120919 - INC RPT, BWN - 973 W NORMAN ST, LOT # 2753
View Document (.msg)	09-19-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120919 - BWN(2ND) - NORMAN & TREVINO
View Document (.msg)	09-19-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120919 - BACTS - INTERFERENCE BY LAB
View Document (.msg)	09-19-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120919 - BACTS, RESC - W NORMAN ST., 2742-2760
View Document (.msg)	09-20-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120919 - BACTS, RESC - 928 W NORMAN ST, 2833-2956
View Document (.msg)	09-20-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120919 - BACTS, RESC - E & W NORMAN ST.2611-2620
View Document (.msg)	10-01-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120920 - INC RPT, BWN - TREVINO
View Document (.msg)	10-01-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120920 - BACTS, RESC - TREVINO
View Document (.msg)	10-17-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121001 - BACTS, RESC - STADLER ST.
View Document (.msg)	10-17-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	120101 - INC RPT, BWN - STADLER ST.
View Document (.msg)	10-17-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121017 - INC RPT, BWN - BEMEN DR.
View Document (.msg)	10-18-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121017 - BACTS, RESC - DEMEN DR.
View Document (.msg)	10-18-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121018 - INC RPT, BWN - MAPPLE ST.
View Document (.msg)	10-18-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121018 - INC RPT, BWN - ORANGE BLVD WELL (LOTS 0336-0388, 0399-0411)
View Document (.msg)	10-18-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121018 - BACTS, RESC - MAPPLE ST (LOTS 0257-0283)
View Document (.msg)	10-24-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121018 - BACTS, RESC - ORANGE BLVD WELL (LOTS 0336-0388, 0399-0411)
View Document (.msg)	10-25-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121024 - INC RPT, BWN - MAGHOLIA DR, LOTS 0073-0094
View Document (.msg)	10-25-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121025 - INC RPT, BWN - PALMER DR.
View Document (.msg)	10-26-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121025 - BACTS, RESC - PALMER DR, LOTS 2203-2219
View Document (.msg)	10-26-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121026 - INC RPT, BWN - PETE ST., LOTS 2566-2573
View Document (.msg)	11-04-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121026 - BACTS, RESC - ST PETE ST, LOTS 2566-2573
View Document (.msg)	11-04-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121104 - INC RPT, BWN - LOTS 0305-0346, 0359-0366
View Document (.msg)	11-04-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121104 - INC RPT, BWN - LOTS 0016-0115
View Document (.msg)	11-04-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121104 - INC RPT, BWN - LOTS 2541-2620, 2838-2853, 2890-2918, 2566-2573, 2800
View Document (.msg)	11-05-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121104 - INC RPT, BWN - LOTS 0412-0415, 0450 & 0459, 0360-0366, 0445-0449
View Document (.msg)	11-05-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121105 - BACTS, RESC - ORANGE BLVD, LOTS 0305-0346, ETC.
View Document (.msg)	11-05-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121105 - BACTS, RESC - ORANGE BLVD, LOTS 02541-2020, ETC.
View Document (.msg)	11-14-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121106 - BACTS, RESC - ORANGE BLVD, LOTS 0016-0115, ETC, WELL FAILURE.
View Document (.msg)	11-14-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121114 - INC RPT, BWN - PALMER DR.
View Document (.msg)	12-04-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121114 - BACTS, RESC - PALMER DR.
View Document (.msg)	12-04-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121204 - BACTS, RESC - PALMER DR.
View Document (.msg)	12-05-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121204 - INC RPT, BWN - PALMER DR.
View Document (.msg)	12-05-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121205 - EM (ADD) - SUTTON ST, LOT 2795
View Document (.msg)	12-08-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121210 - BACTS, RESC - SUTTON ST, LOT 2795.
View Document (.msg)	12-10-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121208 - BACTS - HYDROTANK RECOATING
View Document (.msg)	12-10-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121210 - INC RPT, BWN - TEAKWOOD TR, LOT 415
View Document (.msg)	12-10-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121210 - INC RPT, BWN - MAPLE DR, LOT 240
View Document (.msg)	12-10-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121210 - INC RPT, BWN - BISHOP DR.
View Document (.msg)	12-10-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121210 - BACTS, RESC - MAPLE DR, LOTS 0238-0245
View Document (.msg)	12-10-2012	INCIDENT OR MALFUNCTION REPORTING RELATED	121210 - BACTS, RESC - BISHOP, LOT2292
View Document (.msg)	01-03-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	121210 - BACTS, RESC - TEAKWOOD TR., LOTS 415-0165
View Document (.msg)	01-03-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130103 - BACTS, RESC - GRIMES DR.
View Document (.msg)	01-09-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130103 - INC RPT, BWN - GRIMES DR.
View Document (.msg)	01-09-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	120109 - BACTS, RESC - TREVINO DR.
View Document (.msg)	01-09-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130109 - INC RPT, BWN - TREVINO DR.

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View Document (.msg)	01-22-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130122 - INC RPT, BWN - MAGNOLIA DR.
View Document (.msg)	01-22-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130122 - BACTS, RESC - MAGNOLIA DR., LOT 0077
View Document (.msg)	01-25-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130125 - INC RPT, BWN - LITTLER LN.
View Document (.msg)	01-25-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130125 - BACTS, RESC - LITTLER LN.
View Document (.msg)	02-05-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130205 - INC RPT, BWN - EVERGREEN
View Document (.msg)	02-05-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130205 - INC RPT, BWN - STADLER ST.
View Document (.msg)	02-05-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130205 - BACTS, RESC - STADLER ST.
View Document (.msg)	02-05-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130205 - BACTS, RESC - EVERGREEN, LOTS # 0419
View Document (.msg)	02-06-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130205 - BACTS, RESC - LOT # 128
View Document (.msg)	02-15-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130215 - INC RPT, BWN - PALM DR.
View Document (.msg)	02-15-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130215 - INC RPT, BWN - SUTTON ST.
View Document (.msg)	02-15-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130215 - INC RPT (CORR-), BWN - SUTTON ST.
View Document (.pdf)	03-15-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130215 - BACTS, RESC - SUTTON ST.
View Document (.pdf)	03-16-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130321 - INC RPT, BWN - LOT 2071
View Document (.pdf)	03-18-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130315 - INC RPT, BWN - 707 SUTTON
View Document (.pdf)	03-19-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130318 - INC RPT, BWN - LOTS 224-305
View Document (.pdf)	03-19-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130318 - BACT, RESC - LOTS 224-305
View Document (.pdf)	03-21-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130318 - BACT, RESC - 707 SUTTON
View Document (.msg)	03-25-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130318 - RESC - LOTS 224-305
View Document (.pdf)	03-25-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130325 - INC RPT, BWN - WILLOW WAY
View Document (.pdf)	03-26-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130325 - BACT - LOT 2071
View Document (.pdf)	03-27-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130325 - BACT, RESC - WILLOW WAY
View Document (.pdf)	03-29-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130321 - RESC - LOT 2071
View Document (.pdf)	04-02-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130402 - INC RPT, BWN - BISHOP DR
View Document (.msg)	04-04-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130402 - BACT - BISHOP
View Document (.pdf)	04-25-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130402 - RESC - BISHOP DR
View Document (.pdf)	04-29-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130425 - INC RPT, BWN - LOT 2314
View Document (.pdf)	08-02-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130425 - BACT, RESC - LOT 2314
View Document (.pdf)	08-05-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130802 - INC RPT, BWN - GRIMES
View Document (.pdf)	08-12-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130802 - BACT, RESC - GRIMES
View Document (.pdf)	08-12-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130812 - BACT, RESC - TULIP TREE
View Document (.pdf)	09-03-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130812 - INC RPT, BWN - TULIP TREE
View Document (.pdf)	09-04-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130903 - INC RPT, BWN - LOT 453
View Document (.pdf)	10-07-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	130903 - BWN (AMENDED), BACT, RESC - LOT 463
View Document (.msg)	10-08-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131008 - INC RPT, BWN - BEMEN
View Document (.pdf)	10-08-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131008 - RESC (REVISED) - BEMEN
View Document (.pdf)	10-28-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131008 - BACT, RESC - BEMEN
View Document (.pdf)	10-28-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131028 - INC RPT, BWN - LOT 2005
View Document (.pdf)	11-04-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131028 - BACT, RESC - LOT 2005
View Document (.pdf)	11-05-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131105 - INC RPT, BWN - STADLER
View Document (.pdf)	11-07-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131105 - BACT, RESC - STADLER
View Document (.pdf)	11-07-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131107 - INC RPT, BWN - BIRCH
View Document (.pdf)	11-08-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131107 - BACT, RESC - BIRCH
View Document (.pdf)	11-11-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131111 - INC RPT, BWN - CEDAR
View Document (.pdf)	11-12-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131111 - BACT, RESC - CEDAR
View Document (.pdf)	11-12-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131112 - INC RPT, BWN - W. NORMAN
View Document (.pdf)	11-12-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131112 - INC RPT, BWN - NELSON
View Document (.pdf)	11-13-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131112 - BACT, RESC - SUTTON
View Document (.pdf)	11-13-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131112 - BACT, RESC - NORMAN
View Document (.pdf)	11-13-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131112 - BACT, RESC - NELSON
View Document (.msg)	11-19-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131119 - INC RPT, BWN - BISHOP
View Document (.msg)	11-20-2013	INCIDENT OR MALFUNCTION REPORTING RELATED	131119 - BACT, RESC - BISHOP
View Document (.msg)	01-21-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140121 - INC RPT, BWN - SUTTON
View Document (.msg)	01-22-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140121 - BACT, RESC - SUTTON
View Document (.msg)	02-18-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140218 - INC RPT, BWN - LOT 2610
View Document (.msg)	02-21-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140218 - BACT, RESC - LOT 2610
View Document (.msg)	02-26-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	130225 - INC RPT, BWN - 316 GRIMES DR
View Document (.msg)	02-26-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	130225 - INC RPT, BWN - 316 GRIMES DR
View Document (.msg)	02-26-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	130226 - INC RPT, BWN - 316 GRIMES DR
View Document (.msg)	02-26-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	130226 - INC RPT, BWN - 316 GRIMES DR
View Document (.msg)	02-28-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	130226 - BACT, RESC - 316 GRIMES
View Document (.msg)	03-14-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140314 - INC RPT, BWN - 209 BIRCH ST
View Document (.msg)	03-17-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140314 - INC RPT, BWN - 728 SUTTON ST
View Document (.msg)	03-20-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140314 - BACT, RESC - 209 BIRCH
View Document (.msg)	03-20-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140314 - BACT, RESC - 728 SUTTON ST
View Document (.msg)	03-25-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140325 - INC RPT, BWN - 911 NORMAN
View Document (.msg)	03-28-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140325 - BACT, RESC - 911 NORMAN
View Document (.msg)	04-15-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140415 - INC RPT, BWN - SPRUCE
View Document (.msg)	04-16-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140415 - BACT, RESC - SPRUCE
View Document (.msg)	06-12-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140612 - INC RPT, BWN - 902 E NORMAN ST
View Document (.msg)	06-12-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140612 - BACT, RESC - 902 E NORMAN ST
View Document (.msg)	06-19-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140618 - INC RPT, BWN - 902 E NORMAN ST
View Document (.msg)	06-19-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140618 - BACT, RESC - 902 E NORMAN ST
View Document (.pdf)	06-19-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140619 - INC RPT, BWN - 618 SYCAMORE SQ
View Document (.pdf)	06-23-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140619 - BACT, RESC - 618 SYCAMORE SQ
View Document (.msg)	07-11-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140711 - INC RPT, BWN - 107 W PINE DR
View Document (.msg)	07-15-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140711 - BACT, RESC - 107 W PINE DR
View Document (.msg)	08-25-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140825 - BACT, RESC - BALSAM CIR
View Document (.msg)	08-25-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140825 - INC RPT, BWN - BALSAM CIR
View Document (.msg)	08-29-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140829 - INC RPT, BWN - HICKORY HILL
View Document (.msg)	09-01-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140829 - BACT, RESC - HICKORY HILL
View Document (.msg)	09-11-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140911 - BACT, RESC - SPRUCE DR
View Document (.msg)	09-11-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140911 - BACT, RESC - TREVINO DR
View Document (.pdf)	09-11-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140911 - BACT, RESC - TREVINO DR
View Document (.pdf)	09-11-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140911 - INC RPT, BWN - SPRUCE
View Document (.pdf)	09-11-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140911 - INC RPT, BWN - TREVINO
View Document (.msg)	09-18-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140918 - INC RPT, BWN - 204 BIRCH
View Document (.msg)	09-22-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	140918 - BACT, RESC - 204 BIRCH
View Document (.msg)	10-25-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	141029 - BWN CANCELLED - 654 CEDAR LN
View Document (.msg)	10-29-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	141094 - INC RPT, BWN - 654 CEDAR LN
View Document (.msg)	10-29-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	141094 - INC RPT, BWN - 536 SPRUCE DR
View Document (.msg)	10-31-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	141031 - INC RPT, BWN - 536 SPRUCE DR
View Document (.msg)	11-20-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	BACTE, RESC - 646 CEDAR LANE
View Document (.msg)	11-20-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	INC, BWN, 646 CEDAR LANE
View Document (.msg)	12-03-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	BACTE, RESC - 662 CEDAR LANE
View Document (.msg)	12-03-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	INC, BWN - 662 CEDAR LANE
View Document (.msg)	12-10-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	BACTE, RESC - 203 MAPLE DRIVE
View Document (.msg)	12-10-2014	INCIDENT OR MALFUNCTION REPORTING RELATED	INC, BWN, 203 MAPLE DRIVE
View Document (.msg)	01-23-2015	INCIDENT OR MALFUNCTION REPORTING RELATED	1/20/15 - INC, BWN - 654 HICKORY HILL
View Document (.msg)	01-26-2015	INCIDENT OR MALFUNCTION REPORTING RELATED	1/26/15 - INC, BWN - VALVE REPLACEMENT HICKORY HILL
View Document (.msg)	01-26-2015	INCIDENT OR MALFUNCTION REPORTING RELATED	1/26/15 - BACT, RESC - VALVE REPLACEMENT HICKORY HILL
View Document (.msg)	03-31-2015	INCIDENT OR MALFUNCTION REPORTING RELATED	03/31/15 - INC, BWN - 6" BREAK NORMAN STREET
View Document (.msg)	03-31-2015	INCIDENT OR MALFUNCTION REPORTING RELATED	03/31/15 - RESC - BACT - 6" BREAK NORMAN STREET
View Document (.msg)	04-02-2015	INCIDENT OR MALFUNCTION REPORTING RELATED	4/2/15 - INC, BWN - 2" BREAK NELSON DRIVE
View Document (.msg)	04-02-2015	INCIDENT OR MALFUNCTION REPORTING RELATED	4/2/15 - RESC, BACT - 2" BREAK NELSON DRIVE
View Document (.msg)	08-03-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	2016 08 03 BWN AT 519 HICKORY HILL
View Document (.msg)	08-08-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	2016-08-08 PBWN
View Document (.msg)	08-09-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	2016-08-09 PBWN WATER OAK

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View Document (.msg)	08-16-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2016 08 16 RESCISSION OF PBWN (8-10-2016)
View Document (.msg)	08-30-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	2016 08 30 PBWN - BACTE - 343 HICKORY HILL, LOTS: 325-345 & 347 - 359
View Document (.msg)	09-02-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	2016-09-02 RESCISSION OF PBWN - WATER OAKS
View Document (.msg)	09-20-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	2016/20/2016 - PBWN - AT 911 SUTTON STREET - LOTS 2785-2813
View Document (.msg)	09-22-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	2016/09/22 PBWN RESCISSION
View Document (.msg)	09-27-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	2016/09/27 PBWN AT LOTS 224-257 AND 283-286 AND 300-305
View Document (.msg)	09-30-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	2016/09/30 PBWN RESCISSION AT WATER OAK
View Document (.msg)	10-24-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	10/24/2016 BWN, BACTE, RBWN
View Document (.msg)	10-24-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	2016 10 25 PBWN FOR VALVE INSTALLATION
View Document (.msg)	11-22-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	11/22/2016 BACT, RBWN
View Document (.msg)	12-08-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	12/8/2016 BWN
View Document (.msg)	12-12-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	12/12/2016 BWN
View Document (.msg)	12-14-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	WATER OAK 3354016 RESCISSION OF BWN & RESULTS
View Document (.msg)	12-15-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	2016 12 15 WATER OAK 3354010 RESCISSION OF BWN & 2ND RESULTS
View Document (.msg)	12-19-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	2016 12 19 - INCIDENT REPORT PBWN
View Document (.pdf)	12-19-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	12/19/2016 BACT, RBWN
View Document (.msg)	12-20-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	2016 12 20 PBWN
View Document (.pdf)	12-20-2016	INCIDENT OR MALFUNCTION REPORTING RELATED	12/20/2016 BACT, RBWN
View Document (.msg)	01-25-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	01/25/2017 INC, BWN, BACT, RBWN
View Document (.msg)	01-26-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017-01-25 RESCISSION OF BWN AND RESULTS
View Document (.msg)	02-01-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 01 31 RESCISSION OF PBWN - WATER OAKS
View Document (.msg)	02-01-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 01 31 PBWN - WATER OAKS
View Document (.msg)	02-06-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 02 03 - RESCISSION OF PBWN & RESULTS - WATER OAK
View Document (.msg)	02-09-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	
View Document (.pdf)	03-03-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	03/03/2017 BWN
View Document (.msg)	03-09-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	RESCISSION OF 03-06-2017 BWN & THE RESULTS
View Document (.msg)	04-27-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 04 27 _PBWN AT LOT # 2011 - 421 BEMEN DRIVE
View Document (.msg)	05-09-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 05 09 PBWN DUE TO PLANNED WATER LINE REPAIR
View Document (.pdf)	05-12-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 05 12 RESCISSION OF BOIL WATER NOTICE
View Document (.msg)	05-18-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	05/18/2017 BACTE, BWN, RBWN
View Document (.pdf)	05-22-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 05 22 PBWN
View Document (.pdf)	05-22-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	05/22/2017 BACTE, RBWN
View Document (.pdf)	06-27-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	06/27/2017 BWN, BACTE, RBWN
View Document (.msg)	07-01-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017-7-1 WATER OAKS 3354010 RESCISSION OF BWN & RESULTS
View Document (.msg)	07-24-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 07 24 - RESCISSION OF BWN & RESULTS
View Document (.msg)	07-31-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 07 31 PBWN FOR LOT #110, 302 BALSAM CIRCLE
View Document (.msg)	08-03-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 08 03 RESCISSION OF BWN AND RESULTS
View Document (.msg)	08-21-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 08 22 PRECAUTIONARY BOIL WATER NOTICE
View Document (.msg)	08-22-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 08 23 SECOND BWN FOR THIS WEEK AT WATER OAK. THE SHUTDOWN IS SCHEDULED FOR WEDNESDAY, AUGUST 23
View Document (.msg)	08-25-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 08 25 RESCISSION OF BWN & RESULTS FOR WATER OAK, 3354010, AUGUST 23, 2017 FOR LOTS: 2082 - 2105
View Document (.msg)	08-28-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 08 28 RESCISSION OF BWN & RESULTS FOR LOTS: 2819-2832 AND 2857 - 2868
View Document (.msg)	08-28-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 08 29 WATER OAK BWN FOR TUESDAY, AUGUST 29, 2017
View Document (.msg)	09-01-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 09 01 - RESCISSION OF BWN & RESULTS
View Document (.msg)	09-03-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 09 03 PBWN WATER OAK
View Document (.msg)	09-05-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 09 05 PBWN WATER OAK
View Document (.msg)	09-07-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 09 07 RESCISSION OF PBWN
View Document (.msg)	09-13-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 09 13 BOIL WATER NOTICE
View Document (.msg)	09-26-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 09 21 WATER OAK 3354010 RESCISSION OF BWN & RESULTS
View Document (.msg)	16-17-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 10 :7 PBWN WATER OAK
View Document (.msg)	10-20-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 10 20 BWN RESCISSION WATER OAKS
View Document (.msg)	11-03-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 11 03 PBWN FOR REEDY CREEK ENERGY SERVICES, INC.
View Document (.msg)	11-09-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 11 09 WATER OAK 3354010 RESCISSION OF BWN & RESULTS
View Document (.msg)	12-19-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 12 19 WATER OAK COUNTRY CLUB ESTATES BWN
View Document (.msg)	12-26-2017	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 12 21 - RESCISSION OF PBWN & RESULTS - WATER OAK ESTATES
View Document (.msg)	01-09-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2017 01 10 PLANNED BWN FOR WATER OAK COUNTRY CLUB ESTATES
View Document (.msg)	01-16-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 01 15 BWN FOR WATER OAK
View Document (.msg)	01-16-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 01 12 WATER OAK RESCISSION OF BWN & RESULTS
View Document (.msg)	01-16-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 01 16 EMERGENCY BWN
View Document (.msg)	01-16-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 01 15 RESCISSION OF BWN & RESULTS WATER OAK COUNTRY CLUB ESTATES
View Document (.msg)	01-19-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 01 19 WATER OAK RESCISSION OF BWN & RESULTS
View Document (.msg)	02-12-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 02 12 PBWN WATER OAK COUNTRY CLUB ESTATES
View Document (.msg)	02-14-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 02 14 PBWN WATER OAK COUNTRY CLUB ESTATES
View Document (.msg)	02-15-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 02 15 RESCISSION OF PBWN
View Document (.msg)	02-21-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 02 21 RESCISSION OF BWN AND RESULTS
View Document (.msg)	04-09-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 04 EMERGENCY BWN EMERGENCY BOIL WATER NOTICE
View Document (.msg)	04-13-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 04 12 PBWN HAS BEEN RESCISSION AND RESULTS
View Document (.msg)	04-15-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 04 12 PBWN HAS BEEN RESCISSION AND RESULTS
View Document (.msg)	04-16-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 04 15 RESCISSION OF BWN AND RESULTS
View Document (.msg)	05-30-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 05 30 BWN WELL #2 INOPERABLE
View Document (.msg)	06-04-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 05 30 BWN SCHEDULED FIRE HYDRANT REPLACEMENT
View Document (.msg)	06-25-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 06 02 RESCINDED PBWN
View Document (.msg)	06-28-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 06 23 PBWN DUE TO FIRE HYDRANT REPAIR
View Document (.msg)	07-05-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 06 25 PBWN DUES TO REPAIR OF 4 INCH PIPE
View Document (.msg)	07-20-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 07 05 PBWN RESCISSION AND RESULTS
View Document (.msg)	07-26-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 07 19 PBWN DUE TO PLANNED WATER SHUT DOWN
View Document (.msg)	07-31-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 07 25 PBWN RESCISSION AND RESULTS
View Document (.msg)	08-06-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 07 31 PBWN TO REPAIR 4 INCH WATER MAIN
View Document (.msg)	08-06-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 08 07 PLANNED BWN FOR 802 NELSON DR
View Document (.msg)	08-13-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 08 01 PBWN RESCINDED WITH RESULTS
View Document (.msg)	11-13-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 08 09 PBWN RESCISSION AND RESULTS
View Document (.msg)	11-16-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 11 12 PBWN DUE TO EMERGENCY REPAIRS TO A WATER MAIN
View Document (.msg)	12-10-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 11 16 PBWN RESCINDED AND RESULTS
View Document (.msg)	12-13-2018	INCIDENT OR MALFUNCTION REPORTING RELATED	2018 12 10 PLANNED PBWN FOR WATER LINE REPAIR W. PINE
View Document (.msg)			2018 12 10 PBWN RESCINDED AND RESULTS