State of Florida

Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: May 28, 2026

TO: Adam J. Teitzman, Commission Clerk, Office of Commission Clerk

FROM: Joshua Cohn, Public Utility Analyst II, Division of Accounting & Finance

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

Please placed the attached information submitted by Dinah Schiegner in the consumer correspondence section.

JC/at

Attachment

STATE OF FLORIDA — PUBLIC SERVICE COMMISSION

Docket No. 20250088-WU Sun Communities Finance, LLC d/b/a Water Oak Utility Revised Staff Recommendation — Document No. 03032-2026

FORMAL RATEPAYER OBJECTION AND COMMENT SUBMISSION

Submitted by the Water Oak Oversight Committee Pursuant to the Commission's Public Comment Process

Submitted By:	Dinah Schiegner, J.D., R.N. Legal Advisor, Water Oak Oversight Committee
Authorized By:	[redacted] and [redacted] Representatives, Water Oak Oversight Committee Active Residents — Water Oak Estates, Lady Lake, Lake County, Florida
Filed To:	Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850
Copies To:	Walter Trierweiler, Office of Public Counsel Trierweiler.Walt@leg.state.fl.us | 850-717-0326 Kelly Thompson, PSC Staff KThompson@psc.state.fl.us | 850-413-6986
Docket:	No. 20250088-WU
Subject:	Objections to Revised Staff Recommendation Document No. 03032-2026, Filed May 20, 2026
Date:	May 27, 2026

PRELIMINARY STATEMENT

The Water Oak Oversight Committee submits this formal objection and comment on behalf of the residential ratepayers of Water Oak Estates, Lady Lake, Lake County, Florida. The Committee is authorized by [redacted] and [redacted], active residents of Water Oak Estates who receive water service directly from Sun Communities Finance, LLC d/b/a Water Oak Utility.

Each objection raised in this submission is grounded exclusively in documented facts — drawn from the official PSC docket record for Docket No. 20250088-WU, the Revised Staff Recommendation filed May 20, 2026 (Document No. 03032-2026), filings by the Office of Public Counsel, and confirmed communications from regulatory agencies. No inference is stated as fact. Every claim is supported by a specific, identified document or mathematical calculation.

The Committee respectfully requests that the Commission carefully consider each objection raised herein before the June 2, 2026 Commission Conference and the issuance of any Proposed Agency Action Order.

SECTION I — THE ACTUAL RATE IMPACT IS NOT 117.17 PERCENT

How Staff Derived the 117.17 Percent Figure:

Per Schedule No. 3-A on page 35 of the Revised Staff Recommendation (Document No. 03032-2026), the 117.17 percent Revenue Percentage Increase was derived by dividing the Recommended Revenue Increase of $244,100 by the Staff Adjusted Test Year Revenues of $208,330. That calculation produces a revenue percentage increase — not a rate increase and not a bill impact.

As the Office of Public Counsel has confirmed, the Revenue Percentage Increase of 117.17 percent will always be different from rate increases or bill impacts — particularly with a tiered gallonage rate structure where different customers pay different per-gallon rates depending on their monthly consumption level. The 117.17 percent figure is a mathematical relationship between two revenue totals. It does not reflect what any individual resident's water bill actually increases by.

The 117.17 percent characterization is a revenue calculation — not a rate increase figure. Presenting it as the rate increase to ratepayers is misleading because it obscures the actual per-tier per-gallon increases that appear on individual water bills — which range from 109 percent to 393 percent depending on consumption level.

The Commission's attention is respectfully directed to a material discrepancy between the headline rate increase figure of 117.17 percent and the actual per-tier rate increases that will appear on individual resident water bills. The following figures are derived directly from Schedule No. 4 of Document No. 03032-2026.

Rate Component	Current Rate	Staff Recommended	ACTUAL % INCREASE
Base Facility Charge (5/8" x 3/4")	$5.74/mo	$8.94/mo	**55.7%**
Tier 1: 0–3,000 gallons	$1.07/1,000 gal	$3.65/1,000 gal	**241%**
Tier 2: 3,001–6,000 gallons	$1.11/1,000 gal	$5.47/1,000 gal	**393%**
Tier 3: Over 6,000 gallons	$1.43/1,000 gal	$6.38/1,000 gal	**346%**
General Service Gallonage	$1.17/1,000 gal	$4.45/1,000 gal	**280%**

THE MISSING AVERAGE RESIDENT CALCULATION:

Staff's own Revised Recommendation identifies average residential water demand as 4,540 gallons per month during the test period (Issue 10, Document No. 03032-2026). Applying the staff-recommended rates to that average produces the following:

Consumption Level	Current Monthly Bill	Staff Recommended Bill	Actual Increase
Average Resident — 4,540 gal (Staff's own figure, Issue 10)	$10.66	$28.31	**165%**
3,000 gallons	$8.95	$18.75	**109%**
6,000 gallons	$12.28	$35.16	**186%**

8,000 gallons	$15.14	$47.92	**217%**

The 165 percent actual increase facing the average Water Oak resident at staff's own identified consumption of 4,540 gallons per month does not appear anywhere in Schedule No. 4 of the Revised Staff Recommendation. The Committee respectfully submits that a just and reasonable rate order under Section 367.081, F.S., must accurately characterize the actual financial burden on ratepayers — not only a blended revenue average.

Additionally, Schedule No. 4 retains the original April 7, 2026 recommended rates as a reference column. That framing presents the revised rates as relief when measured against the original proposal. The accurate and appropriate reference is what residents currently pay — not what staff originally proposed.

SECTION II — SPECIFIC OBJECTIONS TO THE REVISED STAFF RECOMMENDATION

Each objection below identifies the relevant PSC issue number, the staff finding, the documented basis for the objection, and the specific relief requested. Every factual statement is supported by a document in the official PSC docket record.

OBJECTION 1 — Quality of Service — Issue 1 — Should Not Be Rated Satisfactory

Staff Recommendation:

Quality of service rated satisfactory.

Documented Basis for Objection:

• Four confirmed service interruptions affecting 10 percent or more of customers were never reported to the Commission — a direct violation of Rule 25-30.251(1), F.A.C. Source: OPC observation letter, February 17, 2026 (Document No. 01137-2026) and OPC letter April 17, 2026 (Document No. 02230-2026).

• The Utility violated Rule 25-22.032, F.A.C., for failure to respond to a customer complaint within 15 days and failure to provide a full and accurate report. Source: Document No. 03032-2026, Issue 1.

• Over 450 resident meter malfunction report forms were submitted into the official docket record. The Utility represented to PSC staff it had no open complaints and was unaware of meter concerns. That representation is directly contradicted by the docket record itself. Of those 450-plus documented complaints: only 12 percent were ever inspected and only 2 percent had any issue addressed or repaired.

• Only 24 of 1,265 residential meters were replaced — a 1.9 percent replacement rate on a system with documented widespread malfunction. Source: Document No. 03032-2026, Issue 4.

• The OPC filed a formal recommendation on April 17, 2026 for a marginal quality of service rating and a 15-basis-point ROE reduction. Staff rejected both recommendations. Source: Document No. 02230-2026.

Relief Requested: The Commission is respectfully requested to adopt the OPC recommendation of a marginal quality of service rating and apply the corresponding 15-basis-point reduction to the Utility's return on equity.

OBJECTION 2 — Rate Case Expense Recovery — Issue 7 — Residents Should Not Pay

Staff Recommendation:

Total rate case expense of $22,140 approved, amortized at $5,535 annually over four years, including $699 in travel expense for two Commission Conferences.

Documented Basis for Objection:

• Sun Communities Finance, LLC filed this rate case. The residential ratepayers of Water Oak Estates did not. Under Section 367.0814(3), F.S., the Commission has discretion — not an obligation — to allow recovery of attorney fees and consultant costs incurred after the initial staff report.

• The April 7, 2026 deferral — which necessitated the second Commission Conference and the additional $506 in travel expense — occurred because PSC staff determined after that conference that the Utility was serving customers outside its Commission-approved service territory. Source: Document No. 03032-2026, Case Background. The Utility's own compliance failure created that additional cost.

- Ratepayers bear no responsibility for the postponement and should not be required to fund the Utility's travel costs to a rescheduled hearing caused by the Utility's own certificate non-compliance.

Relief Requested: The Commission is respectfully requested to disallow recovery of rate case expense above the original staff report baseline and to specifically disallow the $506 postponement travel expense attributable to the Utility's certificate territory violation.

OBJECTION 3 — Management Fees — Issue 7 — Affiliated Transaction Scrutiny Required

Staff Recommendation:

Contractual Services — Professional (Account 631) approved at $70,880. OPC recommendation of 15 percent reduction rejected.

Documented Basis for Objection:

- Account 631 at $70,880 is the largest single operating expense category in the Revised Staff Recommendation — exceeding total employee salaries of $48,174 by 47 percent. Source: Schedule No. 3-C, Document No. 03032-2026.
- This account includes management fees paid by Water Oak Utility to Sun Communities corporate. Sun Communities Finance, LLC is a wholly-owned subsidiary of Asset Investors Operating Partnership, LP, which rolls into Sun Communities, Inc. The fee is paid between affiliated entities within the same corporate family.
- There is no arm's-length negotiation and no competitive bidding for these services. Affiliated transactions require heightened scrutiny to ensure costs reflect fair market value rather than intra-corporate transfers.
- The OPC formally recommended a 15 percent reduction. Staff rejected that recommendation without adequate justification. Source: Document No. 02230-2026 and Document No. 03032-2026, Issue 7.

Relief Requested: The Commission is respectfully requested to adopt the OPC-recommended 15 percent reduction to Account 631 and to apply heightened scrutiny to all affiliated transaction costs included in the Utility's operating expense claim.

OBJECTION 4 — Meter Data Integrity — Issues 1, 3, 6 — Rate Case Data Is Unreliable

Staff Recommendation:

Rate case proceeds on existing billing and meter data. EUW revised to 18.8 percent. Revenues imputed based on 5-year average.

Documented Basis for Objection:

- Over 450 resident meter malfunction report forms are in the official docket record. Of those: only 12 percent were inspected and only 2 percent were addressed or repaired.
- The Utility represented to PSC staff it had no open meter complaints and was unaware of meter concerns prior to the January 21, 2026 Customer Meeting. That representation is directly contradicted by the volume of docket submissions. Source: Document No. 01125-2026 and Document No. 03032-2026, Issue 1.
- Every financial figure in this rate case — gallons sold, revenues, unaccounted-for water, billing determinants — is derived from meter data that residents have formally documented as systemically inaccurate. Staff cannot simultaneously acknowledge widespread meter concerns in Issue 1 and approve a permanent revenue requirement built on data from those same meters.

• Staff was forced to impute general service gallons using a 5-year average because the Utility failed to provide complete consumption data. Source: Document No. 03032-2026, Issue 6. Data imputation is not a substitute for accurate metering.

Relief Requested: The Commission is respectfully requested to direct a comprehensive independent meter audit of all 1,265 residential accounts before permanent rates are established, and to consider whether the current test year data provides a sufficiently reliable foundation for permanent rate-setting.

OBJECTION 5 — Hilltop Expansion — Issue 4 — Written Corporate Promise Broken

Staff Recommendation:

Rate base of $1,492,390 approved including pro forma capital projects. No specific allocation of expansion-related costs identified.

Documented Basis for Objection:

• On July 10, 2018, Sheri Woodworth, Division Vice President of Sun Communities, Inc., sent a written communication to Ron Auger, then-President of the Water Oak Estates HOA, stating unambiguously that no expansion costs of any kind would be passed to existing Water Oak residents. That written communication is a documented corporate promise from the parent company of the Utility.

• The Hilltop Expansion at Water Oak Estates was constructed. PSC Engineering Division subsequently determined the Utility was serving customers outside its Commission-approved service territory — a finding directly connected to the expansion area. Source: Document No. 03032-2026, Case Background.

• The Committee respectfully submits that any portion of the rate base attributable to Hilltop Expansion infrastructure directly contradicts the written corporate promise made to residents in 2018 and should not be recoverable from existing ratepayers.

Relief Requested: The Commission is respectfully requested to determine what portion of the $1,492,390 rate base is attributable to Hilltop Expansion infrastructure and exclude those costs from the revenue requirement, consistent with the written corporate promise of July 10, 2018.

OBJECTION 6 — Certificate Territory Violation — Case Background — Data Integrity

Staff Recommendation:

Utility directed to file certificate amendment by August 18, 2026. Rate case proceeds to June 2 conference.

Documented Basis for Objection:

• Following the April 7, 2026 deferral, PSC staff determined the Utility has been serving customers outside its Commission-approved service territory. The Utility was directed to file for a certificate amendment by August 18, 2026. Source: Document No. 03032-2026, Case Background.

• The test year customer counts, usage data, and revenue figures submitted by the Utility include customers and consumption from service territory the Utility was not legally authorized to serve. The reliability of that data for permanent rate-setting purposes has not been established.

• Setting permanent rates before the certificate amendment proceeding is resolved means the Commission is approving a revenue requirement built on data from partially unauthorized service territory.

Relief Requested: The Commission is respectfully requested to consider whether permanent rates should be deferred until the certificate amendment proceeding is resolved and the boundaries of the Utility's

authorized service territory are established.

OBJECTION 7 — CIAC Non-Compliance — Issue 4 — 24 Years of Ignored Commission Order

Staff Recommendation:

CIAC increased by estimated $103,929 to reflect meter installation fees and service availability charges not collected per Commission Order No. PSC-2000-1165-PAA-WS.

Documented Basis for Objection:

- Commission Order No. PSC-2000-1165-PAA-WS directed Sun Communities Finance, LLC to reinstate meter installation fees and service availability charges in 2000. The Utility did not comply with that order for 24 consecutive years. Source: Document No. 03032-2026, Issue 4.
- CIAC exists specifically to ensure new customers fund the infrastructure required to serve them — protecting existing customers from bearing those costs. By failing to collect CIAC for 24 years, existing ratepayers absorbed costs that new customers should have funded.
- Staff's $103,929 reconstruction is an estimate because the Utility never maintained the records it was ordered to keep. The estimate cannot be independently verified and does not account for 24 years of actual customer growth including the Hilltop Expansion.

Relief Requested: The Commission is respectfully requested to direct a full reconstruction of CIAC based on documented actual customer growth records before permanent rates are set, and to note formally that the current estimate rewards 24 years of non-compliance with a direct Commission order.

OBJECTION 8 — General Service Reclassification — Issue 6 and Schedule 5 — Notice Required

Staff Recommendation:

50 general service customers identified. 15 residential street addresses included on Schedule No. 5 as general service irrigation accounts.

Documented Basis for Objection:

- Schedule No. 5 of Document No. 03032-2026 identifies 15 residential street addresses — including 225 Sakura Ct., 123 Willow Way, 116 Evergreen Lane, 210 Birch St., and others — as general service irrigation customers.
- The general service gallonage rate increases from $1.17 to $4.45 per 1,000 gallons — a 280 percent increase — under the staff recommendation. Source: Schedule No. 4, Document No. 03032-2026.
- Residents at these addresses may be unaware that a second irrigation meter exists at their property and may have no knowledge of their reclassification as general service customers subject to an entirely different rate structure.

Relief Requested: The Commission is respectfully requested to require that each of the 15 residential addresses identified on Schedule No. 5 receive individual written notice of their general service classification and the associated rate impact before any revised billing rate is applied to their accounts.

OBJECTION 9 — 29-Year Rate History — Documented Index Increases vs. Comprehensive Accountability

Staff Finding:

Staff noted in the Case Background of Document No. 03032-2026: 'It has been over 25 years since the Utility's last rate case.' Staff further confirmed: 'While these adjustments provide limited rate relief between rate proceedings, they are not intended to address comprehensive changes in the Utility's revenue requirement.'

Documented Basis for Objection:

- Sun Communities Finance, LLC collected 25 annual index rate increases between 1988 and 2023 — documented by staff in the Case Background of Document No. 03032-2026. Each of those increases was approved by this Commission and collected from ratepayers — including the elderly fixed-income residents of Water Oak Estates.
- Those 25 annual cost-of-living increases were felt by every resident every year. What the Utility avoided for 29 years was not raising rates. It was the comprehensive regulatory scrutiny that a full rate case proceeding requires — scrutiny that would have examined infrastructure maintenance, customer counts, meter accuracy, affiliated transactions, and capital expenditure decisions.
- The revenue gap now cited as justification for a 117 percent increase is substantially the product of 29 years of deferred comprehensive regulatory accountability — during which the Utility collected every annual increase available to it while deferring the obligations that a comprehensive proceeding would have required it to address.
- Under Section 367.081, F.S., the just and reasonable standard requires the Commission to consider what portion of the revenue requirement reflects legitimate ratepayer obligations versus the accumulated consequences of the Utility's own business decisions over nearly three decades.

Relief Requested: The Commission is respectfully requested to examine the revenue requirement with specific attention to what portion of the rate base and operating cost gap is directly attributable to deferred maintenance and deferred regulatory accountability during the 29-year period between rate cases — and whether those self-created costs are properly recoverable from ratepayers under a just and reasonable standard.

OBJECTION 10 — Schedule 4 Bill Comparisons — Misleading Omission of Average Usage

Staff Recommendation:

Schedule No. 4 provides bill comparisons at 3,000, 6,000, and 8,000 gallons per month.

Documented Basis for Objection:

- Staff identifies average residential water demand as 4,540 gallons per month in Issue 10 of Document No. 03032-2026. That figure does not appear anywhere in Schedule No. 4.
- At 4,540 gallons per month under staff-recommended rates, the actual monthly bill increase is 165 percent — from approximately $10.66 to $28.31. That figure is derived directly from the rate structure in Schedule No. 4 applied to staff's own average consumption figure.
- Schedule No. 4 retains the original April 7, 2026 recommended rates as a comparison column. That column presents the revised rates as relief rather than as the increase they represent relative to what residents currently pay.

Relief Requested: The Commission is respectfully requested to direct staff to revise Schedule No. 4 to include a bill comparison at the staff-identified average consumption of 4,540 gallons per month, and to remove the April 7 original rate column as a reference point.

SECTION III — SEWER BILLING CONDUCT — PATTERN OF CONCERN

The Committee acknowledges that the Florida Public Service Commission does not have direct regulatory jurisdiction over the Lady Lake sewer billing arrangement at Water Oak Estates. This section is not submitted as a jurisdictional objection to the rate case. It is submitted solely to place on the record a documented pattern of billing conduct by Sun Communities Finance, LLC that the Commission may find relevant to its assessment of the Utility's overall regulatory compliance posture and the credibility of the financial data it has submitted in this proceeding.

Resident billing records document the following per-gallon sewer rates charged to individual Water Oak households by Sun Communities Finance, LLC: April 2025 — $0.00302; May 2025 — $0.00270; August 2025 — $0.00294; March 2026 — $0.00490. The increase from August 2025 to March 2026 represents a 66.7 percent increase in the per-gallon sewer rate over seven months — imposed without notice to residents and without any regulatory authorization. When residents directly questioned this increase, Water Oak administration stated that Sun Communities had no involvement in sewer billing. That statement was confirmed to be false when a resident visited Lady Lake municipal offices in person and was told directly by municipal staff that sewer billing passes through Sun Communities Finance, LLC — the same entity before this Commission. This matter has been formally referred to the Florida Department of Business and Professional Regulation under OIG Case No. 2026-518-REF for review by the Division of Condominiums and Mobile Homes.

SECTION IV — PENDING REGULATORY MATTERS — REQUEST FOR COMMISSION CONSIDERATION

The Committee respectfully brings to the Commission's attention two pending regulatory matters directly relevant to the data integrity and factual foundation of this rate case. The Committee submits that the findings of these regulatory bodies — once available — may materially affect the Commission's analysis of the revenue requirement, the rate base, and the operating conditions documented in this docket.

MATTER 1 — FLORIDA DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION

Agency:	Florida Department of Business and Professional Regulation (DBPR) Office of Inspector General
Contact:	Matthew Collier, CFE, CIGI Director of Investigations, Office of Inspector General 2601 Blair Stone Road, Tallahassee, FL 32399-1018
OIG Case No.:	2026-518-REF
Status:	Referral from the Office of Inspector General to the Division of Condominiums and Mobile Homes for review and handling. Under review.
Scope:	The referral concerns the conduct of Sun Communities Finance, LLC in its dual capacity as landlord and utility operator at Water Oak Estates — a 55-plus land-lease community governed in part by Chapter 723, Florida Statutes — including billing practices and the relationship between lot rent obligations and utility charges.

The Committee respectfully notes that the Division of Condominiums and Mobile Homes has specific expertise and enforcement authority over the landlord-tenant relationship at land-lease communities under Chapter 723, Florida Statutes. The dual role of Sun Communities Finance, LLC as both landlord and water utility — collecting lot rent and water rates from the same captive resident population — is precisely the structural circumstance that Chapter 723 was designed to address. The DBPR Division's findings may directly inform this Commission's assessment of the affiliated transaction costs and the overall revenue requirement in this proceeding.

MATTER 2 — ST. JOHNS RIVER WATER MANAGEMENT DISTRICT

Agency:	St. Johns River Water Management District (SJRWMD)
Status:	Formal concerns submitted regarding water withdrawal permit compliance and unaccounted-for water. Awaiting assignment of an investigator and a formal file number.
Scope:	Concerns relate to the Utility's documented excessive unaccounted-for water of 18.8 percent — nearly double the 10 percent regulatory threshold — and potential permit compliance issues associated with water withdrawal volumes and distribution system losses identified in the Revised Staff Recommendation, Issue 3.

The SJRWMD has independent regulatory authority over water withdrawal permits and compliance in this region. The District's findings regarding the Utility's water loss, distribution system integrity, and permit compliance may provide additional relevant information for the Commission's assessment of the infrastructure conditions and operating expenses documented in this docket.

REQUEST FOR COMMISSION CONSIDERATION: The Committee respectfully requests that the Commission consider whether the prudent course is to await the findings of the DBPR Division of Condominiums and Mobile Homes (OIG Case No. 2026-518-REF) and the St. Johns River Water Management District before finalizing permanent rates in this proceeding. The findings of these independent regulatory bodies — each with specific expertise directly relevant to the conditions documented in this docket — may materially inform the Commission's analysis and provide a more complete factual record for permanent rate-setting.

SECTION V — SUMMARY OF RELIEF REQUESTED

1.	Revise Schedule No. 4 to include a bill comparison at 4,540 gallons per month — staff's own identified average — accurately reflecting the 165 percent actual increase facing the average Water Oak resident.
2.	Adopt the OPC recommendation of a marginal quality of service rating and apply the corresponding 15-basis-point ROE reduction.
3.	Adopt the OPC recommendation of a 15 percent reduction to Account 631 — Contractual Services Professional — and apply heightened scrutiny to all affiliated transaction costs.
4.	Disallow recovery of rate case expense above the original staff report baseline, including the $506 postponement travel expense attributable to the Utility's certificate territory violation.
5.	Determine what portion of the $1,492,390 rate base is attributable to Hilltop Expansion infrastructure and exclude those costs from the revenue requirement, consistent with the written corporate promise of July 10, 2018.
6.	Direct a comprehensive independent meter audit of all 1,265 residential accounts before permanent rates are established.
7.	Require individual written notice to each of the 15 residential addresses on Schedule No. 5 before any revised billing rate is applied to those accounts.
8.	Direct a full CIAC reconstruction based on documented actual customer growth records rather than the current estimated figure.
9.	Consider whether permanent rates should be deferred until the certificate amendment proceeding is resolved.
10.	Consider whether the prudent course is to await the findings of the DBPR Division of Condominiums and Mobile Homes (OIG Case No. 2026-518-REF) and the St. Johns River Water Management District before finalizing permanent rates.

The Water Oak Oversight Committee respectfully submits that each objection raised in this document is grounded in documented evidence contained in the official PSC docket record, confirmed regulatory communications, or mathematical calculations derived directly from the Revised Staff Recommendation. The Committee respectfully requests that this submission be made part of the official record for Docket No. 20250088-WU and that each objection receive the Commission's careful consideration before any final order is issued.

Respectfully submitted,	Dinah Schiegner, J.D., R.N. Legal Advisor Water Oak Oversight Committee Authorized by Bob Galloway and Ron Auger Active Residents — Water Oak Estates Lady Lake, Lake County, Florida May 27, 2026

This submission is provided to the Office of Public Counsel — Walter Trierweiler — for review prior to formal filing.