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Public Service Commission

June 25, 2026

Mr. Daniel J. McGinn
Special Counsel
Jones Law Firm
106 East College Avenue, Suite 1200
Tallahassee, FL 32301
dmcginn@joneswalker.com

STAFF'S SIXTH DATA REQUEST VIA EMAIL

Re: Docket No. 20250122-WS – Application for staff-assisted rate case in Highlands County, by Sun Communities Acquisitions, LLC d/b/a Buttonwood Bay Utilities.

Dear Mr. McGinn:

By this letter, Commission staff requests that Buttonwood Bay Utilities (Utility) provide responses to the following questions regarding your compliance with the Florida Department of Environmental Protection (DEP) and certain pro forma projects:

1. **Wastewater.** Please refer to your most recent wastewater facility permit approved by the DEP, Permit No. FLA014348-018-DW3P, and the associated Administrative Order (AO) AO-014348-018-SD, issued by the DEP.
 - a. Please explain why the Utility was unable to provide reasonable assurance that the wastewater facility discharges would meet the requirements of Final Order 20-0065 associated with nitrogen and phosphorus limits prior to receiving its permit.
 - b. Please refer to the list of actions identified on page 2 of the AO and specify if each has been met to the DEP's satisfaction. If not, explain why not.
 - c. Please specify what future action(s) are necessary for compliance with the AO, and whether they require any additional expenses or investments to meet the discharge limitations.
2. **Water.** Please refer to the May 20, 2024, Compliance Assistance Offer Letter from the DEP regarding exceedances for the secondary standard of color. Please explain what action(s) the Company took in response. As part of your response, identify each date the required quarterly testing was performed and the issue resolved.

3. **Water.** Please refer to the customer complaints referenced in the September 18, 2024, letter from the DEP. Please explain how each of the complaints were resolved and provide supporting documentation.
4. Please refer to your application and responses to staff's prior data requests regarding the Utility's requested pro forma projects. If you are seeking additional pro forma plant expenses, provide the following information for each pro forma project:
 - a. Description of the project. As part of this response, identify the location(s) associated with it.
 - b. Identify the in-service date of the project and state whether it is actual or estimated.
 - c. Explain why the project is needed. For example, specify if it addresses deferred maintenance, safety, compliance, reliability, or water quality concerns and how it does so.
 - d. Explain if the project is required by a regulatory authority. If so, identify that authority and what mandates the project.
 - e. Identify the number of bids requested and received for the project. If less than three bids were requested and/or received, explain why. Provide copies of the bid(s) as part of this response.
 - f. Identify the selected bid and if it was the least cost bid. If not, explain why not.
 - g. Provide the amount sought for the project by NARUC account by year. If these do not match the bids or if the project costs are estimated, please explain how the project costs were determined. If actual costs, provide the invoice(s) and, if applicable, explain any differences from the bids.
5. Reference is made to the following pro forma projects requested by the Utility: 1. New Control Room; 2. New Generator; 3. High Service Pump; 4. Electrical Upgrades; and 5. New Filter Media. Please provide a detailed description, justification, in-service date, and NARUC account number for each pro forma project aforementioned. In addition, please provide supporting documentation for cost estimates such as bids, invoices or other information for each project.
6. Excessive Unaccounted for Water (EUW) for the water treatment plant based on data provided by the Utility is 19.40% What is the Utility doing or intends to do to mitigate this EUW?
7. Reference the pro forma (O&M) cost for Hurricane Milton submitted by the Utility in this docket. Please provide a detail breakdown of the storm recovery cost.

Mr. Daniel J. McGinn

Page 3

June 25, 2026

Please file all responses electronically via the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20250122-WS), **by Wednesday, July 1, 2026**. In addition, please email the filed response to discovery-gcl@psc.state.fl.us. Please include the docket number on all submissions to the Commission Clerk.

Please contact me by phone at (850) 413-6582 or by email gdavis@psc.state.fl.us if you have any questions.

Sincerely,

s/ Greg Davis

Greg Davis
Engineering Specialist
Bureau of Reliability and Resource Planning
Division of Engineering

PGD:da