

Tristan Davis

From: Tristan Davis on behalf of Records Clerk
Sent: Friday, June 26, 2026 11:46 AM
To: Cynthia Kaiser
Cc: Consumer Contact
Subject: RE: Docket No: 20250108

Good Morning,

We will be placing your comments below in consumer correspondence in Docket No. 20250108, and forwarding them to the Office of Consumer Assistance.

Thank you!

Tristan Davis
Commission Deputy Clerk I
Florida Public Service Commission
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From: Cynthia Kaiser <cakaiser215@gmail.com>
Sent: Friday, June 26, 2026 11:37 AM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: Docket No: 20250108

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Dear Public Service Commission,
I am writing regarding to SUN's response to Staff's Sixth Data Request dated June 5, 2026. I have copied the entire document and provided my comments and concerns in red. Thank you for your time and attention to these concerns.

Cynthia Kaiser
Sunlake Estates Resident

On behalf of Sunlake Estates Utilities, L.L.C. (“Utility”), this letter is the response to Staffs Sixth Data Request dated May 20, 2026.

1. Service Interruptions: Pursuant to Rule 25-30.251(1), Florida Administrative Code (F.A.C.), utilities are required to maintain records of all interruptions affecting 10 percent or more of customers.

Additionally, Rule 25-30.251(2), F.A.C., requires utilities to notify the Commission of any such interruptions. Please provide a list of all interruptions in service between January 1, 2020 and December 2025. As part of your response, provide the following information for each interruption:

a. The number and percentage of customers impacted by the interruption.

SUN’s response to this request is inaccurate. The list provided does not include all water interruptions for 2020-2025 as Staff requested. In fact, there were 15 breaks in 2025; this list documents 10 breaks. There were 29 breaks in 2024; this list documents 17. Nothing is listed for 2020.

b. The time and date of the interruption.

Time of the interruption is not listed as requested.

c. The duration of the interruption.

Duration of the interruption is not listed as requested.

d. The cause of the interruption.

Cause of the interruption is not listed as requested.

e. The date a boil water notice was issued and the date for when it was rescinded, if applicable.

Dates boil water notices issued and rescinded is grossly incomplete.

- Many dates missing (ex: 29 breaks in 2024 – only 17 boil water notices issued)
- Date boil water notice rescinded is not documented.
- Duration of interruption is not noted

In addition, clarity is needed as to why under the column “Community Impacted”, the majority of breaks is listed as 0%, yet many impacted the entire community.

It should also be noted that frequently the “boil water” notice is issued 24-48 hours AFTER the break. A recent example is a water break on Saturday, June 20, 2026 and the boil water notice communication was not issued until Monday, June 22, 2026. This results in residents being unaware and using water without pre-treatment and possibly exposing themselves to harmful water quality.

If the percentage of customers was greater than 10 percent, provide the following additional information as required by Rule 25-30.251, F.A.C.:

f. The remedy of the interruption.

g. What step(s), if any, were taken to prevent recurrence of the interruption.

h. Whether the Utility notified the Commission. If not, explain why not.

Response: See attached spreadsheet titled “BWN Master Log”. Any interruptions are addressed promptly by identifying the source of the outage—typically a water line break or system maintenance activity—and completing the necessary repairs.

Once repairs were finalized, the system was flushed, pressure was restored, and bacteriological sampling was conducted in accordance with Florida Department of Environmental Protection (FDEP) requirements. A precautionary boil water notice remained in effect until laboratory results confirmed that water quality met all applicable safety standards, at which time the notice was rescinded.

Following each event, the Utility evaluated the cause of the interruption and implemented corrective measures where appropriate. These measures may include repair or replacement of aging infrastructure, tightening or reinforcing fittings, and coordination with licensed contractors to ensure proper installation and system integrity. The Utility also continues routine monitoring and maintenance of the distribution system to identify potential vulnerabilities and reduce the likelihood of future service disruptions.

The Utility did not notify the Commission of each individual interruption. These events were localized and temporary in nature and were addressed in accordance with applicable health and safety protocols, including the issuance of precautionary boil water notices to affected residents. We have established protocol to notify the Commission of any outage that impacts 10% or more of the community.

2. Line Breaks: Please explain whether the Utility has considered replacing some or all of the water distribution system to address line breaks and/or excessive unaccounted for water. If so, explain what action(s) were taken to explore the possibility and the resulting Utility decision(s) regarding it. If not, explain why not. As part of your response, if cost estimates were developed, please provide those and explain the methodology with which they were developed.

Response: At this time, the Utility has determined that full system replacement is not warranted based on the nature and frequency of the observed events. The majority of interruptions reflected in the record are the result of isolated distribution line failures or localized maintenance activities, rather than systemic deterioration or widespread infrastructure failure. As such, the Utility has focused on a targeted repair and maintenance approach rather than wholesale replacement. Again, 29 water breaks in one year, at varying locations throughout the community is highly indicative of systemic deterioration and not isolated line failures as SUN describes above.

3. Meter Tests: Rules 25-30.265, 25-30.266, and 25-30.267, F.A.C., relate to meter tests. Specifically, the rules relate to the utility's testing intervals, how customers can request a test, and the utility's records of such requests.

a. For each meter size utilized by the Utility, provide the date of inspection and testing of its water meters, the size of the representative sample used, and the computed accuracy before and after any repair conducted as a result of the testing.

Response: The Utility utilizes standard residential meter sizes typical for manufactured housing communities. Meter inspection and testing are performed on an as-needed basis, such as when accuracy concerns, maintenance issues, or a need for replacements arise. During the test year, the Utility did not conduct a formal, system-wide meter testing program; therefore, no representative sample size or computed accuracy results before and after repair are available.

b. Please provide the number of customer requests for meter testing the Utility received annually for each year 2020 through 2025.

Response: The Utility received one (1) customer request for meter testing during the period of October 2021 through May 2026. There were no customer requests for meter testing received in calendar years 2020 or 2021 prior to October.

In response to the single request received, the Utility conducted an on-site verification by performing a 10-gallon usage test at the resident's home. The test confirmed that the meter accurately registered 10 gallons of water usage, indicating proper meter functionality.

A summary by year is as follows:

2020: 0 requests

2021: 1 request (October)

2022: 0 requests

2023: 0 requests

2024: 0 requests

2025: 0 requests

The requests for meter testing for the years stated above is highly inaccurate. It is glaringly obvious that although numerous requests are made throughout each year, they are NOT being officially reported or recorded. In fact, a process for submitting and responding to complaints or other community-related issues is not documented anywhere, including SUN's prospectus. Nor is there a number to contact the Utility on their monthly postcard invoice, thus residents report issues to the main office. What happens after that is unknown as communications, in general, is poor.

4. Communications: For the following questions, please refer to the virtual customer meeting conducted by the Commission on May 15, 2026.

a. Did the Utility reach out to each customer that provided comments at the customer meeting? If so, when was contact made, and how were the customer's concerns addressed? If no, please explain why.

Response: The Utility did not reach out individually to each customer who provided comments at the customer meeting. Many of the concerns raised were general in nature (e.g., affordability or fixed-income considerations) and were not specific to individual service issues.

Although many comments at the customer meeting were "general in nature", there were several that were specific to individual service issues or general operational issues that were not addressed. Again, SUN's communication to residents is substandard.

b. Please explain the Utility's procedures for receiving and responding to emergency calls pursuant to Rule 25-30.355, F.A.C.

Response: The Utility maintains procedures to receive and respond to emergency calls in accordance with Rule 25-30.355, F.A.C. Emergency calls are received through the community's main office phone line, which is monitored during business hours and forwarded to designated on-call personnel after hours. Upon receipt of an emergency call, the on-call staff member assesses the situation and dispatches appropriate personnel or contractors promptly to address the issue.

SUN's response to emergency reporting is accurate, they fail to mention that if the break occurs during off-hours or weekends, the boil water notice is issued hours/days after water has been restored. Their delay in providing residents with timely notification reflects on SUN's indifference to potentially unsafe water quality. Would THEY want to know in a timely manner, if it happened in their communities?

5. Golf Course: Regarding the golf course within the Utility's service territory, please provide the following information:

a. The specific well used in golf course maintenance and its production during the test year.

Response: The well used for golf course maintenance is identified as DID 34253 (Well D) and DID 9370 (Well B). During the test year, DID 34253 (Well D) and DID 9370 (Well B) were dedicated to supporting golf course operations.

3b. Whether regulated Utility assets or personnel are used to support those operations.

Response: No regulated utility assets are used to support nonregulated operations. The utility does not own or maintain separate assets. Personnel supporting utility functions are community team members, and only the portion of their time attributable to regulated utility activities is allocated to the utility.

c. How associated costs are allocated between regulated and nonregulated activities.

Response: Costs are allocated between regulated and nonregulated activities based on a clear separation of services. Expenses directly attributable to water and sewer utility operations are assigned to those functions, while costs related to nonregulated activities (e.g., home sales, rentals, or amenities) are separately tracked and not included in the regulated cost structure.

d. Whether any associated costs in connection with the golf course are distributed, directly or indirectly, among the ratepayers.

Response: No, there are no costs associated with the golf course that are distributed, either directly or indirectly, among the ratepayers.

Of interest: Please see the excerpt taken from the Building & Grounds meeting of September 30, 2024.

“Question: Is anything being done to improve the water lines at Sunlake?”

“Answer: We spoke about our concerns at the July meeting with SUN reps. Our water lines have been flagged by Corporate due to the high costs of repair. It is possible that they will be replaced, throughout the park, in 2026. Water lines will be replaced section by section. However, in order to do this, residents will be displaced while their section of the Park is being done for at least one week.”