

Nickalus Holmes

From: Nickalus Holmes on behalf of Records Clerk
Sent: Friday, June 26, 2026 1:58 PM
To: jujo13@yahoo.com
Cc: Consumer Contact
Subject: FW: Docket No. 20250108-WS – Additional Comments
Attachments: Additional_Comments_Docket_20250108-WS.pdf

Good afternoon

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,
Nick Holmes
Commission Deputy Clerk II
Office of Commission Clerk
Florida Public Service Commission
850-413-6770

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From: JJ <jujo13@yahoo.com>
Sent: Friday, June 26, 2026 1:26 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: Docket No. 20250108-WS – Additional Comments

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Dear Commission Clerk,

Please file the attached comments in **Docket No. 20250108-WS** regarding Sunlake Estates Utilities, L.L.C.'s application for a water rate increase.

I respectfully request that this document be filed in the correspondence section of the docket and considered by the Commission and its Staff during the review of the Utility's application for a water rate increase.

Thank you for your consideration.

Sincerely,

Judith Jones

Sunlake Estates Resident

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ADDITIONAL COMMENTS ON THE UTILITY'S RESPONSE TO STAFF'S SIXTH DATA REQUEST

Docket No. 20250108-WS

Sunlake Estates Utilities, L.L.C.

I have reviewed the Utility's Response to Staff's Sixth Data Request and respectfully submit the following comments for the Commission's consideration.

Response to Item 1 – Service Interruptions

The Utility's response appears incomplete and does not fully answer the information specifically requested by Staff.

The list provided does not appear to include all known water line breaks during the period requested. Residents are aware of approximately **29 water line breaks during 2024**, yet the Utility's response documents only **17**. Similarly, approximately **15 breaks occurred during 2025**, while only **10** are listed. In addition, no service interruptions are documented for **2020**.

The response also omits information specifically requested by Staff, including:

- the number and percentage of customers affected by each interruption;
- the time and date of each interruption;
- the duration of each interruption;
- the cause of each interruption; and
- the dates precautionary boil water notices were rescinded.

Without this information, it is not possible to determine whether the Utility complied with **Rule 25-30.251, F.A.C.**, including whether any interruption affected more than 10 percent of customers and therefore required notification to the Commission.

The Utility states that it did not notify the Commission of each interruption because the events were localized and affected fewer than 10 percent of customers. However, because the response does not consistently identify either the number or percentage of customers affected by each interruption, this assertion cannot be independently verified.

There also appears to be inconsistency within the Utility's own records. Under the "Community Impacted" column, many interruptions are recorded as affecting **0%**, despite residents knowing that numerous line breaks affected large areas of the community.

Rather than providing all of the specific records requested by Staff, the Utility also provides a general description of its normal repair procedures. While this information

may be helpful, it does not substitute for the requested records relating to individual service interruptions between 2020 and 2025.

Boil Water Notices

Residents have also experienced delays between water line repairs and notification that a precautionary boil water notice has been issued.

A recent example occurred following a water line break on **20 June 2026**, when residents were not notified of the precautionary boil water notice until **22 June 2026**. During this period, residents may have continued using tap water without knowing that a precautionary notice had been issued.

Timely notification is an important public health measure. Delays in issuing precautionary boil water notices warrant careful review.

Response to Item 2 – Line Breaks

The Utility states that full replacement of the water distribution system is not warranted because the interruptions represent isolated distribution line failures rather than systemic deterioration.

This conclusion appears inconsistent with the frequency and distribution of line breaks throughout the community.

Approximately **29 water line breaks during 2024**, occurring at varying locations throughout the community, together with numerous additional breaks during 2025, suggest a broader infrastructure issue rather than isolated failures.

The Utility's current position also appears inconsistent with information previously provided to residents.

Minutes of the Building & Grounds Committee meeting of **30 September 2024** record that:

"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."

If Corporate had already identified the water distribution system for possible replacement because of escalating repair costs, it is difficult to reconcile that position with the Utility's current assertion that wholesale replacement is not warranted because the failures are merely isolated events.

Further clarification from the Utility would be helpful.

Response to Item 3 – Meter Tests

The Utility acknowledges that it does not conduct a formal system-wide meter testing programme.

Given that the Utility is requesting a substantial increase in customer rates, the absence of routine meter testing raises legitimate concerns regarding the ongoing accuracy of customer billing and consumption records.

The Utility also reports receiving only one customer request for meter testing between October 2021 and May 2026.

This appears inconsistent with the number of residents who have questioned unusually high water bills over recent years. While individual residents may not have submitted formal meter test requests, numerous concerns have been communicated to the community office regarding unexpectedly high consumption.

This raises questions as to whether customer concerns are being formally documented and recorded.

Response to Item 4 – Communications

The Utility confirms that it did not contact individual residents following the Commission's customer meeting because many comments were considered "general in nature."

However, several residents raised concerns relating to specific operational issues, including water quality, line breaks, billing concerns and customer communications.

The responses also suggest there is no documented process for recording, tracking and resolving customer complaints or service requests.

Residents generally report utility concerns through the community office. However, there appears to be no documented system showing how complaints are recorded, investigated, resolved or retained.

Without complete complaint records, neither Staff nor the Commission can independently assess the extent or frequency of customer concerns regarding utility operations.

Although the Utility accurately describes its emergency call procedures, the response does not acknowledge the delays residents have experienced in receiving precautionary boil water notices after repairs have been completed.

Again, timely communication is essential where public health may be affected.

Response to Item 5 – Golf Course

I have no additional comments regarding the Utility's responses to Item 5.

Overall Comments

In several instances, the Utility's responses do not fully address the specific information requested by Staff. Instead, the Utility provides general descriptions of its practices while omitting requested factual information or supporting documentation.

As the applicant seeking a significant increase in regulated utility rates, the Utility bears the responsibility of providing complete, accurate and verifiable information to support its application.

Where requested operational records are incomplete or unavailable, it becomes difficult for Staff and the Commission to independently verify the Utility's assertions or determine whether regulatory requirements have been met.

I respectfully request that the Commission carefully consider whether the Utility's responses fully satisfy Staff's requests before relying upon them in evaluating the requested rate increase.

Thank you for your consideration of these comments.

Judith Jones

Resident, Sunlake Estates