CORRESPONDENCE
7/13/2026
DOCUMENT NO. 04188-2026

Tristan Davis

From: Tristan Davis on behalf of Records Clerk
Sent: Monday, July 13, 2026 8:09 AM
To: treengreg@aol.com
Cc: Consumer Contact
Subject: RE: Comments regarding Docket No. 20250122-WS, Sun Communities Acquisitions, LLC

Good Morning,

We will be placing your comments below in consumer correspondence in Docket No. 20250122, and forwarding them to the Office of Consumer Assistance.

Thank you!

Tristan Davis
Commission Deputy Clerk I
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
Phone: (850) 413-6121

From: treengreg@aol.com <treengreg@aol.com>
Sent: Friday, July 10, 2026 5:50 PM
To: Records Clerk <CLERK@PSC.STATE.FL.US>
Subject: Comments regarding Docket No. 20250122-WS, Sun Communities Acquisitions, LLC

Attached (as an MS Word document) are my comments regarding the subject docket scheduled for 16 July 2026.

Since the instructions did not indicate whether the body of the email should include the comments,
I am including a copy as a part of this email.

Kenneth G. Frazier, 419 Spoonbill Dr, Sebring FL
treengreg@aol.com
770-330-5027

Docket No. 20250122-WS

Application for SARC in Highlands County by Sun Communities

Acquisitions LLC d/b/a Buttonwood Bay Utilities

Comments Submitted By: Kenneth G. Frazier 11 July 2026
419 Spoonbill Dr, Sebring FL

Background

Buttonwood Bay is a community consisting of 423 Mobile Home sites (designated as a 55 plus community) and an RV park containing 533 sites. Many of the RV sites are also occupied by permanent owners who have installed single-wide RV's as residences.

The park provides a clubhouse, community center, 2 swimming pools, 2 comfort stations, a laundromat, and numerous other recreations facilities. Water and sewer services are also provided by the owner as required by the Property Prospectus. The 423 Mobile Home sites have metered water service. The RV sites do not have meters and are charged a flat rate. These sites (Mobile Home lots and RV lots) are charged for water and sewer and provide the only income to offset costs.

Other community facilities (2 swimming pools, site office, the Community Center and Rec Hall, laundromat and 2 convenience stations (showers, toilets etc. for campers)) also use water. I do not know if these facilities are charged for water/sewer usage and no data on usage is provided.

The prospectus contains numerous definitions and provisions that clearly indicate the property owner may recoup increased costs for operation, maintenance and improvements (including utilities) by lot fee rental increases. The fees for MH sites have increased substantially over the years; increasing from $3900/year in 2006 to $9300 for 2016; and continue to rise each year. Presumably some of these increases should have been used to pay for improvements and increased cost of maintenance, etc.

Mobile Homeowners are required to maintain their lawns to a high standard which requires substantial watering (estimated to be more than 75% of the total water used each month). This fact is not considered when assessing sewer costs.

Discussion of Rate increase:

The Buttonwood Bay utilities has requested substantial rate increases to recover pro forma capital projects and expenses - $201,098 for year 2025.

The cause of reported losses totaling $201,098 for the year 2025 is not provided but presumably includes the cost of equipment upgrades and system improvements. This is the year that the numerous ongoing problems with the system were remedied (water that stained clothing and household fixtures, persistent odors, damage to pipes and plumbing systems, overall poor water quality, and frequent outages).

It is not clear that the reported losses will occur in future years, since normal operation and maintenance have not substantially increased, and in fact should be mitigated by the improvements. Future years costs should not include such costs for new equipment and upgrades and should return to near "normal" levels.

The proposed rate increase will result in an annual increase of approximately $240,000 (see discussion below). If approved the Utility will recoup substantially more in one year than the reported loss.

Why should a rate increase be granted to recover a loss that will not be ongoing? Also, why should the MH owners bear a substantial responsibility for recovery when the onsite facilities consume a substantial portion of the water at no cost?

Conclusions:

I believe the rate increase should be denied on the basis that approval will result in substantially more income than the reported loss.

Further, I believe that the losses may have already been covered by the continued lot fee increases as permitted by the Prospectus

If the water authority agrees to reconsider this request, I believe that a better accounting of the source of losses should be submitted; a clear case should be made for an ongoing rate increase based on expected operation and maintenance costs; and that the costs should be shared by the onsite facilities in proportion to the amount of water used by such facilities.

Current rental lot fees average $777/month for Mobile home sites and $534 for RV sites. This results in an annual revenue of approximately $7,200,000. The reported losses represent 2.7% of one year's income. While the Buttonwood Bay Utility is not Sun Communities LLC, it is a closely related entity and as such should be considered in the decision.

Discussion of Current and Proposed costs for Water/Sewer

a. **Current cost** - Each RV lot is charged a fixed water and sewer fee since the service is unmetered (currently approximately $21.73/month). Each MH lot is charged a water/sewer fee based on usage (currently approximately $31.42 for 5000 gal). This results in monthly total charges for water /sewer of $24,872 or $298,473 per year.

b. **Cost with Proposed new charges -** The proposed new rates would increase the average monthly costs to $39.00 for RV sites and $56.97 for MH sites using 5000 gal. This results in monthly total charges for water/sewer of $44,885 or $538,624 per year.

c. **Amount of increase** - This is an increase of **$240,000 per year**.

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The proposed rate increase will result in an annual increase of approximately $240,000 (see discussion below). If approved the Utility will recoup substantially more in one year than the reported loss.

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