Nickalus Holmes

From: noreply@psc.state.fl.us
Sent: Monday, July 13, 2026 01:35 PM
To: debbiedestro@gmail.com
CC: Consumer Contact
Subject: Docket Number - 20250122-WS

Good Afternoon, Debra Destro,

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

Sincerely,

Nickalus Holmes
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
850-413-6770

PLEASE NOTE: Florida has a very broad public record law. Most written communications to or from state officials regarding state business are considered to be public records and will be made available to the public and the media upon request. Therefore, your comments may be subject to public disclosure.

From: debbiedestro@gmail.com
Sent: Monday, July 13, 2026 01:33 PM
To: Florida Public Service Commission
Subject: Docket Number - 20250122-WS

Description:
Customer Comment Id: 228
Are you a customer of Sun Communities Acquisitions, LLC d/b/a Buttonwood Bay Utilities: Y
Name: Debra Destro
Phone: 3308085011
Email: debbiedestro@gmail.com

Address: 421 Buttonwood Dr, Sebring, Highlands, FL 33875
Submit Date: Monday, July 13, 2026 01:33 PM

Comment: Docket No. 2025122-WS, Sun Communities Acquisitions, LLC d/b/a/ Buttonwood Bay Utilities

Debra J Destro
421 Buttonwood Dr. Sebring, FL 33875

I oppose the proposed rate increase and new tiered rate structure recommended by the Florida Public Utilities Commission.

Sun Communities Acquisitions, LLC d/b/a/ Buttonwood Bay Utilities is a wholly owned subsidiary of Sun Communities, Inc. (Reference Sun Communities, Inc annual reports for years 2003 through 2025.)
Sun Communities, Inc 2024 annual report shows total revenue of $3.221 billion and net income of $89.0 million. These numbers are important when considering a rate increase and new rate structure for the water/wastewater rates for Buttonwood Bay Utilities.

My comments are based on Document 03756-2026, Filed 6/24/2026.

Issue 3 – EUW (Excessive Unaccounted for Water) - Utility (BWB) is at 29.4% of EUW. There are unaccounted residents that are using water/wastewater and not billed with a water/wastewater bill. The use of the water/wastewater by these residents is considered paid by their rent. Document 03735-2026 filed on 6/24/2026, Issue #10 states there are 858 residential customers using water/wastewater however the actual number of residential customers with water/wastewater service is 959. This number is stated in the Buttonwood Bay Mobile Home Park Prospectus "PA" (Division File Number PRMZ001166-PA) Latest revision dated: October 6, 2010, Item III, Section C (shared facilities), Number 2. This difference of 101 residential customers is not accounted for in any calculations of water/wastewater usage or revenues. There are also other community facilities such as 2 swimming pools, site office, Community Center, Recreation Hall, laundromat, 2 Comfort Stations with shower facilities and common area irrigation systems that are not part of the billed water/wastewater usage.

Issue 4 – Pro Forma Plan Additions – Table 4-1 Pro Forma Projects shows a capital projects expenditure of $481,523. These projects considered by Staff to justify the rate increases are not reflective of the revenue that the Utility should be receiving from the parent company, Sun Communities, Inc. Sun Communities Acquisitions, LLC d/b/a/ Buttonwood Bay Utilities is a wholly owned subsidiary of Sun Communities, Inc. The parent company uses the cost of providing water/wastewater and capital improvements in determining the rent charged to customers. This list of determining factors is listed in the Buttonwood Bay Mobile Home Park Prospectus "PA" (Division File Number PRMZ001166-PA) Latest revision dated: October 6, 2010, Item VIII, Section E, Number 4 (Lot Rent Annual Increases), letter b, items 1, 2, 5, 9 e, f, and i. The Staff recommendation for rate increase is based on income and loss reported by Buttonwood Bay Utilities. The income does not consider the amounts included in monthly rents collected by Sun Communities, Inc. Neither does the Staff recommendation consider amounts collected in rent for the 101 residential customers using water/wastewater. These customers are RV sites that have leases of less than 6 months. Their water/wastewater usage is part of their rents paid to Sun Communities. A portion of the rent paid that is allocated to water/wastewater to Sun Communities, Inc should be recognized and reported by the Utility in the calculations of income used by staff.

Issue 5 and Issue 9 – The rate increase recommended by Staff to achieve an 8.51% return on investment (ROI) and appropriate revenue for Buttonwood Bay is based on flawed numbers. Sun Communities, Inc. has rental lease agreements with the customers of Sun Communities Acquisitions, LLC d/b/a/ Buttonwood Bay Utilities. Not all customers are billed separately for water/wastewater. The 101 residential customers, reference in Issue 3 above, pay for their water/wastewater usage through these rental lease agreements with Sun Communities, Inc. In addition, Sun Communities, Inc owns other community facilities within Buttonwood Bay such as 2 swimming pools, site office, Community Center, Recreation Hall, laundromat, and 2 Comfort Stations with shower facilities, all of which have water/wastewater usage that the Utility does not bill separately for water/wastewater usage. If revenue was either allocated or paid from Sun Communities Inc. to Buttonwood Bay Utilities, the appropriate revenue requirement adjustment to achieve an 8.51% ROI would be much lower.

Issue 6 – It is stated that the Utility did not record any miscellaneous revenues during the test year. Although the Staff review made minor adjustments for inaccuracies in the Utility's billing, it did not consider revenue that should have been considered from rental lease agreements with Sun Communities, Inc. Please see items discussed in Issues 3, 4 and 5.

Issue 10 – The appropriate rate structure and rates recommended by Staff are based on flawed numbers. Staff calculated average residential water demand of 858 residential customers. However, the Utility provides water/wastewater service to 959 customers as determined by the ”PA”. The increase of 101 residential customers would lower the average gallons per customer calculated. In addition, if the EUW was applied to the community facilities then an allocated revenue from Sun Communities, Inc. would affect the appropriate rate structure and rates recommended by Staff.
Staff is recommending a base facility charge and a three-tier inclining block rate structure to conserve water/wastewater usage by customers. However, customers are required by Sun Communities, Inc. rental lease agreement to maintain fully sodded lawn and shrubbery consistent with standards of the neighborhood, including irrigation of lawns and shrubbery … in accordance with the requirements of the park owner. Reference "PA" Item VI, number 6. Due to irrigation requirements, the recommended pricing structure will not have the desired effect on customer consumption of water/wastewater.

In conclusion, the customers of the Utility are in essence paying twice for the operations and capital improvements to the water/wastewater system. Once through rent payments to Sun and again through water/wastewater bills to the Utility. If the Utility recognized revenue from the parent company Sun Communities for the portion of rent that includes the payment for water/wastewater operations and capital improvements, there would not be a loss by the

Utility. The proposed rate increase and new tiered rate structure should be reevaluated.
Thank you.