Nickalus Holmes

From: noreply@psc.state.fl.us
Sent: Monday, July 13, 2026 02:31 PM
To: Joedestro5639@gmail.com
CC: Consumer Contact
Subject: Docket Number - 20250122-WS

Good Afternoon, JOSEPH 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: Joedestro5639@gmail.com
Sent: Monday, July 13, 2026 02:12 PM
To: Florida Public Service Commission
Subject: Docket Number - 20250122-WS

Description:
Customer Comment Id: 230
Are you a customer of Sun Communities Acquisitions, LLC d/b/a Buttonwood Bay Utilities: Y
Name: JOSEPH DESTRO
Phone: 4405675428
Email: Joedestro5639@gmail.com

Address: 421 Buttonwood Dr, Sebring, Highlands, FL 33875
Submit Date: Monday, July 13, 2026 02:12 PM

Comment: I oppose the proposed rate increase and new tiered rate structure recommended by the Florida Public Utilities Commission Docket No 2025122-WS for the following reasons.
Sun Communities Acquisition LLC d/b/a Buttonwood Bay Utilities, hereafter known as Utility, is a wholly owned subsidiary of Sun Communities INC., hereafter known as Sun, which is a publicly traded real estate investment trust. Since 2003, Sun has filed public annual reports and form 10K with the Securities and Exchange Commission which included the subsidiary Utility.
On September 30, 1986, the "PA" Prospectus for Buttonwood Bay Mobile Home Park received its original approval, Division File Number PRMZ001166-PA. The latest revision of the document was filed on October 6, 2010. The final integrated approved copy was assembled November 4, 2011. Hereafter referred to as PA. All residents of the Sun, Buttonwood Bay Mobile Home and RV Park pay lot rental fees to Sun. Per the PA, these rents are based on expenses Sun incurs in providing and maintaining the common areas used by the residents.
PA Section VIII, this section which is titled (Increases in Rent and other Charges) clearly states all the reasons Sun can use to raise rents. Subsection E (General) item 4 (Lot Rent Amount - Increases) states the factors used in rental rate increases. Item b (Factors Affecting Increases) lists the specific expenses Sun used in determining its rental rate increases. The first two items listed are 1) Water rates 2) Sewer rates. This clearly indicates that Sun has expenses related to these two categories that it is required to pay.
The following Issues reference Document 03735-2026 filed 6/24/2026.
Issues 5 and 9 suggest that Utility should achieve an 8.51% return on investment (ROI). The income reported by the Utility and used by staff to achieve the recommended ROI is based on flawed numbers. Sun has rental lease agreements with all the customers of Utility, but not all residents of Sun are billed separately for water/wastewater. Utility reports income from billings to 858 residents. The PA identifies 959 residential and RV lots. The 101 residential customers, not receiving monthly bills, pay for their water/wastewater usage through their rental lease agreements with Sun. In addition, Sun owns and operates community facilities 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 from which the Utility does not recognize any revenue contribution. If revenue was allocated from Sun to Utility, 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.
Issue 10 – The appropriate rate structure and rates recommended by Staff are based on flawed numbers. Staff calculated average residential water demand based on 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.
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: If the Utility recognized revenue from the parent company Sun for the portion of rent that should be allocated to 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.

If the Utility is going to be treated as a stand-alone separate entity from its parent company for the purpose of determining the proposed rate increase, the Utility should not be allowed to provide services to the parent company at no charge. If the Utility is not billing the parent company for its water/wastewater usage, this shows the Utility and Sun are not operating as separate entities but as one entity and the profits of the parent company should also be considered in the final determination of the rate structure.

Not only is it the responsibility of the Florida Public Utilities Commission to recommend a reasonable rate for the Utility, it is also their responsibility to protect the residents of Florida from companies that would use deceptive accounting practices for the sole purpose of improving their profit margins.

Thank You