

July 15, 2026

VIA ELECTRONIC FILING

Adam Teitzman, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 20250122-WS – Application for staff-assisted rate case in Highlands County by Sun Communities Acquisitions, LLC d/b/a Buttonwood Bay Utilities.

Dear Mr. Teitzman:

On behalf of Buttonwood Bay Utilities (“Utility”), this letter is the response to Staff’s Sixth Data Request dated June 26, 2026.

1. Wastewater. Please refer to your most recent wastewater facility permit approved by the DEP, Permit No. FLA014348-018-DW3P, and the associated Administrative Order (AO) AO-014348-018-SD, issued by the DEP.

(a) Please explain why the Utility was unable to provide reasonable assurance that the wastewater facility discharges would meet the requirements of Final Order 20-0065 associated with nitrogen and phosphorus limits prior to receiving its permit.

Response: In accordance with the Administrative Order AO-014348-018-SD, step B determined that the facility will not be able to meet the revised TN levels without upgrades. Kimley Horn is currently under contract to design the required upgrades, and the intent is to have the upgrades operational by the March 1, 2027 deadline (subject to permitting).

(b) Please refer to the list of actions identified on page 2 of the AO and specify if each has been met to the DEP’s satisfaction. If not, explain why not.

Response:

Item a. The effluent sampling has been completed as required.

Item b. A licensed engineer has been obtained as required

Item c. N/A – This as report was not complete as the effluent shows the Utility will not meet the criteria as described above.

Item d. This action is in process and being conducted through the Utility's third-party engineering firm, Kimley Horn, and is anticipated to be completed by 7/16/2026.

Item e. It is anticipated the Utility will meet the 3/1/2027 deadline as described above.

(c) Please specify what future action(s) are necessary for compliance with the AO, and whether they require any additional expenses or investments to meet the discharge limitations.

Response: The design and engineering actions are underway as noted above. Costs are estimated to be approximately \$250,000.

2. Water. Please refer to the May 20, 2024, Compliance Assistance Offer Letter from the DEP regarding exceedances for the secondary standard of color. Please explain what action(s) the Company took in response. As part of your response, identify each date the required quarterly testing was performed and the issue resolved.

Response: Color samples were pulled on the following dates:

5/23/2024

8/15/2024

11/18/2024

1/8/2025

It was determined that the Zeolite media needed to be replaced. During the time frame of 6/7/2024 - 9/23/2024, the Utility's third-party operations company adjusted facility operations to meet the color requirements. The facility is now operating within compliance. The issue was resolved during the week of 9/23/2024.

3. Water. Please refer to the customer complaints referenced in the September 18, 2024, letter from the DEP. Please explain how each of the complaints were resolved and provide supporting documentation.

Response: The residential complaints were anonymous, so no specific customer contact was made. To address the issue forming the basis for the complaint, the Zeolite media was replaced, additional color testing occurred, and the issue was resolved as described above.

A final response was sent to FDEP on 10-17-2024.

4. Please refer to your application and responses to staff's prior data requests regarding the Utility's requested pro forma projects. If you are seeking additional pro forma plant expenses, provide the following information for each pro forma project:

(a) Description of the project. As part of this response, identify the location(s) associated with it.

(b) Identify the in-service date of the project and state whether it is actual or estimated.

(c) Explain why the project is needed. For example, specify if it addresses deferred maintenance, safety, compliance, reliability, or water quality concerns and how it does so.

(d) Explain if the project is required by a regulatory authority. If so, identify that authority and what mandates the project.

- (e) Identify the number of bids requested and received for the project. If less than three bids were requested and/or received, explain why. Provide copies of the bid(s) as part of this response.
- (f) Identify the selected bid and if it was the least cost bid. If not, explain why not.
- (g) Provide the amount sought for the project by NARUC account by year. If these do not match the bids or if the project costs are estimated, please explain how the project costs were determined. If actual costs, provide the invoice(s) and, if applicable, explain any differences from the bids.

Response: Please see attached spreadsheet.

5. Reference is made to the following pro forma projects requested by the Utility:

- 1. New Control Room
- 2. New Generator
- 3. High Service Pump
- 4. Electrical Upgrades
- 5. New Filter Media.

Please provide a detailed description, justification, in-service date, and NARUC account number for each pro forma project aforementioned. In addition, please provide supporting documentation for cost estimates such as bids, invoices or other information for each project.

Response: Please see attached spreadsheet.

6. Excessive Unaccounted for Water (EUW) for the water treatment plant based on data provided by the Utility is 19.40% What is the Utility doing or intends to do to mitigate this EUW?

Response: The Utility expects to perform regular water meter audit, undertake the replacement of meters that are not working based on audit results and other information available, and conduct additional assessments to ensure that all use of water is metered and reconciled in a manner where that the main use ties out to the meters to the extent such reconciliation is feasible. The Utility also anticipates performing bench tests and evaluating and enhancing its leak detection capabilities to minimize the amount of water lost.

7. Reference the pro forma (O&M) cost for Hurricane Milton submitted by the Utility in this docket. Please provide a detailed breakdown of the storm recovery cost.

Response: Please see the attached invoice.

Sincerely,
/s/ Daniel J. McGinn

DJM:

cc: Greg Davis (GDavis@psc.state.fl.us)
discovery-gcl@psc.state.fl.us (via email)

	Describe the project. As part of this response, identify the location(s) associated with it.	Identify the in-service date of the project and state whether it is actual or estimated.	Explain why the project is needed. For example, specify if it addresses deferred maintenance, safety, compliance, reliability, or water quality concerns and how it does so.	Explain if the project is required by a regulatory authority. If so, identify that authority and what mandates the project.	Identify the number of bids requested and received for the project. If less than three bids were requested and/or received, please explain why. Provide copies of the bid(s) as part of this response.	Identify the selected bid and if it was the least cost bid. If not, explain why not.	NARUC Account Number.	Provide the amount sought for the project by NARUC account by year. If these do not match the bids or if the project costs are estimated, please explain how the project costs were determined.
New Control Room	Water Treatment Facility	Estimated 11/20/2025	safety compliance, old building was leaking trussed were rotting and floor was starting to collapse where high service pumps were located.	Not required	requested bids from 4 vendors and only got 1 bid in return.	ullrich water services	304.3	\$61,406.72
New Generator	Water Treatment Facility	Estimated project moved to 2027	Current generator is starting to be aged and fuel tank is failing.	No required	still gathering bids.		310.3	\$300k, estimated from cost to install generators at other plants in company.
High Service Pump	Water Treatment Facility	Estimated 10/1/2026	current HSP is failing.	Not required	still gathering bids.		311.3	\$13k estimated from previous high service pump work.
Electrical Upgrades	Water Treatment Facility	Project no longer needed.	Electrical upgrades not needed at WTP	Not required	N/A		320.3	N/A
New Filter Media.	Water Treatment Facility	Estimated to be moved to 2027	Water treatment falls out of compliance when media in filters starts to fail.	Not Required	still gathering bids.		320.3	\$90k Estimated from previous time work was completed at plant.
TN & TP upgrades to WWTF	Wastewater treatment Facility	Estimated 3/1/2027	Regulatory compliance for A.O-014348-018-SD	Florida Department of Environmental Protection South District. AO-014348-018-SD	Project is in design and permitting	N/A	380.4	\$250K, estimated cost from engineer, designing plant upgrade.



4939 CROSS BAYOU BOULEVARD
NEW PORT RICHEY, FL 34652

INVOICE

Page: 1

Invoice Number: SI110898
Invoice Date: 1/24/2025
Due Date: 2/28/2025

Bill To: Sun Communities, Inc.
10001 US 27 South
Sebring, FL 33870

All pricing anticipates payment by check or ACH. Due to additional cost incurred, services paid by credit card will require an additional 5% processing fee.

Job Number: J01905
Job Description: Buttonwood Bay

Customer ID: C00671
P.O. Number:
WA:

Date	Item/Description	Task Number	Qty.	Unit	Unit Price	Total Price
10/11/2024	Maintenance Technician	2160	57.5	HR(S)	92.58	5,323.35
10/11/2024	Pump out 10/10/24 17,500 gallons 10/11/24 35,000 gallons	2160	1	LF	7,218.75	7,218.75

Hurricane Milton, which affected Highlands County, a job number was created to prepare Buttonwood Bay for the storm. Days before the hurricane struck, US Water Tech visited each lift station and treatment plant to ensure that the generators were operational and that there was no loose debris that could be picked up by the storm. They also verified that all lift stations were functioning properly and ready for the impending weather.

Once the storm hit and immediately after it passed, US Water Tech was dispatched to assess each lift station and treatment plant. There was a power outage at the park, so US Water Tech ensured that the treatment plants had fully operational generators. They assisted in pumping down the collection system to prevent wastewater spills or sewer backups inside houses until power was restored in the community. As soon as power was restored to the park, US Water Tech ensured that each treatment plant and lift station returned to normal operations.

[Click to Pay](#)

[Click Here to Pay](#)

Phone: (727) 848-8292 Ext. 219
Toll Free: (866) 753-8292 Ext. 219
Email: ar@uswatercorp.net

Subtotal:	12,542.10
Total Sales Tax:	0.00
Total USD:	12,542.10
Adjustments:	0.00
Amount Due:	12,542.10