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STATE OF FLORIDA



DIVISION OF ENGINEERING
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Public Service Commission

November 24, 2025

Mr. Daniel J. McGinn
Special Counsel
Jones Law Firm
106 East College Avenue, Suite 1200
Tallahassee, FL 32301
dmcginn@joneswalker.com

STAFF'S FIRST DATA REQUEST VIA EMAIL

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. McGinn:

For the engineering portion of this rate case for Buttonwood Bay Utilities (Buttonwood or Utility), staff requires several items to ensure fast and expedient treatment of your rate case. Please submit the following information for the period of January 1, 2024, to December 31, 2024, (test year) unless another time period is specified, to the Commission Clerk, by **Friday, January 9, 2026**.

1. Purchased Water and/or Wastewater: All Utility related bills from the beginning of the test year to present, which include meter number and location, gallons used, dollars paid, and the Utility's account numbers.
2. Purchased Power: All Utility related electricity bills from the beginning of the test year to present, which include meter number and location, kilowatts used, dollars paid, and the electric company's account numbers.
3. Chemicals: A list of all chemicals used in the treatment of water, amounts purchased, quantity purchased, unit prices paid and dosage rates utilized.
4. Sludge Removal Expenses: Provide a schedule showing the total cost and quantity of removing the sludge, if persons other than owners, stockholders, and employees of the Utility perform such work during the test year.
5. Contractual Services – Testing: A list of tests along with costs paid to outside laboratories for testing the water during the test year.
6. Contractual Services – Other: The costs of operation and maintenance work not performed by Utility employees with an explanation of the type of work performed. These costs include the operator's fee, mowing and grounds keeping, and contracted repair for the water system.

7. Transportation Expenses: A schedule of all vehicles by serial number and description owned or leased by the Utility, original cost or lease documents, whom the vehicles are assigned to, and an explanation of how they are allocated to the Utility, or a copy of the log book showing miles on personal vehicles associated with Utility business. All vehicles are to be available for inspection.
8. Copies of Buttonwood's most recent Primary and Secondary Water Quality test results.
9. Copies of monthly operation reports for water from January 1, 2024, to December 31, 2024, (test year) in Microsoft Excel format, if available, which includes:

FOR WASTEWATER – Total treated, total wash water, total of each chemical in points, chemical dosage rates (average).

FOR WATER – Total water purchased or pumped, total wash water, total of each chemical in points, chemical dosages rates (average).
10. Copy of monthly totals of metered water sold for each month of the test year.
11. A written summary, by permit number, of all Department of Environmental Protection, Water Management District, and/or County Health Department permits.
12. If any plant addition has been made or will be required due to a written order from a governmental agency, please provide a copy of that order.
13. A list of all service complaints received during the test year and four years prior to the test year. Please include an explanation of how each complaint was resolved.
14. A listing of all water and wastewater assets owned by the Utility, including distribution piping, pumping stations, fire hydrants, etc.

Example: 200' – 8" PVC (Sewer)
 250' – 6" PVC Pipe (Water)
 50' – 6" PVC Fire Hydrants (Water)
15. Number of customers classified as to meter size and class (commercial or residential) for the following points in time:
 - a) A minimum of 4 years prior to the beginning of the test (or calendar last) year.
 - b) The beginning of the last calendar year.
 - c) The end of the last calendar year.
 - d) Present.
16. Please provide a copy of the Utility's engineering maps for water and wastewater, showing location and size of water and wastewater mains throughout the service area, and customer location and classification. On each map, please identify vacant customer lots, customer meter sizes, flush points, fire hydrants, and pumping stations.

17. In the Water Operating Section of the Utility's 2024 Annual Report (page W-4), please verify if the total water pumped/purchased was 73,582,000 gallons, the total used for Utility purposes was 0 gallons, and the water sold to customers was 50,199,000 gallons. If not, please provide the correct values. In addition, please explain why there was a discrepancy between the two values, and what actions, if any, the Utility has taken to address unaccounted for water.
18. In the Wastewater Operating Section of the Utility's 2024 Annual Report (page S-5), please confirm that the total gallons of wastewater treated was 14,261,000 gallons. If not, please provide the correct values. In addition, please explain why there was a discrepancy between the amount of water sold and wastewater treated, such as irrigation or other uses, or customer-owned septic systems.
19. Per the Utility's 2024 annual report, there appears to be a significant difference between the volume of water produced and the volume of wastewater processed, with the latter being approximately 20 percent of the former. Please provide an explanation for this discrepancy. If the Utility has irrigation customers, please specify the number of irrigation customers and the total irrigation water monthly usage of those customers. If the Utility has customers with alternative wastewater systems (septic), please specify the number of customers and the total water monthly usage of those customers.
20. Please provide the estimated or actual in-service or work completion dates for the pro forma items listed on the last page of Buttonwood's application.
21. Please fill out the attached spreadsheet concerning any pro forma items the Utility is requesting. Please include any bid proposals or estimates for the pro forma items. If less than three bid proposals were requested for each pro forma item, please explain why.

Please file all responses electronically via the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20250122-WS), and also please email the filed response to discovery-gcl@psc.state.fl.us. Please contact me by phone at (850) 413-6582 or by email gdavis@psc.state.fl.us if you have any questions.

Sincerely,

s/ Greg Davis

Greg Davis
Engineering Specialist
Bureau of Reliability and Resource Planning
Division of Engineering

PGD:da

Enclosure

cc: Office of Commission Clerk (Docket No. 20250122-WS)
Curt Mouring, Office of Auditing and Performance Analysis

Mr. Daniel J. McGinn
November 24, 2025

Attachment

Site	Item	NARUC Account Number	Issue Relevance*	Problem	Solution	Regulatory Mandate (M) or Enhancement (E)	Comments	Year?	Year?	Year?	Total

*For Issue Relevance, please use DM (Deferred Maintenance), S (Safety), C (Compliance), R (Reliability), or WQ (Water Quality). In the year columns, please include the amount spent and projected to be spent