

Tristan Davis

From: Tristan Davis on behalf of Records Clerk
Sent: Monday, May 4, 2026 9:11 AM
To: 'klawr8421@gmail.com'
Cc: Consumer Contact
Subject: RE: 20250088-WU

Good Morning,

We will be placing your comments below in consumer correspondence in Docket No. 20250088, 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

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From: klawr8421@gmail.com <klawr8421@gmail.com>
Sent: Monday, May 4, 2026 8:52 AM
To: Records Clerk <CLERK@PSC.STATE.FL.US>; Consumer Contact <Contact@PSC.STATE.FL.US>
Subject: 20250088-WU

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Please see the attach pdf documents for docket # 20250088-WU.

Sincerely,

Kent Lawrence
754 Bishop Dr.
Lady Lake, FL 32159
207.212.9620
Klawr8421@gmail.com

4 May 2026

Dear PSC,

I am writing as one of the Water Oaks Estates Residents, and the Sun Communities Finance, LLC d/b/a Water Oak Utility. In which a proposed rate increase is being reviewed in docket # 20250088-WU.

Sun Communities Finance, LLC d/b/a Water Oak Utility has been very deceptive with the PSC. Over whelming lack of inconsistent, forthcoming information for the proposed increase.

1. Residents pay a lot rent that was brought forth to the PSC on 7 Apr 2026. The resident's representative mentioned that the rate increase would be illegal, double dipping for the same purpose.

How and where is the lot rent for todays 1300+ sites being used for the Water Oaks Estates infrastructure? Is this not for supplied Utilities, though services required, Maintenance, Repairs, and Overhead?

As lot rents vary by location, it would take an audit to know the exact amount Sun Communities receives. If we generalize it today at \$540 per lot by 1300 lots, based on 2019 information, that's \$702,000 a month, or \$8,424,000 a year. Oh My!

Estimated Monthly/Annual Expenses for 2019 (See Attachment)

Full Disclosure of Itemized Billing

Lot Locations: Paid Monthly

Standard Home Site Lease/Rent \$544.16

Corner Lot Location \$569.08

Waterfront Lot Location \$605.40

Golf Course Frontage Lot \$637.60

Premium Lots \$582, \$598, \$644

2. A question of water metering has been one of the major question or flaws in the PSC review. The Water Oak Estates Residences have asked the following question in an open forum. Sun Communities Finance, LLC d/b/a Water Oak Utility has a permit with St. John's Water Management District. How can there be such an inadequacy in metered water usage, if total water usage is required to be reported under their permit with St. John's Water Management District?

3. New information about a generator being added to the data has brought more inconsistent information. Once again failure to make full disclosure, and included with the data that started with this request 23 Jun 2025.
4. One of the worst statements ever made in society is, "It's easier to ask for forgiveness than permission". This leads to no accountability for the wrong doing impacted on those damaged. This approach is not advisable in regulated scenarios like Homeowners Associations (HOAs), where violating rules can have severe consequences.
5. The review of this commission is greatly appreciated, and makes a clear statement of how large corporations will not get a rubber stamp on the deceptive, or manipulative information effecting Retired Floridians, such as Water Oak Estates 55+ Community.

Sincerely,

Kent Lawrence
754 Bishop Dr.
Lady Lake, FL 32159
207.212.9620
Klawr8421@gmail.com

Important Facts About Your Prospectus and Lot Rental Agreement
Our Unique Status Living in a Manufactured/Mobile Home Park Owned by
Sun Communities in Florida

If you have never lived in a manufactured/mobile home park before, especially in Florida, the applicable rules, rents, fees, utilities, and legal requirements of the corporate owners and the local Homeowner's Association is a relationship that is truly unique. The purpose of this paper is to acquaint you with general information that regulates the interactions between the Florida legislature who writes and enforces Florida Statute 723 Mobile Home Act; the corporate owners (like Sun); the required local organizations known as Homeowner Associations, (like Water Oak HOA) and the State-wide lobbying organizations representing homeowners known as the Federation of Manufactured Homeowners (FMO); the state-wide lobbying organization representing the corporate owners of the parks, Florida Manufactured Housing Association (FMHA); and YOU, the individual homeowner.

The residents of manufactured/mobile home parks are homeowners, but not property owners! We do not directly pay property tax; Sun Corporation pays the property taxes and adds our share of these taxes to our monthly rent or lease. FL Statute 723 dictates specific processes and procedures for both the "Park Owners" and us, the "Renters" through legal contracts known as a Prospectus, Rules and Regulations, and our individual Rental Agreements. Under Florida law the local Homeowner's Association is the legal representative of the homeowners.

FLORIDA STATUTE, Chapter 723, MOBILE HOME PARK LOT TENANCIES

https://www.lawserver.com/law/state/florida/statutes/florida_statutes_chapter_723

covers all legal interactions between Manufactured/Mobile Home Park Owners and Lot Renters. All residents of Water Oak Country Estates should have some familiarity with this important and all-encompassing Florida Law.

In accordance with the Florida Administrative Code, **CHAPTER 61B-31, MOBILE HOME PROSPECTUS AND RENTAL AGREEMENT RULE 61B-31.001 Prospectus and Rental Agreement**, all renters should be familiar with the following guidelines and stipulations that are listed in your individual Prospectus contract with Sun Communities and the lot rental contract that you signed prior to moving into Water Oak Country Club Estates. We've summarized excerpts of some of the main provisions, here:

- The prospectus shall clearly describe all matters required by Chapter 723, Florida Statutes, the Florida Mobile Home Act.

- The prospectus distributed to a home owner or prospective home owner shall be binding for the length of the lot tenancy (usually 12 months, or a full Calendar year from January 1st-December 31st), including any assumptions of that tenancy, if you bought the home from a previous owner (see ** page 4 below). The Prospectus applies to the individual lot and remains the same when passed on to future lot tenants until Sun proposes changes that are approved by the state of Florida. The Rules and Regulations which are part of the Prospectus can be modified each year. The Rental Agreement can change with the sale of the house based on the Consumer Price Index (CPI) for each year and changes in the “Market Value” of similar homes with specific amenities added or subtracted from the overall “price” of the home and location.

- The park owner shall describe in the prospectus the manner in which lot rental amount or user fees will be assessed. If the home owner is responsible for pass-through charges, a statement of that fact and a description of the manner in which the pass-through charges will be assessed are included. The manner shall include the method of allocating the charges.

- The current dollar amount of each type of charge shall also be stated in the prospectus and rental agreement. The park owner may provide blank spaces for the required amounts and write in the amount prior to delivery to the home owner.

- The park owner may use more than one prospectus in the park. Each individual prospectus shall be filed with the Florida 723 Division as a separate filing. There are currently five (5) separate different Prospectus documents used in Water Oak.

- Only a prospectus which has been determined by the State Business Division to meet the requirements of the Statutes and these rules may be delivered to a mobile home owner.

- The park owner shall deliver the prospectus to existing home owners prior to the renewal of their rental agreements, or prior to entering into a new rental agreement, or prior to increasing the lot rental amount. Once a home owner has been given a prospectus, the park owner shall not be required to provide another prospectus but can/shall provide amendments. The rent will change annually, but it is not current practice that the same lot tenant is required to accept or agree to enter into a new rental agreement each year.

- Whether you purchased an existing home or bought a new home, all improvements to the exterior of the home require Management approval in writing before construction. You can obtain a Sun form for “Exterior Improvement Request” from the Administration Office.

- Each Prospectus contains a Rules and Regulation section and all homeowners and rental residents must abide by these standards which are intended to protect the comfort, health, happiness, safety, security and investment of the residents and guests of the Water Oak Community.

- There is **NO SUBSTITUTE** for each lot renter to read their Prospectus and Rental Agreement/Contract thoroughly and carefully. Please ask questions if you need further explanations.

Estimated Monthly/Annual Expenses for 2019
Full Disclosure of Itemized Billing

Lot Locations:

Paid Monthly

Standard Home Site Lease/Rent	\$544.16
Corner Lot Location	\$569.08
Waterfront Lot Location	\$605.40
Golf Course Frontage Lot	\$637.60
Premium Lots	\$582, \$598, \$644

Annual Expenses:

Paid Yearly/Monthly

Real Estate Pass On Tax	\$284.40/\$23.70
Fire & Rescue	\$174.36/\$14.53
Curbside Trash Pickup	\$147.60/\$12.30
Mail box Fee	\$12.00/\$1.00
Water/Sewer Charges – <u>your individual usage</u>	Average: App. \$540/avg. \$45

Base Rent & Fees

- Your base rental fee depends on when you purchased your home and for what amount. This is determined by the current **“average market rate”** and therefore sets a value for your home and the lot you are renting from Sun Communities, Inc. The **Consumer Price Index (CPI)** is used to determine rent increases from year to year. However, the annual base increase shall be raised by a minimum of **\$2.80 per year for the oldest Prospectus** in Water Oak, and the **other four Prospectus documents call for a 5% annual increase** regardless of whether the CPI has changed or not.

- A **monthly mail box fee** of \$1.00 is assessed to each homeowner and by calendar year.

- **Pass-through charges or Pass-on taxes** are the owner’s proportionate share of actual direct costs associated with hookup fees mandated for capital improvement and required for public or privately regulated utilities. These government

assessments are for insurance, ad valorem taxes, and utilities. An amount is calculated by dividing equally among the lots affected (not including empty lots or those used by local Sun Communities sales office, golf course, waste treatment plant, administration, and maintenance facilities). Only house lots are billed by the Town of Lady Lake and that is divided by the number of occupied and buildable lots to determine a pass-thru amount; each resident only pays for his/her single lot share.

In 2019, tax assessments were evenly distributed with a monthly charge of \$23.70; Fire Protection monthly charge is \$14.53; and, trash pickup is \$12.30 per month. These fees or charges are identical for all residents.

● Other monthly fees

1) a water-front premium lot, a premium corner lot, a golf course premium view, and an oversized lot will range in monthly costs and may increase each year depending on the new market rates for those lots; these charges can vary in a given year from \$20-60 per month.

2) an individual lot assessed for any violation of the Rules and Regulations which will vary in amount, such as lawn trimming not performed by homeowner, guest fees (more than two persons for 30+ days in residence), return check fee, pet violations, or any other infringement of the established Rules and Regulations which should be preceded by a written violation notice and required date for corrective action.

3) Water Oak water and sewer charges will vary from owner to owner depending on their individual lot usage. These are included in the Water Oak Utility bill (green post card) and mailed to each resident monthly. The Water Oak Water facility is considered part of government Public Utilities and subject to public utility regulations and mandatory rate increases.

****If you purchased your mobile or manufactured home from a previous resident, you signed an “Assumption of Lot Rental Agreement” because the previous owner had already signed a rental agreement for the entire calendar year when you purchased it. If so, you signed an agreement with Water Oak or Sun Communities to “assume” or pay the same amount listed on the previous owner’s rental agreement until the end of the current Calendar Year that you moved into your home.**

For example, if you bought your home in February of 2018 and assumed the lot rental agreement of the previous owner, you will pay the same amount the previous owner agreed to pay through December, 2018. On January 1, 2019, the rent amount will change to the market value rent you personally signed and agreed to before moving in, along with any pass-along 2019 tax increases and “market values” that you were notified of in the later part of 2018 and would apply in your new lot rental amount due on January 1, 2019.

If the previous owner of your lot was a long-term resident, when they bought their house and received their first lot rental agreement, the market value was most likely a much smaller amount than you agreed to pay years later. So your bill from the date you moved in until the end of December 2018 is probably lower than the amount you will need to pay in all of calendar year 2019. But, when January 1st rolled around, the new monthly rental rate based on market value changes, will be billed to you and may well be a larger amount based on the increase in the market value of your lot. If the previous owner lived in Water Oak for a considerable number of years, your new market value could result in a significant increase. It can be a shocker if you hadn't realized the difference in lot rental prices from what the previous owner paid years ago, and what you now will pay in your lot rent. Market rental rates for a given calendar year are generally set in September of the previous year and a buyer or new resident can get the current market rent and be assured that it will be a little higher after January 1st of the following year.

If you have any questions about the rental fee you pay as well as the pass-on taxes which all of us pay equally each year; or the new market value lot rental price announced for the following year; or the special violation or reimbursement fee \ you may have been billed for, please go to the Sun Administration building and get answers to your questions. If the Administration staff are unable to satisfy inquiries about your base lot rent and the calculations used for your new market value based rent, or any fees listed in your bill, please bring your complaint to a member of the Water Oak Homeowners Association Board of Directors and we will attempt to find out the correct numbers and if they are, in fact, accurate.

Please remember, comparing your base rent and special fees with that of your neighbor may only confuse the matter and some residents may not realize that they need to pay extra fees for either a water-front or golf lot, or they may have been assessed a reimbursement fee for work done by Management when a resident fails to abide by the Rules and Regulations of Water Oak, even if they did get a notice of violation which stated a date when corrective action was required. In addition, please understand that all of us are dealing with confidential financial records that cannot be distributed or revealed to other parties except the specific individuals involved in the dispute over charges. Your HOA Director will always research your financial concerns and advise you of the facts, but we are unable to reveal the specifics of another resident's financial record. This is an explicit matter of adherence to federal and Florida privacy laws.

If you find these facts and "legalese language" to be confusing, you can thank the Florida Legislature and legal, corporate lobbyists who wrote the original Florida Law 723, Mobile Home Act and all the subsequent politicians who were voted into office by Florida voters. Florida Statute 723 was written and structured for residents and their HOA/FMO representatives to experience frustration and failure; it was structured for dominance by corporate owners. As the current President of the Federation of

Manufactured Homeowners (FMO) of Florida, Inc. Jerry Durham, recently stated in the July 2019 FMO Newsletter: ‘The landscape has changed drastically in recent years and most land leased communities have been purchased by private equity firms, corporations (like Sun Communities), and investors who by their very nature have to provide maximized returns to their investors. This generation of mobile/manufactured homeowners is beginning to feel the economic impact of these new owners. We use the term “seniors on fixed incomes”, but this does not seem to resonate with our Legislative leaders. The truth is once you have resided in these communities for 10 or more years both the affordability and equity in your home have been eroded. It is once again time to begin the grassroots movement to affect change. Our Florida state legislators need to understand that our residents need more protections and fairness than the current FL Statute 723 provides us. We need to talk to our neighbors about joining FMO and their local HOA in order to give us much better leverage as we recommit to a leadership role in advocating for manufactured/mobile homeowners. The FMO and HOAs needs to grow and become the Political Force we once were in advocating for affordable, quality home ownership for seniors living in mobile and manufactured homes on leased corporate owned park sites.’”

Therefore, your Water Oak HOA will formally invite our current Florida State Senate and House representatives to address a meeting of Water Oak residents in the fall of 2019. We will ask them to address specific issues in the Florida Statute 723 that adversely affects our residents and state their position. Then we will ask them to answer your direct questions. Please join us in doing our homework on provisions of FL Statute 723 and come to our meeting. We will announce the date and time of the meetings, one with Fla. Senator ® Dennis Baxley, District 12, and one with Fla. Rep. ® Bret Hage, District 33, when arrangements are finalized.

If we can truly advise our state legislators that our HOA represents a majority (or more) of our residents as HOA members who VOTE, they will be much more receptive to our questions, concerns, and complaints. If our numbers and votes are great enough – we could be the difference between victory or defeat for our current representatives in 2020.

Typical questions your Board of Directors is considering are:

- 1) Do you really support senior citizens in Florida with your legislative work, and votes, or just with your political rhetoric?
- 2) Retirement communities, with mostly fixed incomes, should not be subjected to arbitrary profit increases in rent for Sun Corporation every year, over and above the CPI increase, such as 5% in most Prospectus documents in Water Oak. Social Security benefits and retirement pensions never increase by that amount.

3) Each corporate owner of a mobile home park, since it is considered “private property,” should be required to provide effective security and safety measures within their communities. And, the Florida Court system should honor traffic citations given by legal authorities on the properties of mobile home parks and not dismiss them out-of-hand or automatically.

4) Each corporate park owner should be legally obligated to effectively and in a timely manner, address the structural integrity and needed improvements, on an annual basis, of all utilities (water, electric, Cable, broadband, WI-FI, Internet providers, etc.), street maintenance (mandatory sidewalks for pedestrians), and common-use buildings (kitchen electrical connections, audio-visual equipment, fire precautions, plentiful handicap parking for all vehicles, effective drainage, and preventative land erosion projects), within the confines of their respective communities.

Please feel free to suggest more questions, concerns, and complaints about FL Statute 723, your Prospectus, and Rental Rate increases for us to present to our Florida legislators. Contact one or more of your Water Oak Estates Homeowner’s Association Board members and offer your suggestions.

Submitted by Water Oak Estates HOA Board of Directors

July 29, 2019