

**Tristan Davis**

**From:** Tristan Davis on behalf of Records Clerk  
**Sent:** Tuesday, January 27, 2026 8:10 AM  
**To:** 'William Shaul'  
**Cc:** Consumer Contact  
**Subject:** RE: Florida Public Service Commission Docket No.: 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

*PLEASE NOTE: Florida has a very broad public records 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 email message may be subject to public disclosure.*

**From:** William Shaul <william.shaul@gmail.com>  
**Sent:** Monday, January 26, 2026 7:11 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Subject:** Florida Public Service Commission Docket No.: 20250088-WU

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**January 26, 2026**

**RE:** Application for Staff Assisted Rate Case in Lake County by Sun Communities Finance LLC d/b/a Water Oak Utility **Docket No.: 20250088-WU**

My name is William Shaul, resident of Water Oak Estate, 615 Hickory Hill, Lady Lake FL. I did some research regarding passing through water costs to residents and these statements clarify my knowledge and feeling regarding the PSC Proposal.

Florida allows submetering or other cost-allocation methods so long as residents are billed based on actual usage and charges do not exceed what the supplying utility charges, plus limited, cost-based admin/maintenance components. I believe the Water Oak Utility; LLC can structure resident bills so that:

A. Per-gallon (or per-1,000 gallons) rates equal what the system effectively pays to produce or purchase water, and

B. Any additional line items for reading, billing, or system O&M must be traceable to actual, reasonable costs, not arbitrary markups.

**Common-area and “own use” water**

- Florida guidance on sub-metered communities distinguishes between: unit consumption, common-area water, and other operational uses; common-area usage is typically either paid by:
  - The owner/HOA from general funds or
  - Allocated by a transparent formula (e.g., RUBs, flat common charge), not simply rolled into unit volumetric rates without basis.

Water Oak Water Utility, LLC wells and system also serve irrigation, clubhouse, office, or other operational needs and the utility should separately meter or reasonably estimate those uses and decide whether they are:

- A. Treated as a park expense (recovered in lot rent/HOA fees), or
- B. Allocated under a clearly disclosed, cost-based mechanism (e.g., a fixed “common water” component per lot).

**Simply “transferring entirely” all of the LLC’s own water use (including common/operational use) into the per-gallon charge for resident submeters risks violating the “no more than the park paid” and cost-based principles because the Proposed amount result materially exceeds the true unit share of system costs.**

**I object to the weak, misleading or missing data that Water Oak Utility, LLC has submitted in their request for a Rate Review.**

**I believe that the Florida PSC will be quite disciplined in its deliberation and decline implementation of this Proposal.**

**Sincerely,**

**Bill Shaul**

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