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January 16, 2001
VIA HAND DELIVERY

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RECORDS AND REPORTING

Mr. Troy Rendell
Public Utilities Supervisor
Division of Economic Regulation
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Sun Communities Finance Limited Partnership d/b/a Water Oak Utility
Docket No. 990243-WS
Our File No. 33013.01

Dear Mr. Rendell:

I am writing this letter to respond to your letter of January 10, 2001 and more specifically, to request that the Utility be given more time in which to file the reuse project plan as required by the Commission's Final Order issued last summer in the above-referenced case.

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The Utility has been working with its design engineer attempting to determine the specific type of treatment options available, as well as working with the regulators on what will be required in order to implement the reuse plan. However, because of unforeseen delays in accumulating all of this information, the Utility is not yet prepared to file the reuse project plan within the time schedule as required by the Commission's Order.

The Utility was also presently involved in discussions for the possible sale of the system to a local governmental entity, which sale would render the filing of the reuse plan moot. However, since the negotiation process has become lengthy, the Utility is proceeding with its plans to add reuse facilities to its sewage treatment system.

The Utility is also reviewing alternatives for financing and it now appears as though the best available alternative for obtaining that financing for the project is through a related party debt or equity arrangement. The particulars concerning that financing have not yet been worked out.

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Mr. Troy Rendell
January 16, 2001
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We recognize the Commission's desire for the Utility to move forward with this project, and it is certainly the Utility's intent to do so. However, we would like to request that the Commission grant us an additional one hundred and twenty days in which to file the reuse project plan, during which period of time we will try and finalize the various matters necessary in order to file the application with the Commission, formalize the plan itself, begin the permitting process, and discuss with the Commission staff the alternatives chosen. While we could conceivably file a reuse project plan in relatively short order, we believe the one hundred and twenty day delay is a minimum necessary in order for us to finalize the plans in order to make such a filing meaningful and clearly reflective of the Utility's final plans for construction of those reuse facilities.

Please ask the Commissioners or Prehearing Officer, by whatever means are necessary, to grant an additional one hundred twenty days in which to file that reuse project plan, from the current due date of January 19, 2001.

I appreciate your prompt attention to this matter and apologize for the delay in getting back to the Commission in this regard. Should you have any questions, please let me know.

Sincerely,

ROSE, SUNDSTROM & BENTLEY, LLP



F. Marshall Deterding
For The Firm

FMD/tmg

cc: Blanca S. Bayo, Director (via hand delivery)
Mr. Tom O'Branovic (via fax)
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