

STATE OF FLORIDA

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TIMOTHY DEVLIN, DIRECTOR  
DIVISION OF ECONOMIC REGULATION  
(850) 413-6900

Public Service Commission

November 1, 2006

Clark & Roberts, PLC  
Mr. Ronald E. Clark, Esq.  
501 St. Johns Avenue  
Post Office Box 2138  
Palatka, Florida 32178-2138

RECEIVED-PPSC  
06 NOV -2 AM 10:14  
COMMISSION  
CLERK

Re: Docket No. 060653-WS Application for transfer of St. Johns Landing of Putnam County Utilities Services, Inc. d/b/a St. Johns Landing Utilities Service

Dear Mr. Clark:

We are in receipt of your transfer application and after reviewing it, it is not clear as to whether a transfer has occurred or what has transpired in regards to the utility. Staff is aware that the St. Johns Landing of Putnam County Utilities Services, Inc. was dissolved on September 21, 2001. The application indicates that Mr. Frank Uddo, the owner of the utility, is both the buyer and the seller of the utility. Please provide a written response and supporting documentation advising staff of the future owners and plans of St. Johns Landing Utilities Services.

Staff was also informed about a proposed pending sale of the utility. If a sale has occurred, or is pending, then the recently submitted transfer application is deficient and should be readdressed and a completed application resubmitted to the Commission. Please see Rule 25-30.037, Florida Administrative Code, for guidance on the information and documentation required for a transfer of certificate.

If the St. Johns Landing Utilities Service system has been transferred to a new owner or a proposed transfer is pending, please provide a copy of the sales agreement contract which includes the date of the closing, a list of the assets transferred in the sale, and the purchase price for the utility. The sales agreement contract should include a statement that the transfer is contingent upon the approval of the Commission with an unwind provision. Please address the new owners' financial and technical ability in regards to owning a utility. In addition, provide evidence that the utility owns the land or has an agreement for the long term use of the land. Moreover, the application should include a statement that the new owner will fulfill the commitments, obligations, and representations of the seller with regard to utility matters.

- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- 3CL \_\_\_\_\_
- JPC \_\_\_\_\_
- RCA \_\_\_\_\_
- 3CR \_\_\_\_\_
- 3GA \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- JTH \_\_\_\_\_

DOCUMENT NUMBER 060653-WS  
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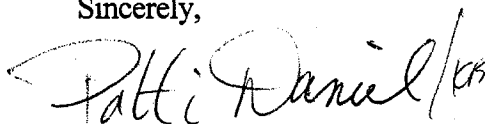
Mr. Ronald E. Clark  
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Your response to this letter should be filed with the Commission on or before **November 30, 2006**. Please be sure to refer to the docket number and direct the response to:

Division of Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

If you have any questions concerning the information requested by this letter, please contact Cheryl Johnson at 850-413-6984 or Rosanne Gervasi at 850-413-6224.

Sincerely,



Patti Daniel  
Supervisor of Certification

PD: caj

cc: Division of Economic Regulation (Johnson)  
Office of the General Counsel (Gervasi)  
Division of Commission Clerk and Administrative Services (Bayó)