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ORIGINAL

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March 6, 2007

D. BRUCE MAY, JR.
850-425-5607
bruce.may@hklaw.com

VIA HAND DELIVERY

Blanca S. Bayo
Division of Commission Clerk and
Administrative Services
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RECEIVED 9:50
07 MAR -6 PM 2:01
COMMISSION
CLERK

070146-WS

Re: *In re: Emergency Complaint of Pasco Health Investors, LLC Against Aloha Utilities, Inc. for Violation of Sections 367.081 and 367.101, Florida Statutes*

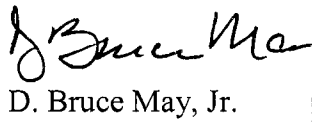
Dear Ms. Bayo:

Pursuant to Rule 25-22.028, Florida Administrative Code, attached please find the original and seven (7) copies of Pasco Health Investors, LLC's Emergency Complaint against Aloha Utilities, Inc. for violation of Sections 367.081 and 367.101, Florida Statutes.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the copy to me. Thank you for your assistance with this filing.

Sincerely,

HOLLAND & KNIGHT LLP


D. Bruce May, Jr.

DBM:kjg

Enclosures

cc: William Terry

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

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DOCUMENT NUMBER-DATE

02041 MAR-6 8

FPSC-COMMISSION CLERK

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Emergency Complaint of Pasco
Health Investors, LLC against Aloha
Utilities, Inc. for Violation of Sections
367.081 and 367.101, Florida Statutes

Docket No. 070146-WS

Filed: March 6, 2007

**EMERGENCY COMPLAINT OF PASCO HEALTH INVESTORS, LLC
AGAINST ALOHA UTILITIES, INC. FOR VIOLATIONS OF SECTIONS
367.081 AND 367.101, FLORIDA STATUTES**

Pasco Health Investors, LLC (“Pasco Health”), by and through undersigned counsel, and pursuant to Rule 25-22.036, Florida Administrative Code, files this emergency complaint against Aloha Utilities, Inc. (“Aloha”) for violations of Sections 367.081 and 367.101, Florida Statutes, by refusing to offer Pasco Health adequate and efficient water and wastewater service at fair, just and reasonable rates.

Basis for the Emergency Complaint

Pasco Health is a developer of nursing home facilities in Florida. Through its proposed tenant, Eastlake Rehab and Care Center, LLC (hereinafter “Eastlake”), Pasco Health has obtained from Florida’s Agency for Health Care Administration (“AHCA”) a Certificate of Need (“CON”) for a 120 bed nursing home facility (the “Project”) to be located on Welbilt Boulevard in Pasco County, Florida (“Project Site”). AHCA issued the CON for the Project Site, based upon a demonstrated need for additional Medicare and Medicaid eligible nursing home beds in western Pasco County. The Project is dependant on water and wastewater utility services from Aloha—the monopoly utility provider in whose service area the Project Site is located. Pasco Health has applied to Aloha for water and wastewater services and,

DOCUMENT NUMBER / DATE

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FPSC-COMMISSION CLERK

in conjunction with that application, has provided Aloha with detailed water usage information that demonstrates that the Project will require approximately 14,700 gallons of water per day (“gpd”). Pasco Health’s demonstrated demand is based on engineering calculations of water and wastewater usage provided to the Florida Department of Environmental Protection (“FDEP”), and actual usage data for two nearby and substantially similar nursing home projects. By applying the rate schedules in Aloha’s tariff to the demonstrated demand of 14,700 gpd, Pasco Health has calculated the appropriate water and wastewater impact fees to be \$237,008.10, and has agreed to pay that amount to Aloha so that it can proceed with the Project. Aloha, however, has rejected that proposal and has continued to condition the supply of utility services on Pasco Health paying excessive upfront water and wastewater impact fees of \$1,318,464.45 or making an upfront cash payment of \$237,008.45 and providing Aloha with an irrevocable letter of credit in the amount of \$1,081,466.35. The excessive impact fees claimed by Aloha are based on its estimate that the proposed nursing home would use 81,776 gpd—an estimate that has no empirical basis and exceeds Pasco Health’s actual usage studies by more than 500%.

If left unabated, Aloha’s refusal to acknowledge Pasco Health’s actual usage studies and its rigid application of the usage guidelines in its tariff will result in rates that (i) are unjust and unreasonable, (ii) unfairly discriminate against nursing home developers like Pasco Health that have designed their projects to conserve water, and (iii) yield excessive profits to Aloha. Moreover, Aloha’s continued

insistence on such excessive and inaccurate impact fees will render this much needed Project economically infeasible. Therefore, unless the Commission grants emergency relief and prevents Aloha from conditioning service on payment of these unreasonable impact fees, Pasco Health will have no alternative but to abandon the Project that the State of Florida has already determined is needed to serve western Pasco County.

Procedural Background and Information

1. The name and address of the Complainant are:

Pasco Health Investors, LLC
4415 Pheasant Ridge Road, Suite 301
Roanoke, VA 24014

Pasco Health is a limited liability company organized and existing under the laws of the Commonwealth of Virginia that is authorized to do business in the State of Florida.

2. All pleadings, motions, orders, and other documents directed to Pasco Health are to be served on the following:

D. Bruce May, Jr.
HOLLAND & KNIGHT LLP
P.O. Drawer 810
Tallahassee, Florida 32302
E-mail: bruce.may@hklaw.com
Phone: (850) 224-7000
Fax: (850) 224-8832

3. The name and address of the utility against which Pasco Health files the emergency complaint are:

Aloha Utilities, Inc.
6915 Perrine Ranch Road
New Port Richey, FL 34655-3904

Aloha is a water and wastewater utility under Florida law and its rates, terms, and conditions for water and wastewater service are subject to the jurisdiction of the Commission pursuant to jurisdiction under Chapter 367, Florida Statutes.

Background

4. Pasco Health and its affiliates are in the business of developing nursing home facilities in Florida and other states around the country. Pasco Health is an affiliate of and managed by Smith/Packett, a healthcare development firm specializing in the design, development, financing, marketing, strategic planning and operation of healthcare facilities and has been in business since 1983. Smith/Packett is one of the largest senior housing and care development companies in the country, managing more than \$40 million new healthcare related projects annually. These projects include nursing homes, assisted living, medical/office buildings, continuing care retirement communities and mixed use facilities. Over the years, Smith/Packett has developed or acquired more than 130 long-term and senior housing facilities through the Southeast with an aggregate value in excess of \$800 million.

5. In 2004, Pasco Health began to explore the development of a nursing home in Pasco County. This process included site selection and budget development, including confirmation with Pasco County concerning utility impact fees. Based upon its studies, Pasco Health entered into a contract to acquire the

Project Site on November 9, 2004, and its proposed tenant, Eastlake, applied for and received from AHCA a CON for a 120 bed nursing home project in Pasco County, Florida, which is referred to as Carrington Place at Trinity. The CON was issued to Eastlake based on a demonstrated need for additional nursing home beds serving Medicare and Medicaid patients in western Pasco County. A copy of the CON is attached as Exhibit "A."

6. The Project is dependent on a reliable and cost effective supply of water and wastewater services. Because the Project Site is located within the monopoly service area of Aloha, Pasco Health approached Aloha to confirm pricing for water and wastewater services in July 2006 as part of final site plan review and the issuance of building permits.

7. On August 25, 2006, Aloha notified Pasco Health that the water and wastewater impact fees for the proposed facility would be \$1,318,464.45. Aloha admits that its calculation of these fees is based on projected usage levels for nursing homes found in Appendix " B" in its Tariff which is styled: "Schedule of Daily Rated Gallonage for Various Occupancy." Aloha's rigid application of those usage guidelines results in an "estimate" that Pasco Health's nursing home facility will use 81,776 gpd.¹ See August 25, 2006, letter from Pamela Yacobelli to Leo Governale, attached as Exhibit "B."

8. By comparison, and upon information and belief, had the nursing home facility been located within the utility service area of Pasco County, water and

¹ [Water impact fees: 81,776 gpd x \$3.333 per gallon = \$272,559.41] + [Sewer impact fees: 81,776 gpd x \$12.79 per gallon = \$1,045,915.04] = \$1,318,474.45.

wastewater impact fees due under the County's 2005 rate schedule would have been approximately \$136,029.00.

9. Upon receipt of Aloha's letter dated August 25, 2006, Pasco Health advised Aloha that its proposed impact fees were significantly above the impact fees of comparable utilities and urged Aloha to calculate water and wastewater impact fees based upon detailed water usage information demonstrating that the facility will require approximately 14,700 gpd. This detailed usage information provided by Pasco Health included (i) engineering reports that it submitted to the FDEP as part of the permitting process and reflected that the proposed facility will utilize a total of 115 gpd per bed plus 20 gpd per employee; and (ii) actual usage data for at least two substantially similar nursing home projects constructed and operated in Pinellas and Pasco Counties.²

10. Based upon the demonstrated demand of 14,700 gpd and using Aloha's rate schedule for service availability and contributions-in-aid-of-construction ("CIAC") for treatment facilities, as set forth in Section 7.1 of Aloha's Water Tariff, Pasco Health calculated the appropriate utility impact fees for the Project to be \$237,008.10.³

11. However, Aloha has refused to establish those impact fees using actual usage data and continues to require Pasco Health to pay impact fees totaling

² One nursing was a 120 bed facility operated by an affiliate of Eastlake in St. Petersburg referred to as Carrington-St. Pete. The other was a 120 bed facility operated by Tandem Health Care in Port Charlotte referred to as Arbor-Port Charlotte. The actual usage information for those facilities was provided to Aloha by letter dated September 29, 2006. See attached Exhibit "C."

³ [Water impact fees: 14,700 gpd x \$3.333 per gallon = \$48,995.10] + [Sewer impact fees: 14,700 gpd x \$12.79 per gallon = \$188,013.00] = \$237,008.10.

\$1,318,464.45—a fee structure that is not reasonably related to the proposed facility's demand for water and wastewater services.

12. Pasco Health has been trying to resolve this issue with Aloha since August 25, 2006, the date when Pasco Health was first notified of the excessive impact fees that Aloha is seeking to impose. Pasco Health's inability to secure cost effective and reliable water and wastewater service from Aloha has prevented the commencement of construction. Pursuant to AHCA regulations, absent good cause, the construction on the facility should have commenced prior to February 28, 2007, otherwise the CON is subject to revocation. Pasco Health's tenant Eastlake has obtained a sixty (60) day extension of the deadline. However, continued delay in the provision of water and wastewater service has now placed the entire Project in jeopardy.

13. In an effort to resolve this impasse Pasco Health has proposed to pay a service availability charge based on its demonstrated demand of 14,700 gpd, with the stipulation that the parties would closely monitor actual usage and Pasco Health would pay Aloha future impact fees based on actual usage.

14. By letter dated January 12, 2007, Aloha rejected Pasco Health's proposed resolution. Aloha stated that it would only be willing to provide the requested water and wastewater service under the following terms: (i) Pasco Health must acknowledge that Aloha's tariff required impact fees of \$1,318,464.454; (ii) Pasco Health must provide Aloha with an initial upfront payment of \$237,008.10; (iii) Pasco Health must provide Aloha with an irrevocable letter of credit in the

amount of \$1,081,466.35 for the disputed amount of the fees; (iv) Pasco Health must acknowledge that the proposed impact fees of \$237,008.10 deviate from the utility's tariff and enter into a special availability contract with Aloha which would be conditioned upon Commission approval; (v) Pasco Health must pay Aloha a \$30,000 "administrative fee" for preparing the special availability contract; and (vi) Pasco Health must agree to forfeit the letter of credit amount (\$1,081,466.35) to Aloha if the Commission does not approve the special availability contract. See January 12, 2007, letter from Marshall Deterding to Bruce Hedrick attached as Exhibit "D."

15. Pasco Health has advised Aloha that terms of its proposal would require Pasco Health to bear the risk that Aloha will be able to impose the entire excessive amount of \$1,318,464.45, and thus is economically infeasible.

16. Because the parties have reached an impasse, and in order to preserve its CON and move forward with the construction of the much needed nursing home facility, Pasco Health has no alternative but to seek emergency relief from the Commission.

Commission's Authority to Ensure that Aloha's Rates and Charges are Just, Reasonable and Not Unfairly Discriminatory

17. Aloha is a water and wastewater utility regulated by the Commission under Chapter 367, Florida Statutes. As such, the Florida Legislature has specifically authorized the Commission to regulate Aloha to protect the public health, safety and welfare and to ensure that Aloha's rates and charges are just, reasonable and not unfairly discriminatory.

18. The Commission is specifically charged with regulating utilities like Aloha for the “protection of the health, safety and welfare.” § 367.011(3), Fla. Stat. (2006).

19. In response to a complaint, or on its own motion, the Commission is authorized to fix rates that are just, reasonable, and do not unfairly discriminate. § 367.081, Fla. Stat. (2006). All charges, including service availability charges, must be based on “the cost of providing the service.” *Id.*

20. Section 367.101, Florida Statutes, requires the Commission to investigate, upon a complaint or on its own motion, a utility’s proposals for charges and conditions for service availability.

The commission shall set just and reasonable charges and conditions for service availability. The commission by rule may set standards for and levels of service-availability charges and service-availability conditions. Such charges and conditions shall be just and reasonable. The commission shall, upon request or upon its own motion, investigate agreements or proposals for charges and conditions for service availability.

§ 367.101, Fla. Stat. (2006).

Aloha Has Violated Sections 367.081 and 367.101
By Insisting on Pasco Health Paying a Connection Fee Based
on Projected Rather Than Actual Usage

21. Aloha has refused to charge impact fees based upon Pasco Health’s demonstrated demand for service. Instead, it continues to insist on excessive fees based upon usage guidelines in its tariff that have no rational relationship to the usage characteristics of the proposed nursing home. Aloha’s actions are unfair, unjust, unreasonable and will result in rates that will yield excessive profits to

Aloha that have no relationship with Aloha's costs of providing the service in contravention of Sections 367.081 and 367.101, Florida Statutes.

22. Pasco Health has provided Aloha with detailed water usage information (including engineering reports and actual usage data for at least two nearby substantially similar nursing home projects) that clearly shows that the proposed nursing home will require approximately 14,700 gpd. Based on that demonstrated demand and Aloha's tariffed rates, Pasco Health has calculated the appropriate water and wastewater impact fees to be \$237,008.10, and has agreed to pay that amount to Aloha so that it can proceed with the Project.

23. Aloha, however, refuses to calculate its utility impact fees based on Pasco Health's actual usage or a reasonable estimate thereof. Instead, the utility conditions the provision of service on Pasco Health paying excessive impact fees which Aloha admits are based on projected usage levels for nursing homes found in guidelines in its tariff. Aloha's rigid application of those usage guidelines results in an "estimate" that Pasco Health's nursing home facility will use 81,776 gpd (and results in impact fees totaling \$1, 318,474.45). This "estimate" exceeds Pasco Health's demonstrated demand (14,700 gpd) by more than 500%.

24. It is unfair, unjust and unreasonable for Aloha to strictly adhere to these "one-size-fits-all" usage guidelines when hard data shows that the guideline estimates exceed actual usage studies five fold.⁴ Moreover, it is undisputed that the

⁴ Notably, other water and wastewater utilities in Florida have similar usage guidelines which are not blindly relied on by the utility to establish impact fees when other empirical usage information is available. *See, e.g.,* Service Availability Policy of Aqua Utilities Florida, Inc.

usage guidelines in Appendix "B" were established without any consideration of the actual usage projections for the Project provided by Pasco Health. Thus, the "estimated" demand for services upon which Aloha has based its impact fees charge bears no rational relationship to the facility's anticipated future demand. Furthermore, the level of impact fees which Aloha attempts to charge Pasco Health (which are based on excessive usage estimates) bears no rational relationship to the utility's actual cost for providing service to the nursing home in direct contravention of Florida law which requires that Aloha's rates be based on "the cost of providing service." See § 367.081(2)(a)1., Fla. Stat. (2006). By way of comparison, Pasco Health was advised in 2005 by the Utilities Department of Pasco County that, had the Project been located within that utility's service area, its impact fees for connection would have been approximately \$136,000. The impact fees claimed by Aloha are ten times that amount.⁵

25. Pasco Health is fully prepared to pay reasonable impact fees based on a reasonable estimate of the Project's actual usage. Given that there is water usage data from virtually identical facilities that have been in operation since 2004, the proposed facility's expected water usage can be accurately and reliably estimated. To ensure that Aloha is not deprived of any valid impact fee to which it is entitled, Pasco Health is willing to provide Aloha with a guarantee that it will pay the full

⁵ To the extent that the Commission concludes that Aloha's tariff must be strictly enforced as Aloha alleges, then the nursing home projected usage rate set out in Appendix "B" of that tariff, as applied to the proposed facility, must be declared invalid, void, and against public policy as a matter of law since it fails to establish impact fees based upon a reasonable estimate of actual usage by the proposed facility and has no legitimate cost basis.

impact fee associated with the proposed facility's actual demand for services. Pursuant to this guarantee, Pasco Health has offered to pay Aloha the impact fees based on its projected usage (i.e., \$237,008.45) and will agree to closely monitor actual usage and pay Aloha future impact fees based on actual usage. Thus, if the facility's actual use exceeds its projected use, Pasco Health will make up the difference with interest. Such an agreement would permit the needed Project to go forward and would provide Aloha with the assurance that it will be fully compensated for the Project's demand.

26. Aloha has rejected that proposal and has stated that it would be willing to provide Pasco Health with the requested water and wastewater service only if Pasco Health agreed to do all of the following: (i) acknowledge that Aloha's tariff required impact fees of \$1,318,464.454; (ii) provide Aloha with an initial upfront payment of \$237,008.10; (iii) provide Aloha with an irrevocable letter of credit in the amount of \$1,081,466.35 for the disputed amount of the fees; (iv) acknowledge that the proposed impact fees of \$237,008.10 deviates from the utility's tariff; (v) enter into a special availability contract with Aloha which would be conditioned upon Commission approval; (vi) pay Aloha an "administrative fee" of \$30,000 for preparing the special availability contract; and (vi) forfeit the entire letter of credit amount (\$1,081,466.35) to Aloha if the Commission does not approve the special availability contract. Not only are these terms onerous, they are commercially infeasible and cannot be interpreted as a good faith effort to

accommodate the efficient usage characteristics of Pasco Health’s proposed nursing home facility.

27. Inherent in Aloha’s demand for an irrevocable letter of credit to support its full impact fee charge of \$1,318,474.45 is the risk that this entire fee may be imposed on the proposed facility—notwithstanding that the charge is based on Aloha’s estimated demand for services that is excessive, arbitrary, and contrary to verifiable evidence.⁶ Pasco Health has advised Aloha that the demand for an irrevocable letter of credit would render the Project economically infeasible and results in a risk that Pasco Health simply cannot prudently assume. Given that Aloha’s excessive charge would destroy the financial viability of the Project, Pasco Health requires the assurance that the impact fees for which it will be obligated to pay will be based on its actual usage, or a reasonable estimate thereof.

**Aloha’s Asymmetrical Service Availability Policy
is Unfair and Unreasonable**

28. As interpreted by Aloha, Paragraph 7.4 of its tariff provides that regardless of the charges that would be required under the usage guidelines in Appendix “B,” Aloha is authorized to charge the customer additional impact fees if it is later determined that actual usage exceeds guideline projections. In other words, if Aloha’s “one-size-fits-all” usage guidelines yield a usage estimate that turns out to be lower than actual usage, Aloha reserves the right to increase the impact fees to ensure that the customer bears a proportional burden based on

⁶Remarkably, Aloha concedes that its own experience indicates the projected usage of 14,700 gpd put forward by Pasco Health “may be a reasonable number.” (Exhibit D.) Yet, as a condition for services, Aloha seeks to exact a minimum administrative fee of \$30,000 and also requires a letter of credit in excess of \$1,000,000.

actual usage. Aloha, however, refuses to calculate impact fees based on actual usage data that shows usage below the levels in the guidelines. Aloha's asymmetrical "heads utility wins, tails customer loses" impact fee policy contravenes the Florida Legislature's express requirement that a utility's "conditions for service availability" must be "just and reasonable." § 367.101, Fla. Stat. (2006).

**Aloha's Actions Inhibit the Development of a
Much Needed Healthcare Facility in Pasco County, Florida**

29. The State of Florida has determined that the Project is needed to provide additional nursing home beds to Medicaid and Medicare eligible patients in western Pasco County. Aloha's insistence on paying or posting a letter of credit for impact fees in excess of \$1.3 million would make this Project financially infeasible. Aloha's continued insistence on Pasco Health paying these excessive fees, if left unabated, will cause Pasco Health to abandon this much needed nursing home project. Aloha's actions thus will cause harm to the "the public health, safety and welfare" which this Commission is charged with protecting. § 367.011(3), Fla. Stat. (2006).

**Aloha's Excessive Usage Projections Eliminates an
Important Incentive for Water Conservation**

30. Aloha's one-size-fits-all assumptions with respect to water usage result in unfair and unreasonable policies that are not responsive to actual water conservation efforts of nursing home developers like Pasco Health. In fact, by assuming that the Project will use 81,776 gpd (when actual usage data indicates

usage will be approximately 14,700 gpd) Aloha penalizes Pasco Health and eliminates important incentives to conserve water. Moreover, Aloha's approach directly contravenes its own tariff, which says that CIAC charges will be allocated on a pro-rata basis.

31. Pasco Health has taken important steps to reduce water consumption through engineering and planning, efficient appliances and fixtures, and other conservation practices. These efforts have produced efficiencies which are verified by actual usage reports from substantially similar facilities. Instead of rewarding Pasco Health's investment in water conservation, Aloha chooses to be punitive. Aloha demands that Pasco Health pay excessive impact fees based on "estimated" usage levels that assumes inefficient and wasteful water consumption and ignores Pasco Health's water conservation initiatives.⁷ More to the point, Aloha's insistence on penalizing Pasco Health for designing its nursing home to achieve significant water conservation measures directly contravenes the plain language in the Memorandum of Understanding between the Commission and the FDEP, which was specifically designed to "encourage and promote water conservation." See Memorandum of Understanding between the Florida Department of Environmental Protection and the Florida Public Service Commission, attached as Exhibit "E."

WHEREFORE, Pasco Health respectfully requests that the Commission:

- (a) Address this emergency complaint at the earliest possible date;

⁷ Pasco Health questions whether any nursing home has ever paid impact charges according to Aloha's existing tariff. Pasco Health contends that the current tariff effectively bans new nursing homes in Aloha's territory.

- (b) Order Aloha to connect with Pasco Health and provide water and wastewater services upon Pasco Health paying connection fees of \$ 237,008.10; and,
- (c) Grant such other relief as the Commission deems appropriate.

Respectfully submitted this 6th day of March, 2007.

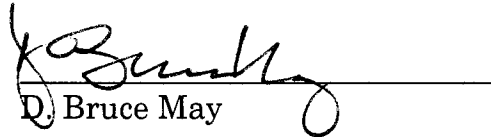


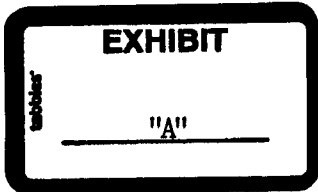
D. Bruce May
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HOLLAND & KNIGHT LLP
P.O. Drawer 810
Tallahassee, Florida 32302
Phone: (850) 224-7000
Fax: (850) 224-8832

Attorneys for Pasco Health Investors, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was provided by U.S. Mail to Aloha Utilities, Inc., 6915 Perrine Ranch Road New Port Richey, FL 34655-3904, this 6th day of March, 2007.


D. Bruce May





STATE OF FLORIDA
AGENCY FOR HEALTH CARE ADMINISTRATION

CERTIFICATE OF NEED

Under the provisions of the "Health Facility and Services Development Act" (Sections 408.031-.045, Florida Statutes AND Chapter 59C-1, Florida Administrative Code), the Agency for Health Care Administration certifies the need for this project.

NUMBER: 9840

APPLICANT:
Eastlake Rehab and Care Center, LLC
248 2nd Street North
Safety Harbor, Florida 34695

PROJECT COST: \$11,132,868
ISSUE DATE: August 30, 2005
TERMINATION DATE: February 28, 2007
REVISED TERMINATION DATE: _____

COUNTY: Pasco

DISTRICT: 5

SUBDISTRICT: 1

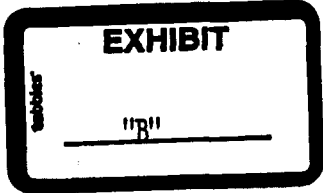
PROJECT DESCRIPTION: Establish a 120-bed replacement skilled nursing facility within a 30-mile radius of the replaced nursing home and within a geographic area that contains at least 85 percent of the facility's current residents. The project involves 54,517 total gross square feet of construction and \$6,832,854 in construction costs.

CONDITIONS: (1) Eastlake Rehab and Care Center, LLC shall provide a minimum of 55.5 percent of its total patient days to Medicaid residents; (2) Eastlake Rehab and Care Center shall be located in the Trinity area of Pasco County; and (3) The 120 nursing home beds currently licensed to Eastlake Rehab and Care Center through Inactive License #SNF15620851 shall be delicensed prior to the licensure of the nursing home authorized by Certificate of Need #9840.

FORM 1793, APRIL 1993

William McArd

DATE: 8/31/05



Aloha Utilities, Inc.

6915 Perrine Ranch Road
New Port Richey, FL 34655

(727) 372-0115 Fax (727) 372-2677

www.aloha-water.com

August 25, 2006

Mr. Leo Governale
Governale Engineering Services, Inc.
1807 Peppertree Drive
Oldsmar, FL 34677

RE: Carrington Place at Trinity

Dear Mr. Governale:

Please find below a listing of the fees due for the project listed above. Please note that should actual consumption exceed the estimate that additional impact fees may be required.

Water Impact Fees	81,776 gpd x 3.333	272.59 ERC's	\$ 272,559.41
Sewer Impact Fees	81,776 gpd x 12.79	633.92 ERC's	<u>\$1,045,915.04</u>
TOTAL			\$1,318,474.45

Please find enclosed copies of two pages from our tariff. The first page is from our Water Tariff that shows the Water and Sewer rates that are charged for Non-Residential customers East of US 19. The second page is Appendix "B" Schedule of Daily Rated Gallonage for Various Occupancy which shows formulas by which we calculate gallons per day. This facility has been classified under Nursing Homes.

Meter Fees and deposits will be determined at a later date. We also require a letter stating the cost estimate of the contributed property. This should be provided to our office as soon as possible so we can calculate and provide you with the Administrative Costs for this project, as this figure is reflected in the Developer Agreement.

August 25, 2006
Mr. Leo Governale
Page 2

Prior to DEP forms being signed, we must have a signed Developer Agreement, signed Amendment to Developer Agreement for Private Lift Station and all impact fees and administration costs paid.

Should you require any additional information, please do not hesitate to contact our office.

Sincerely,



Pamela Yacobelli
Administration Manager

PY/jlw

Enclosures

admin\letters\06\fd\j\l\impact fees-carrington place at trinity

Aloha Utilities, Inc.
 WATER TARIFF

THIRD REVISED SHEET NO. 26.7
 CANCELS SECOND REVISED SHEET NO. 26.7

For the purpose of this Policy, the term contributions-in-aid-of-construction shall include the on-site water distribution and sewage collection system contributed in cash or in kind; payments to defray, in part or in total, the cost of the off-site lines and related facilities; and payments to defray in part the cost of the treatment facilities. (See Appendix "A").

7.0 CONTRIBUTIONS-IN-AID-OF-CONSTRUCTION---TREATMENT FACILITIES

Utility requires that all Contributors pay contributions based in part on a pro rata share of the cost of treatment plant facilities, whether or not the facilities have been constructed or may be constructed to continue to render service. Such payments are herein defined as contributions-in-aid-of-construction and shall be made to all Contributors upon approval of the governmental agency having jurisdiction of this Policy, where water or sewer service is available or agreed to be made available in the territory.

Utility further declares that these contributions shall be uniform among Contributors notwithstanding provisions of prior developers agreements or the practices and procedures pertaining to such charges as established prior to the adopting of part IX, Chapter 25-10, F.A.C.

It is the further purpose of this Section to resolve the inequities and discriminatory practices regarding contributions by placing all owners, builders, and developers on parity with regard to such charges.

7.1 SCHEDULE FOR "CIAC" FOR TREATMENT FACILITIES

The following is a schedule of "CIAC" for treatment facilities to be paid prior to commencement of water and/or sewer services as a prerequisite for such service. The amounts are based on an equivalent residential connection.

<u>Residential</u>	<u>East of US 19</u>	<u>West of US 19</u>
Water Plant Capacity	\$1,000.00 per ERC	\$126.86 per ERC
Sewage Plant Capacity	\$1,650.00 per ERC	\$117.06 per ERC
 <u>Non-Residential</u>		
★ Water	\$3.333 per gallon	\$.470 per gallon
Sewer	\$12.79 per gallon	\$.434 per gallon

EFFECTIVE DATE: November 27, 2002

STEPHEN G. WATFORD
 ISSUING OFFICER

TYPE OF FILING: Service Availability Case

PRESIDENT
 TITLE

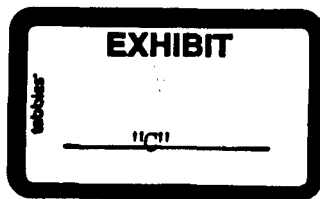
APPENDIX "B"SCHEDULE OF DAILY RATED GALLONAGE
FOR VARIOUS OCCUPANCYTypes of Building Usages

Apartments.....	250	gpd
Bars & Cocktail Lounges.....	5	gpcd (1)
Boarding Schools (Students and Staff).....	75	gpcd
Bowling Alleys (toilet wastes only), per lane.....	100	gpd (2)
Country Clubs, per member.....	25	gpcd
Day Schools (Students and Staff).....	10	gpcd
Drive-in Theatres (per car space).....	5	gpd
Factories, with showers (toilet wastes only).....	30	gpcd
Factories, no showers (toilet wastes only).....	10	gpd/100 sq. ft.
Hospitals, with laundry.....	250	gpd/bed
Hospitals, no laundry.....	200	gpd/bed
Hotels and Motels.....	200	gpd/room & unit
Laundromat.....	225	gpd/washing machine
Mobile Home Parks.....	300	gpd/trailer
Movie Theatres, Auditoriums, Churches (per seat).....	3	gpd
Multiple Dwelling Units.....	193	gpd
Nursing Homes.....	150	gpd/100 sq. ft.
Office Buildings.....	10	gpd/100 sq. ft.
Public Institutions (other than those listed herein)...	75	gpcd
Restaurants (per seat) (see surcharge Section 7.5).....	50	gpcd
Single Family Residential		
Water - 3/4" x 5/8" Meter.....	270	gpd
1" Meter.....	600	gpd
1 1/2" Meter.....	1150	gpd
Sewer.....	270	gpd
Townhouse Residence.....	193	gpd
Stadiums, Frontons, Ball Parks, etc. (per seat).....	3	gpd
Stores, without kitchen wastes, shopping centers.....	15	gpd/100 sq. ft.
Speculative Buildings.....	30	gpd, plus
	10	gpd/100 sq. ft.
Warehouses.....	30	gpd, plus
	10	gpd/1000 sq. ft.

(1) gpcd - gallons per capita per day

(2) gpd - gallons per day

NOTE: Sewage gallonage refers to sanitary sewage flow on unit basis for average daily flow in gallons per day.



GOVERNALE ENGINEERING SERVICES, INC.

September 29, 2006

Jennifer Wilkowski
 Aloha Utilities, Inc.
 6915 Perrine Ranch Road
 New Port Richey, FL 34655

Re: Carrington Place at Trinity

Dear Ms. Wilkowski:

In accordance with our discussion, we have enclosed water consumption records for two nearby existing 120 bed nursing home facilities, equivalent in the total number of beds to be provided at the referenced facility, to demonstrate typical average consumption and summarized as follows:

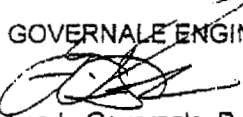
ARBOR NURSING HOME
 PORT CHARLOTTE, FL

CARRINGTON PLACE
 ST. PETERSBURG, FL.

DATE	TOTAL USAGE (GAL.)	DAYS IN CYCLE	AVG. DAILY FLOW (GPD)	TOTAL USAGE (GAL.)	DAYS IN CYCLE	AVG. DAILY FLOW (GPD)
12/2004	369,000	29	12,724	423,400	31	13,685
01/2005	369,000	31	11,903	484,600	32	15,144
02/2005	324,000	28	11,571	483,400	28	17,264
03/2005	373,000	32	11,656	449,900	30	14,997
04/2005	397,000	31	12,806	475,900	29	16,410
05/2005	405,000	31	13,065	463,600	32	14,488
06/2005	382,000	30	12,733	451,300	30	15,043
07/2005	408,000	30	13,600	546,000	33	16,545
08/2005	434,000	32	13,563	452,800	30	15,093
09/2005	448,000	31	14,452	670,800	30	22,360
10/2005	327,000	31	10,548	653,300	31	21,074
11/2005	347,000	30	11,567	583,300	28	20,832
12/2005	425,000	29	14,655	739,900	32	23,122
01/2006	521,000	34	15,324	796,800	32	24,869
02/2006	360,000	27	13,333	644,500	29	22,224
03/2006	353,000	29	12,172	717,500	30	23,917
04/2006	344,000	30	11,467	796,800	32	24,900
05/2006	350,000	31	11,290	600,000	29	20,690
06/2006	339,000	32	10,594	664,500	29	22,914
07/2006	396,000	32	12,375	798,400	33	24,194
08/2006	312,000	28	11,143			

We respectfully request your consideration of the foregoing along with the supporting data provided to tabulate the anticipated flows from the proposed referenced project. Should you have any questions or need additional information, please contact me at your convenience.

GOVERNALE ENGINEERING SERVICES, INC.


 Leo L. Governale, P.E.

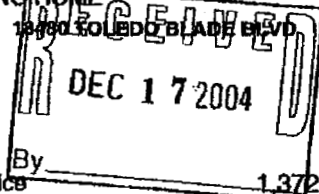
Cc: Troy Smith
 Jyke Jones



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME Service Address: 18700 TOLEDO BLVD	2552-080006	16-DEC-2004	05-JAN-2005 <small>Applies to current charges only</small>



CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	
16141	15772	369	11/15/2004	12/14/2004	29

By _____
 Gen Water Service 1,372.68
 Base Facility Charge 230.93
 Customer Charge 2.77

General Sewer Service 1,125.45
 Base Facility Charge 350.01

CURRENT TOTAL \$ 3,081.84
 TOTAL DUE \$ 3,081.84

TANDEM HEALTH CARE of:
 1305 PR

VENDOR #: 5085 PR

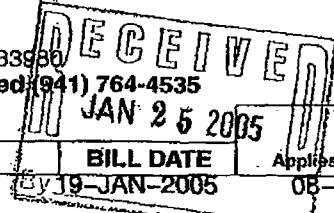
INV. #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
1216042	6000	7415		3081.84
INV. DATE:				
12-16-04				
COMPLETED BY:				
PR				
APPROVED BY:				
[Signature]				

RECEIVED



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P.O. Box 516000 PUNTA GORDA FL 33951-6000
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 E-mail: ccusupport@charlottefl.com

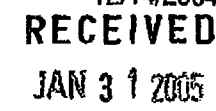


CUSTOMER NAME ARBOR NURSING HOME Service Address: 18480 TOLEDO BLADE BLVD	ACCOUNT NUMBER 2552-080006	BILL DATE 19-JAN-2005	DUE DATE 08-FEB-2005 <small>Applies to current charges only</small>
--	--------------------------------------	---------------------------------	--

CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	

Balance Forward	\$ 3,081.84	16510	16141	369	12/14/2004	01/14/2005	31
Gen Water Service	1,372.68						
Base Facility Charge	230.93						
Customer Charge	2.77						
General Sewer Servic	1,125.45						
Base Facility Charge	350.01						

CURRENT TOTAL \$ 3,081.84
 TOTAL DUE \$ 6,163.68



TANDEM HEALTH CARE of:
 1305 PTC

VENDOR #:	5085 PTC	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
INV. #:	011905/1	6000	7415		3081.84
INV. DATE:	1-19-05				
COMPLETED BY:					

ENTERED



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
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 E-mail: ccusupport@charlottefl.com

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 FEB 16 2005

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME	2552-080006	15-FEB-2005	07-MAR-2005

Service Address: 18480 TOLEDO BLADE BLVD

CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	

Balance Forward \$ 3,078.84

	16834	16510	324	01/14/2005	02/11/2005	28
Gen Water Service						
Base Facility Charge						
Customer Charge						

General Sewer Servic	988.20
Base Facility Charge	350.01

CURRENT TOTAL **\$ 2,777.19**
 TOTAL DUE \$ 5,856.03

RECEIVED
 FEB 22 2005

TANDEM HEALTH CARE of:				
<i>1305 PR</i>				
VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
<i>5085 PR</i>				
INV. #:				
<i>021505</i>	<i>6000</i>	<i>7415</i>		<i>277.19</i>
INV. DATE:				
<i>2-15-05</i>				
COMPLETED BY:				
<i>M</i>				
APPROVED BY:				



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME Service Address: 18480 TOLEDO BLADE BLVD	2552-080006	18-MAR-2005	07-APR-2005 <small>Applies to current charges only</small>

CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		
			FROM	TO	DAYS

Balance Forward \$ 3.00 CR

Gen Water Service	1,387.56	17207	16834	373	02/17/2005 - 03/15/2005	32
Base Facility Charge	230.93					
Customer Charge	2.77					
General Sewer Service	1,137.85					
Base Facility Charge	350.01					

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 MAR 23 2005

CURRENT TOTAL \$ 3,108.92
 TOTAL DUE \$ 3,108.92

TANDEM HEALTH CARE of:
 1305 PR

VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
5085 PR	6000	7415		3108.92

INV. #: 2552-080006 Micros
 INV. DATE: 3-15-05
 COMPLETED BY: *[Signature]*

ENTD MAR 30 2005



CHARLOTTE COUNTY UTILITIES

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 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

APR 21 2005

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME	2552-080006	19-APR-2005	09-MAY-2005

Applies to current charges only

Service Address: 18480 TOLEDO BLADE BLVD

CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	

Balance Forward \$ 3.00 CR

Gen Water Service 1,476.84
 Base Facility Charge 230.93
 Customer Charge 2.77

General Sewer Servc 1,210.85
 Base Facility Charge 350.01

CURRENT TOTAL \$ 3,271.40

TOTAL DUE \$ 3,268.40

RECEIVED
 APR 25 2005

TANDEM HEALTH CARE of:				
1305 Prt				
VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
5085	6002	7495		3268.40
INV. #:	INV. DATE:			
2552-080006	4-19-05			
COMPLETED BY:				
mr				



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

MAY 27 2005

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME	2552-080006	19-MAY-2005	08-JUN-2005

Service Address: 18480 TOLEDO BLADE BLVD

CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	
18009	17604	405	04/15/2005	05/16/2005	31

General Water Servic 1,506.60
 Base Facility Charge 230.93
 Customer Charge 2.77

General Sewer Servic 1,235.25
 Base Facility Charge 350.01

Penalty Charge 98.05

CURRENT TOTAL \$ 3,423.61

TOTAL DUE \$ 3,423.61

RECEIVED
 JUN 01 2005

TANDEM HEALTH CARE of:
 1305 PR

VENDOR #:	DEPT NO.	GL ACCT.	TUE ACCT.	AMOUNT
5085		60007415		3423.61
INV. #:	INV. DATE:	COMPLETED BY:	APPROVED BY:	
MAY-06 2552-080006	5-19-05			
DESC:				



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME Service Address: 18480 TOLEDO BLADE BLVD	2552-080006	JUN-2005	07-JUL-2005 <small>Applies to current charges only</small>

ENTERED

JUN 28 2005

CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	
18391	18009	382	05/16/2005	06/15/2005	30

General Water Servic 1,421.04
 Base Facility Charge 230.93
 Customer Charge 2.77

General Sewer Servic 1,165.10
 Base Facility Charge 350.01

Penalty Charge 102.71

CURRENT TOTAL \$ 3,272.56

TOTAL DUE \$ 3,272.56

RECEIVED
 JUN 27 2005

TANDEM HEALTH CARE of:

1805 Ave

VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
5085	6000	7415		3272.56
INV. #:	June-05			
2552-080006				
INV. DATE:	6-17-05			
COMPLETED BY:	M			
APPROVED BY:	M			



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME	2552-080006	19-JUL-2005	08-AUG-2005
Service Address: 18480 TOLEDO BLADE BLVD			Applies to current charges only

CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	
18799	18391	408	06/15/2005	07/15/2005	30

General Water Servc 1,517.76
 Base Facility Charge 230.93
 Customer Charge 2.77

General Sewer Servc 1,244.40
 Base Facility Charge 350.01

Penalty Charge 98.17

CURRENT TOTAL \$ 3,444.04
 TOTAL DUE \$ 3,444.04

ENTERED
 JUL 27 2005

TANDEM HEALTH CARE of:

PR-1301

VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
<i>5085</i>	<i>6000</i>	<i>7415</i>		<i>3444.04</i>
INV. #:				
<i>2552-080006</i>				
INV. DATE:				
<i>7-15-05</i>				
COMPLETED BY:				
<i>M</i>				
APPROVED BY:				

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 RECEIVED
 05



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
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 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME Service Address: 18480 TOLEDO BLADE BLVD	2552-080006	19-AUG-2005	08-SEP-2005 <small>Applies to current charges only</small>

CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	

Balance Forward \$ 0.02 CR

General Water Servic 1,614.48
 Base Facility Charge 290.93
 Customer Charge 2.77

General Sewer Servic 1,323.70
 Base Facility Charge 350.01

Penalty Charge 103.32

CURRENT TOTAL \$ 3,625.21
 TOTAL DUE \$ 3,625.19

19233 18799 434 07/15/2005 08/16/2005 32

RECEIVED
AUG 26 2005

RECEIVED

TANDEM HEALTH CARE of:
 PTC By 1305
 AUG 28 2005

VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
5085	6000	7415		3625.19
INV. #: 2552-080006				
INV. DATE:				



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME Service Address: 18480 TOLEDO BLADE BLVD	2552-080006	21-SEP-2005	11-OCT-2005 <small>Applies to current charges only</small>

	CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
				FROM	TO	
General Water Serv	19681	19233	448	08/16/2005	09/16/2005	31
Base Facility Charge						
Customer Charge						

General Water Serv 1,666.56
 Base Facility Charge 230.93
 Customer Charge 2.77

General Sewer Serv 1,366.40
 Base Facility Charge 350.01
 Penalty Charge 108.76

CURRENT TOTAL \$ 3,725.43
 TOTAL DUE \$ 3,725.43

RECEIVED
 OCT 03 2005

RECEIVED
 SEP 28 2005

TANDEM HEALTH CARE of:				
<i>PTC BOS</i>				
VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
5085				
INV #: 2552080006	10000	7415		3725.43
INV. DATE: 11/1				

ENTER DATE 08 2005



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME Service Address: 18480 TOLEDO BLADE BLVD	2552-080006	19-OCT-2005	08-NOV-2005 <small>Applies to current charges only</small>

	CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
				FROM	TO	
Deposit Interest App						
General Water Servic	20008	19681	327	09/16/2005	10/17/2005	31
Base Facility Charge						
Customer Charge						
General Sewer Servic						
Base Facility Charge						
Penalty Charge						
CURRENT TOTAL						\$ 46.88 CR
TOTAL DUE						\$ 2,860.98

TANDEM HEALTH CARE of:				
<i>PTC 1305</i>				
VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
<i>5085</i>				
INV. #: <i>2552-080004</i>	<i>0000</i>	<i>7415</i>		<i>2860.98</i>
INV. DATE: <i>10/19/05</i>				
COMPLETED BY: <i>[Signature]</i>				
APPROVED BY:				

RECEIVED
 OCT 20 2005



CHARLOTTE COUNTY UTILITIES

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 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME	2552-080006	18-NOV-2005	08-DEC-2005
Service Address: 18480 TOLEDO BLADE BLVD			

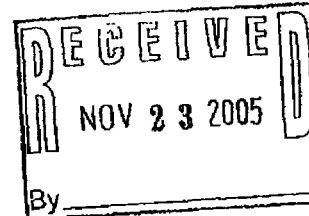
CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	
20355	20008	347	10/17/2005	11/16/2005	30

General Water Servic 1,290.84
 Base Facility Charge 230.93
 Customer Charge 2.77

General Sewer Servic 1,058.35
 Base Facility Charge 350.01

Penalty Charge 85.82

CURRENT TOTAL \$ 3,018.72
 TOTAL DUE \$ 3,018.72



TANDEM HEALTH CARE of:					
1305 PTC					
VENDOR #:	5085	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
INV. #:	2552-080006	6000	7415		3018.72
INV. DATE:	11/18/05				



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME	2552-080006	20-DEC-2005	09-JAN-2006

Applies to current charges only

Service Address: 18480 TOLEDO BLADE BLVD

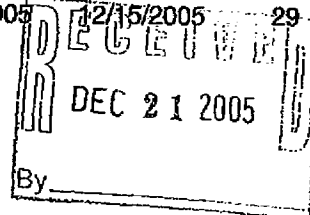
	CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
				FROM	TO	
General Water Servc	20780	20355	425	11/16/2005	12/15/2005	29
Base Facility Charge						
Customer Charge						
General Sewer Servc						
Base Facility Charge						
Penalty Charge						

General Water Servc 1,581.00
 Base Facility Charge 230.93
 Customer Charge 2.77

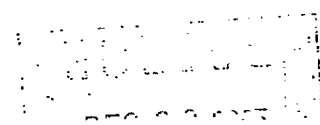
 General Sewer Servc 1,296.25
 Base Facility Charge 350.01

 Penalty Charge 90.56

CURRENT TOTAL \$ 3,551.52
 TOTAL DUE \$ 3,551.52



TANDEM HEALTH CARE of:				
<i>1305-PTC</i>				
VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
<i>5085</i>				
INV. #:				
<i>2552-080006</i>	<i>6000</i>	<i>7415</i>		<i>3551.52</i>
INV. DATE:				
<i>12-15-05</i>				





CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME ARBOR NURSING HOME	ACCOUNT NUMBER 2552-080006	BILL DATE 20-JAN-2006	DUE DATE 09-FEB-2006 <small>Applies to current charges only</small>
--	--------------------------------------	---------------------------------	--

Service Address: 18480 TOLEDO BLADE BLVD

CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	

General Water Serv	2,011.06
Base Facility Charge	239.47
Customer Charge	2.87
General Sewer Serv	1,646.36
Base Facility Charge	362.96
Penalty Charge	106.54

21301	20780	521	12/15/2005	01/16/2006	31
-------	-------	-----	------------	------------	----

RECEIVED
 JAN 23 2006
 By _____

ENTERED JAN 27 2006

CURRENT TOTAL \$ 4,369.26
 TOTAL DUE \$ 4,369.26

RECEIVED

TANDEM HEALTH CARE of:					
<i>1305 PTC</i>					
VENDOR #:	5085	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
INV. #:	2552-080006	6000	7415		4369.26
INV. DATE:	1/20/06				



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
(941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
E-mail: ccusupport@charlottefi.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME	2552-080006	16-FEB-2006	08-MAR-2006
Service Address: 18480 TOLEDO BLADE BLVD			

CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	
21661	21301	360	01/18/2006	02/14/2006	27

General Water Servc 1,389.60
Base Facility Charge 239.47
Customer Charge 2.87

General Sewer Servc 1,137.60
Base Facility Charge 362.96

Penalty Charge 131.08

CURRENT TOTAL \$ 3,263.58
TOTAL DUE \$ 3,263.58

RECEIVED
FEB 21 2006
By

TANDEM HEALTH CARE of:
1305 PTC

VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
<i>5085</i>	<i>10000</i>	<i>7415</i>		<i>3263.58</i>
INV. #: <i>2552-080006</i>				
INV. DATE: <i>2/16/06</i>				
COMPLETED BY:				

RECEIVED
MAR 03 2006

ENTERED MAR 07 2006



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME Service Address: 18480 TOLEDO BLADE BLVD	2552-080006	17-MAR-2006	06-APR-2006 <small>Applies to current charges only</small>

RECEIVED
 MAR 22 2006
 By _____

CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	
22014	21861	353	02/14/2006	03/15/2006	

General Water Servic 1,362.58
 Base Facility Charge 239.47
 Customer Charge 2.87

 General Sewer Servic 1,115.48
 Base Facility Charge 362.96

 Penalty Charge 97.91

CURRENT TOTAL \$ 3,181.27
 TOTAL DUE \$ 3,181.27

RECEIVED
 MAR 31 2006

RECEIVED
 MAR 25 2006
 By _____

TANDEM HEALTH CARE of:					
1305 PTC					
VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT	
5085	6000	7415		3,181.27	
INV. #:	2552-080006				
INV. DATE:	3/17/06				
COMPLETED BY:	SK				



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME ARBOR NURSING HOME	ACCOUNT NUMBER 2552-080006	BILL DATE 19-APR-2006	DUE DATE Applies to current charges only 09-MAY-2006
--	--------------------------------------	---------------------------------	---

Service Address: 18480 TOLEDO BLADE BLVD

CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	
22358	22014	344	03/15/2006	04/14/2006	30

General Water Servic 1,327.84
 Base Facility Charge 239.47
 Customer Charge 2.87

General Sewer Servic 1,087.04
 Base Facility Charge 362.96

Penalty Charge 95.44

CURRENT TOTAL \$ 3,115.62
 TOTAL DUE \$ 3,115.62

RECEIVED
 APR 27 2006
 By _____

RECEIVED
 APR 23 2006

TANDEM HEALTH CARE of:
 1305 PTE

VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
5085	6000	7415		3115.62
INV. #: 2552-080006	INV. DATE: 4/19/06			COMPLETED BY: SK



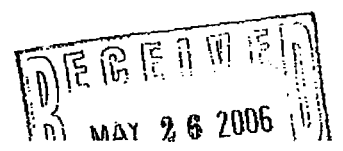
CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME	2552-080006	17-MAY-2006	06-JUN-2006
Service Address: 18480 TOLEDO BLADE BLVD			

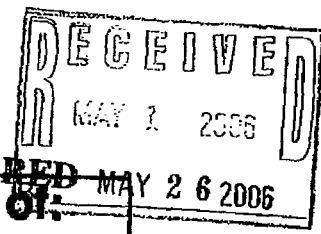
	CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		
				FROM	TO	DAYS
Balance Forward	\$ 95.44 CR	<i>paid penalty charge & x's last month</i>				
	22708	22358	350	04/14/2006	05/15/2006	31
General Water Servc	1,351.00					
Base Facility Charge	239.47					
Customer Charge	2.87					
General Sewer Servc	1,106.00					
Base Facility Charge	362.96					
Penalty Charge	90.61					

CURRENT TOTAL: \$ 3,152.91
 TOTAL DUE \$ 3,057.47



TANDEM HEALTH CARE OF
1305 PTC

VENDOR #	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
5085	6000	7415		3057.47
INV. #:	2552-080006			
INV. DATE:	5/17/06			
COMPLETED BY:				





CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE <small>Applies to current charges only</small>
ARBOR NURSING HOME Service Address: 18480 TOLEDO BLADE BLVD	2552-080006	20-JUN-2006	10-JUL-2006

CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	
23047	22708	339	05/15/2006	06/16/2006	32

General Water Service 1,308.54
 Base Facility Charge 239.47
 Customer Charge 2.87

General Sewer Service 1,071.24
 Base Facility Charge 362.96

Penalty Charge 91.72

CURRENT TOTAL \$ 3,076.80
 TOTAL DUE \$ 3,076.80

RECEIVED
 JUN 26 2006

TANDEM HEALTH CARE of:
1305 PTC

VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
5085				
INV. #: 2552-080006	6000	7415		2985.98
INV. DATE: 6/20/06	7000	8840		91.72
COMPLETED BY: SIL				
APPROVED BY: WJ				



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlotteff.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME	2552-080008	21-JUL-2006	11-AUG-2006

Applies to current charges only

Service Address: 18480 TOLEDO BLADE BLVD

CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
			FROM	TO	
23443	23047	396	06/16/2006	07/18/2006	32

General Water Servic 1,528.56
 Base Facility Charge 239.47
 Customer Charge 2.87

General Sewer Servic 1,251.36
 Base Facility Charge 362.96

Penalty Charge 92.31

CURRENT TOTAL \$ 3,477.53

TOTAL DUE \$ 3,477.53

RECEIVED
 JUL 26 2006

TANDEM HEALTH CARE of:
1305 PTC

VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
<i>5085</i>				
INV. #: <i>8552-080006</i>	<i>1600</i>	<i>7415</i>		<i>3385.32</i>
INV. DATE: <i>7/21/06</i>	<i>7000</i>	<i>8846</i>		<i>92.31</i>
COMPLETED BY: <i>SK</i>				
APPROVED BY: <i>ML</i>				



CHARLOTTE COUNTY UTILITIES

P.O. Box 516000 PUNTA GORDA FL 33951-6000
 25550 Harbor View Road, Unit 1, Port Charlotte FL 33980
 (941) 764-4300 or (800) 524-3494; Hearing Impaired (941) 764-4535
 E-mail: ccusupport@charlottefl.com

CUSTOMER NAME	ACCOUNT NUMBER	BILL DATE	DUE DATE
ARBOR NURSING HOME Service Address: 18480 TOLEDO BLADE BLVD	2552-080006	17-AUG-2006	08-SEP-2006 <small>Applies to current charges only</small>

	CURRENT READ	PREVIOUS READ	USAGE (TGALS)	SERVICE PERIOD		DAYS
				FROM	TO	
General Water Servie	23755	23443	312	07/18/2006	08/15/2006	28
Base Facility Charge						
Customer Charge						

General Water Servie 1,204.32
 Base Facility Charge 239.47
 Customer Charge 2.87

General Sewer Servie 985.92
 Base Facility Charge 362.96

CURRENT TOTAL \$ 2,795.54
 TOTAL DUE \$ 2,795.54

RECEIVED
 AUG 28 2006
ENTERED AUG 30 2006
 By _____

TANDEM HEALTH CARE of:				
<i>1305 PTC</i>				
VENDOR #:	DEPT NO.	GL ACCT.	SUB ACCT.	AMOUNT
<i>5085</i>				
INV. #: <i>2552-080006</i>	<i>6000</i>	<i>7415</i>		<i>2795.54</i>
INV. DATE: <i>8/17/06</i>				
COMPLETED BY: <i>SK</i>				
APPROVED BY:				

CERTIFICATE #: 13453

LICENSE #: SNF10760961

State of Florida
AGENCY FOR HEALTH CARE ADMINISTRATION
DIVISION OF HEALTH QUALITY ASSURANCE

SKILLED NURSING FACILITY
STANDARD

This is to confirm that Carrington Place of St Pete LLC has complied with the rules and regulations adopted by the State of Florida, Agency For Health Care Administration, authorized in Chapter 400, Part II, Florida Statutes, and as the licensee is authorized to operate the following:

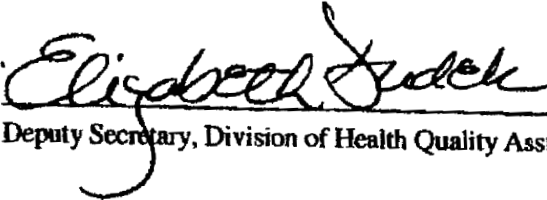
CARRINGTON PLACE NURSING & REHABILITATION CENTER
10501 ROOSEVELT BLVD NORTH
SAINT PETERSBURG, FL 33716

TOTAL: 120 BEDS

CHANGE OF OWNERSHIP

ACTION EFFECTIVE DATE: 05/01/2006

LICENSE EXPIRATION DATE: 04/30/2007


Deputy Secretary, Division of Health Quality Assurance

1/1

03:10:34 p.m. 09 18 2006

03:28:20 p.m. 09-18-2006 1 727 578 5255

CARRINGTON PLACE 727 578 5255

10501 ROOSEVELT BLVD N

ACCOUNT NUMBER

042780-124373

04-09

BILL DATE

7/17/06

DUPLICATE DATE

8/02/06

Last Bill Amount	6,260.10
Payments	6,260.10-
Adjustments	.00
Balance Forward	.00

Rate Class : COMMERCIAL

Last payment amount/date:

6,260.10 7/17/06

Service	Service Period	Days	Meter Number	Current	Previous	Usage
				454211	446227	7984
			Consumption	Charge		Total
WA	6/08/06	7/11/06 33	60156103			
WA	BASE CHARGE - WATER			62.79		
WA	USAGE @1.01/1000 GAL		477,000	481.77		
WA	AVG TO 1.4 TIMES AVG		190,800	373.97		
WA	1.4 TO 1.8 TIMES AVG		130,600	373.52		
WA	**THW @1.64/1000 GAL		798,400	1,309.38		
	TOTAL WATER					2,601.43
FD	FIRE SVC - 6 INCH			7.88		7.88
SE	BASE CHARGE - SEWER			80.03		
SE	USAGE @3.37/1000 GAL		798,400	2,690.61		
	TOTAL SEWER					2,770.64
CR	CONTAINER 8YD/6PKUP			1,094.08		
CR	CONTAINER LOCK CHG			3.00		
CR	CARDBOARD 8X3			149.76		
CR	CONTAINER 4YD/3PKUP			326.04		
	TOTAL CONTAINER					1,572.88
SW	STORMWATER MNGMT FEE			157.13		157.13
	UTILITY TAX - WATER			260.93		260.93
	LATE CHARGE		7/13/06			93.90
	Total Current Charges					7,464.79
	Balance Forward					.00
	Total Amount Due					7,464.79

SEE 1. - 1.2.2.2.2.2.

10501 ROOSEVELT BLVD N

ACCOUNT NUMBER	CYCLE	BILL DATE	DUE DATE
042780-134373	04-08	6/14/06	6/30/06

Last Bill Amount	13,357.22
Payments	13,357.22-
Adjustments	.00
Balance Forward	.00

Rate Class : COMMERCIAL
 Last payment amount/date: 111.87 6/12/06

Service	Service Period	Days	Meter Number	Consumption	Current Charge	Previous	Usage Total
WA	5/10/06	6/08/06 29	60136103		446227	439582	6645
WA	BASE CHARGE - WATER				62.79		
WA	USAGE @1.01/1000 GAL			477,000	481.77		
WA	AVG TO 1.4 TIMES AVG			187,500	367.50		
WA	**TBN @1.64/1000 GAL			664,500	1,089.78		
	TOTAL WATER						2,001.84
FD	FIRE SVC - 6 INCH				7.98		7.88
SE	BASE CHARGE - SEWER				80.03		
SE	USAGE @3.37/1000 GAL			664,500	2,239.37		
	TOTAL SEWER						2,319.40
CR	CONTAINER @2D/6PKUP				1,094.08		
CR	CONTAINER LOCK CHG				3.00		
CR	CARDBOARD SKS				149.76		
CR	CONTAINER 4TD/3PKUP				326.04		
	TOTAL CONTAINER						1,572.88
SW	STORMWATER MNGT FEE				157.13		157.13
	UTILITY TAX - WATER				200.97		200.97
Total Current Charges							
Balance Forward						6,260.10	
Total Amount Due						.00	6,260.10
Deposit on Account					2,656.50		

10501 ROOSEVELT BLVD N

ACCOUNT NUMBER	CYCLE	BILL DATE	DUE DATE
042780-134373	04-08	5/12/06	5/31/06

Last Bill Amount 7,458.04
 Payments .00
 Adjustments .00
 Balance Forward 7,458.04

Rate Class : COMMERCIAL
 Last payment amount/date: 6,697.80 4/13/06

Service	Service Period	Days	Meter Number	Consumption	Current Charge	Previous	Usage
WA	4/11/06	5/10/06	28	60156103	192.56	439582	6000
WA	BASE CHARGE - WATER				62.79		Total
WA	USAGE @1.01/1000 GAL			477,000	481.77		
WA	AVG TO 1.4 TIMES AVG			123,800	241.08		
WA	**TBW @1.64/1000 GAL			600,000	984.00		
	TOTAL WATER						1,769.64
FD	FIRE SVC - 6 INCH				7.88		7.88
SE	BASE CHARGE - SEWER				80.03		
SE	USAGE @3.37/1000 GAL			600,000	2,022.00		
	TOTAL SEWER						2,102.03
CR	CONTAINER 8YD/6PKUP				1,094.08		
CR	CONTAINER LOCK CHG				3.00		
CR	CARDBOARD 8X3				149.76		
CR	CONTAINER 4YD/3PKUP				326.04		
	TOTAL CONTAINER						1,572.88
SW	STORMWATER MNGMT FEE				157.13		157.13
	UTILITY TAX - WATER				177.75		177.75
	LATE CHARGE						111.87
	5/11/06						
	Total Current Charges						5,899.18
	Balance Forward						7,458.04
	Total Amount Due						13,357.22
	Deposit on Account				2,656.50		

Pd 5/10 ch# 29219

ENTERED

SERVICE ADDRESS			
10501 ROOSEVELT BLVD N			
ACCOUNT NUMBER	CYCLE	BILL DATE	DUE DATE
042780-134373	04-08	4/14/06	5/02/06

Last Bill Amount 6,697.80
 Payments 6,697.80-
 Adjustments .00
 Balance Forward .00

Rate Class : COMMERCIAL
 Last payment amount/date: 6,697.80 4/13/06

Service	Service Period	Days	Meter Number	Current	Previous	Usage
WA	3/10/06	4/11/06	32	433582	425614	7968
Consumption				Charge		Total
WA	BASE CHARGE - WATER			62.79		
WA	USAGE \$1.01/1000 GAL		477,000	481.77		
WA	AVG TO 1.4 TIMES AVG		190,800	373.97		
WA	1.4 TO 1.8 TIMES AVG		129,000	368.94		
WA	**TBW \$1.64/1000 GAL		796,800	1,306.75		
	TOTAL WATER					2,594.22
FD	FIRE SVC - 6 INCH			7.88		7.88
SE	BASE CHARGE - SEWER			80.03		
SE	USAGE \$3.37/1000 GAL		796,800	2,685.22		
	TOTAL SEWER					2,765.25
CR	CONTAINER 8YD/6KUP			1,094.08		
CR	CONTAINER LOCK CHG			3.00		
CR	CARDBOARD 8X3			149.76		
CR	CONTAINER 4YD/3KUP			326.04		
	TOTAL CONTAINER					1,572.88
SW	STORMWATER MNGMT FEE			157.13		157.13
	UTILITY TAX - WATER			260.21		260.21
	LATE CHARGE		4/12/06			108.47
Total Current Charges						7,458.04
Balance Forward						.00
Total Amount Due						7,458.04

10501 ROOSEVELT BLVD N
 ACCOUNT NUMBER: 042780-134373
 CYCLE: 04-08
 BILL DATE: 3/15/06
 DUE DATE: 3/31/06

Last Bill Amount 6,113.50
 Payments 6,113.50-
 Adjustments .00
 Balance Forward .00

Rate Class : COMMERCIAL
 Last payment amount/date: 6,113.50 3/09/06

Service	Service Period	Days	Meter Number	Current Charge	Previous	Usage
WA	2/08/06	3/10/06 30	60156103	425614	418439	7175
Service			Consumption			Total
WA	BASE CHARGE - WATER			62.79		
WA	USAGE @1.01/1000 GAL			481.77		
WA	AVG TO 1.4 TIMES AVG		477,000	373.97		
WA	1.4 TO 1.8 TIMES AVG		190,800	142.14		
WA	**TBW @1.64/1000 GAL		49,700	1,176.70		
	TOTAL WATER		717,500			
FD	FIRE SVC - 6 INCH			7.88		2,237.37
SE	BASE CHARGE - SEWER			80.03		7.88
SE	USAGE @3.37/1000 GAL		717,500	2,417.98		
	TOTAL SEWER					2,498.01
CR	CONTAINER 8YD/6KUP			1,094.08		
CR	CONTAINER LOCK CHG			3.00		
CR	CARDBOARD BXS			149.76		
CR	CONTAINER 4YD/3PKUP			326.04		
	TOTAL CONTAINER					1,572.88
SW	STORMWATER MNGMT FEE			157.13		157.13
	UTILITY TAX - WATER			224.53		224.53
Total Current Charges						6,697.80
Balance Forward						.00
Total Amount Due						6,697.80
Deposit on Account				2,656.50		

After the due date, a late fee may be charged to your account.

POSTED

** ATTENTION ** TBW = Tampa Bay Water Cost **
 Use Action Online to Pay Your Utility Bill
 @ www.stpete.org/utilitybill
 You can also pay your utility bill by phone
 24 hours a day using our Interactive Voice
 Response system by calling (727) 893-7341.
 Internet & telephone payment services are FREE

YOUR WATER USAGE RATE IS BASED
 ON AN AVERAGE MONTHLY WATER
 CONSUMPTION OF 477000 GAL
 BETWEEN 10-01-04 AND 09-30-05.

ADDRESS

10501 ROOSEVELT BLVD N

Last Bill Amount	7,349.25
Payments	7,349.25-
Adjustments	.00
Balance Forward	.00

ACCOUNT NUMBER	CYCLE	BILL DATE	DUE DATE
042780-134373	04-08	2/14/06	3/03/06

Rate Class : COMMERCIAL
 Last payment amount/date: 7,349.25 1/30/06

Service	Service Period	Days	Meter Number	Current Charge	Previous Usage
WA	1/10/06	2/08/06 29	60156103	418439	411994
WA	BASE CHARGE - WATER		Consumption	62.79	6445
WA	USAGE @1.01/1000 GAL		477,000	481.77	Total
WA	AVG TO 1.4 TIMES AVG		167,500	328.30	
WA	**TEW @1.64/1000 GAL		644,500	1,056.98	
WA	TOTAL WATER				1,929.84
FD	FIRE SVC - 6 INCH			7.88	7.88
SE	BASE CHARGE - SEWER			80.03	
SE	USAGE @3.37/1000 GAL		644,500	2,171.97	
SE	TOTAL SEWER				2,252.00
CR	CONTAINER 8YD/6PKUP		CAFFIR ON PLACE	1,094.08	
CR	CONTAINER LOCK CHG		Acct Pd	3.00	
CR	CARDBOARD 8X3		Acct 500055	4540.62	
CR	CONTAINER 4YD/3PKUP		Acct 500059	1572.88	
CR	TOTAL CONTAINER				1,572.88
SW	STORMWATER MNGMT FEE		Acct	157.13	
SW	UTILITY TAX - WATER		Acct	193.77	
Total Current Charges					6,113.50
Balance Forward					.00
Total Amount Due					6,113.50
Deposit on Account				2,656.50	

After the due date, a late fee may be charged to your account.

**** ATTENTION ** TEW = Tampa Bay Water Cost ****
 Use Action Online to Pay Your Utility Bill
 @ www.stpate.org/utilitybill
SANITATION SCHEDULE FOR PRESIDENT'S DAY HOLIDAY
 Week of February 20th, Residential Collections:
 Monday collections will be on Tuesday
 Tuesday collections will be on Wednesday

YOUR WATER USAGE RATE IS BASED ON AN AVERAGE MONTHLY WATER CONSUMPTION OF 477000 GAL BETWEEN 10-01-04 AND 09-30-05.

Service Address
 10501 ROOSEVELT BLVD N

Last Bill Amount 6,905.91
 Payments 6,905.91-
 Adjustments .00
 Balance Forward .00

Account Number 042780-134373
 Cycle 04-08
 Bill Date 1/17/06
 Due Date 2/02/06

Rate Class : COMMERCIAL
 Last payment amount/date: 6,905.91 1/05/06

Service	Service Period	Days	Meter Number	Current Charge	Previous Usage
WA	12/09/05	1/10/06	32	411994	7958
Service			60156103	404036	
WA	BASE CHARGE - WATER		Consumption	Charge	Total
WA	USAGE @1.01/1000 GAL		477,000	62.79	
WA	AVG TO 1.4 TIMES AVG		190,800	481.77	
WA	1.4 TO 1.8 TIMES AVG		128,000	373.97	
WA	**TBW @1.64/1000 GAL		795,800	366.08	
	TOTAL WATER			1,305.11	
FD	FIRE SVC - 6 INCH			7.88	2,589.72
SE	BASE CHARGE - SEWER			80.03	7.88
SE	USAGE @3.37/1000 GAL		795,800	2,681.85	
	TOTAL SEWER				2,761.88
CR	CONTAINER 8YD/6BKUP			1,094.08	
CR	CONTAINER LOCK CHG			3.00	
CR	CARDBOARD 8X3			149.76	
CR	CONTAINER 4YD/3BKUP			326.04	
	TOTAL CONTAINER				1,572.88
SW	STORMWATER MNGMT FEE			157.13	157.13
	UTILITY TAX - WATER			259.76	259.76

CASHING

Inv Dt _____ Amt _____

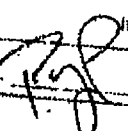
Gl Acct _____ Amt _____

GL Acct _____ Amt _____

GL Acct _____ Amt _____

GL Acct _____ Amt _____

Inv total _____

Approved By: 

Spz Post Dt _____

Total Current Charges
 Balance Forward
 Total Amount Due
 Deposit on Account

After the due date, a late fee may be charged to your account.

YOUR WATER USAGE RATE IS BASED ON AN AVERAGE MONTHLY WATER CONSUMPTION OF 477000 GAL BETWEEN 10-01-04 AND 09-30-05.

10501 ROOSEVELT BLVD N

042780-134373 04-08 12/14/05 1/03/06

Last Bill Amount 5,561.77
 Payments 5,561.77-
 Adjustments .00
 Balance Forward .00

Rate Class : COMMERCIAL
 Last payment amount/date: 5,561.77 12/01/05

Service	Service Period	Days	Meter Number	Current	Previous	Usage
WA	11/07/05	12/09/05	32	404036	396637	7399
Service			Consumption	Charge		Total
WA	BASE CHARGE - WATER			62.79		
WA	USAGE @1.01/1000 GAL		477,000	481.77		
WA	AVG TO 1.4 TIMES AVG		190,800	373.97		
WA	1.4 TO 1.8 TIMES AVG		72,100	206.21		
WA	**TEW @1.64/1000 GAL		739,900	1,213.44		
	TOTAL WATER					2,338.18
ED	FIRE SVC - 6 INCH			7.88		7.88
SE	BASE CHARGE - SEWER			80.03		
SE	USAGE @3.37/1000 GAL		739,900	2,493.46		
	TOTAL SEWER					2,573.49
CR	CONTAINER 8YD/6PKUP			1,094.08		
CR	CONTAINER LOCK CHG			3.00		
CR	CARDBOARD 8X3			149.76		
CR	CONTAINER 4YD/3PKUP			347.79		
	TOTAL CONTAINER					1,594.62
SW	STORMWATER MNGMT FEE			157.13		157.13
UTILITY TAX	CHANGES			234.61		234.61

WASHINGTON PLACE

Inv Dt _____ Amt _____
 GL Acct _____ Amt _____
 GL Acct _____ Amt _____
 GL Acct _____ Amt _____
 GL Acct _____ Amt _____
 (Inv Total) _____

Total Current Charges 6,905.91
 Balance Forward .00
 Total Amount Due 6,905.91
 Deposit on Account 2,656.50

After this due date, a late fee may be charged to your account.

Approved By: _____

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 @ www.stpete.org/utilitybill
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 ON AN AVERAGE MONTHLY WATER
 CONSUMPTION OF 477000 GAL
 BETWEEN 10-01-04 AND 09-30-05.

10501 ROOSEVELT BLVD N

10501 ROOSEVELT BLVD N

Last Bill Amount	5,816.89
Payments	5,816.89
Adjustments	.00
Balance Forward	.00

Account Number	04-08	Start Date	11/15/05	Due Date	12/05/05
042780-134373					

Rate Class : COMMERCIAL
 Last payment amount/date: 5,816.89 11/03/05

Service	Service Period	Days	Meter Number	Current	Previous	Usage
WA	10/10/05	11/07/05	28	396637	390804	5833
Service			Consumption	Charge		Total
WA	BASE CHARGE - WATER			62.79		
WA	USAGE @1.01/1000 GAL		477,000	481.77		
WA	AVG TO 1.4 TIMES AVG		106,300	208.35		
WA	**TBW @1.64/1000 GAL		583,300	956.61		
	TOTAL WATER					1,709.52
FD	FIRE SVC. - 6 INCH			7.88		7.88
SE	BASE CHARGE - SEWER			80.03		
SE	USAGE @3.37/1000 GAL		583,300	1,965.72		
	TOTAL SEWER					2,045.75
CR	CONTAINER 8YD/6PKUP			1,094.08		
CR	CONTAINER LOCK CHG			3.00		
CR	CONTAINER 4YD/2PKUP			222.91		
CR	CARDBOARD 8X3			149.76		
	TOTAL CONTAINER					1,469.75
SW	STORMWATER MNGMT FEE			157.13		157.13
	UTILITY TAX - WATER			171.74		171.74

ENTERED

	TOTAL Current Charges	5,561.77
	Balance Forward	.00
	Total Amount Due	5,561.77
Inv Dt	Acc't No	
GL Acct	Amt	
GL Acct	Amt	
GL	Amt	
GL Acct	Amt	
	Inv Total	

Deposit on Account 2,656.50

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EVACUATION LEVEL: B
 All Mobile/Manufactured Homes
 are Level A
**YOUR WATER USAGE RATE IS BASED
 ON AN AVERAGE MONTHLY WATER
 CONSUMPTION OF 477000 GAL
 BETWEEN 10-01-04 AND 09-30-05.**

10501 ROOSEVELT BLVD N

Last Bill Amount 5,980.27
 Payments 5,980.27-
 Adjustments .00
 Balance Forward .00

Account Number	Cycle	Bill Date	Due Date
042780-134373	04-08	10/14/05	11/01/05

Rate Class : COMMERCIAL
 Last payment amount/date: 5,980.27 10/06/05

Service	Service Period	Days	Meter Number	Current Charge	Previous	Usage Total
WA	9/09/05	10/10/05	31	60156103	390804	6533
WA	BASE CHARGE - WATER			60.67	364271	
WA	USAGE @ .97/1000 GAL			462.69		
WA	AVG TO 1.4 TIMES AVG			333.21		
WA	**TBW @1.59/1000 GAL			1,038.75		
	TOTAL WATER					1,895.32
FD	FIRE SVC - 5 INCH			7.88		7.88
SE	BASE CHARGE - SEWER					
SE	USAGE @3.32/1000 GAL					
	TOTAL SEWER					
CR	CONTAINER 8YD/6PKUP					
CR	CONTAINER LOCK CHG					
CR	CONTAINER 4YD/2PKUP					
CR	CARDBOARD 8X3					
	TOTAL CONTAINER					1,364.92
SW	STORMWATER MNGMT FEE					157.13
	UTILITY TAX - WATER					190.32
	DEPOSIT INTEREST					46.49

GL Ac.	Amt
inv 653,300	168.96
GL Ac.	1,094.08
GL Ac.	3.00
GL Ac.	222.91
GL Ac.	44.93
inv Total	157.13
	190.32
	46.49

10/10/05
 Total Current Charges 5,816.89
 Balance Forward .00
 Total Amount Due 5,816.89
 Deposit on Account 2,656.50

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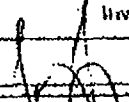
EVACUATION LEVEL: B
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 are Level A
 YOUR WATER USAGE RATE IS BASED
 ON AN AVERAGE MONTHLY WATER
 CONSUMPTION OF 477000 GAL
 BETWEEN 10-01-04 AND 09-30-05.

10501 ROOSEVELT BLVD N

Last Bill Amount 4,274.65
Payments 4,274.65-
Adjustments .00
Balance Forward .00

042780-134373 04-08 9/15/05 10/03/05

Rate Class : COMMERCIAL
Last payment amount/date: 4,274.65 9/15/05

Service	Service Period	Days	Meter Number	Current	Previous	Usage
WA	8/10/05	9/09/05	30	384271	377563	6708
Consumption				Charge		Total
WA	BASE CHARGE - WATER			60.67		
WA	USAGE @ .97/1000 GAL		443,300	430.00		
WA	AVG TO 1.4 TIMES AVG		177,320	335.13		
WA	1.4 TO 1.8 TIMES AVG		50,180	139.50		
WA	**TBW @ 1.59/1000 GAL		670,800	1,066.57		
TOTAL WATER						2,030.87
ED	FIRE SVC - 6 INCH			7.88		7.88
SE	BASE CHARGE - SEWER			78.85		
SE	USAGE @ 3.32/1000 GAL		670,800	2,227.06		
TOTAL SEWER						2,305.91
CR	CONTAINER 8YD/6PKUP			977.60		
CR	CONTAINER LOCK CHG			2.50		
CR	CONTAINER 4YD/2PKUP			198.99		
TOTAL CONTAINER						1,179.09
SW	STORMWATER MNGMT FEE			153.30		153.30
UTILITY TAX - WATER				203.88		203.88
LATE CHARGE						64.12
SPECIAL PICKUP Pd						35.22
Acct	Anti	9/13/05		Total Current Charges		5,980.27
Acct	Anti	8/15/05		Balance Forward		.00
				Total Amount Due		5,980.27
GL Acct	Anti			Deposit on Account		2,656.50
Net Total						
Approved by: 				Sys Font		

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CONSUMPTION OF 443300 GAL
BETWEEN 10-01-03 AND 09-30-04.

DUPLICATE

10501 ROOSEVELT BLVD N
 ACCOUNT NUMBER: 042780-134373
 CYCLE: 04-08
 BILL DATE: 8/15/05
 DUE DATE: 8/31/05

Last Bill Amount 4,960.73
 Payments 4,960.73-
 Adjustments .00
 Balance Forward .00

Rate Class : COMMERCIAL
 Last payment amount/date: 4,960.73 8/08/05

Service	Service Period	Days	Meter Number	Current Charge	Previous	Usage
WA	7/11/05	8/10/05	60156103	377563	373035	4528
Consumption						Total
WA	BASE CHARGE - WATER			60.67		
WA	USAGE @ .97/1000 GAL		443,300	430.00		
WA	AVG TO 1.4 TIMES AVG		9,500	17.96		
WA	**TBW @1.59/1000 GAL		452,800	719.95		
TOTAL WATER						1,228.58
FD	FIRE SVC - 6 INCH			7.88		7.88
SE	BASE CHARGE - SEWER			78.85		
SE	USAGE @3.32/1000 GAL		452,800	1,503.30		
TOTAL SEWER						1,582.15
CR	CONTAINER 8YD/6PKUP			977.60		
CR	CONTAINER LOCK CHG			2.50		
CR	CONTAINER 4YD/2PKUP			198.99		
TOTAL CONTAINER						1,179.09
SW	STORMWATER MNGMT FEE			153.30		153.30
UTILITY TAX - WATER				123.65		123.65

UTILITY TAX - WATER	As provided
Total Current Charges	4,274.65
Balance Forward	.00
Total Amount Due	4,274.65
Deposit on Account	2,656.50
After the due date, a late fee may be charged to your account.	
Account No	INV D
Account Name	CARRINGTON PLACE

*****EVACUATION LEVEL INFORMATION UPDATE*****
 The Evacuation Level info. printed here has been updated based on the Pinellas County map published on July 31, 2005 in the St. Petersburg Times. This is the most current Evacuation Level information provided by Pinellas County.
 ** TBW = Tampa Bay Water Cost**

EVACUATION LEVEL: B
 All Mobile/Manufactured Homes are Level A
 YOUR WATER USAGE RATE IS BASED ON AN AVERAGE MONTHLY WATER CONSUMPTION OF 443300 GAL BETWEEN 10-01-03 AND 09-30-04.

10501 ROOSEVELT BLVD N

Last Bill Amount 4,172.05
 Payments 4,172.05-
 Adjustments .00
 Balance Forward .00

042780-134373 04-08 7/15/05 8/02/05

Rate Class : COMMERCIAL
 Last payment amount/date: 4,172.05 7/11/05

Service	Service Period	Days	Meter Number	Consumption	Current Charge	Previous	Usage Total
WA	6/08/05	7/11/05	33	60156103	373035	367575	5460
WA	BASE CHARGE - WATER				60.87		
WA	USAGE @ .97/1000 GAL			443,300	430.00		
WA	AVG TO 1.4 TIMES AVG			102,700	194.10		
WA	**TBW 81.59/1000 GAL			546,000	868.14		
	TOTAL WATER						1,552.91
FD	FIRE SVC - 6 INCH				7.88		7.88
SE	BASE CHARGE - SEWER				78.85		
SE	USAGE 83.32/1000 GAL			546,000	1,812.72		
	TOTAL SEWER						1,891.57
CR	CONTAINER 8YD/6PKUP				977.60		
CR	CONTAINER LOCK CHG				2.50		
CR	CONTAINER 4YD/2PKUP				218.89		
	TOTAL CONTAINER						1,198.99
SW	STORMWATER MNGMT FEE				153.30		153.30
					156.08		156.08

UTILITY PAY SUMMARY		
Inv Dt	Acct Pd	Total Current Charges
GL Acct	Amt	Balance Forward
GL Acct	Amt	Total Amount Due
GL Acct	Amt	Deposit on Account
GL Acct	Amt	
GL Acct	Amt	
	Inv Total	
Approved By: <i>[Signature]</i>	Sys Post Dt	

4,960.73
 Balance Forward .00
 Total Amount Due 4,960.73
 Deposit on Account 2,656.50
 After the due date, a late fee may be charged to your account.

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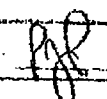
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 CONSUMPTION OF 443300 GAL
 BETWEEN 10-01-03 AND 09-30-04.**

10501 ROOSEVELT BLVD N

Last Bill Amount	4,325.18
Payments	4,325.18-
Adjustments	.00
Balance Forward	.00

042780-134373	04-08	6/14/05	6/30/05
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Rate Class : COMMERCIAL
 Last payment amount/date: 4,325.18 6/09/05

Service	Service Period	Days	Meter Number	Consumption	Current Charge	Previous	Usage
WA	5/09/05	6/08/05 30	60156103		367575	363062	4513
WA	BASE CHARGE - WATER				60.67		Total
WA	USAGE @ .97/1000 GAL			443,300	430.00		
WA	AVG TO 1.4 TIMES AVG			8,000	15.12		
WA	**TBW @ 1.59/1000 GAL			451,300	717.57		
	TOTAL WATER						1,223.36
FD	FIRE SVC - 6 INCH				7.88		7.88
SE	BASE CHARGE - SEWER				78.85		
SE	USAGE @ 3.32/1000 GAL			451,300	1,498.32		
	TOTAL SEWER						1,577.17
CR	CONTAINER 8YD/6PKUP				977.60		
CR	CONTAINER 4YD/1PKUP				107.12		
CR	CONTAINER LOCK CHG				2.50		
	TOTAL CONTAINER						1,087.22
SW	STORMWATER MGMT FEE				153.30		153.30
	CARRINGTON PLACE						
UT	UTILITY TAX - WATER				123.12		123.12
GL Acct	Amt		Total Current Charges				4,172.05
GL Acct	Amt		Balance Forward				.00
GL Acct	Amt		Total Amount Due				4,172.05
GL Acct	Amt		Deposit on Account		2,656.50		
After the due date, a late fee may be charged to your account.							
Inv Total							
Approved By:  Sys Post Dr							

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 CONSUMPTION OF 443300 GAL
 BETWEEN 10-01-03 AND 09-30-04.**

10501 ROOSEVELT BLVD N

10501 ROOSEVELT BLVD N

Last Bill Amount	4,347.88
Payments	4,347.88
Adjustments	.00
Balance Forward	.00

ACCOUNT NUMBER 042780-134373	CHRG 04-08	PRD DATE 5/13/05	DUPL DATE 6/01/05
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Rate Class : COMMERCIAL
Last payment amount/date: 4,347.88 5/13/05

Service	Service Period	Days	Meter Number	Current Charge	Previous Usage
WA	4/07/05	5/09/05	60156103	369062	358426
Service			Consumption		4636
WA	BASE CHARGE - WATER			60.67	Total
WA	USAGE @ .97/1000 GAL		443,300	430.00	
WA	AVG TO 1.4 TIMES AVG		20,300	38.37	
WA	**TBW 81.59/1000 GAL		463,600	797.12	
	TOTAL WATER				1,266.16
FD	FIRE SVC - 6 INCH			7.88	7.88
SE	BASE CHARGE - SEWER			78.85	
SE	USAGE @ 3.32/1000 GAL		463,600	1,539.15	
	TOTAL SEWER				1,618.00
CR	CONTAINER 8YD/6PKUP			977.60	
CR	CONTAINER 4YD/1PKUP			107.12	
CR	CONTAINER LOCK CHG			2.50	
	TOTAL CONTAINER				1,087.22
SW	STORMWATER MNGMT FEE			153.30	153.30
	UTILITY TAX - WATER			127.40	127.40
	GATE CHARGE		5/12/05		65.22
GL Acct		Amt	Total Current Charges		4,325.18
GL Acct		Amt	Balance Forward		.00
GL Acct		Amt	Total Amount Due		4,325.18
GL Acct		Amt	Deposit on Account	2,656.50	
GL Acct		Amt			
	Inv Total				

UTILITY TAX - WATER	Acct Pd	5/12/05
GL Acct	Amt	Total Current Charges
GL Acct	Amt	Balance Forward
GL Acct	Amt	Total Amount Due
GL Acct	Amt	Deposit on Account
GL Acct	Amt	
	Inv Total	
Approved By:		Sys Post D:

**** ATTENTION ** TBW = Tampa Bay Water Cost ****
 Use Action Online To Pay Your Utility Bill
 @ www.stpete.org/utilitybill
SANITATION REVISED SCHEDULE FOR MEMORIAL DAY
 Week of May 30th Residential Collections:
 Monday collections will be on Tuesday
 Tuesday collections will be on Wednesday

YOUR WATER USAGE RATE IS BASED ON AN AVERAGE MONTHLY WATER CONSUMPTION OF 443300 GAL BETWEEN 10-01-03 AND 09-30-04.

SERVICE ADDRESS
10501 ROOSEVELT BLVD N
 ACCOUNT NUMBER: **042780-134373** CYCLE: **04-08** BILL DATE: **4/14/05** DUE DATE: **5/02/05**

Last Bill Amount **8,629.56**
 Payments **8,629.56**
 Adjustments **.00**
 Balance Forward **.00**

Rate Class : **COMMERCIAL**
 Last payment amount/date: **4,228.06 4/12/05**

Service	Service Period	Days	Meter Number	Consumption	Current Charge	Previous	Usage Total
WA	3/09/05	4/07/05 29	60156103		358426	353667	4759
WA	BASE CHARGE - WATER				60.87		
WA	USAGE @ .97/1000 GAL			443,300	430.00		
WA	AVG TO 1.4 TIMES AVG			32,600	61.61		
WA	**TBW 81.59/1000 GAL			475,900	756.68		
	TOTAL WATER						1,308.96
FD	FIRE SVC - 6 INCH				7.88		7.88
SE	BASE CHARGE - SEWER				78.85		
SE	USAGE @ 3.32/1000 GAL			475,900	1,578.99		
	TOTAL SEWER						1,658.84
CR	CONTAINER 8YD/6PKUP				977.60		
CR	CONTAINER 4YD/1PKUP				107.12		
CR	CONTAINER LOCK CHG				2.50		
	TOTAL CONTAINER						1,087.22
SW	STORMWATER MNGMT FEE				153.30		153.30
	UTILITY TAX - WATER				131.68		131.68
Total Current Charges							4,347.88
Balance Forward							.00
Total Amount Due							4,347.88
Deposit on Account					2,656.50		

After the due date, a late fee may be charged to your account.

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SERVICES ADDRESS

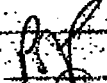
10501 ROOSEVELT BLVD N

Last Bill Amount 4,401.50
 Payments .00
 Adjustments .00
 Balance Forward 4,401.50

ACCOUNT NUMBER	CYCLE	BILL DATE	DUE DATE
042780-134373	04-09	3/15/05	3/31/05

Rate Class : COMMERCIAL
 Last payment amount/date: 4,471.00 2/10/05

Service	Service Period	Days	Meter Number	Current Charge	Previous Usage	Usage Total
WA	2/07/05	3/09/05	60156103	353667	349168	4499
Service			Consumption			
WA	BASE CHARGE - WATER			60.67		
WA	USAGE @ .97/1000 GAL		443,300	430.00		
WA	AVG TO 1.4 TIMES AVG		6,600	12.47		
WA	**TEW @1.59/1000 GAL		449,900	715.34		
	TOTAL WATER					1,218.48
FD	FIRE SVC - 6 INCH			7.88		7.88
SE	BASE CHARGE - SEWER			78.85		
SE	USAGE @3.32/1000 GAL		449,900	1,493.67		
	TOTAL SEWER					1,572.52
CR	CONTAINER 8YD/6PKUP			977.60		
CR	CONTAINER 4YD/1PKUP			107.12		
CR	CONTAINER LOCK CHG			2.50		
	TOTAL CONTAINER					1,087.22
SW	STORMWATER MNGMT FEE			153.30		153.30
	UTILITY TAX - WATER			122.64		122.64
	LATE CHARGE					66.02

3/14/05
 CARRINGTON PLACE
 Inv Amt Total Current Charges
 Balance Forward 4,228.06
 Total Amount Due 4,401.50
 8,629.56
 GL Acct Deposit on Account 2,656.50
 After the due date, a late fee may be charged to your account.
 GL Acct Amt
 Inv Total
 Approved By:  Eye Post D

**** ATTENTION **** TEW - Tampa Bay Water Cost
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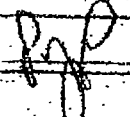
**YOUR WATER USAGE RATE IS BASED
 ON AN AVERAGE MONTHLY WATER
 CONSUMPTION OF 44300 GAL
 BETWEEN 10-01-03 AND 09-30-04.**

SERVICE ADDRESS
 10501 ROOSEVELT BLVD N

ACCOUNT NUMBER: 042780-134373
 CYCLE: 04-08
 BILL DATE: 2/14/05
 DUE DATE: 3/03/05

Last Bill Amount 4,471.00
 Payments 4,471.00-
 Adjustments .00
 Balance Forward .00

Rate Class : COMMERCIAL
 Last payment amount/date: 4,471.00 2/10/05

Service	Service Period	Days	Meter Number	Current Charge	Previous Usage	Usage Total
WA	1/10/05	2/07/05 28	60156103	3491.68	344334	4834
Consumption						
WA	BASE CHARGE - WATER			60.67		
WA	USAGE @ .97/1000 GAL		443,300	430.00		
WA	AVG TO 1.4 TIMES AVG		40,100	75.79		
WA	**TBW @1.59/1000 GAL		483,400	768.61		
TOTAL WATER						1,335.07
FD	FIRE SVC - 6 INCH			7.88		7.88
SE	BASE CHARGE - SEWER			78.95		
SE	USAGE @3.32/1000 GAL		483,400	1,604.89		
TOTAL SEWER						1,683.74
CR	CONTAINER 8YD/6PKUP			977.60		
CR	CONTAINER 4YD/1PKUP			107.12		
CR	CONTAINER LOCK CHG			2.50		
TOTAL CONTAINER						1,087.22
SW	STORMWATER MNGMT FEE			153.30		153.30
CARRINGTON PLACE						
UTILITY TAX - WATER				134.29		134.29
GL Acct		Amt	Total Current Charges			4,401.50
GL Acct		Amt	Balance Forward			.00
GL Acct		Amt	Total Amount Due			4,401.50
GL Acct		Amt	Deposit on Account	2,656.50		
After the due date, a late fee may be charged to your account.						
Inv Total:						
Approved by: 				S/s Post Off:		

**** ATTENTION ** TBW = Tampa Bay Water Cost ****
 Use Action Online to Pay Your Utility Bill
 @ www.stpete.org/utilitybill
 To pay by phone, call (727)893-7341
 There will be NO CHANGE in the residential
 refuse collection schedule for the week of
 February 21, 2005 (President's Day holiday week)

YOUR WATER USAGE RATE IS BASED
 ON AN AVERAGE MONTHLY WATER
 CONSUMPTION OF 443300 GAL
 BETWEEN 10-01-03 AND 09-30-04.

SERVICE ADDRESS			
10501 ROOSEVELT BLVD N			
ACCOUNT NUMBER	CYCLE	BILL DATE	DUE DATE
042780-134373	04-08	1/14/05	2/02/05

Last Bill Amount 8,144.19
 Payments 8,144.19-
 Adjustments .00
 Balance Forward .00

Rate Class : COMMERCIAL
 Last payment amount/date: 4,062.00 1/14/05

Service	Service Period	Days	Meter Number	Current	Previous	Usage
WA	12/09/04	1/10/05	32	344334	339488	4846
Service			Consumption	Charge		Total
WA	BASE CHARGE - WATER			60.67		
WA	USAGE @ .97/1000 GAL		443,300	430.00		
WA	AVG TO 1.4 TIMES AVG		41,300	78.06		
WA	**TEW @ 1.59/1000 GAL		464,600	770.51		
	TOTAL WATER					1,339.24
FD	FIRE SVC - 6 INCH			7.88		7.88
SE	BASE CHARGE - SEWER			78.85		
SE	USAGE @ 3.32/1000 GAL		484,600	1,608.87		
	TOTAL SEWER					1,687.72
CR	CONTAINER 8YD/6EKUP			977.60		
CR	CONTAINER 4YD/1FKUP			107.12		
CR	CONTAINER LOCK CHG			2.50		
	TOTAL CONTAINER					1,087.22
SW	STORMWATER MNGMT FEE			153.30		153.30
	UTILITY TAX - WATER			134.71		134.71
	LATE CHARGE		1/13/05			60.93
	Total Current Charges					4,471.00
	Balance Forward					.00
	Total Amount Due					4,471.00
	Deposit on Account			2,656.50		

**** ATTENTION ** TEW = Tampa Bay Water Cost ****
 Use Action Online to Pay Your Utility Bill
 @ www.stpete.org/utilitybill
 You can also pay your utility bill by phone
 24 hours a day using our Interactive Voice
 Response system by calling (727) 893-7341.
 Internet & telephone payment services are FREE!

**YOUR WATER USAGE RATE IS BASED
 ON AN AVERAGE MONTHLY WATER
 CONSUMPTION OF 443300 GAL
 BETWEEN 10-01-03 AND 09-30-04.**

10501 ROOSEVELT BLVD N

10501 ROOSEVELT BLVD N

ACCOUNT NUMBER	CITY	BILL DATE	DOE DATE
042780-134373	04-08	12/14/04	1/03/05

Last Bill Amount 7,794.97
 Payments 3,712.78-
 Adjustments .00
 Balance Forward 4,082.19

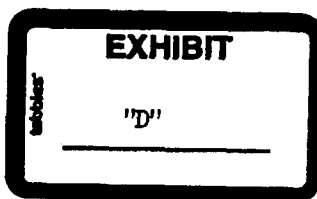
Rate Class : COMMERCIAL
 Last payment amount/date: 3,712.78 11/24/04

Service	Service Period	Days	Meter Number	Consumption	Current Charge	Previous	Usage
WA	11/08/04	12/09/04	31	60156103	339488	335254	4254
WA	BASE CHARGE - WATER				60.67		Total
WA	USAGE @ .97/1000 GAL			423,400	410.70		
WA	**TBW \$1.59/1000 GAL			423,400	673.21		
	TOTAL WATER						1,144.58
FD	FIRE SVC - 6 INCH				7.88		7.88
SE	BASE CHARGE - SEWER				78.85		
SE	USAGE @ 3.32/1000 GAL			423,400	1,405.69		
	TOTAL SEWER						1,484.54
CR	CONTAINER 8YD/6KUP				977.60		
CR	CONTAINER 4YD/1PKUP				107.12		
CR	CONTAINER LOCK CHG				2.50		
	TOTAL CONTAINER						1,087.22
SW	STORMWATER MGMT FEE				153.30		153.30
	UTILITY TAX - WATER			12/13/04	115.25		115.25
	LATE CHARGE			11/22/04			61.23
	SHUT-OFF NOTICE FEE						8.00
Total Current Charges							4,062.00
Balance Forward							4,082.19
Total Amount Due							8,144.19
Deposit on Account					2,656.50		

After the due date, a late fee may be charged to your account.

****ATTENTION** TBW - Tampa Bay Water Cost****
 This utility bill includes increases to the following utility services: water (5%), sewer (4%), storm water (\$1.00 per SRR) and if applicable, reclaimed water (\$1.00 per SRR). All rate increases were approved by City Council during a Public Hearing on 9-16-04.

YOUR WATER USAGE RATE IS BASED ON AN AVERAGE MONTHLY WATER CONSUMPTION OF 44300 GAL BETWEEN 10-01-03 AND 09-30-04.



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MARTIN S. FRIEDMAN, P.A.
VALERIE L. LORD
BRIAN J. STREET

January 12, 2007

Bruce Hedrick
Vice President of Development
Pasco Health Investors, LLC
4415 Pheasant Ridge Road, Ste. 301
Roanoke, VA 24014

Re: Aloha Utilities, Inc.; Service to Carrington Place at Trinity in Newport Richey, FL
Our File No. 26038.52

Dear Mr. Hedrick:

I am the attorney who represents Aloha Utilities, Inc. in matters related to the provision of water and wastewater services in New Port Richey and unincorporated Pasco County, Florida. It has been brought to my attention that representatives on your project are concerned with the service availability charges to be imposed by my client on the "Carrington Place at Trinity" nursing home facility.

First of all, let me note that the charges being imposed upon you are those required to be charged under the terms of our tariff, as specifically designated in Appendix B to that tariff.

With that said, Aloha is willing to pursue specific approval by the Public Service Commission of an alternative method for calculating the service availability charges due by your nursing home, under certain conditions.

The information supplied by your engineer to the Florida Department of Environmental Regulation suggests that your facility will utilize a total of 115 gallon per day per bed plus 20 gallons per day per employee, as the demand on my client's system. Given the fact that your facility proposes to have 120 beds and 45 employees, a calculated demand of 14,700 average gallons per day results. While we do not necessarily agree with the method for arriving at that demand figure, our experience indicates that the total average daily demand which results from it may be a reasonable figure. Therefore, we are willing to utilize that demand figure in calculating the appropriate service availability charge provided by my client.

Based upon this information, we are willing to move forward with the preparation and execution of a Developer Agreement utilizing that demand level and calculating a water service availability charge of \$48,995.10 and a sewer service availability charge of \$188,013.00 for a total service availability charge of \$237,008.10. However, we are willing to do this only under the following conditions:

- (1) I will prepare, on behalf of the Utility, a proposed "Special Service Availability Contract." It will utilize, as a basis, the Utility's standard Developer Agreement, but will be modified in order to recognize the demonstration of a lower demand flow than is envisioned under our standard tariff provisions (as outlined above).

Bruce Hedrick
January 12, 2007
Page 2

- (2) As part of the Special Service Availability Contract drafted above, your client will be required to execute and provide to Aloha at the time of signing that Special Service Availability Contract, a letter of credit in the amount of \$1,081,466.35 which represents the difference between the charges proposed to be assessed under the Special Service Availability Contract and the amount that would normally be required under the terms of the Utility's tariff as previously relayed to you (\$1,318,474.45 - \$237,008.10 = \$1,081,466.35). That letter of credit will be outstanding until released by Aloha, and Aloha will be authorized to draw up to the full amount of that letter of credit, as soon as the Public Service Commission renders its decision establishing the appropriate service availability charges for your client. In the event that the Florida Public Service Commission agrees with the proposed reduced service availability charges, as outlined above and as will be stated in the agreement, that letter of credit will be released by Aloha. That letter of credit will remain outstanding until released by Aloha, or until drawn upon by Aloha, under the circumstances as outlined above.
- (3) You will be required to execute this Agreement and upon such execution, in addition to those proposed service availability fees, to pay to the Utility an administrative fee equal to \$30,000, to cover the Utility's legal, engineering, and administrative costs, including the cost of preparation of the Agreement and approval for it from the Public Service Commission, among other administrative functions related to the provision of service to this nursing home facility. To the extent our costs exceed this amount, you will be invoiced and required to pay these additional charges within 10 days of such invoice.
- (4) The Utility will submit the Special Service Availability Contract to the Florida Public Service Commission for approval, in accordance with the terms of Florida Public Service Commission rules. This will take approximately 90 days from the date of filing to gain approval.

We believe that this is the only way in which we can move forward with charging you a service availability charge different than that authorized and required by our standard tariff, and we are ready to move forward with that as soon as we receive your approval for the above-outlined course of action. Keep in mind that service availability charges applicable to any development, including yours, are those which are in effect at the time the developer physically connects his facility to the Utility's system and as such, are subject to change at any time.

As soon as you give us the go ahead formally in writing to move forward under the terms as outlined above, I will begin preparation of this Special Service Availability Contract for execution and submission to the Public Service Commission.

If you have any questions in this regard, please let me know.

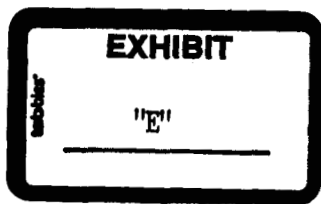
Sincerely,
ROSE, SUNDSTROM & BENTLEY, LLP



F. Marshall Deterding
For The Firm

FMD/tms

cc: Stephen G. Watford, President of Aloha Utilities, Inc.
Lee Atkinson, Esquire



Memorandum of Understanding

Florida Department of Environmental Protection

and

Florida Public Service Commission

The Florida Department of Environmental Protection (DEP) and the Florida Public Service Commission (PSC) recognize that water conservation and water reuse are key elements of Florida's long-term water management strategy. It is our joint goal and high priority to ensure that Florida's water and wastewater utilities provide safe and efficient treatment and use of water and wastewater. This memorandum of understanding (MOU) formally establishes the policies and procedures to be followed by the DEP and PSC to promote and encourage water conservation and reuse, and safe and efficient water supply and wastewater management services.

BACKGROUND

Drinking Water Program

The Federal Safe Drinking Water Act requires certain monitoring, testing, treatment, and reporting to ensure the quality of potable waters. The Florida Safe Drinking Water Act, contained in Chapter 403, Florida Statute (F.S.), outlines the basic requirements for Florida's drinking water program. Chapters 62-550, 62-555, 62-560, and 62-699, Florida Administrative Code (F.A.C.), contain specific requirements governing drinking water systems in Florida. The PSC's responsibilities for regulation of investor-owned drinking water utilities are outlined in Chapter 367, F.S.

Domestic Wastewater Program

The Federal Clean Water Act and the Florida Water Pollution Control Act requires effective treatment and management of wastewater in order to protect the nation's ground water and surface water resources. Florida's wastewater management and environmental control programs are contained in Chapter 403, F.S. Specific regulations governing domestic wastewater management are contained in Chapters 62-600, 62-601, 62-602, 62-604, 62-610, 62-611, 62-620, 62-625, 62-628, 62-640, 62-650, and 62-699, F.A.C. The PSC's responsibilities for regulation of investor-owned wastewater utilities are outlined in Chapter 367, F.S.

Water Reuse Program

The encouragement and promotion of water conservation and reuse of reclaimed water are established as state objectives in Sections 403.064(1) and 373.250, F.S.

The DEP, in association with the PSC, the water management districts, and other state agencies, has developed and implemented a comprehensive reuse program designed to meet those objectives. This water reuse program includes:

1. Comprehensive rules governing the reuse of reclaimed water (Chapter 62-610, F.A.C);
2. A mandatory reuse program;
3. The Antidegradation Policy;
4. The Indian River Lagoon System and Basin Act;
5. The APRICOT Act; and
6. Requirements for evaluation of reuse feasibility.

Section 403.064, F.S., requires that after January 1, 1992, all applicants for permits to construct or operate a domestic wastewater treatment facility in a water resource caution area evaluate the costs and benefits of reusing reclaimed water as part of their application for the permit.

The Antidegradation Policy is contained in Chapter 62-4, F.A.C., "Permits," and Chapter 62-302, F.A.C., "Surface Water Quality Standards." These rules require an applicant for a new or expanded discharge to surface waters to demonstrate that the discharge is clearly in the public interest. As part of this public interest test, the applicant must evaluate the feasibility of reuse of reclaimed water. If reuse is economically and technologically reasonable, it will be preferred over the surface water discharge.

The Indian River Lagoon System and Basin Act, which is contained in Chapter 90-262, Laws of Florida, provides increased protection to the Indian River Lagoon System. Section 3 of the Act requires the owner of an existing sewage treatment facility within the Indian River Lagoon Basin to investigate the feasibility of using reclaimed water for beneficial purposes. These reuse feasibility studies were to be completed before July 1, 1992.

OBJECTIVES

The common objectives, as they relate to drinking water systems and domestic wastewater systems subject to regulation by the DEP and the PSC, are as follows:

1. To monitor drinking water treatment and distribution systems to ensure that safe and reliable water is produced and delivered in accordance with applicable rules and drinking water standards.
2. To monitor domestic wastewater systems to ensure the safe and efficient collection, treatment, and reuse or disposal of wastewater and residuals.
3. To encourage and promote water conservation and water reuse.
4. To foster conservation and to reduce withdrawals and use of ground water and surface water through employment of conservation-promoting rate structures, reuse of reclaimed water, and consumer education programs.
5. To encourage and promote the efficient and effective reuse of reclaimed water.
6. To promote the continued economic viability of utility systems.

PSC RESPONSIBILITIES

The following is a general description of the roles and responsibilities of the PSC related to drinking water systems, water conservation, domestic wastewater systems, and water reuse. The PSC's jurisdiction is limited to economic regulation of investor-owned utilities and is effective in only some of the counties in Florida. The PSC will offer assistance to the extent provided by law and agency workload. The PSC agrees to implement policies and procedures necessary to administer the following duties:

Drinking Water Systems

1. When appropriate, arrange for joint public meetings with customers to ensure that customers are aware of the need for drinking water system improvement projects, and the potential impacts the projects will have on service rates.
2. Inform the DEP of the PSC public meetings with customers and hearings in which drinking water system projects will be discussed.
3. Review proposed rate structures for investor-owned water utilities within PSC jurisdiction.

4. Provide assistance to DEP on consumer confidence reports and capacity development programs.
5. Provide assistance in review of water conservation rate structures within PSC jurisdiction, to ensure that the rate structures are designed to promote water conservation.
6. Monitor abandonment and bankruptcy proceedings for investor-owned water utilities within PSC jurisdiction. Inform the DEP of pending abandonment and bankruptcy cases.
7. Provide legal and technical support to the DEP in any related administrative hearings or legal proceedings, if an applicant for a DEP permit challenges the interpretation of Section 367.031, F.S.

Domestic Wastewater Systems

1. When appropriate, arrange for joint public meetings with customers to ensure that customers are aware of the need for domestic wastewater system improvement projects, and the potential impacts the projects will have on service rates.
2. Inform the DEP of the PSC public meetings with customers and hearings in which domestic wastewater projects will be discussed.
3. Review proposed rate structures for investor-owned wastewater management utilities within PSC jurisdiction.
4. Monitor abandonment and bankruptcy proceedings for investor-owned wastewater utilities within PSC jurisdiction. Inform the DEP of pending abandonment and bankruptcy cases.
5. Provide legal and technical support to the DEP in any related administrative hearings or legal proceedings, if an applicant for a DEP permit challenges the interpretation of Section 367.031, F.S.
6. Work with utilities within its jurisdiction and with the DEP to strengthen efforts to ensure that wastewater facilities have sufficient capacity available. The DEP has adopted rules requiring utilities to perform timely planning, design, and construction of expanded facilities to ensure that sufficient wastewater treatment, disposal, and reuse capacity is available.
7. Work with utilities within its jurisdiction and with the DEP to strengthen efforts to ensure proper operation and maintenance and to promote compliance with DEP permit requirements. The DEP has adopted rules governing proper operation and maintenance of domestic wastewater systems and has initiated a program designed to increase rates of compliance with permit requirements.

Water Reuse

1. When appropriate, arrange for joint public meetings with customers to ensure that customers are made aware of the need for reuse system improvement projects, and the potential impacts the projects will have on service rates.
2. Inform the DEP of the PSC public meetings with customers and hearings in which water reuse will be discussed.
3. Provide feasibility analyses of the financial impacts, if any, of reuse projects on both the customers and the domestic wastewater utilities within PSC jurisdiction.
4. Within 10 days of receipt of a reuse feasibility study from DEP, review the document for completeness of the financial aspects and notify the DEP whether or not the document is complete and whether or not the PSC will be able to conduct a complete review. If the PSC staff determines that it will be able to review the document, the PSC staff shall provide comments and recommendations to the DEP within 30 days of receipt of the complete document.
5. Participate in appropriate DEP hearings in which the feasibility of reuse will be discussed.
6. Review proposed rate structures for reuse projects for investor-owned utilities within PSC jurisdiction. As noted in Section 403.064(6), F.S., and pursuant to Chapter 367, F.S., the PSC shall allow utilities that implement reuse projects to recover all prudent costs of such facilities through their rates.
7. Assist the water management districts in the review of reuse feasibility studies associated with the mandatory reuse program in Chapter 62-40, F.A.C., and other reuse-related activities of the water management districts in the counties within PSC jurisdiction. A separate MOU between the water management districts and the PSC governs these activities.

DEP RESPONSIBILITIES

The following is a general description of the roles and responsibilities of the DEP related to drinking water systems, water conservation, domestic wastewater systems, and water reuse. The DEP agrees to adopt and implement policies and procedures necessary to administer the following duties:

Drinking Water Systems

1. Review applications for construction of drinking water systems.
2. Monitor compliance of drinking water systems with applicable rules and drinking water standards.
3. Notify the PSC of impending abandonment or bankruptcy cases involving investor-owned water utilities and assist the PSC in such cases, as needed.
4. Verify the existence of a certificate of authorization from the PSC before issuance of a construction permit for a new drinking water system for utilities subject to Chapter 367, F.S.
5. Participate in interagency programs and working groups on subjects of mutual concern to the agencies.
6. Provide expert technical testimony at PSC customer meetings and hearings for rate cases or other proceedings involving investor-owned utilities. This shall be done at the PSC's request without the need for subpoenas.

Domestic Wastewater Systems

1. Administer the federal National Pollutant Discharge Elimination System (NPDES) program.
2. Administer the federal Underground Injection Control (UIC) Program.
3. Administer the federal Pretreatment Program.
4. Review applications for construction and operation of domestic wastewater facilities.
5. Monitor compliance of domestic wastewater systems with applicable rules and effluent discharge limitations.
6. Monitor water quality in the State's ground waters and surface waters.
7. Notify the PSC of impending abandonment or bankruptcy cases involving investor-owned wastewater utilities and assist the PSC in such cases, as needed.
8. Verify the existence of a certificate of authorization from the PSC before issuance of a permit for construction of a new domestic wastewater treatment facility for utilities subject to Chapter 367, F.S.

9. Provide expert technical testimony at PSC customer meetings and hearings for rate cases or other proceedings involving investor-owned utilities. This shall be done at the PSC's request without the need for subpoenas.

Water Reuse

1. Administer the State's water reuse program.
2. Review reuse feasibility studies required by Section 403.064, F.S., the Antidegradation Policy, or the Indian River Lagoon System and Basin Act.
3. Within five working days after receipt of a reuse feasibility study required by Section 403.064, F.S., the Antidegradation Policy, or the Indian River Lagoon System and Basin Act, provide a copy of the reuse feasibility study to the PSC. This applies only to feasibility studies produced by investor-owned utilities located within counties regulated by the PSC.
4. Make final determinations on the adequacy of reuse feasibility studies. Comments and recommendations made by the PSC on the financial aspects of these reuse feasibility studies will be considered by the DEP.
5. Provide expert technical testimony at PSC customer meetings and hearings for rate cases or other proceedings involving investor-owned utilities. This shall be done at the PSC's request without the need for subpoenas.

PROJECT COORDINATION

Drinking Water Program

1. The PSC will designate a Drinking Water Project Manager.
2. The DEP's Drinking Water Section Administrator will serve as the DEP's Drinking Water Project Manager.
3. Exchange of information between the DEP and the PSC shall be through the designated Drinking Water Project Managers. Copies of pertinent correspondence related to drinking water treatment and distribution and water conservation issues shall be sent to the appropriate agency's Drinking Water Project Manager.

Domestic Wastewater Program

1. The PSC will designate a Domestic Wastewater Project Manager.

communication and coordination among the permitting staffs. The focus is on identification of potential suppliers of reclaimed water (domestic wastewater treatment systems) and potential users of reclaimed water (applicants for consumptive use permits) and to develop strategies for maximizing the use of reclaimed water within the areas served by the individual DEP districts and water management districts.

Overall Coordination

The designated Drinking Water, Domestic Wastewater, and Reuse Project Managers from the DEP and the PSC shall meet as necessary. The meetings will address and review progress on the drinking water, domestic wastewater, and water reuse programs in Florida and will attempt to resolve any issues that may be identified by the staffs.

AMENDMENTS


This MOU may be amended by mutual agreement of the DEP and PSC. It shall remain in effect until it is dissolved by mutual agreement among the agencies or terminated by an agency after giving 30-days written notice to the other agency.

PREVIOUS MOU


This MOU supersedes the previous MOU dated November 20, 1992 between the DEP and the PSC. Upon signature of this MOU, the MOU dated November 20, 1992 will be null and void.

EFFECTIVE DATE AND SIGNATURES

This MOU will become effective after being signed by both parties.



E. Leon Jacobs, Jr., Chairman
Florida Public Service Commission



David B. Struhs, Secretary
Department of Environmental Protection

SEPTEMBER 3, 2001

Date

September 13, 2001

Date