

LAW OFFICES

ROSE, SUNDBSTROM & BENTLEY, LLP

2548 BLAIRSTONE PINES DRIVE  
TALLAHASSEE, FLORIDA 32301

(850) 877-6555

Fax (850) 656-4029

www.rsbatorneys.com

FREDERICK L. ASCHAUER, JR.  
CHRIS H. BENTLEY, P.A.  
ROBERT C. BRANNAN  
F. MARSHALL DETERDING  
JOHN R. JENKINS, P.A.  
KYLE L. KEMPER  
STEVEN T. MINDLIN, P.A.  
CHASITY H. O'STEEN  
DAREN L. SHIPPY  
WILLIAM E. SUNDBSTROM, P.A.  
DIANE D. TREMOR, P.A.  
JOHN L. WHARTON

ROBERT M. C. ROSE, (1924-2006)

CENTRAL FLORIDA OFFICE  
SANLANDO CENTER  
2180 WEST STATE ROAD 434  
SUITE 2118  
LONGWOOD, FLORIDA 32779  
(407) 830-6331  
FAX (407) 830-8522

MARTIN S. FRIEDMAN, P.A.  
BRIAN J. STREET

CHRISTIAN W. MARCELLI, OF COUNSEL  
(LICENSED IN NEW YORK ONLY)

June 30, 2008

VIA HAND DELIVERY

RECEIVED-FPSC  
08 JUN 30 PM 2:13  
COMMISSION  
CLERK

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

Re: Sun Communities Finance LLC D/B/A Water Oak Utility; PSC Docket No. 080295-WU  
Our File No. 33013.01

Dear Ms. Cole:

Attached is a revision to the Application for Revenue Neutral Rate Restructuring entitled "First Amended Application for Revenue Neutral Rate Restructuring" that should replace the pleading originally submitted with the Application on May 30, 2008. This has been amended in order to reference in the first paragraph the Limited Proceeding Statute as requested by the Staff Attorney. Nothing of substance has changed within this Application.

CMP \_\_\_\_\_ I am enclosing the original and 15 copies of the "First Amended" pleading.

COM \_\_\_\_\_

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

ECR \_\_\_\_\_

GOL \_\_\_\_\_

OPC \_\_\_\_\_

PCA \_\_\_\_\_

SCR \_\_\_\_\_

SSA \_\_\_\_\_

FMD/tms

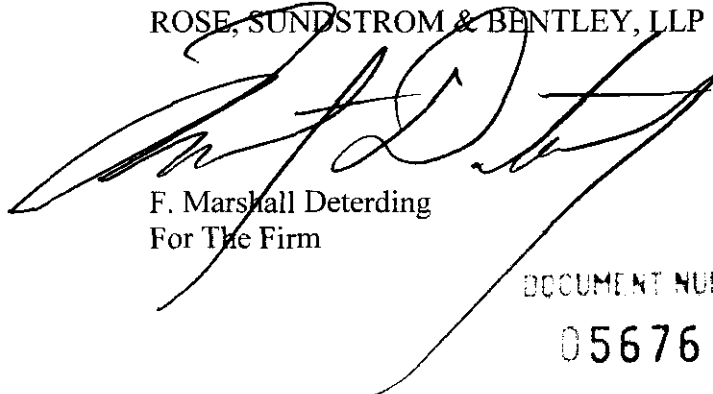
SEC cc: Keino Young, Esq.

OTM Jennie Lingo

Paul Stallcup

Sincerely,

ROSE, SUNDBSTROM & BENTLEY, LLP



F. Marshall Deterding  
For The Firm

DOCUMENT NUMBER-DATE

05676 JUN 30 08

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application of Sun )  
Communities Finance, LLC )  
d/b/a Water Oak Utility for ) Docket No. 080295-WU  
Revenue Neutral Water Rate )  
Restructuring in Lake County. )  
\_\_\_\_\_ )

FIRST AMENDED APPLICATION FOR REVENUE NEUTRAL RATE RESTRUCTURING

COMES NOW Sun Communities Finance, LLC d/b/a Water Oak Utility in accordance with the requirements and the provisions of Section 25-22.036 and 25-30.446, Florida Administrative Code, and Sections 367.0822 and 367.091, Florida Statutes, and files this Application for restructuring of its water rates and in support thereof states as follows:

1. The name and address of the Applicant as it appears on the Applicant's certificate and its principle place of business are as follows:

Sun Communities Finance, LLC d/b/a Water Oak Utility  
The American Center 27777 Franklin Road, Suite 200  
Southfield, MI 48034-8205

2. The Applicant is a separate division of a Limited Liability Corporation incorporated in Florida. The date of formation of that Limited Liability Corporation is June 9, 1999. The name and address of the owners of the Applicant are as follows:

Sun Communities Finance, LLC  
The American Center 27777 Franklin Road, Suite 200  
Southfield, MI 48034-8205

3. The Applicant currently utilizes rates and a rate structure established for the Utility by Commission Order No. PSC-00-1165-PAA-WS, issued on June 27, 2000 and subsequently

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FPSC-COMMISSION CLERK

adjusted through indexes filed in 2003 through 2005.

4. The address within the service area where the Application is available for customer inspection during the time the Rate Application is pending is as follows:

Sun Communities Finance, LLC d/b/a Water Oak Utility  
106 Evergreen Lane  
Lady Lake, Florida 32159

5. Attached as **Exhibit "A"** is a statement signed by an officer that the Utility will comply with the noticing requirements of Rule 25-30.446, Florida Administrative Code.

6. The St. Johns River Water Management District has informally informed the Utility that implementing a conservation oriented rate structure will be a requirement when the existing Consumptive Use Permit is up for renewal in 2010. They have been informed of our intent to go ahead and seek PSC approval for such a change and the staff of the District have expressed support for this Application and a desire for us to do so as quickly as possible. Attached as **Exhibit "C"** is a recent letter requested from the District to memorialize their previously expressed support of this proposed rate structure change.

7. Since the Applicant herein is not seeking an increase in rates, but rather a revenue neutral rate restructuring, an estimate by a professional engineer or other knowledgeable person, to establish a projected cost related to such requirement, is not applicable.

8. Since the Applicant herein is not seeking an increase in rates, but rather a revenue neutral rate restructuring, a schedule

that provides specific rate base components for which the Utility seeks recovery and the other requirements under Section 25-30.445(4)(c), (d), (e), (f), (g), (h), (i), and (l) are inapplicable and have not been provided.

9. Schedules which depict the information required by Section 25-30.445(4)(j), (k), and (m), including a calculation of annualized revenues for the most recent 12 month period using the rates in effect at the time the Utility is filing its Application; the schedule reflecting this by customer class and meter size; a schedule of current and proposed rates for all classes of customers; and a copy of all workpapers and calculations used to calculate the requested rates and allocations between each customer class, are included in the attached four accounting schedules included as part of **Exhibit "B"** hereto.

10. A consolidated billing analysis is included as part of **Exhibit "B"** as Schedule E-14.

11. The Utility's rate base has not declined since its most recent rate proceeding and in fact, has increased substantially. No additional expenses are sought for recovery pursuant to this Application and, therefore, the statement required by Section 25-30.445(7), Florida Administrative Code, is not applicable.

12. Attached hereto in accordance with the requirements of Rule 25-30.020(2)(g) is a filing fee in the amount of \$1,000 for utilities with the existing capacity to serve between 501 and 2,000 ERCs.

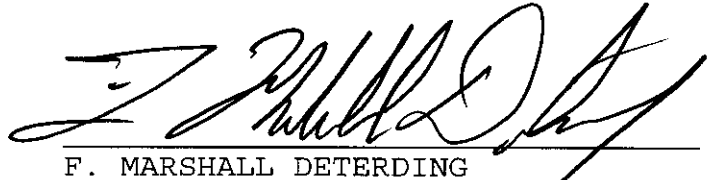
WHEREFORE the Utility requests that the Florida Public Service

Commission do the following:

1. Accept jurisdiction to grant a revenue neutral rate restructuring for Sun Communities Finance, LLC d/b/a Water Oak Utility; and
2. Approve the requested rates in order to implement an inclining block rate structure for the water system of Sun Communities Finance, LLC d/b/a Water Oak Utility.

Respectfully submitted on this  
30<sup>th</sup> day of June 2008, by:

ROSE, SUNDSTROM & BENTLEY  
2548 Blairstone Pines Drive  
Tallahassee, Florida 32301  
(850) 877-6555



F. MARSHALL DETERDING