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DIVISION OF ENGINEERING
TOM BALLINGER
DIRECTOR
(850) 413-6910

Public Service Commission

September 26, 2013

Mr. F. Marshall Deterding
Sundstrom, Friedman & Fumero, LLP
2548 Blairstone Pines Drive
Tallahassee, FL 32301

Re: Docket No. 130229-WS - Application for amendment of territory for Certificate Nos. 622-W and 564-S in Volusia and Brevard Counties by Farnton Water Resources LLC.

Dear Mr. Deterding:

Your application for Farnton Water Resources LLC (FWR) for an amendment to the water and wastewater territories in Volusia and Brevard Counties has been received and reviewed by Commission staff. This letter addresses the deficiencies of the application.

Deficiencies

1. Pursuant to Rule 25-30.036(3)(1), Florida Administrative Code (F.A.C.), the applicant should provide a detailed statement regarding the proposed method of financing the construction. In lieu of providing the detailed financial statement, FWC referred staff to the documents filed in its application for an original wastewater certificate in Docket No. 110298-SU (Farnton Water Resources LLC). This is not sufficient for a detailed analysis of FWC's current financial condition. Please provide a current detailed statement regarding the proposed method of financing the construction as required by Commission rule.
2. Pursuant to Rule 25-30.036(3)(1), F.A.C., the applicant should also provide the projected impact on the utility's capital structure. The projected impact on the utility's capital structure was not provided.

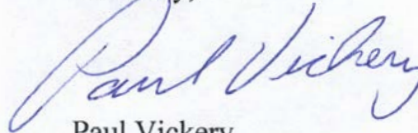
Mr. F. Marshall Deterding

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Your response to this letter should be filed with the Commission on or before October 25, 2013. When filing the response, please include the docket number and direct the response to the Director, Office of the Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399. If you have any questions please call Mrs. Melinda Watts at (850) 413-6952, or Ms. Caroline Klancke at (850) 413-6220.

Sincerely,

A handwritten signature in blue ink that reads "Paul Vickery". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Paul Vickery

Chief, Reliability and Resource Planning

PV:mw;pz

cc: Lydia Roberts (ECO)
Melinda Watts (ENG)
Caroline Klancke (GCL)
CLK for docket file
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