

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application for staff-assisted)
rate case in Pasco County by Shady) DOCKET NO. 900025-WS
Oaks Mobile-Modular Estates, Inc.)
_____)

PREHEARING STATEMENT

Shady Oaks Mobile-Modular Estates, Inc., ("Shady Oaks"), by and through its undersigned counsel, hereby files its Prehearing Statement in accordance with the requirements of Order No. PSC-92-1079-PCO-WS, and states:

Witnesses:

(a). Shady Oaks intends to call Richard D. Sims to testify as to the escrow and escrow requirement issues.

Exhibits:

(b). Those exhibits which Shady Oaks intends to utilize are those exhibits attached to the prefiled testimony of all witnesses and those exhibits consulted or relied upon by any witness or relevant to the testimony or position of any witness or party. Shady Oaks may also utilize certain exhibits on cross-examination, the nature of which is undetermined at this time.

ACK ✓
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APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG 1
LIN 4
OPC _____
RCH _____
SEC 1
WAS
OTH _____

Statement of Basic Position:

(c). It is the position of Shady Oaks that the escrow requirement should be significantly reduced.

questions of Fact:

(d). At what level should the escrow requirement for this utility be established.

questions of Law:

(e). Shady Oaks knows of no question of law the party

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considers at issue.

Questions of Policy:

(f). Shady Oaks knows of no policy question the party considers at issue.

Stipulations:

(g). Shady Oaks knows of no issues that have been stipulated to by the parties.

Pending Motions:

(h). Shady Oaks knows of no pending Motions or other matters that the party seeks action upon.

(i). Shady Oaks knows of no requirement set forth in the Procedure Order that cannot be complied with.

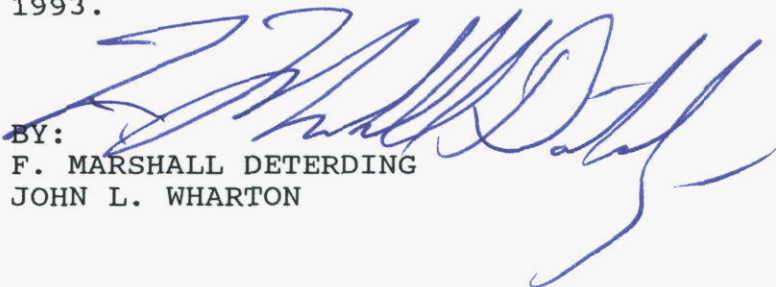
Respectfully submitted on this
11th day of May, 1993 by:

ROSE, SUNDSTROM & BENTLEY
2548 Blairstone Pines Drive
Tallahassee, Florida 32301
(904) 877-6555

BY:
F. MARSHALL DETERDING
JOHN L. WHARTON

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing instrument furnished by hand delivery to Matthew Feil, Esquire Florida Public Service Commission, 101 E. Gaines Street, Tallahassee, Florida 32399-0850, this 11th day of May, 1993.

BY: 
F. MARSHALL DETERDING
JOHN L. WHARTON