

ORIGINAL
FILE COPY

HAAG, GAFFNEY & WILCOX, P.A.
ATTORNEYS AT LAW
452 PLEASANT GROVE ROAD
INVERNESS, FLORIDA 34452

*JEANNETTE M. HAAG
KAREN O. GAFFNEY
DAVID L. WILCOX
WILLIAM J. CATTO
*CERTIFIED CIRCUIT CIVIL
AND FAMILY MEDIATOR

TELEPHONE
352 / 726-0901
FAX
352 / 726-3345

September 20, 1996

Via facsimile (904) 413-6687
Public Service Commission
Capitol Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Attn: Records and Reporting
RE: Meadows Utility Company, Inc.

- A. Application for Transfer of Certificate of Facilities 95-1026 WS
- B. Application for Staff Assisted Rate Case 96-0523-WS

Ladies and Gentlemen:

As you know, our office represents Dennis Jones and Brandi Jones, his wife, with regard to their objections to the above two (2) applications and other matters. The purpose of this correspondence is to provide the Public Service Commission with additional information regarding the manner in which Meadows Utility Company, Inc. is currently operating these facilities. More specifically, on September 10, 1996, our office, on behalf of Mr. and Mrs. Jones requested an opportunity to review documents held by Meadows Utility Company, Inc. relative to its operation of the facilities. See, Exhibit "A" to this correspondence. We requested an opportunity to review any and all documents relative to the operation of the plant over the last eighteen (18) months to and including rate information, cost of service and payments by any person of fees to J & J water and Sewer Corporation, the Wilson Trust and/or Meadows Utility Company, Inc.

On Monday, September 16, 1996, Mr. Paul Lafond contacted me on behalf of Meadows Utility Company, Inc. and advised that I could review the requested documents at his business office located on State Road 200 in Ocala, Florida on Friday, September 20, 1996. No privilege not to permit review was asserted. I arrived at Mr. Lafond's office at 10:45 a.m. on September 20, 1996. At that time Mr. Lafond produced the following documents:

K _____
A _____
P _____
F _____
AU _____
TR _____
AG _____
ES _____
IN _____
PC _____
CH _____
SEC _____
WAS _____
OTH _____

Bundy

DOCUMENT #
10/28-9
9/20/96

Public Service Commission
Page 2
September 20, 1996

- A. PSC Memorandum dated August 26, 1996 to Mr. Bethea
- B. Memorandum dated July 22, 1996 from G. Edwards,
Engineer
- C. Notice of Customer Meeting

No other documents were produced and no privilege was asserted in support of the failure to allow inspection of the records.

I again requested an opportunity to review the records and was informed that they were located at Mr. Lafond's home and he was not required to allow the review of those documents. As you know, the majority, if not all, of the records are subject to customer review both by law and pursuant to the recorded Management Agreement for the subdivision. This failure to allow inspection of relevant records in order to obtain sufficient information and be properly informed prior to the customer meeting is inappropriate and wrongful.

If you have any questions or are in need of any additional information, please do not hesitate to contact me. I look forward to hearing from you.

Yours truly,

HAAG, GAFFNEY & WILCOX, P. A.

By:



Karen O. Gaffney

(Dictated by Mrs. Gaffney but signed her absence to avoid delay.)

KOG/eve
Enclosure
cc: Mr. and Mrs. Dennis Jones

HAAG, GAFFNEY & WILCOX, P.A.

ATTORNEYS AT LAW

452 PLEASANT GROVE ROAD
INVERNESS, FLORIDA 34452

*JEANNETTE M. HAAG
KAREN O. GAFFNEY
DAVID L. WILCOX
WILLIAM J. CATTO

TELEPHONE
352 / 726-0901

FAX
352 / 726-3345

September 10, 1996

*CERTIFIED CIRCUIT CIVIL
AND FAMILY MEDIATOR

Meadows Utility Company, Inc.
10374 North Natchez Loop
Dunnellon, Florida 34434

RE: Application for Transfer of Certificate No. 361-W
and 316-S and Application for Rate Increase

Dear Sir or Madam:

Our office has been retained by Dennis Jones and Brandi Jones, his wife, with regard to the above noted applications and the numerous concerns that they have. As Mrs. Jones has informed you, pursuant to the recorded documents as contained within the public records in and for Citrus County, Florida, it appears that each of the owners of lots located in Dexter Park Villas owns an undivided one over one hundred fifty-third (1/153) interest in and to the water and sewer plants. Accordingly, Meadows Utility Company, Inc. is not the undivided owner of these parcels and therefore, is not in a position to apply for a transfer of the Certificate or rate increase. I enclose herewith a copy of the Common Elements, Declaration as well as the Management Agreement applicable to the property. To date, no meeting has been held with no vote taken as to whether or not Meadows Utility Company, Inc. is the desired management company. Given the fact that this corporation has extensively attempted to purchase property not owned by its Grantor, this would appear to be a concern.

In order to acquire sufficient information and documentation prior to the customer meeting of September 25, 1996, our office on behalf of Dennis Jones and Brandi Jones hereby request the provision of and/or opportunity to review any and all documents relative to the operation of the plant over the last eighteen (18) months to and including rate information, cost of service and payments by any person of fees to J & J Water and Sewer Corporation, the Wilson Trust and/or Meadows Utility Company.

EXHIBIT "A"

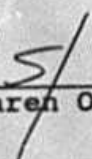
Meadows Utility Company, Inc.
Page 2
September 10, 1996

Once again, please provide the requested documents as soon as possible so that sufficient time to review the same is provided prior to the September 25, 1996 customer service meeting.

Yours truly,

HAAG, GAFFNEY & WILCOX, P. A.

By:



Karen O. Gaffney

KOG/eve

Enclosures

cc: Mr. and Mrs. Dennis Jones
Public Service Commission
Attn: Patricia Brady