

LAW OFFICES
ROSE, SUNDBSTROM & BENTLEY, LLP

2548 BLAIRSTONE PINES DRIVE
TALLAHASSEE, FLORIDA 32301

(850) 877-6555

CHRIS H. BENTLEY, P.A.
F. MARSHALL DETERDING
CAROL L. DUTRA
MARTIN S. FRIEDMAN, P.A.
JOHN R. JENKINS, P.A.
STEVEN T. MINDLIN, P.A.
DAREN L. SHIPPY
WILLIAM E. SUNDBSTROM, P.A.
DIANE D. TREMOR, P.A.
JOHN L. WHARTON

MAILING ADDRESS
POST OFFICE BOX 1567
TALLAHASSEE, FLORIDA 32302-1567

November 12, 1999

TELECOPIER (850) 656-4029

VIA HAND DELIVERY

ROBERT M. C. ROSE
OF COUNSEL

Cissy Rehwinkel
Division of Water and Wastewater
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Water Oaks Utility Company, Inc.; Docket No. 990243-WU
Our File No. 33013.01

Dear Cissy:

I am attaching hereto the utility's response to the Audit Report issued in the above-referenced matter. This has been prepared by Gary Morse, the consultant to the utility, and I believe goes over all the adjustments that we believe are necessary to the Audit Report.

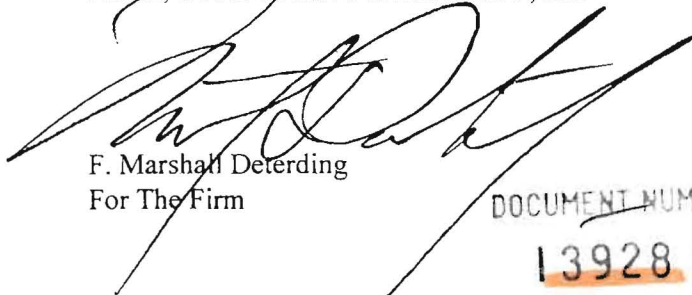
In addition to Gary's adjustments, you should also note that on the wastewater operating income statement contained on page 33 of the Audit Report, the total operating expense figure of \$101,065 contains a transposition or addition error and should, in fact, be \$113,997 even before the adjustments that we have outlined herein in Gary's attached report.

After a review of the attached, I believe you will see that the information within the Audit Report does not fairly represent the results of operations for this utility company for the year-ended 1998. Some of these are the results of a failure of the utility to actually book expenses related to the utility system and others are merely corrections of errors in the calculations by the auditor.

If you have any questions or disagree with any of the adjustments outlined in Gary's report, please let me know and we can sit down and discuss them further. We would like to resolve any differences or misunderstandings before you finalize a recommendation by staff in this case.

Sincerely,

ROSE, SUNDBSTROM & BENTLEY, LLP



F. Marshall Deterding
For The Firm

DOCUMENT NUMBER - DATE
13928 NOV 12 99
FPSC-RECORDS/REPORTING

AFA
APP
CAF
CMU
CTR
EAG
LEG
MAS
DPC
PAI
SEC
VAW
JTH

FMD/lm
Enclosures

Cissy Rehwinkel
November 12, 1999
Page 2

cc: Stephanie Crossman, Esquire
Troy Rendell
Denise Vandiver, C.P.A.
Gary Morse, P.E.
Jan Charron
Julian Coto, P.E.
Ms. Blanca Bayo, Clerk ✓

babcock\2rehwinkel.fmd

Memorandum

Date: October 29, 1999

To: Julian Coto, P.E., Excel Engineering
Marshall Deterding, Rose, Sundstrom, & Bentley, LLP
Dick Leiter, Sun Communities, Inc.
Jan Charron, Sun Communities, Inc.
Gabriele Umbel, Water Oak Utilities

From: Gary S. Morse

Re: Review of Staff Audit Report
Water Oak Utilities Co.
FPSC Docket No. 990243-WU

I have completed a review of the FPSC staff audit report dated August 25, 1999. While the auditor was very thorough, I have a number of recommended material adjustments as discussed herein.

Audit Exception No. 5 – Residential Unbilled Revenues – The audit imputes revenue for the approximately 200 customers that were subject to the preexisting contract/long term lease.

The auditor has computed the estimated revenues that would have been generated by these customers during 1998 characterized as unbilled revenues and includes those revenues in the determination of the net income of the Utility for the earnings calculation. The audit report indicates that water revenues of \$30,785.29 and wastewater revenues of \$46,923.20 would be generated at their “average monthly consumption”.

Exhibit 1 attached shows that based upon current water rates, the auditor used 12,661 gallons as the “average monthly consumption” in the revenue calculation. It is recommended that the actual average monthly water consumption for only residential accounts for 1998 be used, which is 11,255 gallons per month based on the data contained in Table 1 of the filing. By using the lower actual amount of 11,255 gallon per month, the annual water revenue generated is reduced by \$1,721. There is a corresponding reduction to the Regulatory Assessment Fees of \$77.

In reviewing the revenue generated for the wastewater system of \$46,923.20 as recommended in the audit report, the average monthly revenue gallons used by the auditor is 5,749 which does not seem all that unreasonable from a revenue gallon standpoint. However, based on the actual 1998 revenue of \$114,001 and the actual average number of residential customers billed of 531, the average monthly consumption is 4,947 gallons. As indicated under the Wastewater column of Exhibit 1 attached, by using this lower monthly consumption, the annual wastewater usage revenue is reduced by \$3,985 with a corresponding reduction to the Regulatory Assessment Fees of \$179.

Audit Exception No. 6 – General Service and Model Unbilled Revenues –

Here again the auditor recommends the imputation of revenue associated with the General Service customers as well as revenue associated with service to the model homes. Schedules E and F compute water revenue of \$23,931 and wastewater revenue of \$35,651 for the General Service customers. Schedules G and H compute water revenue of \$767 and wastewater revenue of \$514 for the model homes. I would not dispute the model home revenues. However, I have reviewed the General Service revenue calculations in the report, and believe that the auditor seriously overstated the revenues.

Exhibit No. 2 attached shows 12 months of revenue for water and wastewater utilizing the actual metered data from the time the utility initially installed the meters. Based upon this data, the auditor overstated General Service water revenue by \$14,121 and wastewater revenue by \$28,184. The auditor erred in the average monthly use for the Front Entrance and the Social Club. Schedule E of the report shows an average monthly water use of 1,113,273 gallons for the Front Entrance and 827,033 gallons for the Social Club. These amounts are way overstated.

Corresponding reductions should be made to the associated Regulatory Assessment Fees of \$610 for water and \$867 for wastewater.

The following comments are related to the Audit Disclosures contained on pages 24 through 29 of the report.

Audit Disclosure No. 3 – Pro Forma Operations and Maintenance Expenses – The report makes reference to correspondence from the FDEP regarding future testing and reporting requirements. The information was forwarded to analysts and engineers in Tallahassee for consideration as the auditor could not determine the impact on the utility.

The correspondence requires all utilities to provide a mailing to all customers with information concerning the quality of the water beginning this year. It is called a Consumer Confidence Report (“CCR”) and is sent to all customers once each year. The actual cost to prepare the CCR for 1999 is \$973 as detailed in Item 1 of Exhibit No. 3 attached. This cost should be directly assigned to the water system.

Additionally, there is the recent cost to notify all customers of the FPSC Customer meeting that took place at Water Oak on October 7th. Item 2 of Exhibit No. 3 attached shows the actual cost to prepare the mailing is \$1,104.52 amortized over 4 years, or \$276 per year. It is anticipated that the same cost will be incurred at the conclusion of this case to mail final notices to the customers. As such the same amount is shown on Exhibit No. 3 for the cost of the final notices. The Commission staff should recognize this and include this in its analysis.

There are two other items of cost that should be recognized by the staff as pro forma adjustments. These are the cost to read the additional 200+ meters each month, the cost to prepare/mail bills, and the administrative cost to process the payments. J and B Accounting charges \$0.85 per bill per month which includes meter reading, bill preparation and reporting, and mailing of the bills. As indicated on Exhibit No. 3, Item 3, the additional cost per year is \$2,170 that should be included as a Pro Forma operating expense.

The administrative cost to process the payments and make the deposits by the utility staff is estimated at \$1,573 per year as shown in Item 4. This does not include any costs associated with meter rereads, if any are required.

The auditor made adjustments salaries to recognize the allocation of time spent by Sun Community employee working for the Utility. However, no attempt was made to identify other Sun Community or Water Oak Country Club expenses that should be allocated or assigned to the Utility. Item 5 deals with

the cost of mowing the spray field, the plant sites, and the lift stations performed by a contract landscaper. As indicated in Item 5, the Utility is including in next years budget \$1,400 per month or \$16,800 per year for this function, along with a small amount of money, \$300 per year, for spray field head replacement. Thus, it is recommended that the staff include \$17,100 as a pro forma adjustment.

Item 6 relates to a pro forma adjustment for office rent. The Utility will begin paying Sun Communities office rent next year in the amount of \$4,800 annually. The offices used by the Utility are also used by the same employees who do work for Water Oak Country Club, and as such, the Utility should pay a pro rata share for rent on the space.

Item 7 relates to a pro forma adjustment for transportation expense. The Utility has included in its budget for the upcoming year \$3,450 which represents a 15% allocated share of vehicle expense of Water Oak Country Club. Utility personnel use the vehicles owned by Water Oak Country Club and should incur a portion of the costs for operation, maintenance, insurance, and depreciation on the vehicles. Additionally, Bob Pent, the plant operator, uses his personal vehicle and is reimbursed for mileage by the Utility. The actual cost of the reimbursement for 1998 was \$714.58, and the Utility is budgeting \$720 in the upcoming budget year for this item of expense. Therefore, the total transportation expense is \$4,170, which should be split equally between the water and wastewater systems.

Audit Disclosure No. 4 – Rate Case Expense – The audit report identifies \$11,462,45 of charges from Excel Engineering (those invoices also include legal fees) associated with this limited proceeding beginning with Invoice No. 2134 dated October 23, 1998. The audit report also includes the filing fee of \$1,000. We believe that the auditor did not review all the invoices relating to the rate restructuring. Exhibit No.4 attached provides a summary of the invoices from Excel Engineering that were not recognized in the audit. As indicated they amount to an additional \$21,914.58 which includes several charges from the attorneys Rose, Sundstrom, and Bently. A copy of the invoices has been attached. The total rate case expense should be \$34,377 as shown on Exhibit No. 4. Page 2 of Exhibit No. 4 shows the estimated legal fees and consulting fees anticipated to completion of the case in the amount of \$8,777 for a total rate case expense of \$43,154.

I am available to answer any questions the FPSC staff may have regarding the enclosed analyses.

Exhibit No. 1
Audit Exception No. 5
Residential Unbilled Revenue

	<u>Water</u>	<u>Wastewater</u>	<u>Total</u>
Totals Per Audit:	\$ 30,785	\$ 46,923	\$ 77,708
Base Charges Per Audit:	\$ 15,288	\$ 18,360	\$ 33,648
Usage Charges Per Audit:	\$ 15,497	\$ 28,563	\$ 44,060
Calculated Avg Monthly Usage Per Audit:	12,661	5,749	
Actual 98 Avg Monthly Usage Per Filing:	11,255	4,947	
Recommended Usage Charge:	\$ 13,776	\$ 24,578	\$ 38,354
Revenue Difference From Audit	<u>\$ (1,721)</u>	<u>\$ (3,985)</u>	<u>\$ (5,706)</u>

Exhibit No. 2
Audit Exception No. 6
General Service and Model Unbilled Revenue

The utility installed water meters for these accounts in February of 1998 as required by the St. Johns River Water Management District. The utility began billing Sun Communities for water usage by these accounts in July of 1999. As such, we would agree with the audit report in concept, but would disagree with the revenues computed in the audit report for the General Service accounts. The computed revenue in the audit for the Models is reasonable.

Actual usage for the General Service accounts for 9 months of 1998 and 3 months of 1999 was analyzed and the monthly revenues are shown below.

Based upon review of Schedule E for Audit Exception No. 6, the monthly usage data for Lot 1-Front Entrance is overstated, as is Lot 4-Social Club. Based on a review of the actual monthly for 1998, the average usage per month for Lot 1-Front Entrance is 26,290 and the average use per month for Lot 4-Social Club is 41,460 gallons.

Water System:	Water Usage	Usage Charge	Base Charge	Total
Mar-99	216,823	\$ 110.58	\$ 650.75	\$ 761.33
Feb-99	78,031	\$ 39.80	\$ 650.75	\$ 690.55
Jan-99	44,876	\$ 22.89	\$ 650.75	\$ 673.64
Dec-98	336,735	\$ 171.73	\$ 650.75	\$ 822.48
Nov-98	741,461	\$ 378.15	\$ 650.75	\$ 1,028.90
Oct-98	443,808	\$ 226.34	\$ 650.75	\$ 877.09
Sep-98	1,015,887	\$ 518.10	\$ 650.75	\$ 1,168.85
Aug-98	411,918	\$ 210.08	\$ 650.75	\$ 860.83
Jul-98	570,671	\$ 291.04	\$ 650.75	\$ 941.79
Jun-98	195,846	\$ 99.88	\$ 638.01	\$ 737.89
May-98	18,157	\$ 9.26	\$ 638.01	\$ 647.27
Apr-98	24,240	\$ 12.36	\$ 586.96	\$ 599.32
12 Mo Total	4,098,453			\$ 9,809.94
Audit Report Total (Page 15)				\$ 23,930.60
Difference				\$ (14,120.66)

Wastewater System:	Usage (1)	Gal Charge	Base Charge	Total
Mar-99	132,843	\$ 332.11	\$ 321.13	\$ 653.24
Feb-99	31,521	\$ 78.80	\$ 321.13	\$ 399.93
Jan-99	29,056	\$ 72.64	\$ 321.13	\$ 393.77
Dec-98	194,205	\$ 485.51	\$ 321.13	\$ 806.64
Nov-98	384,499	\$ 961.25	\$ 321.13	\$ 1,282.38
Oct-98	278,708	\$ 696.77	\$ 321.13	\$ 1,017.90
Sep-98	256,287	\$ 640.72	\$ 321.13	\$ 961.85
Aug-98	321,218	\$ 803.05	\$ 321.13	\$ 1,124.18
Jul-98	344,281	\$ 860.70	\$ 321.13	\$ 1,181.83
Jun-98	16,329	\$ 40.82	\$ 321.13	\$ 361.95
May-98	14,363	\$ 35.91	\$ 321.13	\$ 357.04
Apr-98	21,100	\$ 52.75	\$ 321.13	\$ 373.88
12 Mo Total	2,024,410			\$ 7,467.65
Audit Report Total (Page 15)				\$ 35,651.37
Difference				\$ (28,183.73)

(1) Represents usage for Pro Shop, Social Club, Main Club House, Rehab Center, and Office.

Exhibit No. 3
Audit Disclosure No. 3
Pro Forma O&M Expenses

1. On March 24, 1999, the utility received notification from the Florida Department of Environmental Protection of all known future water and wastewater testing and reporting requirements.

Audit Opinion/Recommendation: The effects of the above information on the utility's water and wastewater test year expense in 1999 and beyond could not be determined by audit staff.

The utility is now required to comply with FDEP and produce a Consumer Confidence Report (CCR) each year. The following estimated annual cost is provided for consideration based upon the actual cost to produce the report for 1999 which will be sent to all customers on October 14th.

	Average		
	Hours	Hourly Rate	Cost
Direct Labor	30	\$ 15.00	\$ 450.00
Payroll Taxes @ 7.65%			\$ 34.43
Envelopes/Labels			\$ 81.00
Printing			\$ 150.00
Postage @ \$0.33 per letter			\$ 258.00
Total Cost to Water System			<u>\$ 973.43</u>

2. The auditor did not make a pro forma adjustment to include in rate case expense the cost associated with mailing the customer meeting notices and final notices. The cost associated with each notice is as follows:

	Meeting Notice (1)	Final Notice (2)
Labor (30 manhours @ \$15.00 per hour)	\$ 450.00	\$ 450.00
Payroll Taxes @7.65%	\$ 34.43	\$ 34.43
Printing	\$ 118.34	\$ 118.34
Envelopes/Labels	\$ 81.00	\$ 81.00
Postage @ \$0.55 per letter	\$ 420.75	\$ 420.75
Total	<u>\$ 1,104.52</u>	<u>\$ 1,104.52</u>
Annual Cost with 4 Year Amortization '(3)	<u>\$ 276.13</u>	<u>\$ 276.13</u>

(1) Actual cost incurred.

(2) Estimated based on actual cost to prepare and mail customer meeting notice.

(3) These cost should be split 50-50 to the water and wastewater systems.

Exhibit No. 3
Audit Disclosure No. 3 Con't.
Pro Forma O&M Expenses

3. The staff auditor made no proforma adjustment relative to the meter reading and bill preparation cost associated with the 200+ customers that will be billed for service beginning next year. The amount for Contractual Service-Billing should be as follows:

Total No. of Accounts (Year End 98)	760
Cost Per Bill Per Month (1)	\$ 0.85
Total Contractual Billing Cost Per Year	<u>\$ 7,752</u>
Amount per Audit Exception No. 8 & 9	\$ 5,582 (\$2,791 each for water & sewer)

(1) Based on actual cost of \$0.85 per bill per month per information provided by J&B Accounting and Billing. Includes meter reading, bill preparation, and postage.

4. Additional labor and administrative costs associated with processing payments each month associated with the 200 additional accounts are provided for consideration.

Labor:	Hours/Mo.	Hourly Rate	Labor Cost
Gabriele Umbel Manager	2	\$ 28.00	\$ 56.00
Marilen	5	\$ 6.75	\$ 33.75
Diane	4	\$ 8.00	\$ 32.00
Total Labor Cost Per Month			<u>\$ 121.75</u>
Total Direct Labor Cost Per Year			\$ 1,461.00
Payroll Taxes @ 7.65%			\$ 111.77
Total Labor Cost Per Year			<u><u>\$ 1,572.77</u></u>

Note: Does not include any costs associated with rereading of meters at customers request.

5. The staff auditor made no adjustment to operation and maintenance expenses relating to sprayfield maintenance and mowing. The monthly cost to mow the two wastewater spray fields, the wastewater plant, the lift stations and the water plant sites is estimated at \$1,400 per month per lawn maintenance company contract. Additionally, \$300 per year for the replacement of broken spray heads. These costs are incurred by Water Oak Country Club, but will be directly charged to the utility in the next calendar year budget. See attached Lawn Maintenance Contract.

Total Recommended Adjustment is \$17,100 that should be split 90% to wastewater system and 10 % to water system. This allocation is based on the relative size of water and wastewater plant lands.

6. The staff auditor made no adjustment to operation and maintenance expenses relating to the utility office rent. Water Oak Utilities uses the offices of Water Oak Country Club. The office was recently moved to 106 Evergreen Lane. This property is owned by Sun Communities. The offices are used for utility operations as well as administration/maintenance of the community. There is 1,200 square feet of space in the building. Each person that works in this building spends time working for the utility and each office is used for utility related work. Assuming \$8.00 per sq. foot based on local costs of \$7 to \$9 (per local ERA Real Estate quote), the annual rent expense is \$9,600 per year. Based on 50% utility use, it is recommended that \$4,800 per year be allocated to the utility.

Total Recommended Adjustment is \$4,800, which should be split 50% to water and 50% to wastewater.

7. The staff auditor made no adjustment to operation and maintenance expenses relating to Transportation Expense. Water Oak Utilities' plant operator, Bob Pent, uses his personal vehicle to travel to the plants, lift stations, and water testing per FDEP. He submits a travel expense report each month and is reimbursed for mileage at a rate of 31.5 cents per mile. The total actual expense for 1998 was \$714.58. The reimbursement came out of the Water Oak Country Club account, however, the reimbursement will come out of the Utilities' account starting next year and would be an appropriate utility expense. For the upcoming budget year, \$60.00 per month, or \$720 per year has been budgeted. Additionally, Water Oak Country Club maintenance vehicles are used by the maintenance supervisor, Chuck Radick, and his five (5) people to maintain and perform repairs to the water distribution/wastewater collection system. There are four vehicles involved in this activity. The utility will be allocated 15% of the cost to operate/maintain these vehicles in the upcoming year based on the estimate by Mr. Radick of the usage for water and sewer related duties. The allocated annual cost to operate/maintain these vehicles is \$3,450 per year including gas, insurance and depreciation.

Total Recommended Adjustment is \$4,170, which should be split 50% to water and 50% to wastewater.

Exhibit No. 4
 Audit Disclosure No. 4
 Pro Forma O&M Expenses

1. The staff auditor reviewed invoices from Excel Engineering related to rate case expense for the period 10/23/98 through 6/9/99 as shown on page 29 of the audit. However, several invoices were missed or excluded, many of which were for attorney charges related to the rate case. A summary follows:

Date	Invoice No.	Amount
6/4/1999	2324	\$ 474.79
#####	2357	592.62
#####	2365	210.00
8/3/1999	2369	246.24
#####	2923	168.90
#####	2420	1,504.90
1/4/1999	2158	759.18
#####	2461	170.00
#####	1908	815.47
5/4/1998	1931	1,347.18
#####	2034	1,021.66
#####	2043	248.00
#####	2061	890.50
#####	2072	630.50
#####	2075	347.50
#####	2104	1,463.24
9/4/1998	2086	758.33
#####	2143	2,856.08
#####	2136	859.69
#####	2354	370.00
#####	2397	123.15
#####	2462	3,492.43
4/1/1999	2272	21.50
#####	1927	2,542.72
Total Missed Invoices		<u>\$ 21,914.58</u>
Invoices Included in Audit		11,462.45
Filing Fee (included in Audit)		1,000.00
Subtotal Rate Case Expense		<u>\$ 34,377.03</u>

Exhibit No. 4
Audit Disclosure No. 4
Pro Forma O&M Expenses

The following is an estimate of costs to complete the case:

Legal Fees:	\$ 6,000.00
Rate Case Consulting (Gary Morse)	
October Billing (incurred)	\$ 1,267.14
November Billing (est.)	\$ 195.00
Other Estimated Costs:	
Review/analyze Staff Recommendation	\$ 195.00
Attend Agenda Conference:	
Labor	\$ 520.00
Travel	\$ 600.00
Total Estimated Cost to Complete	<u>\$ 8,777.14</u>
Costs to date from Page 1	\$ 34,377.03
Total Rate Case Expense (Legal/Consulting)	<u><u>\$ 43,154.17</u></u>

Water Oak Utilities, Inc.
Docket No. 990243-WU
Water Net Operating Income
Test Year Ended December 31, 1998

Line No.	Description	Per Audit	Recommended Adjustments	Per Company
1	Operating Revenues	\$ 131,154		\$ 131,154
2	Residential Revenues		\$ (1,721)	(1,721)
3	General Service Revenues		(14,121)	(14,121)
4	Total Operating Revenues	<u>131,154</u>	<u>(15,842)</u>	<u>115,312</u>
	Operating Expenses			
6	O & M Expense	52,334		52,334
7	Consumer Confidence Report		973	973
8	Contract Services:			-
9	Billing		1,085	1,085
10	Landscape Maintenance		1,710	1,710
11	Rent		4,800	4,800
12	Transportation		2,085	2,085
13	Rate Case Expense			-
14	Customer Notices		276	276
15	Legal/Rate/Engineering		7,673	7,673
16	Miscellaneous		786	786
17	Subtotal O & M Expense	<u>52,334</u>	<u>19,389</u>	<u>71,723</u>
18	Depreciation Expense	8,985	-	8,985
19	Taxes Other Than Income	20,520	(713)	19,807
20	Income Tax Expense	-	-	-
21	Total Operating Expenses	<u>81,839</u>	<u>18,676</u>	<u>100,515</u>
22	Net Operating Income (Loss)	\$ 49,315		\$ 14,797
23	Rate Base (Per Staff Audit)	\$ 133,263	\$ 2,424	\$ 135,687
24	Calculated Return on Rate Base	37.01%		10.91%
25	Rate Base Per Company	\$ 228,576	\$ 2,424	\$ 231,000
26	Calculated Return on Rate Base			6.41%

Water Oak Utilities, Inc.
Docket No. 990243-WU
Wastewater Net Operating Income
Test Year Ended December 31, 1998

Line No.	Description	Per Audit	Recommended Adjustments	Per Company
1	Operating Revenues	\$ 197,089		\$ 197,089
2	Residential Revenues		\$ (3,985)	(3,985)
3	General Service Revenues		(28,184)	(28,184)
4	Total Operating Revenues	197,089	(32,169)	164,920
	Operating Expenses			
6	O & M Expense	72,466		72,466
7	Consumer Confidence Report		-	-
8	Contract Services:			-
9	Billing		1,085	1,085
10	Landscape Maintenance		15,390	15,390
11	Rent		4,800	4,800
12	Transportation		2,085	2,085
13	Rate Case Expense			-
14	Customer Notices		276	276
15	Legal/Rate/Engineering		7,673	7,673
16	Miscellaneous		786	786
17	Subtotal O & M Expense	72,466	32,095	104,561
18	Depreciation Expense	19,613	-	19,613
19	Taxes Other Than Income	21,918	(1,448)	20,470
20	Income Tax Expense	-	-	-
21	Total Operating Expenses	113,997	30,648	144,645
22	Net Operating Income (Loss)	\$ 83,092		\$ 20,275
23	Rate Base (Per Staff Audit)	\$ 146,847	\$ 4,012	\$ 150,859
24	Calculated Return on Rate Base	56.58%		13.44%
25	Rate Base Per Company	\$ 126,681	\$ 4,012	\$ 130,693
26	Calculated Return on Rate Base			15.51%

AGREEMENT

THIS AGREEMENT made and entered into this 10 day of JULY, 1997 by and between MIKE'S MAINTENANCE (hereinafter referred to as the "Contractor") and Water Oak Country Club Estates (hereinafter referred to as the "Park"), provides: Contractor and Park are sometimes referred to herein collectively as "Parties" and individually as "Party".

WITNESSETH

Whereas, the Park desires to obtain the services of a lawn maintenance contractor for purposes of servicing its residents;

Whereas, the Contractor is in the business of providing such services;

Whereas, the Park currently has 704 occupied lots, common areas including highway frontage, offices, clubhouses, medians, models, post office and vacant residential lots, RV storage, water treatment plant, sewage treatment plant and spray fields that require maintenance;

Now, Therefore, in consideration of the above and the mutual conditions and undertakings as hereinafter set forth, it is agreed as follows:

1. Services. The services provided by Contractor include mowing, trimming, and edging all lawns within the park and all common areas, waterways and retention ponds. Mowing and trimming will be performed with each mowing. Additional services included in this contract are maintenance of beds and labor for installation, trimming and weeding of shrub beds, labor for fertilization of turf and shrubs, mowing of vacant residential lots, RV storage, water treatment plant, sewage treatment plant and spray fields.

2. Contractor's Responsibilities. Contractor shall provide sufficient personnel and equipment to perform the services in a reasonable, workmanlike manner. Contractor shall supply proof of worker's compensation insurance as required by state law. Contractor shall also supply proof of insurance for personal injury and property damage in an amount not less than One Million (\$1,000,000.00) Dollars per occurrence. Contractor shall indemnify, defend and hold harmless the park for all claims, accidents, or occurrences arising out of Contractor's operations except for those claims, accidents or occurrences occasioned by the sole negligence of the Park or its employees. Park owner shall be named as an additional insured under all liability insurance.

3. Performance. Depending on weather, Contractor will perform 42 to 45 (forty-two to forty-five) complete services of occupied sites and common areas, 18 (eighteen) services per year of vacant sites (May to October 2 (two) times per month and November to April one time per month).

4. Consideration. The Park shall pay Contractor at the rate of \$15.00 (fifteen) dollars per lot per month for mowing of each residential site. The cost of mowing, trimming, and "weed eating" common areas, waterways and retention ponds, vacuum service, weeding planter beds, and edging shall be \$1,830.00 (one thousand eight hundred and thirty) dollars per month, mowing of vacant residential lots, RV storage, water treatment plant, sewage treatment plant and spray fields shall be \$4,200.00 (forty two hundred) per month.

5. Payment. Payment in accordance with Paragraph 4 shall be made within thirty (30) days following completion of services and delivery of an invoice.

6. Term. The term of this Agreement shall be until December 31, of the year 2000.

7. Annual Fee Adjustment. Annually, on the commencement date of this contract, the Contractor may increase the fees for services rendered to the customer to reflect changes in the cost of doing business, provided sixty (60) days advance notice is given to the Customer. This service fee increase shall be based on changes (percent of change) in the Consumer Price Index (CPI-U) for all urban consumers as published by the U.S. Department of Labor, Bureau of Labor Statistics; the reference period will be from September to September. Such increase shall be computed by multiplying the fee charged in the previous year by the percentage change in the above described CPI. However, in no event shall the yearly percentage increase exceed six (6%) percent per unit per annum.

8. This Agreement may be terminated upon ten (10) days; written notice if the Park fails to pay in accordance with this Agreement for services properly rendered. In the event of default, Contractor shall have such remedies as provided by law. This Agreement may be terminated at the Park's option upon ten (10) day written notice to the Contractor at any time, if Contractor fails to perform the services within the prescribed time or if Contractor fails to perform in a courteous, workmanlike manner. In addition, the Park shall have such other remedies as provided by law.

9. Binding Effect. This Agreement is binding upon both parties, their heirs, successors, and assigns. Contractor may not, however, assign this contract without the prior written approval of the Park. If any provision hereof is determined to be invalid by a Court of competent jurisdiction, the remaining terms and conditions hereof shall remain in full force and effect.

10. Legal Fees. In the event that either party in this contract institutes legal action for the Violation of this contract, the successful Party in such action shall be entitled to be reimbursed by the losing Party in such action for all of its reasonable attorney fees and reasonable Court costs and to have the Judgement therefore.

11. Complete Agreement. The Parties acknowledge that there are no oral agreements between them and that this Agreement constitutes the complete understanding of the Parties.

IN WITNESS WHEREOF, the Parties hereto have set their hands on the date first recited above.

WITNESS:

[Signature]

By: Michael Lopez
Contractor

Michael Lopez

WITNESS:

[Signature]

By: Thomas Brown ACM
Customer

Thomas Brown

WATER OAK UTILITIES COMPANY, INC.
 Legal Fees and Costs Re: Gross-Up Disposition

<u>Invoice Number</u>	<u>Billing Date</u>	<u>Fees</u>	<u>Out-of Pocket</u>	<u>Total</u>
18415	02/20/98	\$ 52.50	\$ 2.70	\$ 55.20
18559	03/20/98	770.00	37.97	807.97
18707	04/14/98	1,837.50	10.22	1,847.72
19096	07/15/98	227.50	13.00	240.50
19214	08/12/98	332.50	0.00	332.50
19468	10/19/98	822.50	22.19	844.69
19616	11/17/98	437.50	0.00	437.50
20189	03/18/99	1,577.00	1,140.79	2,717.79
20354	04/21/99	1,197.00	1.15	1,198.15
20438	05/17/99	456.00	3.79	459.79
20586	06/16/99	589.00	3.62	592.62
21025	09/15/99	152.00	7.00	159.00
21311	10/22/99	1,159.00	193.43	1,352.43
Incurring but Unbilled	<u>11/01/99</u>	<u>684.00</u>	<u>135.00</u>	<u>819.00</u>
Total Actual Fees & Costs Through 10/31/99		\$ 10,294.00	\$1,570.86	\$ 11,864.86
Estimated to Complete to PAA (1) (if unprotested)		<u>5,700.00</u>	<u>300.00</u>	<u>6,000.00</u>
Total Actual & Estimated Legal Fees to Final Order		<u>15,994.00</u>	<u>1,870.86</u>	<u>1,7864.86</u>

(1) Thirty hours of Legal Time based on estimate for: Final organization and review of audit response; discussions with staff and client re: same; obtain and review Staff Recommendation and forward with analysis to client; meeting with consultants, prepare for and attend Agenda Conference, review Order and send with letter to client; prepare client for implementation of rate change and assist with final noticing.

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
4/26/99	2291

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, Fl 32159

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING		
	PN WAT97032		
0.5	Clerical	30.00	15.00
	Attorney: Rose, Sundstrom & Bently (see attached)	1,198.15	1,198.15
	Public Resource Management Group, Inc. (see attached)	156.77	156.77
Thank you and God Bless		Total	\$1,369.92

pse

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
6/4/99	2324

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, Fl 32159

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING		
	PN WAT97032		
0.5	Clerical Attorney: Rose, Sundstrom & Bently (see attached)	30.00 459.79	15.00 459.79
Thank you and God Bless		Total	\$474.79

pse

EXCEL ENGINEERING CONSULTANTS, INC.

122 Wilshire Blvd.
Casselberry, FL 32707

Invoice

DATE	INVOICE #
6/9/99	2326

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, Fl 32159

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING		
	PN WAT97032		
0.5	Clerical Public Resource Management Group, Inc. (see attached)	30.00 308.50	15.00 308.50
Thank you and God Bless		Total	\$323.50

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

122 Wilshire Blvd.
Casselberry, FL 32707

Invoice

DATE	INVOICE #
6/22/99	2357

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, FL 32159

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
0.5	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING PN WAT97032 Clerical Attorney: Rose, Sundstrom & Bently (see attached)	592.62	0.00 592.62
Thank you and God Bless		Total	\$592.62

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

122 Wilshire Blvd.
Casselberry, FL 32707

Invoice

DATE	INVOICE #
7/12/99	2365

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, FL 32159

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING		
	PN WAT97032		
0.5	Clerical Rating service, Gary Morse (see attached)	30.00 195.00	15.00 195.00

Thank you and God Bless	Total	\$210.00
-------------------------	--------------	----------

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

122 Wilshire Blvd.
Casselberry, FL 32707

Invoice

DATE	INVOICE #
8/3/99	2369

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, FL 32159

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
0.5	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING PN WAT97032 Clerical Gary Morse: PSC Rating (see attached)	30.00 231.24	15.00 231.24
Thank you and God Bless		Total	\$246.24

PSC

Invoice

EXCEL ENGINEERING CONSULTANTS, INC.

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
9/18/99	2923

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, Fl 32159

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING		
	PN WAT97032		
0.33	Clerical Attorney: Rose, Sundstrom & Bently (see attached)	30.00 159.00	9.90 159.00
Thank you and God Bless		Total	\$168.90

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
10/4/99	2420

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, FL 32159

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
0.33	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING PN WAT97032 Clerical Public Resource Management Group, Inc. (see attached)	30.00 1,495.00	9.90 1,495.00
Thank you and God Bless		Total	\$1,504.90

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

122 Wilshire Blvd.
Casselberry, FL 32707

Invoice

DATE	INVOICE #
1/4/99	2158

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97031	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES C.U.P. PN WAT97031		
0.5	Clerical	30.00	15.00
	Public Resource Management Group, Inc. (see attached)	621.00	621.00
	Projector & screen rental for presentation	123.18	123.18
Thank you and God Bless		Total	\$759.18

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
1/11/99	2164

BILL TO
Ms. Gabrielle Umbel Water Oaks Country Club 216 Magnolia Court Lady Lake, Florida 32159

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING		
	PN WAT97032		
0.5	Clerical Public Resource Management Group, Inc. (see attached)	30.00 700.94	15.00 700.94
	REIMBURSABLE:		
	• B-prints	3.85	3.85
	• ups/wat98051	13.80	13.80
	• projector & screen	123.18	123.18
	• photo/wat98051	2.96	2.96
	• ups/wat98051	13.80	13.80
	Total Reimbursable Expenses		157.59
Thank you and God Bless		Total	\$873.53

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
3/1/99	2235

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
0.5	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING PN WAT97032 Clerical Public Resource Management Group, Inc. (see attached)	30.00 438.50	15.00 438.50

Thank you and God Bless	Total	\$453.50
-------------------------	--------------	-----------------

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
10/25/99	2461

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, FL 32159

P.O. NO.	TERMS	PROJECT
WAT97012	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAK COUNTRY CLUB GENERAL SERVICES		
2	Project Manager * Meet with Dick, Jan, Gabrielle, and SJRWMD to discuss water use	85.00	170.00
Thank you and God Bless		Total	\$170.00

EXCEL ENGINEERING CONSULTANTS, INC.

PSC

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
3/23/99	2250

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, FL 32159

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING		
	PN WAT97032		
0.5	Attorney: Rose, Sundstrom & Bently (see attached) Clerical	2,717.70 30.00	2,717.70 15.00
Thank you and God Bless		Total	\$2,732.70

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
3/30/98	1908

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97031	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
0.25	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING & COMPLETION OF C.U.P. PN WAT97031 PROPOSAL: 97107 Attorney: Rose, Sundstrom & Bently (see attached) Administrative	807.97 30.00	807.97 7.50
Thank you and God Bless		Total	\$815.47

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
5/4/98	1931

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97031	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
0.25	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING & COMPLETION OF C.U.P. PN WAT97031 PROPOSAL: 97107 Public Resource Management Group, Inc. (see attached) Clerical	1,339.68 30.00	1,339.68 7.50
Thank you and God Bless		Total	\$1,347.18

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
6/18/98	2034

BILL TO
Mr. Tom Harnic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97031	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING & COMPLETION OF C.U.P. PN WAT97031 PROPOSAL: 97107		
0.33	Clerical Public Resource Management Group, Inc. (see attached)	30.00 914.39	9.90 914.39
	Blueprints General Reimbursables & materials	29.75 67.62	29.75 67.62
Thank you and God Bless		Total	\$1,021.66

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
7/22/98	2043

BILL TO
Mr. Tom Harnic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97031	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
0.25	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING & COMPLETION OF C.U.P. PN WAT97031 PROPOSAL: 97107 Attorney: Rose, Sundstrom & Bently (see attached) Clerical	240.50 30.00	240.50 7.50
Thank you and God Bless		Total	\$248.00

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
7/31/98	2061

BILL TO
Mr. Tom Harnic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97031	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
0.5	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING & COMPLETION OF C.U.P. PN WAT97031 PROPOSAL: 97107 Public Resource Management Group, Inc. (see attached) Clerical	875.50 30.00	875.50 15.00
Thank you and God Bless		Total	\$890.50

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
8/13/98	2072

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97031	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING & COMPLETION OF C.U.P. PN WAT97031 PROPOSAL: 97107		
0.5	Public Resource Management Group, Inc. (see attached)	615.50	615.50
	Clerical	30.00	15.00
Thank you and God Bless		Total	\$630.50

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
8/20/98	2075

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97031	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
0.5	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING & COMPLETION OF C.U.P. PN WAT97031 PROPOSAL: 97107 Clerical Attorney: Rose, Sundstrom & Bently (see attached)	30.00 332.50	15.00 332.50

Thank you and God Bless	Total	\$347.50
-------------------------	--------------	-----------------

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
9/24/98	2104

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97031	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
0.5	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING & COMPLETION OF C.U.P. PN WAT97031 PROPOSAL: 97107 Clerical Public Resource Management Group, Inc. (see attached)	30.00 1,448.24	15.00 1,448.24
Thank you and God Bless		Total	\$1,463.24

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
9/4/98	2086

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97031	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING & COMPLETION OF C.U.P. PN WAT97031 PROPOSAL: 97107		
8.5	Project Manager * Meeting with Dick, Jan, Gab, Gary * Coordination * Coordination with Gary Morse * Review numbers	85.00	722.50
	UPS/wat97012 Blueprints	7.77 28.06	7.77 28.06
Thank you and God Bless		Total	\$758.33

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
11/5/98	2143

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97031	Due on recpt	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
0.5	WATER OAKS COUNTRY CLUB ESTATES C.U.P. PN WAT97031 Clerical Public Resource Management Group, Inc. (see attached)	30.00 2,841.08	15.00 2,841.08

Thank you and God Bless	Total	\$2,856.08
-------------------------	--------------	-------------------

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
10/28/98	2136

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97031	Due on recpt	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
0.5	WATER OAKS COUNTRY CLUB ESTATES C.U.P. PN WAT97031 Clerical Attorney: Rose, Sundstrom & Bently (see attached)	30.00 844.69	15.00 844.69
Thank you and God Bless		Total	\$859.69

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
11/30/98	2153

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97032	Due on recpt	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
0.33	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING PN WAT97032 Attorney: Rose, Sundstrom & Bently (see attached) Clerical	437.50 30.00	437.50 9.90
	Thank you and God Bless		Total \$447.40

PSE

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
1/20/99	2197

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING		
	PN WAT97032		
29	Project Manager: see attached	85.00	2,465.00
3	Clerical	30.00	90.00
Thank you and God Bless		Total	\$2,555.00

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
2/26/99	2217

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
3.5	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING PN WAT97032 Project Manager (see attached)	85.00	297.50

Thank you and God Bless		Total	\$297.50
-------------------------	--	--------------	-----------------

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
5/7/99	2300

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, Fl 32159

P.O. NO.	TERMS	PROJECT
WAT98051	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING		
	PN WAT97032		
0.75	Project Manager * Coordination with Gary Morse and Rieger	85.00	63.75
2	Clerical	30.00	60.00
	Printing charges	7.50	7.50
	Postage & Handling Charges	8.36	8.36
Thank you and God Bless		Total	\$139.61

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
6/18/99	2354

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, FL 32159

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING PN WAT97032		
4	Project Manager * Meeting with Gabriele, Jan, Morse RE: PSC issues & lot credit * Coordinate with Morse, Dieterding, and R. Lee	85.00	340.00
1	Clerical	30.00	30.00
Thank you and God Bless		Total	\$370.00

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
8/20/99	2397

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, FL 32159

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING		
	PN WAT97032		
1	Project Manager	85.00	85.00
1.17	Clerical	30.00	35.10
	printing, xerox copies	2.50	2.50
	Postage & Handling Charges	0.55	0.55

Thank you and God Bless

Total

\$123.15

EXCEL ENGINEERING CONSULTANTS, INC.

PSC

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
10/25/99	2462

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, FL 32159

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING		
	PN WAT97032		
25	Project Manager * Coordinate with PSC staff; Morse; attorney * Meet with Dick, Jan, Gabrielle * Review documents * Meeting with HOA and lot credits * Flow analysis * PSC hearing	85.00	2,125.00
0.5	Clerical Attorney: Rose, Sundstrom & Bently (see attached)	30.00 1,352.43	15.00 1,352.43
Thank you and God Bless		Total	\$3,492.43

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
4/1/99	2272

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, Fl 32159

P.O. NO.	TERMS	PROJECT
WAT99032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAK PSC		
0.5	Clerical: copy, mail PSC papers to Charron	30.00	15.00
	Printing	4.60	4.60
	Postage & Handling Charges	1.90	1.90
Thank you and God Bless		Total	\$21.50

PSC

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
10/23/98	2132

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97032	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING PN WAT97032 15.5 Project Manager: see attached	85.00	1,317.50
	REIMBURSABLE: * Airplane & Travel expenses * Postage & Handling Charges	802.00 4.98	802.00 4.98
Thank you and God Bless		Total	\$2,124.48

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
12/10/97	1841

BILL TO
Mrs. Gabrielle Umbel Water Oak Country Club 106 Evergreen Lane Lady Lake, Fl 32159

P.S.C.

P.O. NO.	TERMS	PROJECT
WAT97012	Net 30	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAK COUNTRY CLUB ADDITIONAL SERVICES PN WAT97012		
3	Project Manager	85.00	255.00
0.33	Clerical	30.00	9.90
	REIMBURSABLE:		
	*aerials & blueprints/wat97012	76.85	76.85
	*Postage	4.97	4.97
Merry CHRISTmas & a Happy NewYear!		Total	\$346.72

pse

EXCEL ENGINEERING CONSULTANTS, INC.

Invoice

122 Wilshire Blvd.
Casselberry, FL 32707

DATE	INVOICE #
4/24/98	1927

BILL TO
Mr. Tom Hamic Sun Communities 478 Chickadee Court Plant City, Florida 33565

P.O. NO.	TERMS	PROJECT
WAT97031	15 DAYS	Water Oak Country Cl...

QUANTITY	DESCRIPTION	RATE	AMOUNT
	WATER OAKS COUNTRY CLUB ESTATES PUBLIC SERVICE COMMISSION (PSC) RATE RESTRUCTURING & COMPLETION OF C.U.P. PN WAT97031 PROPOSAL: 97107		
6	Project Manager: On-site meeting with Gary Morse, Hamic, Leiter, et al to discuss PSC	85.00	510.00
2	Project Manager: Telephone conference with Attorney & Morse	85.00	170.00
0.5	Administrative Attorney: Rose, Sundstrom & Bently (see attached)	30.00 1,847.72	15.00 1,847.72
Thank you and God Bless		Total	\$2,542.72