

REQUEST TO ESTABLISH DOCKET  
(PLEASE TYPE)

Date 01/22/01

Docket No. 010087-WS

1. Division Name/Staff Name Economic Regulation - Rendell
2. OPR ECR (Willis, Rendell, Lingo, Stallcup)
3. OCR LEG
4. Suggested Docket Title Application for approval for a reuse plan in Lake County by Sun Communities Finance LLC d/b/a Water Oak Utility

5. Suggested Docket Mailing List (attach separate sheet if necessary)
  - A.
  - B.
  - 1.

<u>F. Marshall Deterding</u>	<u>Sun Communities Finance Limited Partnership</u>
<u>Rose, Sundstrom &amp; Bentley, LLP</u>	<u>31700 Middlebelt Road, Suite 145</u>
<u>2548 Blairstone Pines Drive</u>	<u>Farmington Hills, MI 48334-2321</u>
<u>Tallahassee, FL 32301</u>	

2. Interested Persons and their representatives (if any)

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6. Check one:
- Documentation is attached.
- Documentation will be provided with recommendation.

LAW OFFICES

**ROSE, SUNDBSTROM & BENTLEY, LLP**

2548 BLAIRSTONE PINES DRIVE  
TALLAHASSEE, FLORIDA 32301

(850) 877-6555

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

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

TELECOPIER (850) 656-4029

ROBERT M. C. ROSE  
OF COUNSEL

January 16, 2001

**VIA HAND DELIVERY**

Mr. Troy Rendell  
Public Utilities Supervisor  
Division of Economic Regulation  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Sun Communities Finance Limited Partnership d/b/a Water Oak Utility  
Docket No. 990243-WS  
Our File No. 33013.01

RECEIVED  
FLORIDA PUBLIC SERVICE  
COMMISSION  
01 JAN 17 AM 11:02  
DIVISION OF  
ECONOMIC REGULATION

Dear Mr. Rendell:

I am writing this letter to respond to your letter of January 10, 2001 and more specifically, to request that the Utility be given more time in which to file the reuse project plan as required by the Commission's Final Order issued last summer in the above-referenced case.

The Utility has been working with its design engineer attempting to determine the specific type of treatment options available, as well as working with the regulators on what will be required in order to implement the reuse plan. However, because of unforeseen delays in accumulating all of this information, the Utility is not yet prepared to file the reuse project plan within the time schedule as required by the Commission's Order.

The Utility was also presently involved in discussions for the possible sale of the system to a local governmental entity, which sale would render the filing of the reuse plan moot. However, since the negotiation process has become lengthy, the Utility is proceeding with its plans to add reuse facilities to its sewage treatment system.

The Utility is also reviewing alternatives for financing and it now appears as though the best available alternative for obtaining that financing for the project is through a related party debt or equity arrangement. The particulars concerning that financing have not yet been worked out.

Mr. Troy Rendell  
January 16, 2001  
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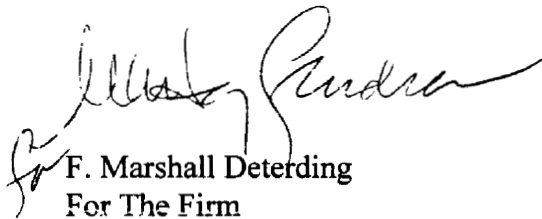
We recognize the Commission's desire for the Utility to move forward with this project, and it is certainly the Utility's intent to do so. However, we would like to request that the Commission grant us an additional one hundred and twenty days in which to file the reuse project plan, during which period of time we will try and finalize the various matters necessary in order to file the application with the Commission, formalize the plan itself, begin the permitting process, and discuss with the Commission staff the alternatives chosen. While we could conceivably file a reuse project plan in relatively short order, we believe the one hundred and twenty day delay is a minimum necessary in order for us to finalize the plans in order to make such a filing meaningful and clearly reflective of the Utility's final plans for construction of those reuse facilities.

Please ask the Commissioners or Prehearing Officer, by whatever means are necessary, to grant an additional one hundred twenty days in which to file that reuse project plan, from the current due date of January 19, 2001.

I appreciate your prompt attention to this matter and apologize for the delay in getting back to the Commission in this regard. Should you have any questions, please let me know.

Sincerely,

ROSE, SUNDBSTROM & BENTLEY, LLP

  
F. Marshall Deterding  
For The Firm

FMD/tmg

cc: Blanca S. Bayo, Director (via hand delivery)  
Mr. Tom O'Branovic (via fax)  
Mr. Kevin Bennett (via fax)  
Mr. Jan Charron (via fax)  
Gary Morse, P.E. (via fax)  
Julian Coto, P.E. (via fax)

wateroak\3rendell.ltr