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March 20, 2001

Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Building, Room 110
Tallahassee, FL 32399-0850

VIA HAND DELIVERY

Re: Docket No. 001083-WU
Application for transfer of Certificate No. 518-W in Lake County from Century
Realty Funds, Inc. and Haselton Associates, Ltd. d/b/a Route 19A Joint Venture
to CWS Communities L.P.


Dear Ms. Bayo:

Enclosed for filing in the above referenced docket is an original and two (2) copies of a
letter to Stephanie Clapp regarding maintenance of the utility's books and records in-state.

Please acknowledge receipt of the foregoing by stamping the enclosed extra copy of this
letter and returning same to my attention.

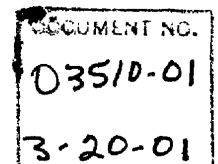
Sincerely,

RUDEN, McCLOSKEY, SMITH,
SCHUSTER & RUSSELL, P.A.


Kathryn G. W. Cowdery
Attorney

KGC/ldv
Enclosures

cc: Stephanie Clapp (via hand delivery)
w/enclosure



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March 20, 2001

Stephanie Clapp
Division of Regulatory Oversight
2540 Shumard Oak Boulevard
Tallahassee, FL 32399- 0850

Re: Docket No. 001083-WU, Application for transfer of Certificate No. 518-W in Lake County from Century Realty Funds, Inc. and Haselton Associates, Ltd. d/b/a Route 19A Joint Venture to CWS Communities LP.

Dear Ms. Clapp:

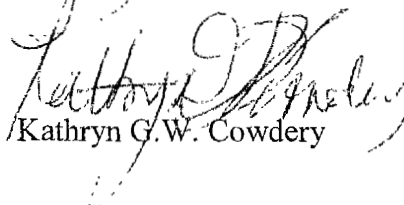
This letter addresses the following requirement which was specified in the commission's Order Approving Transfer, Requiring Accounts and Records to be Maintained in Conformance with the NARUC Uniform System of Accounts and Notice of Proposed Agency Action Order Declining to Establish Rate Base, No. PSC-01-0425-PAA-WU, issued on February 22, 2001, in the above docket:

“ORDERED that CWS Communities LP shall maintain the utility's books and records in-state or request the requisite authorization from the Commission by March 31, 2001, with its 2000 annual report to continue to maintain them out-of-state.”

With regard to this language, it has been determined that the Utility shall maintain its books and records in-state. Although the actual accounting is done in CWS's El Paso, Texas accounting headquarters, all original invoices are kept in Florida, and hard copies of all books and records will be sent on a monthly basis to the utility in Florida. These books and records are also accessible by computer in Florida, with assistance from Texas accounting personnel. The books and records will be maintained in an orderly manner at the park office such that PSC auditors may access the information as needed.

Please let me know if you have any questions.

Sincerely,


Kathryn G.W. Cowdery