

STATE OF FLORIDA

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DIVISION OF LEGAL SERVICES
NOREEN S. DAVIS
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(850) 413-6199

Public Service Commission

September 6, 2001

Karen Walker, Esquire
P.O. Drawer 810
Tallahassee, Florida 32302

Re: Docket No. 992015-WU - Application for limited proceeding to recover costs of water system improvements in Marion County by Sunshine Utilities of Central Florida, Inc.

Dear Ms. Walker:

Staff is now in the preliminary stages of reviewing invoices for the bills of: Holland & Knight, LLP; H.W. Barrineau & Associates, Inc.; and Cronin, Jackson, Nixon and Wilson. Unfortunately, in every instance where Holland & Knight has redacted a portion of the invoice, staff is unable to determine the reasonableness of the bill and whether it directly related to this limited rate proceeding. Because it is the utility's burden to prove that its costs are reasonable, staff will be forced to recommend to the Commission that, in each instance of a redaction, the costs be disallowed. Therefore, Sunshine Utilities of Central Florida should provide unredacted copies of the invoices by no later than September 20, 2001, such that staff may assess their reasonableness.

Also, staff cannot determine whether the bills from Cronin, Jackson, Nixon and Wilson are reasonable. In past rate cases, Cronin, Jackson, Nixon and Wilson have submitted bills/invoices in enough detail for staff to make such a determination. Please advise Cronin, Jackson, Nixon and Wilson to provide invoices and reports with a level of information that the firm ordinarily provides for a rate case and as requested in data requests Nos. 10 and 11.

If you have any questions, or if I can be of any further assistance, please contact me at (850) 413-6234.

Sincerely,

Ralph R. Jaeger
Ralph R. Jaeger
Senior Attorney

RRJ/lw

cc: Division of Economic Regulation (Fletcher, Merchant)
✓ Division of the Commission Clerk and Administrative Services
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