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per Tom Walden / ECR
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Docket 021036

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November 26, 2002

Ms. Pam Daniel, certification Supervisor
Division of Commission Clerk and Administrative Services
Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

EDUCATION RELATIONSHIP
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Re: Docket No. 02136-WS: Application for North Sumter utility Company, L.L.C. for amendment of Certificate Nos. 618-W and 532-S in Sumter County, Florida

Dear Ms. Daniel:

This letter is in response to a letter from the Department of Community Affairs dated November 15, 2002 regarding an amendment in service territory for the North Sumter Utility Company, L.L.C. in Sumter County. The facts regarding DRI and Comprehensive Plan approvals as presented in the letter from DCA are correct. The vast majority of the approximately 2,080 acre requested service area extension is contained in an approved DRI - The Villages of Sumter. A small portion of the requested service area (northwestern site) that is not in the DRI is approximately 190 acres. This area is adjacent to the DRI and a Notice of Proposed Change (NOPC) and Comprehensive Plan Amendment to incorporate the area into the DRI has been submitted to Sumter County, DCA and the Withlacoochee RPC on November 26, 2002. Further, the conversion of this land into urban uses is a logical extension of existing, well planned development that is served with a level of urban services that exceeds most of the cities in the area.

The Applicant does not agree with the suggestion by DCA that the PSC may want to consider waiting to approve the expansion of the northwestern site service area until the comprehensive plan amendment is adopted and the appeal deadline has ended. The Applicant would offer the following reasons for this position:

1. Using DCA's suggestion, The Villages must wait until the DRI NOPC is approved and a Comprehensive Plan Amendment is processed. This typically takes about six months after submittal of the NOPC and Comprehensive Plan Amendment assuming there are no appeals. Then, the North Sumter Utility Company would apply for PSC certification of the utility service area, which may then take another several months. Assuming the certification of the service area is secured, permits will then have to be processed to build the facilities, taking another 3-6 months. If these procedures have to be done sequentially and not concurrently, then

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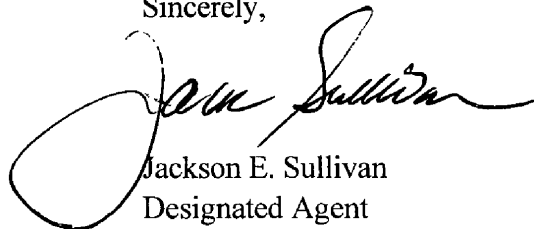
the entire construction schedule for The Villages will be thrown off. The certification of the service area is necessary to get financing and permitting into place to match construction deadlines.

2. Until the additional service area is certified by the PSC, the Developer cannot document how the area will be served with utilities. This precludes obtaining financing for utilities and may provide an additional stumbling block toward securing overall financing for the project. It is necessary for the Developer to know much earlier in the permitting and development process how the project is to be serviced with utilities.

3. There is nothing in the Sumter County Comprehensive Plan that precludes extension of utilities into rural areas. The North Sumter Utility Company plans to serve this area, will have the capacity in its system to serve and when constructed will have water and sewer lines immediately adjacent to the northwestern area capable of connecting any development to its water and sewer systems.

The North Sumter Utility respectfully requests that the PSC move forward with approval of the requested extension of the North Sumter Utility service area in order to facilitate the service of this area with a very high level of centralized water and sewer utility service. If you have questions, please contact me at (850) 224-1585.

Sincerely,



Jackson E. Sullivan
Designated Agent

cc: Charles Gauthier, Chief, DCA
John Parker, The Villages
Trey Arnett, P.E., Grant and Dzuro Engineering