

State of Florida



Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

DATE: June 6, 2003
TO: Division of the Commission Clerk and Administrative Services
FROM: Office of the General Counsel (Harris) *LDH*
RE: Docket No. 020010-WS - Application for staff-assisted rate case in Highlands County by
The Woodlands of Lake Placid, L.P.

Please file the attached letter from Martin S. Friedman, Esquire, dated June 5, 2003, with an attached Schedule of Actual and Estimated Rate Case Expense, in the docket file for the above-referenced docket.

LDH/dm

cc: Division of Economic Regulation (Marshall, Moniz)
Office of the General Counsel (Echternacht)

I:\020010\file-memo ldh

DOCUMENT NUMBER DATE

05093 JUN-9 8

FPSC-COMMISSION CLERK

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REPLY TO ALTAMONTE SPRINGS

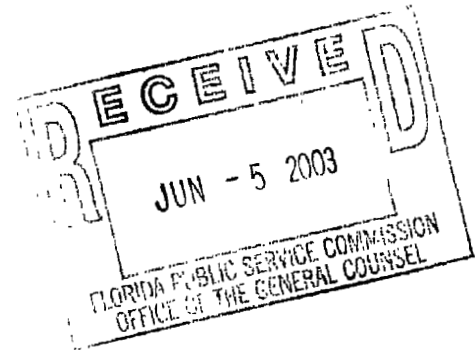
CENTRAL FLORIDA OFFICE
600 S. NORTH LAKE BLVD., SUITE 160
ALTAMONTE SPRINGS, FLORIDA 32701
(407) 830-6331
FAX (407) 830-8522

MARTIN S. FRIEDMAN, P.A.
VALERIE L. LORD, *OF COUNSEL*
(LICENSED IN TEXAS ONLY)

June 5, 2003

HAND DELIVERY

Larry Harris, Staff Attorney
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399



Re: Docket No. 020010-WS; Highvest Corporation's and L.P. Utilities Corporation's
Protest of PAA SARC Order
Our File No.: 37074.01

Dear Larry:

In accordance with our agreement, enclosed is an updated Schedule of Actual and Estimated Rate Case Expense in the above-referenced matter.

Very truly yours,

MARTIN S. FRIEDMAN
For the Firm

MSF:dmp
Enclosure

cc: Mr. John H. Lovelette (w/enclosure)
Steve Burgess, Esquire (w/enclosure) (via Hand Delivery)

L.P. UTILITIES CORPORATION
 SCHEDULE OF ACTUAL AND ESTIMATED RATE CASE LEGAL EXPENSE
 DOCKET NO.: 020010-WS

ROSE, SUNDSTROM & BENTLEY, LLP

ACTUAL BILLINGS

<u>Month of Service</u>	<u>Invoice Date</u>	<u>Time Charges</u>	<u>Expenses</u>	<u>Total</u>
December 2002	1/24/03	\$ 1,642.50	\$ 0.75	\$ 1,643.25
January 2003	2/19/03	\$ 1,845.00	\$ 15.08	\$ 1,860.08
February 2003	3/14/03	\$ 1,620.00	\$ 77.00	\$ 1,697.00
March 2003	4/11/03	\$ 1,012.50	\$ 252.92	\$ 1,265.42
April 2003	5/19/03	\$ 4,095.00	\$ 101.25	\$ 4,196.25
TOTAL ACTUAL BILLINGS THROUGH 5/19/03		\$10,215.00	\$ 447.00	\$10,622.00
May 2003	UNBILLED	\$ 8,842.50	\$ 292.71	\$ 9,135.21

ESTIMATE TO COMPLETE THROUGH PAA

Numerous telephone conferences with client, OPC and Staff; Review Transcript; Prepare Post-Hearing Brief; Review Staff Recommendation; Monitor PSC Agenda Conference; Research and Draft Post-Order Motions and advise client accordingly. - 29 HOURS

Total Estimate to Complete	\$ 6,525.00	\$ 300.00	\$ 6,825.00
TOTAL ACTUAL & ESTIMATED LEGAL EXPENSE	\$25,582.50	\$ 1,039.71	\$26,622.21

06/30/03

ROSE, GUNDBSTROM & BENTLEY
DRAFT STATEMENT

17:29:1

CLIENT# 37074 L.P. UTILITIES CORPORATION
MATTER# 1 PROTEST PAA STAFF ASSISTED RATE CASE

OPB
FEE TARGET
MATTER AMOUNT

** UNBILLED HOURS & FEES ****

INIT	DATE	HOURS	DESCRIPTION	RATE	FEES	CUMULATIVE	TAX CODE
MSF	05/01/03	0.90	REVIEW PSC STAFF'S PROPOSED PRELIMINARY STATEMENT AND TELEPHONE CONFERENCE WITH PSC ATTORNEY HARRIS CONCERNING SAME; TELEPHONE CONFERENCE WITH ATTORNEY HARRIS WHO TELEPHONED; LETTER TO ATTORNEY HARRIS WITH CORRECTIONS TO PROPOSED PREHEARING STATEMENT.	225.00	202.50	202.50	0
MSF	05/01/03	0.00	PROPOSED PREHEARING STATEMENT.	225.00	0.00	202.50	0
MSF	05/05/03	9.30	TRAVEL TO TALLAHASSEE AND ATTEND PREHEARING CONFERENCE AND RETURN TO ORLANDO.	225.00	2,092.50	2,295.00	0
MSF	05/09/03	0.30	REVIEW LETTER FROM MR. LOVELETTE AND RESEARCH AND DRAFT RESPONSE.	225.00	67.50	2,362.50	0
MSF	05/16/03	1.90	RESEARCH AND DRAFT UPDATED RATE CASE EXPENSE EXHIBIT; REVIEW PROPOSED LETTER TO CUSTOMERS; TELEPHONE CONFERENCE WITH MR. LOVELETTE CONCERNING SAME; BEGIN RESEARCH REIT IN SARC'S.	225.00	427.50	2,790.00	0
MSF	05/21/03	1.20	REVIEW LETTER FROM MR. LOVELETTE REGARDING PREHEARING ORDER AND RESEARCH AND DRAFT LETTER OF MR. LOVELETTE; TELEPHONE CONFERENCE WITH MR. COZIER WHO TELEPHONED.	225.00	270.00	3,060.00	0
MSF	05/23/03	0.30	REVIEW AND RESPOND TO LETTER FROM MS. LOVELETTE.	225.00	67.50	3,127.50	0
MSF	05/26/03	7.20	PREPARE FOR TRIAL; LEGAL RESEARCH.	225.00	1,620.00	4,747.50	0
MSF	05/27/03	7.20	TRAVEL TO LAKE PLACID AND CONFERENCE WITH MR. LOZIER AND LOVELETES; FINAL TRIAL PREPARATION.	225.00	1,620.00	6,367.50	0
MSF	05/28/03	11.00	CONFERENCE WITH MR. LOZIER, MR. AND MRS. LOVELETTE; TRIAL; RETURN TO ORLANDO.	225.00	2,475.00	8,842.50	0
-----				TOTAL FEES		-----	
TOTAL HOURS	39.30					8,842.50	

** UNBILLED DISBURSEMENTS ****

INIT	DATE	DETAILS	REFERENCE	AMOUNT	TAX	CUMULATIVE	TYPE
	04/22/03	FEDERAL EXPRESS		15.93		15.93	2
	04/23/03	FEDERAL EXPRESS		20.84		36.77	2
	04/23/03	LEXIS SERVICE		10.00		46.77	42
	05/25/03	PHOTOCOPIES		45.00		91.77	20
	05/29/03	TRAVEL EXPENSE		200.94		292.71	3
		msf 5/27-28					

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PLEASE REFER TO INVOICE NUMBER
WHEN REMITTING

F.E.I. # 59-2783536

L.P. UTILITIES CORPORATION
P O BOX 478
LAKE PLACID, FL 33862

INVOICE # 26875
MAY 19, 2003
FILE # 37074-0001

PAGE 1

MATTER	PROTEST PAA STAFF ASSISTED RATE CASE	
ACCOUNTS RECEIVABLE BALANCE FORWARD		\$1,643
04/02/03	TELEPHONE CONFERENCE WITH PSC ATTORNEY K. ECHERNACHT RE: FORM OF NOTICE TO CUSTOMERS.	0.10
04/03/03	PREPARE NOTICE OF HEARING; COMMUNICATIONS WITH PSC ATTORNEY ECHTERNACHT.	1.00
04/04/03	TELEPHONE CONFERENCE WITH PSC ATTORNEY HARRIS WHO TELEPHONED; TELEPHONE CONFERENCE WITH MR. LOVETTE.	0.20
04/06/03	REVIEW PUBLIC COUNSEL'S RESPONSE TO WITHDRAWAL OF ISSUES AND MOTION TO ACCEPT UNTIMELY FILING; RESEARCH AND DRAFT RESPONSE THERETO.	1.00
04/07/03	PREPARE NOTICE OF HEARING; COMMUNICATIONS WITH PSC ATTORNEY ECHTERNACHT RE: NOTICE.	0.40
04/16/03	REVIEW NOTICE OF TAKING DEPOSITIONS AND LETTER TO MR. LOVELETTE CONCERNING SAME.	0.30
04/17/03	REVIEW PSC ORDER AND LETTER TO MR. LOVELETTE CONCERNIGN SAME; REVIEW OPC'S PREFILED TESTIMONY ON CIAC AND LETTER TO MR. LOVELETTE CONCERNING SAME; RESEARCH AND DRAFT OF PREHEARING STATEMENT.	1.60
04/17/03	PREPARE AFFIDAVIT OF MAILING AND NOTICE OF HEARING TO CUSTOMERS; NOTICE OF FILING; LETTER TO JOHN LOVELETTE RE: MAILING NOTICE OF HEARING TO CUSTOMERS AND NEWSPAPER NOTICE; COMMUNICATIONS WITH PSC STAFF RE: NEWSPAPER NOTICE.	1.50
04/18/03	TELEPHONE CONFERENCE WITH MR. LOVELETTE	0.30

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MAY 19, 2003
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04/18/03	REGARDING REBUTTAL TESTIMONY ON WATER METERS. PREPARE LETTER TO J. LOVELETTE, DISPLAY ADVERTISEMENT FOR NEWSPAPER;	0.80	
04/22/03	COMMUNICATIONS WITH PSC ATTORNEY ECHTERNACHT RE: NEWSPAPER NOTICE. REVIEW SCHEDULE FROM MR. LOVELETTE OF METERS; TELEPHONE CONFERENCE WITH MR. LOVELETTE; TELEPHONE CONFERENCE WITH PSC ATTORNEY ECTENAUCHT WHO TELEPHONED;	1.50	
04/23/03	REVIEW PREHEARING STATEMENT OF PSC STAFF AND PUBLIC COUNSEL. COMMUNICATIONS WITH PSC ATTORNEY ECHTERNACHT RE: NEWSPAPER NOTICE; LETTER TO HIGHLANDS CO. NEWSPAPER.	0.20	
04/25/03	TELEPHONE CONFERENCE WITH PSC ATTORNEY HARRIS WHO TELEPHONED; TELEPHONE CONFERENCE WITH MR. LOVELETTE.	0.50	
04/28/03	PARTICIPATE IN PRE-PREHEARING CONFERENCE.	0.50	
04/29/03	TRAVEL TO LAKE PLACID; CONFERENCE WITH MR. AND MRS. LOVELETTE AND MR. COZIER REGARDING DEPOSITION; ATTEND DEPOSITIONS; RETURN.	8.30	
		18.20	
			4,095.00
	LONG DISTANCE CALLS	3.50	
	TRAVEL EXPENSE	277.84	
	LEGAL ADVERTISEMENTS	81.20	
	TELECOPIER	7.50	
	PHOTOCOPIES	130.75	
	TOTAL COSTS ADVANCED		500.00
	TOTAL STATEMENT		\$4,595.00

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L.P. UTILITIES CORPORATION
P O BOX 478
LAKE PLACID, FL 33862

INVOICE # 26715
APRIL 11, 2003
FILE # 37074-0001

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MATTER PROTEST PAA STAFF ASSISTED RATE CASE

ACCOUNTS RECEIVABLE BALANCE FORWARD \$1,643.25

03/03/03	TELEPHONE CONFERENCE WITH MR. LOVELETTE REGARDING DISCOVERY RESPONSE.	0.20	
03/04/03	REVIEW OPC PREFILED TESTIMONY OF MR. LARKIN AND LETTER TO MR. LOVELETTE CONCERNING SAME; TELEPHONE CONFERENCE WITH PSC ATTORNEY HARRIS WHO TELEPHONED.	0.70	
03/10/03	REVIEW OPC RESPONSE TO DISCOVERY AND LETTER TO MR. LOVELETTE CONCERNING SAME.	0.40	
03/24/03	TELEPHONE CONFERENCE WITH PSC ATTORNEY HARRIS WHO TELEPHONED; REVIEW PSC STAFF'S PREFILED TESTIMONY; REVIEW OPC'S RESPONSE TO DOCUMENT REQUEST; DRAFT NOTICE WITHDRAWING REGRESSION AND CIAC ISSUES; LETTER TO MR. LOVELETTE.	1.30	
03/26/03	TELEPHONE CONFERENCE WITH MR. LOVELETTE REGARDING RESPONSES TO PSC'S SECOND SET OF DISCOVERY AND PREFILED TESTIMONY; REVIEW PREFILED TESTIMONY IN PREPARATION OF REBUTTAL TESTIMONY FOR MR. LOVELETTE.	0.90	
03/29/03	RESEARCH AND DRAFT RESPONSES TO PSC STAFF'S SECOND SET OF DISCOVERY.	1.00	
		4.50	1,012.50
	LONG DISTANCE CALLS	0.50	
	FEDERAL EXPRESS	16.17	
	TELECOPIER	1.50	
	PHOTOCOPIES	224.75	
	LEXIS SERVICE	10.00	

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PAGE 2

TOTAL COSTS ADVANCED	252.92
TOTAL STATEMENT	\$1,265.42
TOTAL DUE ON ACCOUNT	\$2,908.67

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L.P. UTILITIES CORPORATION
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INVOICE # 26586
MARCH 14, 2003
FILE # 37074-0001

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MATTER PROTEST PAA STAFF ASSISTED RATE CASE
ACCOUNTS RECEIVABLE BALANCE FORWARD \$1,643.25

02/03/03	REVIEW PSC STAFF RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS AND LETTER TO MR. LOVELETTE CONCERNING SAME.	0.50
02/04/03	TRAVEL TO TALLAHASSEE; PREPARE FOR AND ATTEND CONFERENCE WITH PSC STAFF AND OFFICE OF PUBLIC COUNSEL REGARDING ISSUES: RETURN TO ORLANDO.	3.20
02/09/03	REVIEW PSC DISCOVERY RESPONSES TO PSC DISCOVERY REQUESTS AND LETTER TO MR. LOVELETTE CONCERNING SAME; LETTER TO PSC ATTORNEY HARRIS.	0.50
02/12/03	REVIEW CORRESPONDENCE AND DOCUMENTS FROM MR. LOVELETTE AND LETTER TO MR. LOVELETTE CONCERNING SAME.	0.40
02/18/03	TELEPHONE CONFERENCE WITH MR. LOVELETTE; RESEARCH AND DRAFT OBJECTIONS TO DISCOVERY.	0.80
02/20/03	TELEPHONE CONFERENCE WITH MR. COZIER WHO TELEPHONED; RESEARCH AND DRAFT LETTER TO MR. CAMAREN AT UTILITIES, INC. REGARDING PROSPECTIVE SALE.	0.70
02/26/03	REVIEW PROPOSED RESPONSES TO STAFF'S INTERROGATORIES; REVIEW PSC STAFF'S SECOND SET OF INTERROGATORIES AND PRODUCTION OF DOCUMENTS AND LETTER TO MR. LOVELETTE CONCERNING SAME.	0.80
02/27/03	TELEPHONE CONFERENCE WITH PSC ATTORNEY HARRIS WHO TELEPHONED.	0.30
		7.20

1,620.00

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L.P. UTILITIES CORPORATION

INVOICE # 26586
MARCH 14, 2003
FILE # 37074-0001

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LONG DISTANCE CALLS	7.50
TELECOPIER	6.50
PHOTOCOPIES	53.00
LEXIS SERVICE	10.00

TOTAL COSTS ADVANCED	77.00
TOTAL STATEMENT	\$1,697.00
TOTAL DUE ON ACCOUNT	\$3,340.25

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INVOICE # 26433
FEBRUARY 19, 2003
FILE # 37074-0001

PAGE 1

MATTER

PROTEST PAA STAFF ASSISTED RATE CASE

01/07/03	RESEARCH AND DRAFT MOTION TO AMEND PETITION; LETTER TO MR. LOVELETTE; TELEPHONE CONFERENCE WITH PSC ATTORNEY HARRIS WHO TELEPHONED.	1.50	
01/09/03	TELEPHONE CONFERENCE WITH MR. LOVELETTE WHO TELEPHONED.	0.20	
01/15/03	REVIEW STAFF'S PROPOSED ISSUES; REVIEW AND PREPARE FOR TELEPHONE CONFERENCE WITH STAFF ON ISSUES; TELEPHONE CONFERENCE WITH PSC STAFF AND PUBLIC COUNSEL REGARDING ISSUES.	0.80	
01/16/03	TELEPHONE CONFERENCE WITH MR. LOVELETTE AND REDRAFT ESCROW AGREEMENT AND LETTER TO MR. LOVELETTE CONCERNING SAME.	0.40	
01/18/03	REVIEW PUBLIC COUNSEL'S NOTICE OF INTERVENTION AND LETTER TO MR. LOVELETTE CONCERNING SAME.	0.30	
01/19/03	RESEARCH AND DRAFT INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO THE PSC STAFF; REDRAFT DISCOVERY FOR PUBLIC COUNSEL.	1.20	
01/20/03	TELEPHONE CONFERENCE WITH MR. LOVELETTE.	0.20	
01/22/03	FINALIZE DISCOVERY TO PSC STAFF AND PUBLIC COUNSEL.	0.40	
01/27/03	TELEPHONE CONFERENCE WITH MR. COZIER AND MR. LOVELETTE WHO TELEPHONED.	1.00	
01/30/03	RESEARCH AND DRAFT PREFILED TESTIMONY FOR MR. LOVELETTE; REVIEW PSC ORDER ALLOWING AMENDMENT TO PETITION AND LETTER TO MR. LOVELETTE CONCERNING SAME.	2.20	
		8.20	1,845.00
	FEDERAL EXPRESS	15.08	

Continued

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L.P. UTILITIES CORPORATION

INVOICE # 26433
FEBRUARY 19, 2003
FILE # 37074-0001

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TOTAL COSTS ADVANCED	15.08
TOTAL STATEMENT	\$1.860.08

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F.E.I. # 59-2783536

L.P. UTILITIES CORPORATION
C/O JOHN H LOVELETTE
129 SOUTH COMMERCE AVE
SEBRING, FL 33870

INVOICE # 26300
JANUARY 24, 2003
FILE # 37074-0001

PAGE 1

MATTER	PROTEST PAA STAFF ASSISTED RATE CASE		
12/06/02	REVIEW STAFF RECOMMENDATION AND COMMISSION VOTE SHEET.	0.40	
12/18/02	REVIEW DOCUMENTATION FROM MS. LOVELETTE; CONFERENCE WITH MR. LOVELETTE.	2.80	
12/20/02	DRAFT ESCROW AGREEMENT AND EMAIL TO MR. LOVELETTE; REVIEW LETTER FROM MR. LOVELETTE AND DRAFT RESPONSE.	1.00	
12/23/02	RESEARCH AND DRAFT PETITION FOR FORMAL ADMINISTRATIVE HEARING; REDRAFT ESCROW AGREEMENT AND EMAIL TO MR. LOVELETTE.	2.10	
12/24/02	FINALIZE PETITION FOR FORMAL HEARING.	0.70	
12/26/02	TELEPHONE CONFERENCE WITH MR. RENDELL AT PSC WHO TELEPHONED.	0.30	
		7.30	1,642.50
	LONG DISTANCE CALLS	0.75	
	TOTAL COSTS ADVANCED		0.75
	TOTAL STATEMENT		\$1,643.25

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