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STATE OF FLORIDA

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DIVISION OF ECONOMIC REGULATION
(850) 413-6900

Public Service Commission

October 14, 2004

Pierre D. Thompson
Buffalo Bluff Utilities, Inc.
1301 Plantation Island Drive, #206B
St. Augustine, Florida 32085-0070

Re: Docket No. 041096-WS – Application for Transfer of Certificate Nos. 542-W and 470-S in Putnam County from Buffalo Bluff Utilities, Inc. to St. John’s River Club, L.L.C.

Dear Mr. Thompson:

Your application for transfer of certificate Nos. 542-W and 470-S in Putnam County from Buffalo Bluff Utilities, Inc. to St. John’s River Club, L.L.C. has been received and reviewed by Commission staff. This letter addresses deficiencies and additional information needed regarding your application filed on September 17, 2004.

Deficiencies

1. Tariff Sheets. Pursuant to Rule 25-30.037(2)(s), Florida Administrative Code, the applicant shall provide an original and two copies of the sample tariff sheets reflecting the change in ownership, the new issuing officers, and the name of the utility. Please provide a complete a set of original tariffs for both the water and wastewater systems. A copy of the tariffs can be access from the Commission website: www.floridapsc.com.

- CMP _____
- COM _____ 2.
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- RCA _____
- SCR _____
- SEC 1
- OTH _____

2. Affidavit and Notice. Rules 25-30.030(6) and 25-30.030(8), Florida Administrative Code, require the applicant to provide an affidavit that the actual notice of the application was completed. A copy of the notice is to accompany the affidavit. Please provide this document as a late filed exhibit, as indicated in the application.

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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Additional Information

1. **Financial ability.** Provide a description of the source and amount of financial backing available to St. John's River Club, L.L.C. for utility operations and improvements, including financial statements for the members of St. John's River Club, L.L.C.
2. **Evidence of Land Ownership.** The application indicates that a warranty deed will be executed and conveyed to St. John's River Club, L.L.C. at some date in the future. Please provide a copy of the unexecuted warranty deed.
3. **Who is currently managing and operating the Buffalo Bluff Utilities, Inc. systems and when will the buyer take over the management and operation of the system?**
4. **Who is responsible for the utility's 2004 regulatory assessment fees and will the fees be pro rated between the buyer and seller based on the date of transfer?**

Please provide the original and four copies of the response to this letter to the Commission on or before November 15, 2004. When filing the response, please be sure to refer to the docket number and to direct the response to:

Division of Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Should you have any questions concerning the information in this letter, please contact Cheryl Johnson at 850-413-6984 or Martha Brown 850-413-6187 or Stan Rieger at 850-413-6970.

Sincerely,



Patti Daniel
Supervisor of Certification

PD:caj

cc: Division of Economic Regulation (Johnson, Rieger)
Office of the General Counsel (Brown)
~~Division of Commission Clerk and Administrative Services~~