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May 24, 2005

Jennifer Brubaker, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

HAND DELIVERY

Re: Florida Water Transfer to Aqua Utilities
Docket No. 040951-WS

Dear Jennifer:

Enclosed please find replacement tariff sheets setting forth a more detailed legal description for the water service territories for the Friendly Center and Palms Mobile Home Park systems in Lake County. The lack of a certificate for these systems was originally raised in a letter from Patti Daniel, dated September 24, 2004. We responded to that letter on October 22, 2004, and February 9, 2005. As set forth in those responses, when these systems were acquired, they were non-regulated and, consequently no Certificate of Transfer was required. A similar situation exists with respect to Park Manor in Putnam County which I discussed with Stephanie Clapp and Stan Regier last week.

Based upon our conversations subsequent to the February 5 letter, it is Florida Water's understanding that staff is reviewing these matters and will determine the appropriate way to address the current lack of certificates. Accordingly, it is our understanding that there is no further additional being sought from Florida Water with respect to the acquisition of any of these three systems at this time. Please let me know if this assumption is incorrect.

Sincerely,


J. Stephen Menton

CMP _____
COM _____
CTR _____
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GCL _____
OPC _____
MMS _____
RCA _____ JSM/rd
SCR _____ Enclosures
SEC 1 _____
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Jennifer Brubaker, Esq.

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cc: Mr. Richard Redemann (w/enc.)
Ms. Patti Daniel (w/enc.)
Mr. Tom Walden (w/enc.)
Blanca Bayo (w/enc.)
Melissa Taylor (w/enc.)
Tony Isaacs (w/enc.)

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LAKE COUNTY

Description Of Territory Served

FRIENDLY CENTER

Township 20 South, Range 26 East, Lake County, Florida.

As a point of reference, commence at a permanent reference marker located at the northwesterly corner of the Northeast 1/4 of Section 29, Township 20 South, Range 26 East, Lake County, Florida;

thence easterly along the northerly boundary of said Section 29, South 89°21'40" East a distance of 50.00 feet to a point of intersection with the easterly boundary of Monroe Street, a right-of-way;

thence South 00°20'10" West a distance of 1,250.71 feet along the easterly boundary of said Monroe Street, to a point of intersection with the northerly boundary of Georgia Avenue, a right-of-way and the point of beginning of this description;

thence South 00°20'10" West a distance of 100.00 feet along the easterly boundary of said Monroe Street to a point of intersection with the southerly boundary of said Georgia Avenue;

thence North 89°30'20" West a distance of 25.00 feet along the southerly boundary of said Georgia Avenue;

thence South 00°20'10" West a distance of 413.88 feet along the easterly boundary of said Monroe Street to a point of intersection with the northerly boundary of S.R. 561, a right-of-way;

thence North 28°24'37" East a distance of 53.12 feet along the northerly boundary of said S.R. 561, to a point of intersection with a northerly extension of the easterly boundary of said Monroe Street;

thence South 00°20'10" West a distance of 277.31 feet along said northerly extension of the easterly boundary of Monroe Street to a point of intersection with an easterly extension of the southerly boundary of said Vermont Avenue;


thence South 89°33'30" East a distance of 117.93 feet along said easterly extension of the southerly boundary of Vermont Avenue to a point of intersection of the westerly boundary of said Monroe Street with the southerly boundary of said Vermont Avenue;

thence South 89°33'30" East a distance of 629.57 feet along the southerly boundary of said Vermont Avenue to a point of intersection with the westerly boundary of Madison Street, a right-of-way;

thence North 00°29'28" East a distance of 727.96 feet, along the westerly boundary of said Madison Street to a point of intersection with the northerly boundary of said Georgia Avenue;

Effective Date:

By:


Tony Isaacs, Vice President
Customer Services

LAKE COUNTY

Description Of Territory Served

FRIENDLY CENTER (Cont.)

thence South 89°30'20" East a distance of 645.56 feet to a point of intersection with the westerly boundary of said Monroe Street;

thence North 00°20'10" East a distance of 17.00 feet along the westerly boundary of said Monroe Street;

thence South 89°30'20" East a distance of 100.00 feet to a point of intersection with the said point of beginning and the completion of this description.

Effective Date:

By:



Tony Isaacs, Vice President
Customer Services

LAKE COUNTY

Description Of Territory Served


PALMS MOBILE HOME PARK

Township 20 South, Range 24 East, Lake County, Florida.

That part of the following, lying West of U. S. Highway No. 27 -- the East 1/2 of the North 1/2 of the Southwest 1/4 of the Northeast 1/4; the North 1/2 of the Southeast 1/4 of the Northeast 1/4; and the East 1/2 of the South 1/2 of the Northwest 1/4 of the Northeast 1/4, less the North 330 feet thereof; all lying and being in Section 36, Township 20 South, Range 24 East, Lake County, Florida.

Effective Date:

By:



Tony Isaacs, Vice President
Customer Services