Law Offices

ROSE, SUNDSTROM & BENTLEY, LLP

2548 Blairstone Pines Drive TALLAHASSEE, FLORIDA 32301

FREDERICK L. ASCHAUER, JR. CHRIS H. BENTLEY, P.A. ROBERT C. BRANNAN DAVID F. CHESTER F. MARSHALL DETERDING JOHN R. JENKINS, P.A. STEVEN T. MINDLIN, P.A. CHASITY H. O'STEEN DAREN L. SHIPPY WILLIAM E. SUNDSTROM, P.A. DIANE D. TREMOR, P.A. JOHN L. WHARTON

(850) 877-6555 FAX (850) 656-4029 www.rsbattorneys.com CENTRAL FLORIDA OFFICE SANLANDO CENTER 2180 West State Road 434 **SUITE 2118** LONGWOOD, FLORIDA 32779 (407) 830-6331 Fax (407) 830-8522

ROBERT M. C. ROSE, OF COUNSEL WAYNE L. SCHIEFELBEIN, OF COUNSEL January 26, 2006

MARTIN S. FRIEDMAN, P.A. VALERIE L. LORD BRIAN I. STREET

VIA FACSIMILE TRANSMISSION

Denise N. Vandiver Bureau Chief of Authority Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

RE:

OTH ____

Docket No.: 050926-GU

Request by Chesapeake Utilities Corporation for Authorization to Maintain Accounting Records Outside of the State of Florida

Dear Ms. Vandiver:

On behalf of Chesapeake Utilities Corporation, here are the Company's answers to the questions raised in your January 9, 2006 letter regarding the above matter.

- 1. Related to paragraph 3 of the filing, please describe in more detail, the accounting records to be maintained in Delaware. Please specifically address the following items, as well as any other accounting records to be moved.
 - a. Original invoices and other accounts payable records.

CMP ____ Company Response COM _____ These items will be located in Dover, DE. CTR _____ b. Plant and depreciation records, such as original work orders. ECR ____ GCL ____ Company Response Plant and Depreciation records will be located in Dover, DE and the original work OPC _____ orders will be located in Winter Haven, FL. RCA _____ SCR _____ c. Billing and revenue records. SGA SEC RECEIVED & FILED

C-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00807 JAN 26 %

FPSC-COMMISSION CLERK

Denise N. Vandiver January 26, 2006 Page 2

Company Response

These records will be located in Winter Haven, FL.

Also, the Company currently does not have any plans to move any additional records to Dover, DE.

- 2. When is Chesapeake moving its books and records out of state?
 - a. If these records have already been moved, when did this move occur?

Company Response

Accounts payable was moved to Dover, DE in the month of June 2005. The remaining accounting records were moved in October 2005.

- 3. Relating to paragraph 4 of the filing, has the company quantified the estimated cost savings?
 - a. Is so, please provide the amount and the basis for the calculation.

Company Response

The Company will recognize an annual cost savings of \$71,770 in external audit fees, which represents actual costs incurred by PricewaterhouseCoopers for the 2004 audit. This amount will increase annually as our rates with PricewaterhouseCoopers increase. This amount does not include the internal costs incurred by the Company's internal auditors for their testing of the controls as required by the Sarbanes-Oxley Act.

Thank you for your attention.

Sincerely,

Wayne L. Schiefelbein

Hoyne L Schiefelden

Of Counsel

WLS/dcr

cc: Div. of Economic Regulation (Slemkewicz) (via fax)

Div. of Competitive Markets and Enforcement (Bulecza-Banks) (via fax)

General Counsel (Stern) (via fax)

Div. of Records and Reporting (via hand-delivery)

G:\chesapeake\Vandiver ltr.wpd