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April 29, 2008

Cheryl Johnson
Division of Economic Regulation
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Application for certificates to provide water and wastewater service in Hardee and Polk
Counties by TBBT Utility LLC; PSC Docket No. 080103
Our File No. 42064.01

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Dear Cheryl:

During our recent conversations you had inquired about the Polk County portion of the service territory for TBBT Utility LLC (hereafter TBBT). I am attaching hereto conceptual master plans for the water and wastewater collection and distribution systems anticipated for use on the Polk County property. The specifics concerning the facilities to be in place are as follows:

1. Water Facilities - The Water Conceptual Master Plan shows the planned location of the water distribution system. It is anticipated that there will be 45 ERCs, including 40 to 45 residential, and a sales center located on this property. Therefore, the average daily demand will be expected to be approximately 16,200 gallons per day at 360 gallons per day per ERC. At the present time, there is anticipated that the water treatment will be provided by one or two wells chlorinated and distributed within the Polk County area.
2. Wastewater Facilities - The Wastewater Conceptual Master Plan shows the planned location of the wastewater distribution system. It is anticipated that there will be 45 ERCs, including 40 to 45 residential, and a sales center located on this property. Therefore, the average daily demand will be expected to be approximately 16,200 gallons per day at 360 gallons per day per ERC. The type of treatment has not yet been determined, though it is anticipated the Utility will utilize a small package treatment plant until long-term needs of this area and the surrounding areas are determined.
3. Reclaimed Water Facilities - To the extent that the system ultimately designed and constructed is capable of providing reclaimed water, the Utility anticipates utilizing that reclaimed water in landscape areas and conceivably on the residential lots, though it is anticipated that the latter may not be feasible. More will be known once

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the type of wastewater treatment and the exact number of connections and location of the plant are determined.

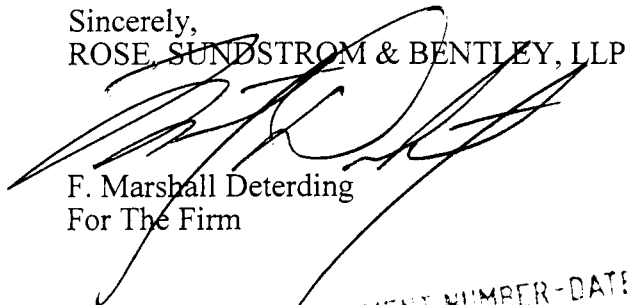
4. Timing of Development and Demand Within Polk County Property - It is anticipated that the construction of the sales center for the Polk County property will commence soon after approval of the project, and that construction of the entire project is anticipated to occur within two to four years thereafter, with build out occurring within approximately one year.

The Polk County property was not utilized as a basis for determining the rates for the overall system, despite the fact that it is anticipated to be developed in relatively short order, because the property in Hardee County provided the immediate need and a simpler basis upon which to base initial rates. Because the type of treatment will be similar in both parcels, it is anticipated that the rates established for the Hardee County property will be similarly applicable to the Polk County property because of similar capital and operating costs.

5. Service Transverses County Boundaries - The Polk County and Hardee County systems, though utilizing separate distribution, collection and treatment facilities, will be very similar in nature and are located relatively close to one another. As such, it is anticipated that all administrative, billing, collection, accounting, treatment, maintenance, testing, permitting, and functions of every type, will be housed within the same offices and utilize the same personnel tools and equipment. Therefore, the service rendered by the Utility will transverse county boundaries in that all of the same personnel will be utilized for meeting the obligations of the Utility in both counties.
6. Proper Planning for Service - In order to properly plan for service to the Polk County property, it is imperative that the Utility be certificated for service at this time, so that the final planning and design can be undertaken in short order, so that service is available when needed in the very near future. The conceptual plans, as attached, are in conformance with the currently existing Polk County Comprehensive Plan and the zoning applicable to the proposed service area within Polk County.

Please let me know if you have any further questions on this issue. I will be getting back to you shortly on the issues that were raised in your letter of April 11, 2008.

Sincerely,
ROSE, SUNDBSTROM & BENTLEY, LLP



F. Marshall Deterding
For The Firm

FMD/tms
cc: Patti Daniel
Lisa Bennett
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DOCUMENT NUMBER-DATE

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