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DIVISION OF WATER & WASTEWATER  
DANIEL M. HOPPE, DIRECTOR  
(850) 413-6900

# Public Service Commission

August 4, 1999

Buttonwood Bay Water & Sewer Company, LLC  
c/o Martin S. Friedman, Esquire  
Rose, Sundstrom & Bentley, LLP  
2548 Blairstone Pines Drive  
Tallahassee, Florida 32301

Re: Docket No. 990915-WS: Application by Sun Life Trailer Resorts Limited Partnership for transfer of majority organizational control of Buttonwood Bay Utilities, Inc., holder of Certificates 431-W and 364-S in Highlands County, merger into Buttonwood Bay Water & Sewer Company, LLC. and name change on certificates to Buttonwood Bay Water & Sewer Company, LLC.

Dear Mr. Friedman:

Your application on behalf of Sun Life Trailer Resorts Limited Partnership for transfer of majority organizational control was received by the Commission on July 14, 1999, and assigned the above referenced docket number and name. Staff has preliminarily reviewed the application for deficiencies as well as for items that need clarification or correction. These items are as follows:

Deficiency:

FA \_\_\_\_\_  
ED \_\_\_\_\_  
AF \_\_\_\_\_  
DU \_\_\_\_\_  
TR \_\_\_\_\_  
AG \_\_\_\_\_  
EG \_\_\_\_\_  
IAS \_\_\_\_\_  
PC \_\_\_\_\_  
RR \_\_\_\_\_  
EC \_\_\_\_\_  
AW \_\_\_\_\_  
TH \_\_\_\_\_

1. Names and addresses of the buyer's partners. Pursuant to Rule 25-30.037(3)(c), Florida Administrative Code (F.A.C.), the name(s) and address(es) of all of the buyer's corporate officers, directors, partners and any other person(s) who will own an interest in the utility are to be included in the application. The application indicates that the buyer's partners are a limited partnership and a corporation. The partners involved in each partnership must be disclosed in order to satisfy the requirements of the Rule. According to the Secretary of State, Division of Corporations, there is not a listing for Sun Life Associates, LP, which you list as a limited partner. Please provide an explanation.
2. Transfer in public interest, buyer's experience and financial ability. Pursuant to Rule 25-30.037(3)(f), F.A.C., a statement is to be provided which describes how the transfer is in

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the public interest, including a summary of the buyer's experience in water and wastewater utility operations, and showing the buyer's financial ability to provide service. The statement provided is inadequate in that the public interest issue was not adequately addressed and the buyer's experience and financial ability were not addressed at all. Please provide a more compelling statement as to why the transfer is in the public interest. Additionally, please provide a statement detailing the buyer's experience in water and wastewater utility operations, as well as, financial statements for the buyer.

Clarifications or Corrections.

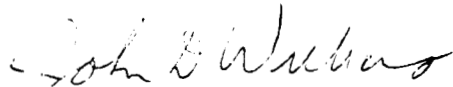
1. Notices of actual application. The exhibit concerning the noticing to other utilities and government officials has been received and appears to be in order. At this time the exhibits concerning the noticing to customers and the publishing of the notice in the paper are still outstanding.
2. Please provide a 3 ½" disk with the utility's territory description and the Water and Wastewater Tariffs in WordPerfect 6.1 or comparable format.

The original and four copies of the response to the information requested in this letter should be filed with the Commission on or before **September 24, 1999**. When filing the response, please be sure to reference the docket and to direct the response to :

**Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850**

Should you have any questions concerning the information requested in this letter, please contact Stephanie Clapp, of my staff, at (850) 413-6997.

Sincerely,



John D. Williams  
Chief, Bureau of Policy Development  
and Industry Structure

JDW/sc

cc: Division of Water and Wastewater (Hoppe, lowe, Messer, Redemann)  
Division of Legal Services (Crossman)  
Division of Records and Reporting