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November 22, 2019  
VIA E-FILING

Adam Teitzman, Commission Clerk  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RE: Docket No. 20190185-WS; Application for authority to transfer assets of exempt entity in Sumter County by the City of Wildwood South Sumter Utility Company, L.L.C.  
Our Matter No. 070274

Dear Mr. Teitzman:

The following is South Sumter Utility Company, L.L.C.'s ("Utility") response to Staff's November 22, 2019, Notice of Apparent Violation.

There has been no violation of Section 367.031, Florida Statutes, or Rule 25-30.037(1)(a), F.A.C. While the Utility holds legal title to the collection and distribution systems, it has not taken over the utility. This is the same arrangement that the City of Wildwood had with the original developer. The Utility does not charge the City for the use of the collection and distribution system. The City continues to operate the utility systems pending this Commission's approval of the transfer. The City pays all expenses, bills the customers and collects the revenues just as it did prior to the Utility purchasing the collection and distribution system from the original developer. In other words, the customers have remained the customers of the City, and as far as the customers are concerned nothing has changed, nor will it until the Commission approves the transfer. The purchase of the collection and distribution system under the current circumstances is not a "transfer of an existing water or wastewater utility" as that term is used in Rule 25-30.037(1)(a), F.A.C.

Please do not hesitate to contact me should you or staff have any questions regarding this response.

Very truly yours,

/s/ Martin S Friedman  
MARTIN S. FRIEDMAN  
For the Firm

MSF/