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Public Service Commission

May 11, 2009

STAFF DATA REQUEST

Brian Davidson
c/o Energy Tax Solutions, Inc.
1310 Wallwood Drive
Bradenton, Florida 33510

RE: Docket No. 090080-GU-Complaint of Paradise Lakes, Inc. against Peoples Gas System for alleged improper billing.

Dear Mr. Davidson

By this letter, the Commission staff requests that Paradise Lakes provide responses to the following data requests.

1. Please provide evidence that TECO Peoples Gas (PGS) admitted it wrongly reclassified Paradise Lakes, Inc.'s service from commercial to residential rates.
2. Please provide evidence that the difference between Paradise Lakes, Inc. and Paradise Lakes Resort Management, LLC is new ownership, not new services.
 - a. Describe how the change in ownership was accomplished (i.e., outright sale to a new entity, transfer/sale of ownership within existing owners/management, etc.).
 - b. Please provide documentation for all the facilities provided within Paradise Lakes, Inc. that use natural gas.
 - c. Are these facilities open to the general public, or only to members?
 - d. If the facilities are available to the general public, please provide documentation demonstrating this.
3. Please explain who Brian Davidson is representing and his client's connection to the current owners of Paradise Lakes, Inc. and Paradise Lakes Resort Management, LLC. Please explain if the previous entity still exists, and what its relationship is to the new management? When the ownership changed, did the management staff change also?

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4. If a retroactive refund is issued, to whom would PGS pay this refund?
5. Please provide copies of bills sent to Paradise Lakes, Inc. and Paradise Lakes Resort Management, LLC, showing services under the commercial rate prior to the change to residential service under the residential rate and service subsequent to the change back to commercial rates.

Please file the original and five copies of the requested information by Wednesday, May 27, 2009, with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6199 if you have any questions.

Sincerely,



Martha C. Brown
Senior Attorney

MCB/amv

cc: Office of Commission Clerk
Ansley Watson, Jr.