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**WILL WEATHERFORD**  
*SPEAKER OF THE HOUSE OF REPRESENTATIVES*

March 5, 2014

Carlotta S. Stauffer, Director  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Re: Docket No. 130211-WS; Application for staff-assisted rate case in Polk County by S.V. Utilities, Ltd.

Dear Ms. Stauffer:

Attached is a list of issues that the Office of Public Counsel has prepared to identify concerns we have with the information included in the staff report that addresses the preliminary review of the requested rate increase. We are submitting this letter in an effort to be up front with our concerns and allow the staff and utility sufficient time to review our concerns and ask for any additional information that might be needed. If you should have any questions, please feel free to call or e-mail me.

Respectfully submitted,

*s/ Denise N. Vandiver*

Denise N. Vandiver  
Legislative Analyst

c: Division of Accounting & Finance (Prestwood, Mouring, Lester)  
Division of Economics (Daniel, Hudson, Thompson)  
Division of Engineering (Lewis, Vickery, Buys)  
Office of the General Counsel (Corbari)  
Office of Auditing and Performance Analysis (Deamer)

Office of Public Counsel (Reilly)

Friedman, Friedman & Long, P.A.  
Martin S. Friedman

Brian Altman  
S.V. Utilities, Ltd.

OPC Issues and Concerns  
S.V. Utilities, Ltd.  
Docket No. 130211-WS

Quality of Service

1. We have reviewed the letters submitted to the PSC regarding this case. As of February 27, 2014, there are 43 letters and 15 of these customers commented on various aspects of the quality of service provided. Because of the magnitude of the rate increase proposed in the staff report, most people addressed that issue. We are concerned that the quality of service should be carefully considered and that the secondary standards should also be reviewed before the Commission makes a finding on the quality of service. The 15 customers who commented on the quality of service made the following comments:

- Frequent periods when necessary to boil water due to broken pipes
- Customer was billed for consumption when the meter was turned off
- Leaking system
- Meters covered with debris and no usage statements mailed to customers
- No usage statements mailed to customers
- Water should taste better; Broken water mains and underground lines leaking
- Quality of water has not been addresses; no improvements made to piping
- No usage statements mailed to customers; work on sewer plant – smell is often very offensive
- Test the water lines for leaks
- Poor, non-maintained system will result in continued water loss
- Are water lines maintained to eliminate leaks
- Checking for leaks and repairing them should be done
- Where is the maintenance program, does the utility check for leaks
- One home flooded from sewage from plugged or inadequate sized lines; no usage statements mailed to customers
- One home flooded from sewage from plugged or inadequate sized lines; no usage statements mailed to customers (same statement, different customer)

Document No. 00622-14 in this docket is titled Docket correspondence - Consumers and their representatives. As of February 28, 2014, this document includes 107 pages of correspondence from utility customers. This correspondence represents letters from 43 customers addressing the substantial percentage increase recommended in the preliminary staff report, the quality of water and other issues. Attached to this letter is a matrix OPC has prepared to summarize these comments (Attachment A). The specific headings indicate:

- a. time and date stamp with the Document
- b. name of the customer
- c. size of the increase
- d. amount of unaccounted for water
- e. customers required to irrigate lots and wastewater based on irrigation consumption
- f. many residents are seasonal residents
- g. quality of water

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Unaccounted For Water

2. The staff report states that the utility records indicate unaccounted for water of 32% and that the staff will further investigate the issue. OPC is very concerned about this number as are the customers. Out of the 43 letters included in the customer correspondence file (Document No. 00622-14) 33 of the letters addressed this issue. The staff audit in the related audit of CHC VII, Ltd. found nine unread meters. We believe that the staff should investigate whether S.V. Utilities has water meters on all locations, including the golf courses, and whether all of the meters are included in the billing data provided to set the billing determinants.

The utility customers believe that there are two possible reasons for the excessive unaccounted for water. They believe that there are inaccurate meters and locations where the park owner built direct line connections for irrigation systems that bypass the water meter. We recommend that the staff verify whether there are any unmetered or under-metered uses of water, especially irrigation on the golf courses or common areas.

We recommend that at a minimum the purchased power and chemical expenses should be reduced for the lost and unsold water. However, this is not the first time the Commission has brought this issue to the utility's attention. In the last rate case (Docket No. 070413-WS) the utility also had an excessive unaccounted for water problem. If the utility indeed has a 32% level for unaccounted for water in this case, and has not addressed this problem since it was raised six years ago, we believe that the Commission should take a more aggressive action. We believe that if the utility cannot account for **one-third** of its water pumped, this indicates poor utility management. If the utility does not justify its water usage, we recommend that the Commission consider one of the following two alternatives:

- The Commission should impute revenues for the lost and unsold revenues and include those gallons in the billing determinants used to set rates.
- In the alternative, the Commission should consider further reductions to expenses such as salaries or professional fees to reflect the poor management of the utility.

Used and Useful Plant

3. Wastewater Treatment Plant: This utility has not previously had a Commission order setting a used and useful percentage for the wastewater treatment plant. The staff report calculates that the wastewater treatment plant is 86% used and useful. The report further claims that because the service territory is built out and there is no potential for growth, the wastewater treatment plant should be considered 100% used and useful. Commission Rule 25-30.432, Florida Administrative Code includes the build out issue as an item that will be considered. However, we believe that the Commission should also consider the prudence of the size of the plant. If the utility built a plant that is larger than what the current customers are using, we believe that the Commission should determine whether this was reasonable and prudent.

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Rate of Return

4. The staff report indicates that the utility's capital structure consists of an intercompany payable and calculates a return on equity based on a capital structure reflecting 100% equity. However, it has been Commission practice that when a when all the investor sources of capital are from the parent company, the Commission uses the parent company capital structure to calculate the rate of return.<sup>1</sup> We recommend that the staff review the parent company capital structure and use the relative balances and cost rates of the debt and equity at that level, reconciled to the utility rate base.

O&M Expenses

Salaries & Wages

5. The staff report included Salaries & Wages Expense of \$46,515 for the water system and \$54,614 for the wastewater system. The staff report does not indicate how it came up with this level of expense. Our review of the audit work papers indicates that the expense should be lower. Because we have been unable to reconcile the information included in the audit work papers to the total expense in the staff report and the fact that the utility has requested that the salary amounts be held as confidential, the following analysis will be limited to a generic discussion of the areas we believe need further review.

Utility Employees

Our review indicates that the utility has requested salary expenses for four utility employees: J. Coryell (WP 43-9, pg. 6), S. Marquart (WP 43-9, pg. 6), R. Curls (WP 43-9, pg. 8), and J. Wright (WP 43-9, pg. 7). These employees appear to allocate their total time among all the utilities, with 25% allocated to S.V. Utilities, Ltd. The audit work papers (10-12 pgs. 6-8) include a brief description of duties for three of these employees and we agree that if the allocations do not duplicate any duties included in contractual services, then they appear reasonable.

Jerry Coryell - Water & Wastewater: overseeing all water line repairs, repairs and maintenance at each of the water plants, overseeing the cross-connection control plan (water system requirement by the Health Dept.), assisting with lift station maintenance and repair, assisting with wastewater plant operations and maintenance and responsible for water meter replacements, 100% of his time on water and wastewater duties (estimated 50% / 50%).

Steve Marquart- Water & Wastewater: wastewater plant maintenance, lift station maintenance and repair (checks lift stations daily), water line repairs and water plant maintenance, 100% of his time on water and wastewater duties (estimated 50% / 50%).

Jason Wright - Wastewater Operator: primary role is to oversee the operations of all of our wastewater plants; making sure the plants are operating properly,

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<sup>1</sup> See Order No. PSC-10-0606-PAA-WS, issued October 4, 2010, in Docket No. 090447-WS, In re: Application for staff-assisted rate case in Seminole County by CWS Communities d/b/a Palm Valley Utilities; and Order No. PSC-11-0015-PAA-WS, issued January 5, 2011, in Docket No. 090531-WS, In re: Application for staff-assisted rate case in Highlands County by Lake Placid Utilities, Inc.

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carrying through the required tests, logging the plant, performance, overseeing the lift station operation & maintenance and checking each of the plants daily, 100% of his time with the wastewater plants.

**Park Employees**

In addition, it appears that the utility has requested an allocation of salary expense for two park employees as shown on WP 43-9, pg. 6: R. Lattin and D. Cloutier. These employees are allocated at 30% (for R. Lattin) and 25% (for D Cloutier). The audit work papers (10-12 pgs. 6-8) include a brief description of duties for these employees.

Russ Lattin - Swiss Village, Community Manager (SV Utilities), Community Manager: responsible for the property management of each of these communities. His duties include collecting rents and utility billings, managing the maintenance crew at the communities, enforcing the rules and regulations of the communities, overall community appearance, working with the HOA, etc., approximately 30% of his time dealing with utilities issues - including, collecting utility billing payments, dealing with water leaks, lift station issues, meter testing, etc.

Dan Cloutier - Swiss Village, Maintenance (SV Utilities), Maintenance: responsible for garbage collection, painting, power washing, mowing, landscaping, etc., responsible for reading the water meters, preparing the meter reading books and sending them to corporate for billing, re-reads meters when necessary, approximately 25% of his time on water items

We are concerned that the 25-30% allocation for these employees is not reasonable and allocates more expense to the utility than is reasonable. The description provides insufficient detail to justify the 25-30%. The utility should provide actual records (or estimates if none are available) that indicate how many hours a day, week, or month, each employee spends on each specific activity. We believe that these allocations need more detail to justify the reasonableness.

In addition, OPC has a concern that the expenses of the utility have not been fully allocated to affiliated businesses of the parent company. Attachment B includes information on other communities owned by the utility parent. We have not found in the staff audit or the staff report any discussion that the staff has reviewed all the affiliated activities and how these activities impact the allocation of costs to S.V. Utilities, Ltd. There are no organization charts, lists of affiliate companies, or other analysis that delineates duties and responsibilities that would be the **basis** for an appropriate allocation factor between the parks and the utilities. We believe that staff should carefully review how these affiliate activities impact this utility (as well as CHC). In addition, customers have also indicated concern that the park employees above (that were identified solely as managers of the Swiss Village, Hidden Cove East, and Hidden Cove West communities) also manage other communities (Hidden Cove and Cypress Creek Village). We recommend that the costs for the park employees should be further allocated to all other communities managed by these employees.

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OPC also notes that the utility has requested additional expenses if the billing is increased from quarterly to monthly. No additional expenses should be included for new duties without looking at any reduction of test year expenses. For instance, the utility stated that it would need to hire a new employee to read meters. If this duty is incorporated in a pro forma adjustment, there should be an adjustment to reduce the test year expenses for the time that was previously spent by the park employee. The utility also requested additional administrative time to process monthly bills. We believe that the requested time is excessive and should be reduced to a more reasonable level to reflect the computerized bill calculation. In addition, if any pro forma increase is considered, there should only be an increase for any incremental time spent.

**Corporate/Admin**

The last allocation to salary expense is for “corporate/admin” for B. Altman as shown on WP 43-9, pg. 7. The information provided in the audit work paper appears to indicate a 25% allocation for utilities, with a further allocation to each utility system. However, our calculated expense seems to suggest that the staff report may have only made the 25% allocation to SV but neglected to further allocate that amount among the four utilities. Because we have not seen the staff calculation, we cannot be certain of this.

In addition, we are concerned that the 25% allocation to the utilities is not a reasonable allocation. The audit work papers (10-12 pgs. 6-8) include a brief description of the duties as shown below:

Brian Altman - Vice President, Century Companies: works at the company's corporate headquarters, responsible for the overall property management, oversees the Community Managers at each park, the Utility employees and is responsible for the operations of the communities, including rent and utility billing, collections, park maintenance and upkeep, rules and regulation enforcement, utility operations (water and sewer systems), etc., about 25% of his time on water and wastewater items.

The description provides insufficient detail to justify the 25%. The utility should provide actual records (or estimates if none are available) that indicate how many hours a day, week, or month is spent on each specific activity. We believe that this allocation needs more detail to justify the reasonableness.

**Contractual Services**

Our last concern is that the salary expenses discussed above may be duplicative of contractual services provided. The staff audit report reflects the following balances for Contractual Services.

	Water	Wastewater
CS - Professional Fees	13,252	6,133
CS - Other	1,132	5,160

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The Professional Fees include services provided by Consta-Flow (\$7,800 for water) and Ivan King (\$3,185.52 for water and the same amount for wastewater.) The Contractual Service – Other includes another \$3,475 to Consta-Flow for the wastewater system.

The audit work papers requested contracts for these individuals and none were provided. We believe that the staff should carefully review these charges to determine that these services are not already included in the services provided by the employees listed above.

Chemicals

6. The Chemical Expense for water includes an invoice for \$86.55 that is from outside the test year. It is dated June 2012. We recommend that this invoice be removed from the water chemical expense.

The Chemical Expense for wastewater includes an invoice for \$335.71 that is from outside the test year. It is dated June 2012. We recommend that this invoice be removed from the wastewater chemical expense.

Materials & Supplies

7. The Materials & Supplies water expense includes an entry dated March 18, 2013 for \$732.95 paid to Ferguson Enterprises, Inc. (See detail on audit work paper 43-3). The audit work papers do not appear to include a copy of the invoice or description of the expense. This item is substantially larger than most of the expenses for Materials and Supplies. We believe that this should be more closely examined to determine if it should be capitalized.

The Materials & Supplies wastewater expense includes the following two entries that are substantially larger than most of the expenses for Materials and Supplies. (See detail on audit work paper 43-13). We believe that these should be more closely examined to determine if they should be capitalized.

- USA Blue Book	4/17/13	\$1,565.91
- Winans Electric Motors	5/15/13	\$1,636.89

Contractual Services-Professional

8. The staff report includes \$13,252 for the Contractual Services – Professional Expense for the water system. This amount includes 13 payments of \$600 to Consta-Flow. As these appear to be for monthly invoices, one of these should be removed from the test year expense as it appears to be from outside the test year. The audit work papers indicate a request for contracts that went unanswered.

The wastewater expense includes \$2,947.96 in charges from Water Resource Associates. The last item for \$1,900 is substantially different than other amounts in this account and the invoice numbering for this vendor is also different. We believe that this invoice should be reviewed to determine if the services are for S.V. Utilities and whether the amount should be capitalized or amortized over multiple years.

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Based on the invoice numbering, it also appears that the \$883.80 is a charge for June 2012 which is outside the test year. We believe that this charge should be removed from the test year expense.

12-0804.6	WATER RESOURCE ASSOCIATES, INC.	7/12/2012	883.80
12-0804.7	WATER RESOURCE ASSOCIATES, INC.	8/20/2012	164.16
12-0776.3	WATER RESOURCE ASSOCIATES, INC.	9/4/2012	1,900.00
			2,947.96

Contractual Services-Testing

9. The water expense includes an invoice dated June 29, 2012 in the test year. The total invoice from Mid Florida Water Lab (#08859) was for \$584 and was allocated to SV Utilities for \$140.73. This invoice was provided in response to staff's data request (Document No. 06450-13). We believe that this invoice is outside the test year and \$140.73 should be removed from test year expenses.

The wastewater expense includes an invoice dated April 17, 2012 in the test year. The total invoice from Southern Utility Service (#8829) was for \$120 and was paid July 16, 2013. This invoice was also provided in response to staff's data request (Document No. 06450-13). We believe that this is also outside the test year and \$120 should be removed from test year expenses.

Transportation Expense

10. In the CHC VII, Ltd. audit work papers there is a petty cash invoice for Ivan King. Audit Work Paper 43-5 (pages 13 and 14 of 156) includes the support for this reimbursement and indicates an expense of \$861.13 for Sprint from 12/30/11 through 12/31/12 and an expense for gas of \$2,475.00 from 4/30/12 through 12/31/12. The amount that is allocated to S.V. Utilities is \$401.95 for water and the same amount for wastewater. This reimbursement includes expense from months outside the test year. We believe that the transportation expense should be reduced by \$125.92 for both water and wastewater.

Vendor	Dates	Total Expense	Months in Test Year	Months out of Test Year	Ratio to exclude	Expense out of Test Year	SV %	Water Adj	Wastewater Adj
Sprint	12/30/11 - 12/31/12	861.13	6	6	50%	430.57	24%	51.67	51.67
Gas	4/30/12 - 12/31/12	2,475.00	6	2	25%	618.75	24%	74.25	74.25
		3,336.13				1,049.32		125.92	125.92

Rates

11. The customers and OPC have reviewed the consumption and billing data included in the staff audit report. Audit work paper 41 page 2 is a chart that is a summary of the total bills and consumption for the test year. Our review appears to indicate that the "4-Quarters" column is a summary of the detailed information from the four quarterly billing reports provided by the utility. This column indicates quarterly billing of an average number of 725 residential customers, which correlates to the number mentioned on page 3 of the staff report. However, we do not know the source of the

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“12-months” column and it appears to understate the total number of monthly bills for the residential customers. The work paper indicates a total of 8,460 monthly residential bills, which equates to approximately 705 residential customers. We are concerned that the rates should use the billing determinants as indicated by the bills and consumption data from the billing reports.

12. The Staff Report indicates that the customer base is non-seasonal. However, correspondence we reviewed in Document No. 00622-14 appears to indicate that about half of the customer base is seasonal but that the residents maintain irrigation on their lots while they are not in residence.
13. The current rates include a monthly Base Facility Charge of \$15.71 which includes both water and wastewater and 8,000 gallons. Many customers expressed concern that they were not aware of their past consumption history. Currently, the Base Facility Charge is billed monthly and the usage charge is billed quarterly. Customers have told us that no bills are sent indicating usage if the customer did not exceed the 24,000 gallons per quarter (8,000 gallons per month). Therefore, customers have no basis to analyze the impact of this rate increase. We recommend that the Commission require the utility send each of the customers a report indicating their consumption for the most recent twelve month period, showing the consumption for each quarter. This report could be sent out with the customer notice for the rate increase and would assist the customers in assessing the actual impact on their monthly expenses.

**S.V. Utilities, Ltd.**  
**Customer Correspondence**  
**Document No. 00622-14**

Date	Time	Name	Concerns					Quality Complaint
			%	UAW	Irrig	PT Res	Quality	
2/24/14	10:30 AM	Mary Hartman	Y					
2/21/14	9:59 AM	Kloreeta Sutton	Y	Y				
2/21/14	9:58 AM	Melinda Ross	Y	Y				
2/20/14	12:54 PM	Janice Parker	Y	Y			Y	Half the time we have to boil water because of problems with broken pipes; UAW: need to check to see who is not hooked up to a meter
2/20/14	12:53 PM	Charles & Sharon Schmidt	Y	Y				
2/20/14	12:51 PM	Deborah & Roderick Fitzpatrick	Y	Y	Y	Y		
2/20/14	12:50 PM	Kenneth Metke	Y		Y	Y		
2/19/14	10:44 AM	Agnes Sanders	Y	Y				
2/18/14	3:15 PM	Bruce MacPherson	Y	Y				
2/18/14	3:14 PM	David Buss	Y					
2/18/14	3:13 PM	Christopher Roy	Y					
2/18/14	3:12 PM	Bruno Klimavicius	Y	Y			Y	Billed for consumption when meter turned off
2/18/14	3:11 PM	Greg & Diane Hachey	Y	Y			Y	Leaking system
2/18/14	9:45 AM	Ron & Vicki Josey	Y	Y			Y	No statements of prior usage, meters covered with debris
2/18/14	9:42 AM	Charles & Mary Huizinga	Y		Y	Y	Y	No statements of prior usage
2/14/14	12:59 PM	Walter O'Gara	Y	Y				
2/14/14	12:57 PM	Nancy Turner	Y	Y			Y	Water should taste better; UAW: Broken water mains and underground lines leaking
2/14/14	12:53 PM	Frank Sears	Y			Y		
2/14/14	12:51 PM	Helen Kelly		Y				
2/14/14	12:50 PM	Daisy PaLuch	Y				Y	Quality of water has not been addressed, no improvements have been made to the piping
2/13/14	12:11 PM	Nancy Noble	Y	Y				
2/13/14	12:05 PM	Veronica Denio	Y	Y			Y	Start sending statement of water usage, work on sewer plant - smell is often very offensive
2/13/14	11:06 AM	Graham & Kayann Sademaker	Y	Y	Y	Y		
2/13/14	11:02 AM	Mr. & Mrs. Michael McGarrahan		Y				
2/13/14	10:58 AM	Phillip & Noreen Drummond		Y				

**S.V. Utilities, Ltd.**  
**Customer Correspondence**  
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Date	Time	Name	Concerns					Quality Complaint
			%	UAW	Irrig	PT Res	Quality	
2/13/14	10:56 AM	Ray Patterson	Y	Y				
2/12/14	10:42 AM	Nancy Beagle		Y	Y			
2/12/14	10:40 AM	Dee Medrano	Y	Y	Y		Y	UAW: Test the water lines for leaks
2/12/14	10:38 AM	Elaine Patterson		Y				
2/12/14	10:35 AM	Robert Wolff	Y	Y				
2/12/14	10:33 AM	Doris Moates	Y	Y				UAW: If there are leaks and lost water, the customers should not have to pay for it
2/12/14	10:31 AM	Corrine Dysent	Y	Y				
2/12/14	10:27 AM	William Stanley		Y				
2/12/14	10:26 AM	Lynda Desqunier		Y				
2/12/14	10:25 AM	Linda Couture	Y					
2/12/14	10:22 AM	Nan Newsom	Y	Y	Y	Y	Y	UAW: Poor, non-maintained systems will result in continued water loss
2/10/14	2:17 PM	Linda Jordan & Bud Crawford	Y	Y			Y	UAW: Are water lines being maintained to eliminate leaks?
2/10/14	2:15 PM	Wincell Spence & Lynne Edser	Y	Y		Y		UAW: why was utility allowed to have significant UAW for so long
2/10/14	2:13 PM	Maurice & Dolores Runnals	Y	Y			Y	UAW: Checking for leaks and repairing them should be done
2/10/14	12:35 PM	Donald McConaphy	Y	Y			Y	UAW: where is the maintenance program, do they regularly check hydrants, do they know how to test water lines?
2/10/14	12:33 PM	Constance Olson	Y	Y				
2/7/14	9:12 AM	W.T. & Diana Koss	Y		Y		Y	One home flooded with sewage from plugged or inadequate sized sewer line; no reports of consumption; SOP needed to address water leakage
2/7/14	9:12 AM	Randal & Kerri Ruse, Richard & Linda Busche, Thomas Bentz	Y		Y		Y	One home flooded with sewage from plugged or inadequate sized sewer line; no reports of consumption; SOP needed to address water leakage
43			36	33	9	7	15	17

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### Angler's Cove West



### Angler's Green



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### Hidden Cove



### Hidden Cove East



### Hidden Cove West



### Hidden Golf Club



### Oak Hammock



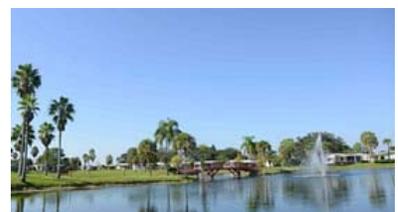
### Swiss Golf & Tennis Club



### Swiss Village



### Tower Lakes



**Whisper Lake**



P ru#Lqir

**Winter Haven Oaks**



P ru#Lqir

Su|yde| #w|w|p hq|###Whup v|c i|k|v|###Frgwdfw|Kv ###DjhqwDr|lq ###E Frs |ujkw#e |#UI#Frp p xq|w|v

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**Cypress Creek Village**  
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Winter Haven, Florida

**Priced from the \$40's**

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**Cypress Creek Village**, one of the leading Florida 55+ mobile home communities, is ideally located in the heart of Central Florida between Tampa and Orlando. Buyers looking for affordable **Mobile homes in Florida** will find there is something for everyone at Cypress Creek Village. Whether starting your day working out in a state-of-the-art fitness room, participating in numerous activities at the clubhouse with your friendly neighbors, taking a swim in the beautiful heated pool, or just relaxing in the Jacuzzi, **Cypress Creek Village** offers the most affordable Active Retirement Community living in Central Florida. Less than 75 miles from Florida's gorgeous east and west coast beaches, **Cypress Creek Village** is only an hour from major theme parks and Orlando and Tampa airports. Central Florida's mild climate amid the backdrop of beautiful Winter Haven, "The City of 100 Lakes," makes **Cypress Creek Village** the perfect place to live the true Florida lifestyle in an affordable, active retirement community. Residents may enjoy all types of water sports, including fishing for large mouth bass, bream, speckled perch, red-finned pike, bluegill, and sunshine bass in the pristine waterways and abundance of lakes. Winter Haven's southern "chain of lakes" is home to the beautiful tropical and botanical gardens at Cypress Gardens. Cypress Creek Village, a gated 55+ active retirement community, offers you a beautiful place to call home when searching for **Florida 55+ mobile home communities**.



## Walden Woods South

**Walden Woods South**  
Active Retirement Community  
Homosassa Springs, Florida  
**Priced from the \$40's**

[Click here to visit this Active Retirement Community](#)

At Walden Woods South, you can still see eagles soaring above the moss-draped oak trees or dolphins and manatees playing side-by-side in the crystal-clear waters of the area's beautiful waterways. Less than an hour north of Tampa and close to all major theme parks, **Walden Woods South** is one of best Central Florida 55+ mobile home communities in the center of it all. The homes sit on beautiful mobile home lots. Florida, home of the Seminole Indians named this magical area "Homosassa"...home of many fish. Yes, the tarpon and bass are still plentiful! **Walden Woods South**, one of CRF Communities gated **Florida 55+ mobile home communities**, offers you a relaxed, enjoyable lifestyle. Central Florida's mild climate invites you to dive, swim and fish all year long. Home to seven of the United States' most beautiful spring-fed rivers, **Florida's Nature Coast and Walden Woods South** are treasures waiting to be explored! Observe manatees in their natural habitat at Homosassa Springs State Wildlife Park or experience the unspoiled "Old Florida" at Chassahowitzka National Refuge. **Walden Woods South**, an affordable active retirement community nestled in the heart of Florida's most beautiful region, is waiting just for you. So when searching for a Florida 55+ mobile home communities, remember **Walden Woods South** is the Active Retirement Community for you!

## WINTER HAVEN OAKS

Winter Havens Oaks  
**Active Retirement Community**  
*Winter Haven, Florida*  
*Priced from the \$40's*

[Click here to visit this Active Retirement Community](#)

Winter Haven's beautiful Winter Haven Oaks, Central Florida's premiere Active Retirement Community. The homes sit on beautiful Mobile Home Lots. Florida the sunshine state is a great place to look for an Active Retirement Community. Winter Haven Oaks is situated in the heart of Central Florida. Known for its charm, Winter Haven is a beautiful city, ideally located between Tampa and Orlando, Florida's beautiful east and west coast beaches, and close to world-renowned theme parks and two international airports. Winter Haven Oaks is the perfect home for buyers looking for affordable Florida 55+ mobile home communities, in an area known for stunning natural beauty. Just a short distance from the metropolitan influences of Tampa and Orlando, Winter Haven exudes small-town charm and overflows with fun activities. Close to beautiful Cypress Gardens, Winter Haven Oaks is a gated 55+ active retirement community of mobile homes in Florida that offers you a beautiful place to call home. With the mild Central Florida climate and 50+ lakes, 14 of which are connected by canals forming the "Chain of Lakes," there are endless opportunities for boating, fishing, or simply enjoying a breathtaking Florida sunset. Come and see Winter Haven Oaks for yourself! One of the finest Central Florida Active Retirement Community brought to you by CRF Communities.

Visit [Florida Retirement Communities](#)

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4140 Ashton Club Drive  
Lake Wales, FL 33859  
1-800-234-1581  
[info@crfcommunities.com](mailto:info@crfcommunities.com)

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Walden Woods South  
Florida Retirement Communities

## CRF Communities

### New Retirement Communities

We offer active retirement communities in Florida with gated homes and villas that may be personalized (custom changes) in our full-service design center.

[Lake Ashton](#)

[Vienna Square](#)



**Lake Ashton**

**Customized Site-Built Homes**

**Lake Wales, FL**

**Priced from the \$149,000 - \$300's**

[Click here to visit this active retirement community](#)

Set on over 1200 acres of choice virgin Florida ranch land fronting the serene waters of Lake Ashton, this is simply the best of new retirement communities in Florida! A **gated retirement community**, Lake Ashton's amenities include a 26,000 sq ft clubhouse, 30,000 sq ft health and fitness center, indoor pool and outdoor pool, two 18-hole private golf courses, lighted tennis courts, boat ramp/dock, movie theater, bowling alley and much, much more! This best of active retirement communities features single-family homes and motor coach garage homes priced from the \$100s. Never before has elegance and value been so perfectly defined in a master planned, gated retirement community. Lake Ashton, the premier address of Central Florida's active retirement communities, sets the standards of excellence in design, construction, amenities, lifestyle, security, and affordability for Florida **new retirement communities**. At Lake Ashton, you may stimulate your mind, body and soul. Keep your mind active by participating in groups, clubs, clinics, special programs and classes that emphasize learning new skills. Rejuvenate your body by staying active and inspire your soul by sharing your values and beliefs with others in and around Lake Ashton. Join social groups that celebrate your friendships and keep your spirits lifted. Doctors agree... staying active is the closest thing to a fountain of youth!



*Vienna Square*

**Vienna Square**

**Maintenance Free Villas and Custom Site Built Homes**

**Winter Haven, FL*****Priced from the mid \$100's******[Click Here to Visit another one of our great Florida Retirement Communities](#)***

Whether you prefer the convenience of maintenance free living in your own villa, or desire the peaceful setting of a single family home, Vienna Square, one of CRF Communities' new Retirement Communities, offers you elegance and affordability, together in harmony. All the amenities, activities, area attractions, shopping and restaurants await you in this best of active retirement communities in beautiful Winter Haven, Florida . The amenities at Vienna Square will be one of the many reasons why you will agree it is the best of active retirement communities in Florida. With a beautiful clubhouse, heated swimming pool, jacuzzi, tennis, organized activities every month, movie theater and so much more, you'll have many activities to enjoy in your new maintenance free life at this great **gated retirement community**. Living in new retirement communities like Vienna Square, you will spend less time on your lawn and more time visiting friends and enjoying the sunny Florida lifestyle. Vienna Square's maintenance-free villas are perfect for you! Choose from the Symphony or the Sonata floor plan featuring: single-story living, two-car garage, covered porch (Symphony only), walk-in closets, master bedroom and bathroom suite, guest bedroom and bathroom, family room and dining room in this best of active retirement communities. Vienna Square, a gated retirement community, has convenient access to many affordable services such as shopping, medical facilities, restaurants, and entertainment.

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Walden Woods South

Florida Retirement Communities

## CRF Communities

### Central Florida RV Parks

Central Florida RV Parks offers a piece of sunny Florida without the hassle of finding a Florida RV Park site and making a reservation



Bay Lake Motorcoach Resort  
Motor Coach Pads and Casitas  
Florida RV Park  
Auburndale, Florida  
Priced from the \$40's including pad  
[Click here to visit this Florida RV Park](#)

Bay Lake Motorcoach Resort is an exclusive gate-guarded Florida RV Park community of 260 premium Class A motorcoach pad and casita sites located in beautiful Central Florida. Nestled along the shores of Lake Mattie's 1,079 acres of spring fed fresh water is this "Key West Inspired, Nature Refined" Florida RV Park motorcoach resort. This Florida RV Park is close to everything that makes central Florida the vacation capital of the world. The sparkling waters and sandy beaches of either the west or east coast are 65 miles away. Bay Lake RV Resort is 30minutes from major theme parks and Orlando and Tampa airports.

Visit [Florida Retirement Communities](#)

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