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**WILL WEATHERFORD**  
*Speaker of the House of  
Representatives*

**DON GAETZ**  
*President of the Senate*

**J.R. Kelly**  
*Public Counsel*

August 15, 2013

Ms. Carlotta Stauffer, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re:** Docket No. 140038-SU - Application for transfer of majority organizational control of Crooked Lake Park Sewerage Co. in Polk County, and for name change on Certificate No. 517-S to Glenbrook Properties, LLC, a Florida limited liability company.

Dear Ms. Stauffer:

On April 8, 2014 and May 27, 2014, Staff sent letters to Crooked Lake Park Sewerage Company ("Utility") requesting additional information concerning the proposed transfer of majority organizational control of the Utility. By letters dated May 9, 2014 and June 11, 2014, the Utility provided responses to Staff's letters.

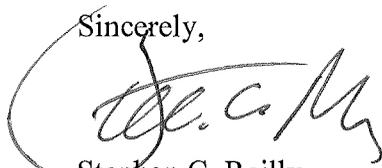
To date, the applicant has failed to provide important information required by Commission Rule 25-30.037(3) (g), F.A.C. This subsection of the rule requires the applicant to provide financial statements for all persons or entities who will own 10% or more of the Utility ownership being acquired. From the documents already furnished by the applicant, it appears that Mr. Louis Garrard V is the sole owner and managing member of the Limited Liability Company that is being proposed to own 100% of the Utility. The Commission's rule requires Mr. Garrard to file with the Commission a current personal financial statement, which may be filed confidentially if requested.

Subsection (g) specifically requires a “list of all entities, including affiliates, that have provided, or will provide, funding to the buyer, and an explanation of the manner and amount of such funding, which shall include their financial statements and copies of any financial agreements with the utility.” We believe that the Utility must provide such a list and explain any affiliate relationships, including the buyer’s relationship with Mainstay Financial Service, LLC (“Mainstay”), if it is an affiliate.

We finally also point out that the Utility provided evidence of financing with Mainstay at a 10% per annum interest rate which we believe will need to be further investigated in any future rate proceeding.

We fully support Staff in its efforts to discover this important financial information in order to ensure that the proposed transfer of majority organizational control of the Utility is in the public interest.

Sincerely,

A handwritten signature in black ink, appearing to read 'S.C. Reilly', is written over a large, faint circular stamp or watermark.

Stephen C. Reilly  
Associate Public Counsel

cc: Caroline Klancke, Esq.  
Craig B. Hill, Esq.  
James C. McClendon II, Esq.  
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