

STATE OF FLORIDA

COMMISSIONERS:  
ART GRAHAM, CHAIRMAN  
LISA POLAK EDGAR  
RONALD A. BRISÉ  
EDUARDO E. BALBIS  
JULIE I. BROWN



DIVISION OF ENGINEERING  
TOM BALLINGER  
DIRECTOR  
(850) 413-6910

## Public Service Commission

September 8, 2014

Mr. Craig B. Hill  
625 East Lime Street, Suite 5  
Lakeland, FL 33801

**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 Mr. Hill:

On April 8, 2014, and again on 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. The Utility provided responses to staff's requests on May 9, 2014 and June 11, 2014. However, to date, the applicant has failed to provide information required by Commission Rule 25-30.037(3)(g), F.A.C. Specifically, this subsection of the rule requires the applicant to provide financial statements for all persons or entities who will own 10 percent or more of the Utility ownership being acquired.

Based on documents already in staff's possession, it appears Glenbrook Properties, LLC (Glenbrook) is the sole owner being proposed to own 100 percent of the Utility. The Commission's rule requires Glenbrook to file with the Commission a current financial statement, which may be filed confidentially if requested.

In addition, 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." Staff believes that the Utility must provide such a list and explain any affiliate relationships or common ownership, including the buyer's relationship with Mainstay Financial Service, LLC (Mainstay). If Mainstay is an affiliate or related party to Glenbrook, a current financial statement for Mainstay must also be filed.

Your application will not be considered complete until the deficiencies identified in this letter have been corrected. These corrections should be submitted no later than September 29,

Mr. Craig B. Hill  
Page 2  
September 8, 2014

2014. If the documentation is received by September 29, 2014, staff plans to file its recommendation for consideration at the November 25, 2014, Agenda Conference.

When filing the response, please include the docket number and direct the response to Carlotta Stauffer, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850. If you have any questions concerning the items identified above, please contact me at (850) 413-6592 or by e-mail at [pvickery@psc.state.fl.us](mailto:pvickery@psc.state.fl.us), or Jennifer Crawford at (850) 413-6228 or by e-mail [jcrawfor@psc.state.fl.us](mailto:jcrawfor@psc.state.fl.us).

Sincerely,

A handwritten signature in black ink that reads "Paul Vickery". The signature is written in a cursive style with a large, looping initial "P".

Paul Vickery  
Chief of Reliability & Resource Planning  
Division of Engineering

cc: Division of Accounting & Finance (Frank, Prestwood)  
Office of the Commission Clerk  
Louis F. Garrard  
Kenneth Knowlton