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LAW OFFICES

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June 5, 1997

#### VIA FEDERAL EXPRESS

Ms. Blanca Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

RE: Application for Certificates to Provide Water and Wastewater Service in Clay County by Point Water and Sewer, Inc.; Docket No. 961321-WS

Dear Ms. Bayo:

In connection with the above-referenced matter, enclosed please find the following:

- An original and fifteen copies of Point Water & Sewer, Inc.'s Motion for Extension of Time to File Exhibits; and
- 2. An original and seven copies of Notice of Filing.

Please file the originals and distribute the copies in accordance with your usual procedures. If you have any questions or comments, please do not hesitate to contact me.

ACK		Very truly yours,
AFA		
APP		DOUGLAS H. REYNOLDS
CAF ——DI	HR:pdl	
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EG 2 cc	J. Michael Lindell, Esq.	
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OPC	Public Service Commission Point Water & Sewer, Inc.	1
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SEC	DOCUMENT NUMBER - DATE	DOCUMENT NUMBER-DATE
MAS	05635 JUN-65	05634 JUN-65
	FPSC-RECORDS/REPORTING	FPSC-RECORDS/REPORTING

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application for Certificates	)	
to provide Water and Wastewater	)	DOCKET NO. 961321-WS
Service in Clay County by Point	)	Date Submitted for
Water and Sewer, Inc.	)	Filing: June 5, 1997
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## POINT WATER & SEWER, INC'S MOTION FOR EXTENSION OF TIME TO FILE EXHIBITS

COMES NOW Applicant, POINT WATER & SEWER, INC. (hereinafter referred to as "PWS"), and moves the Commission for an extension of time to file various exhibits which were partially or wholly omitted from its Prehearing Rebuttal Statements which were timely filed on May 27, 1997, and shows the Commission the following:

- The original Order Establishing Procedure allowed PWS fourteen (14) days after the filing of Staff's Prehearing Statements to file its rebuttal testimony and evidence.
- The Order Revising Order Establishing Procedure reduced that amount to eight (8) days, which included the Memorial Day weekend.
- 3. In spite of time limitations, PWS timely filed its rebuttal testimony on May 27, 1997.
  However, it has been brought to PWS' attention that two exhibits, to wit: "JEY-2" and "JEY-3", which were attached to John Yonge's Affidavit, were omitted. They were filed on May 29, 1997.
- PWS has also recently learned that two pages were omitted from Exhibits "JY-2", which are being filed contemporaneously herewith.
- In addition, PWS has learned that numerous pages were missing from Jim Lucas'
   Report, to wit: "JL-2" and said Report is being filed contemporaneously herewith.
- In addition, on June 4, 1997, PWS received from the Florida Department of Environmental Protection, the Notice of DEP Permit Issuance, dated May 23, 1997, which DOCUMENT NUMBER-DATE

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should be added as Exhibit "JY-4-A". Although PWS attempted to acquire a copy of same prior to May 27, 1997, through no fault of its own, it was unable to do so. A copy of "JY-4-A" is being filed contemporaneously herewith.

7. There will be no prejudice to any other party as a result of these exhibits being filed and included in this proceeding and their admission would be in the interst of justice.

WHEREFORE, PWS moves for an extension of time to file these exhibits and that they be filed with the subject testimony and included in the Record in this action.

Respectfully submitted,

COX & REYNOLDS 4875 North Federal Highway 10th Floor Fort Lauderdale, FL 33308 Phone: (954) 491-5220

Fax: (954) 491-0702

DOUGLAS H. REYNOLDS Florida Bar No. 367435

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and fifteen copies of the foregoing Motion have been furnished by Hand Delivery this 5th day of June, 1997 to Blanca Bayo, Director, Division of Records and Reporting, Florida Public Service Commission, 2450 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, and copies of the foregoing have been furnished to J. Michael Lindell, Esq., Hayes & Lindell, P.A., 233 E. Bay Street, Suite 620, Jacksonville, Florida 32202; Kathleen M. Johnson, Staff Counsel Division of Legal Services, Florida Public

Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850; and Scott G. Schildberg, Esq., Martin, Ade, Birchfield & Mickler, 3000 Independent Square, Jacksonville, Florida 32201, by U.S. Mail this 5th day of June, 1997.

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DOUGLAS H. REYNOLDS