ORIGINAL

RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA
JOHN R. ELLIS
KENNETH A. HOFFMAN
THOMAS W. KONRAD
MICHAEL G. MAIDA
J. STEPHEN MENTON
R. DAVID PRESCOTT

HAROLD F. X. PURNELL

GARY R. RUTLEDGE

POST OFFICE BOX 551, 32302-0551 215 SOUTH MONROE STREET, SUITE 420 TALLAHASSEE, FLORIDA 32301-1841 OF COUNSEL: CHARLES F. DUDLEY

G. MAIDA TELEPHONE (850) 681-6788
EN MENTON TELECOPIER (850) 681-6515

GOVERNMENTAL CONSULTANTS: PATRICK R. MALOY AMY J. YOUNG

February 24, 1999

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

Re: Docket No. 980657-WS

Dear Ms. Bayo:

HAND DELIVERY

PA 2:58

Enclosed herewith for filing in the above-referenced docket on behalf of Florida Water Services Corporation ("Florida Water") are the original and fifteen copies of Florida Water's Motion for Extension of Time to File Rebuttal Testimony.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Kenneth A. Hoffingan

Sincerely,

DOCUMENT NUMBER-DATE

02404 FEB 24 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION ORIGINAL

In re: Application for amendment)	
of Certificates Nos. 279-W and)	
226-S to add territory in Seminole)	Docket No. 980657-WS
County by Florida Water Services)	
Corporation)	Filed: February 24, 1999
)	

FLORIDA WATER SERVICES CORPORATION'S MOTION FOR EXTENSION OF TIME TO FILE REBUTTAL TESTIMONY

Florida Water Services Corporation ("Florida Water"), by and through its undersigned counsel, and pursuant to Rule 28-106.204, Florida Administrative Code, hereby requests an extension of time up to and until April 1, 1999, to file its rebuttal testimony. In support of its Motion, Florida Water states as follows:

- 1. Florida Water intends to file rebuttal testimony responding to the prefiled testimony Ms. Frances Chandler, submitted on behalf of Seminole County; Ms. Billie Messer, submitted on behalf of the Commission; and Mr. Charles Gauthier, submitted on behalf of the Commission. Florida Water's rebuttal testimony is currently due February 25, 1999.
- 2. Due to the number and magnitude of pending Commission, circuit court and appellate proceedings in which Florida Water is involved, Florida Water's counsel has had insufficient time to secure an expert witness for the purpose of reviewing the testimony of the above-named witnesses and providing rebuttal testimony addressing the comprehensive plan issues raised by these witnesses in connection with Florida Water's application to amend its certificates in Seminole County.
- According to the most recent Commission calendar, revised February 22, 1999, the
 final hearing in this proceeding has been postponed from April 29-30, 1999 to August 3-4, 1999.

DOCUMENT NUMBER-DATE
02404 FEB 24 ST

Florida Water understands that a Revised Order Establishing Procedure and Notice of Hearing will soon be issued confirming the new final hearing dates of August 3-4, 1999 and establishing a new deadline of April 1, 1999 for the filing of rebuttal testimony.

4. In light of this postponement of over three months for the final hearing, Florida Water submits that no party will be prejudiced by allowing Florida Water up to and until April 1, 1999, to secure an expert witness for the purpose of preparing and filing rebuttal testimony as outlined above.

WHEREFORE, for the foregoing reasons, Florida Water respectfully requests an extension of time of up to and until April 1, 1999, to file its rebuttal testimony in this proceeding.

Respectfully submitted,

KENNETHA. HOFFMAN, ESQ.

Rutledge Ecenia, Purnell & Hoffman, P.A.

P. O. Box 551

Tallahassee, FL 32302

(850) 681-6788

and

BRIAN P. ARMSTRONG, SENIOR VICE PRESIDENT AND GENERAL COUNSEL MATTHEW J. FEIL, ESQ. Florida Water Services Corporation P. O. Box 609520 Orlando, Florida 32860-9520 (407) 880-0058

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 24th day of February, 1999:

Coalition for Responsible Econolockhatchee Development, Inc. P. O. Box 621047 Ovideo, FL 32762

Mr. Charles K. Smith, P.E. City of Oviedo 400 Alexandria Boulevard Oviedo, FL 32765

Lonnie N. Groot, Esq. Office of the County Attorney 101 E. First Street Sanford, Fl 32711

Jennifer S. Brubaker, Esq. Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Room 370 Tallahassee, FL 32399-0850

KENNETH A. HOFFMAN, ESQ

Chu.ext