

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Application for increase)
in wastewater rates in Seven)
Springs System in Pasco County)
by Aloha Utilities, Inc.)
_____)

DOCKET NO. 891643-80
RECORDS AND REPORTING


ALOHA UTILITIES' REQUESTS FOR ORAL ARGUMENT

Aloha specifically requests oral argument on the Staff's Motion To Compel And Request For Extension Of Time To File Pre-filed Testimony and OPC's Motion for Extension of Time to File Testimony. Particularly with regard to Staff's Motion To Compel, the only way the prehearing officer can appreciate exactly what it is that staff is seeking to compel Aloha to create, project, calculate, or estimate is to hear argument as to each of the four interrogatories at issue. Only through such argument will the prehearing officer learn what information exists, (which would be discoverable by the staff or any other party in the case upon proper request), as opposed to what information is not currently in existence.

Staff's request that the prehearing officer order the information to be compiled and conveyed to the staff by July 18th is demonstrative of staff's misapprehension as to exactly what is being requested, or how difficult and costly it would be to compile at all, much less by this deadline. Oral argument would also provide an opportunity to discuss these matters with the prehearing officer and the staff to determine what can reasonably be provided to meet the needs of the staff. The Utility stands ready to participate in such oral argument on less than one hour's notice, and anticipates it will take no more than 30 minutes total.

- APP _____
- CAF _____
- CMP _____
- COM 3
- CTR _____
- ECR Merhat
- LEG 2
- OPC _____
- PAI 1
- RGO 1
- SEC 1
- SER _____
- OTH _____

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WHEREFORE, and consideration of the above, Aloha respectfully requests the prehearing officer grant oral argument to the parties regarding staff's outstanding motions.

DATED this 13th day of July, 2000.



JOHN L. WHARTON, ESQ.
F. MARSHALL DETERDING, ESQ.
Rose, Sundstrom, & Bentley, LLP
2548 Blairstone Pines Drive
Tallahassee, FL 32301
(850) 877-6555

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing has been furnished by Fax and U.S. Mail to Steve Burgess, Esquire, Office of Public Counsel, and Ralph R. Jaeger, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850 on this 13th day of July, 2000.



John L. Wharton, Esq.
F. Marshall Deterding, Esq.