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August 21, 2000

REPORTING

GOVERNMENTAL CONSULTANTS: PATRICK R. MALOY AMY J. YOUNG

HAND DELIVERY

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. 980744-WS

Dear Ms. Bayo:

Enclosed herewith for filing 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 Prefiled Testimony and Exhibits and Prehearing Statements.

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

Sincerely,

Kenneth A. Hoffman

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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into ratemaking	)	
considerations of gain on sale from sale	)	Docket No. 980744-WS
of facilities of Florida Water Services	)	
Corporation to Orange County.	)	Filed: August 21, 2000
	)	

## FLORIDA WATER SERVICES CORPORATION'S MOTION FOR EXTENSION OF TIME TO FILE PREFILED TESTIMONY AND EXHIBITS AND PREHEARING STATEMENTS

Florida Water Services Corporation ("Florida Water"), by and through its undersigned counsel, and pursuant to Rule 28-106.204(1), Florida Administrative Code, hereby moves for an extension of time of forty-five (45) days for the filing of all prefiled testimony and exhibits and prehearing statements in this docket. In support of this Motion, Florida Water states as follows:

- Order No. PSC-00-1170-PCO-WS, reflecting the controlling dates for the filing of prefiled testimony and exhibits and prehearing statements in this proceeding. Pursuant to the Order Establishing Procedure, Florida Water's prefiled direct testimony and exhibits are due September 9, 2000; Intervenors' prefiled direct testimony and exhibits are due October 6, 2000; Staff's prefiled direct testimony and exhibits, if any, are due November 3, 2000; and, Florida Water's prefiled rebuttal testimony and exhibits are due December 1, 2000. Prehearing statements are currently due to be filed December 26, 2000.
- 2. Due to the recent departure of Florida Water's in-house counsel, the undersigned counsel have assumed responsibilities for numerous dockets involving Florida Water, as well as issues involved in the instant proceeding, previously handled by Florida Water's in-house counsel. Due to this substantial increase in work load, Florida Water's undersigned counsel require additional

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time to meet with potential witnesses for the preparation of prefiled direct testimony and exhibits in this docket and to continue the transition and the handling of Commission matters previously handled by Florida Water's in-house counsel.

Accordingly, for the foregoing reasons, Florida Water requests a forty-five (45) day

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extension of time for the filing of its direct testimony and exhibits in this proceeding. Florida Water also requests that the date for filing Prehearing Statements be concomittantly extended for a period of forty-five (45) days. The undersigned counsel has conferred with the Office of Public Counsel ("OPC") and is authorized to represent that OPC does not object to the relief requested in this motion so long as the controlling date for the filing of OPC's prefiled testimony in this docket is also reestablished forty-five (45) days after the date set forth in the Order Establishing Procedure and the

new controlling dates do not result in a postponement of the final hearing currently scheduled for

February 1-2, 2001. The forty-five (45) day extension requested herein for the filing of all prefiled

testimony and exhibits and prehearing statements will not require a rescheduling of the final hearing.

WHEREFORE, for the foregoing reasons, Florida Water respectfully requests that the Prehearing Officer enter an Order granting this Motion and extending the controlling dates for the filing of prefiled testimony and exhibits and prehearing statements for a period of forty-five (45) days.

Respectfully submitted,

KENNETH A. HOFFMAN, ESQ.

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 21st day of August, 2000:

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

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