BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for increase in water and wastewater rates in Charlotte, Highlands, Lake, Lee, Marion, Orange, Pasco, Pinellas, Polk and Seminole Counties by Utilities, Inc. of Florida

Docket No. 20200139-WS

UTILITIES, INC. OF FLORIDA'S REQUEST FOR ORAL ARGUMENT ON ITS MOTION FOR RECONSIDERATION

Utilities, Inc. of Florida ("UIF" or the "Company"), by and through its undersigned counsel, respectfully requests that the Florida Public Service Commission ("Commission") allow oral argument on its Motion for Reconsideration and in support states:

- 1. UIF has file a Motion for Reconsideration of Order No. PSC-2021-0206-WS, since the Order ignored and thus does not address UIF's request for a repression adjustment.
- 2. Since the issue of a repression adjustment was not discussed in the Staff Recommendation and thus not addressed by the Commissioners at the Commission Conference, UIF believes that the Commissioners can benefit by hearing oral argument on the issue.
- 3. This issue is significant and ignoring UIF's request for a repression adjustment when the rate increase clearly meets the Commission criteria for including such adjustment, will result in UIF earning approximately one half a million dollars less annually than the revenue requirement which the Commission determined was fair and reasonable.
- 4. UIF believes that fifteen (15) minutes for each party is sufficient time for each party to explain its position on this important issue. Oral argument will also afford the Commissioners an opportunity to question the parties on this issue which is seldom addressed in an adversary forum.

1

WHEREFORE, Utilities, Inc. of Florida respectfully requests the Commission allow each party fifteen (15) minutes for Oral Argument on its Motion for Reconsideration.

Respectfully submitted this 18th day of June, 2021, by:

DEAN MEAD & DUNDAD	DEAN MEAD
DEAN, MEAD & DUNBAR	DEAN MEAD
106 East College Avenue, Suite 1200	420 South Orange Ave., Suite 700
Tallahassee, Florida 32301	Orlando, FL 32801
Telephone: (850) 999-4100	Direct Telephone: (407) 310-2077
Fax: (850) 577-0095	Fax: (407) 423-1831
jwharton@deanmead.com	mfriedman@deanmead.com
/s/John L. Wharton John L. Wharton, Esquire	/s/ Martin S. Friedman Martin S. Friedman, Esquire

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-

mail to the following parties this 18th day of June, 2021:

Richard Gentry, Esquire
Stephanie Morse, Esquire
Anastacia Pirrello, Esquire
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400
morse.stephanie@leg.state.fl.us
gentry.richard@leg.state.fl.us
pirrello.anastacia@leg.state.fl.us

Jennifer Crawford, Esquire
Walter Trierweiler, Esquire
Bianca Lherisson, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
wtrierwe@psc.state.fl.us
jcrawfor@psc.state.fl.us
BLheriss@psc.state.fl.us.

/s/ Martin S. Friedman
Martin S. Friedman