

LAW OFFICES
ROSE, SUNDBSTROM & BENTLEY, LLP
2548 BLAIRSTONE PINES DRIVE
TALLAHASSEE, FLORIDA 32301

FREDERICK L. ASCHAUER, JR.
CHRIS H. BENTLEY, P.A.
ROBERT C. BRANNAN
F. MARSHALL DETERDING
JOHN R. JENKINS, P.A.
KYLE L. KEMPER
STEVEN T. MINDLIN, P.A.
CHASITY H. O'STEEN
DAREN L. SHIPPY
WILLIAM E. SUNDBSTROM, P.A.
DIANE D. TREMOR, P.A.
JOHN L. WHARTON
ROBERT M. C. ROSE (1924-2006)

(850) 877-6555
FAX (850) 656-4029
www.rsbattorneys.com

REPLY TO CENTRAL FLORIDA OFFICE

October 2, 2007

E-FILING

CENTRAL FLORIDA OFFICE
SANLANDO CENTER
2180 W. STATE ROAD 434, SUITE 2118
LONGWOOD, FLORIDA 32779
(407) 830-6331
FAX (407) 830-8522

MARTIN S. FRIEDMAN, P.A.
VALERIE L. LORD
BRIAN J. STREET

Ann Cole, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

RE: Docket No.: 070183-WS; In re: Proposed adoption of Rule 25-30.4325, F.A.C., Water Treatment Plant Used and Useful Calculations
Our File No.: 30057.147

Dear Ms. Cole:

Enclosed for filing in the above-referenced docket is Utilities, Inc.'s Petition for Leave to Intervene.

Should you have any questions regarding this filing, please do not hesitate to give me a call.

Very truly yours,



MARTIN S. FRIEDMAN
For the Firm

MSF/mp
Enclosure

cc: Rosanne Gervasi, Esquire, Office General Counsel (w/enclosure) (via e-mail)
Stephen Reilly, Esquire, Office of Public Counsel (w/enclosure) (via e-mail)
Kenneth A. Hoffman, Esquire (w/enclosure) (via e-mail)
John P. Hoy, Chief Regulatory Officer (w/enclosure)
Rick Durham, Regional Vice President for Operations (w/enclosure)
Patrick C. Flynn, Regional Director (w/enclosure)

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Proposed adoption of Rule 25-30.4325,) DOCKET NO.: 070183-WS
F.A.C., Water Treatment Plant Used and)
Useful Calculations.)

UTILITIES, INC.'S PETITION FOR LEAVE TO INTERVENE

UTILITIES, INC., by and through its undersigned attorneys and pursuant to Rule 28-106.205, F.A.C., moves this Commission to Intervene in this Docket, and in support thereof, states:

1. The name, address and telephone number of the Petitioner is:

Illinois Office: 2335 Sanders Road
Northbrook, IL 60062
PHONE: (847) 498-6440
ATTN: Mr. John Hoy

Florida Office: 200 Weathersfield Avenue
Altamonte Springs, FL 32714-4099
PHONE: (407) 869-8588
ATTN: Mr. Patrick C. Flynn

2. The name, address and telephone number of the Petitioner's representative is:

Martin S. Friedman, Esquire
Rose, Sundstrom & Bentley, LLP
2180 W. State Road 434, Suite 2118
Longwood, FL 32779
PHONE: (407) 830-6331
mfriedman@rsbattorneys.com

3. The instant proceeding is for the adoption of a Rule standardizing the methodology for establishing the used and useful calculation for water treatment plants. Petitioner's substantial interests are affected by the proposed Rule in that it owns and operates ten (10) subsidiaries in Florida to which this proposed Rule will be applicable.

Petitioner has participated in the workshops which resulted in the proposed Rule, including providing written comments which were incorporated in the proposed Rule.

4. Petitioner received notice of the Commission decision to conduct a formal hearing verbally at the Commission's August 28, 2007, Agenda, and by receipt of Commission Order No.: PSC-07-0741-PCO-WS, upon its issuance on September 17, 2007.

5. Petitioner supports the proposed Rule and knows of no disputed issues of material fact, but expects some to be raised by Office of Public Counsel.

6. Petitioner supports the proposed Rule, thus does not allege any facts warranting reversal or modification of the proposed Rule.

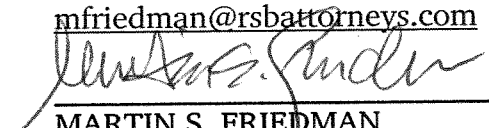
7. Petitioner supports the proposed Rule, thus knows of no specific statutes or rules which would require reversal or modification of the proposed Rule.

8. Petitioner seeks this Commission's adoption of the proposed Rule in its current form.

WHEREFORE, Petitioner requests this Commission to grant it intervention in the Docket with full party status equal to that of Office of Public Counsel.

Respectfully submitted this 2nd day of October, 2007, by:

Rose, Sundstrom & Bentley, LLP
2180 W. State Road 434, Suite 2118
Longwood, FL 32779
PHONE: (407) 830-6331
mfriedman@rsbattorneys.com


MARTIN S. FRIEDMAN
For the firm


CERTIFICATE OF SERVICE
DOCKET NO.: 070183-WS

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished
by E-mail and U. S. Mail this 2nd day of October, 2007, to:

Stephen C. Reilly, Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400

Rosanne Gervasi, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Kenneth A. Hoffman, Esquire
Rutledge, Ecenia
Post Office Box 551
Tallahassee, FL 32302



MARTIN S. FRIEDMAN
For the firm