

ORIGINAL



JACK SHREVE  
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STATE OF FLORIDA  
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature  
111 West Madison St.  
Room 812  
Tallahassee, Florida 32399-1400  
850-488-9330

July 10, 2002

Blanca S. Bayo, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RECEIVED FPSC  
02 JUL 10 PM 4:13  
COMMISSION  
CLERK

Re: Docket No. 981079-SU

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of Citizens' Notice of Intervention.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Stephen M. Presnell,  
Associate Public Counsel

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CAF \_\_\_\_\_  
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OPC 1 Enclosure  
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SEC 1 \_\_\_\_\_  
OTH 16 RECEIVED & FILED

16  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

07117 JUL 10 8

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Application for amendment )  
of Certificate No. 104-S to extend )  
service territory in Pasco County by )  
Hudson Utilities, Inc., and request for )  
limited proceeding. )  
\_\_\_\_\_ )

Docket No. 981079-SU

Filed: July 10, 2002

**CITIZENS' NOTICE OF INTERVENTION**

The Citizens of the State of Florida, through their attorney, the Public Counsel, pursuant to Section 350.0611, Florida Statutes, and Rule 25-22.039, Florida Administrative Code, hereby give notice of intervention in the above-referenced docket.

The Citizens submit:

1. The docket number is 981079-SU and the name of the agency is the Florida Public Service Commission.

2. The Intervenor is the Office of Public Counsel, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400, and is entitled to participate as a matter of statutory right under Section 350.0611(1), which authorizes the Public Counsel "to appear in the name of the state or its citizens, in any proceeding or action before the commission...."

3. The disputed issues of material fact will manifest as the parties pursue discovery and other investigation of the application filed by Hudson Utilities, Inc. At this point, however, the Citizens are not aware of any specific disputed issues of material fact.

DOCUMENT NUMBER-DATE

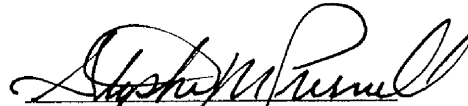
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FPSC-COMMISSION CLERK

4. The ultimate fact is that Hudson has the obligation under Florida law and Order of the Commission to provide service within its service area within a reasonable time.

Respectfully submitted,

Jack Shreve  
Public Counsel



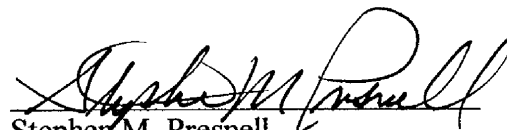
Stephen M. Presnell  
Associate Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399-1400  
Telephone 850.488.9330

Attorneys for the Citizens  
of the State of Florida

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing CITIZENS' NOTICE OF INTERVENTION has been served by hand delivery to Rosanne Gervasi, Esq., Division of Legal Services, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, and by U.S. Mail to Kenneth A. Hoffman, Esq. and Martin P. McDonnell, Esq., Rutledge, Ecenia, Purnell & Hoffman, P.A., P.O. Box 551, Tallahassee, Florida 32302 on this 10th day of July, 2002.



Stephen M. Presnell  
Associate Public Counsel