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FLORIDA PUBLIC
SERVICE COMMISSION

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April 5, 1991



City of Sanibel

800 Dunlop Road
Sanibel, Florida 33957

AREA CODE - 813

- CITY COUNCIL 472-4135
- ADMINISTRATIVE 472-3700
- BUILDING 472-4555
- EMERGENCY MANAGEMENT 472-3111
- FINANCE 472-9615
- LEGAL 472-4359
- PARKS & RECREATION 472-3373
- PLANNING 472-4136
- POLICE 472-3111
- PUBLIC WORKS 472-6397

Mr. Steven Tribble
 State of Florida
 Public Service Commission
 Fletcher Building
 101 East Gaines Street
 Tallahassee, Florida 32399-0870

Re: Sanibel Sewer System
 Partners, Ltd. for
 Amendment to Certi-
 ficate No. 187-S in
 Lee County
 Docket No. 900802

910476-5U

Dear Mr. Tribble

Enclosed you will find the original and 15 copies of Objection to Application for Extension of Service Area, along with the original and three copies of Motion for Consolidation and the original and three copies of Motion for Extension of Time in which to File Testimony and Exhibits in the above-referenced case. Please file same and return time-stamped copies to me in the enclosed envelope.

Thank you.

Very truly yours,

Robert D. Pritt
 Robert D. Pritt
 City Attorney

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TB

 FPSC-BUREAU OF RECORDS

RDP:DL
Enclosures

- ACK
- AFA _____
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- LIN 6
- OPS 1
- RCH _____
- SEC 1
- WAS _____
- OTH _____

900802-54 only
 motion for
 Extension
 DOCUMENT NUMBER-DATE

03380 APR-8 1991

PSC-RECORDS/REPORTING

1 ea ext
 motion for
 consolidation
 DOCUMENT NUMBER-DATE

03379 APR-8 1991

PSC-RECORDS/REPORTING

910476-54 only
 objection
 DOCUMENT NUMBER-DATE

03378 APR-8 1991

PSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Sanibel Sewer System)
Partners, Ltd. for Amendment)
to Certificate No. 187-S in)
Lee County.)

DATED: APRIL 5, 1991
DOCKET NO. 900802

910476-54

OBJECTION TO APPLICATION FOR
EXTENSION OF SERVICE AREA

The City of Sanibel (the City), a municipal corporation and governmental authority within the meaning of Section 367.045 F.S., hereby objects to the application of Sanibel Sewer System Partners, Ltd. for amendment to Certificate No. 187-S in Lee County, dated April 2, 1991, and further states as follows:

1. The name and address of the person to receive copies of documents and filing is:

ROBERT D. PRITT
City Attorney
City of Sanibel
800 Dunlop Road
Sanibel, Florida 33957

2. The City objects because the area that is proposed to be added to the Sanibel Sewer System service area is an area that is already being served by that system and has been served for some time, including times in excess of one year, and such past service would be seemed to be in conflict with the intent of Section 367.045 F.S.

3. The City also objects because the application submitted by the Sanibel Sewer System, coupled with the application for extension of service area under a currently pending case, Docket Number 900802-SU (which is an application for amendment and deletion of service area) furthers a strategy on the part of the

DOCUMENT NUMBER-DATE

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available.

4. As part of the aforesaid scheme, this application is in contravention of the City's goals, objectives and policies contained in its Comprehensive Land use Plan, which is an approved local government plan developed pursuant to Sections 163.3161-163.3211 F.S.

5. The application, placed in its context with the other pending application for addition and deletion of service area, does not appear to be consistent with the public interest; and it appears conversely to be based primarily, if not solely, upon the economic benefit of this private, for-profit, business entity.

WHEREFORE, the City of Sanibel:

1. Formally objects to the application for extension of service area filed by the Sanibel Sewer System Partners, Ltd. on April 2, 1991;
2. Requests a proceeding under Section 120.57 F.S., as authorized by Section 367.045(4) F.S.;
3. Requests a public hearing as authorized by Section 376.045(4) F.S.; and
4. Requests such other relief as is authorized by law, including, but not limited to, an award of its costs herein.

Respectfully submitted,

Robert D. Pritt

Robert D. Pritt
Attorney for City of Sanibel
800 Dunlop Road
Sanibel, Florida 33957
(813) 472-4359
Florida Bar No. 0196571

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Objection to Application for Extension of Service Area has been served by ordinary mail upon Kathryn G. W. Cowdery, Attorney for Applicant, 1709-D Mahan Drive, Tallahassee, Florida 32308, this 3th day of April, 1991.

Robert D. Pritt

Robert D. Pritt