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February 24, 1999

FEDERAL EXPRESS

Ms. Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Application by United Water Florida Inc. for
an Extension of Service Area in St. Johns
County, Florida, Docket No. 981637-WS

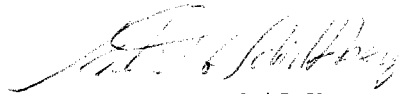
Dear Ms. Bayo:

In connection with the above-referenced matter, please find enclosed for filing an original and seven (7) copies of United Water Florida Inc.'s Motion for Extension of Time ("Motion"). Please file the original Motion and distribute the copies in accordance with your usual procedures.

Also please find enclosed a double sided high density diskette, WordPerfect for Windows 6.1, containing the Motion.

If you have any questions or comments regarding this matter, please do not hesitate to call.

Sincerely yours,


Scott G. Schildberg

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CM _____
- CR _____
- EA _____
- LE 1 _____
- LP 3 _____
- OP _____
- RC _____
- SD 1 _____
- WAS _____
- OTH _____

cc: Mr. Gary R. Moseley
Mr. Randall W. Corbin
Ms. Rosanne Gervasi (by mail and facsimile)
Mr. Kenneth A. Hoffman
Ms. Suzanne Brownless
Mr. F. Marshall Deterding

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DOCUMENT NUMBER-DATE

02495 FEB 25 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application by United Water) DOCKET NO. 981637-WS
Florida, Inc. for an Extension of)
Service Area in St. Johns County,) DATE SUBMITTED FOR FILING:
Florida) February 24, 1999
_____)

**United Water Florida Inc.'s
Motion for Extension of Time**

United Water Florida Inc. ("United Water Florida"), pursuant to Rule 28-106.204, Florida Administrative Code ("FAC"), by and through its undersigned attorneys, hereby moves the Florida Public Service Commission ("Commission") to extend the time for United Water Florida to file its direct testimony and exhibits from March 1, 1999, to March 22, 1999, and also to extend the time for filing of Intervenors' direct testimony and exhibits, Staff's testimony and exhibits, Rebuttal testimony and exhibits, and the Prehearing Statements by the same three (3) week period, and as grounds therefore states as follows:

1. On February 22, 1999, the Commission issued Order No. PSC-99-0373-PCO-WS, the Order Establishing Procedure in Docket No. 981637-WS ("Procedure Order").

2. The Procedure Order allows three (3) weeks for the preparation of all testimony and exhibits other than United Water Florida's direct testimony and exhibits. Intervenors have three (3) weeks after the filing of the utility's direct testimony and exhibits (from March 1, 1999 to March 22, 1999) to file their direct testimony and exhibits. The Staff has three (3) weeks after the filing of the Intervenors' direct testimony and exhibits (from

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

March 22, 1999 to April 12, 1999) to file its testimony and exhibits. Rebuttal testimony and exhibits are not due until three (3) weeks after the filing of the Staff's testimony and exhibits (April 12, 1999 to May 3, 1999).

3. The Procedure Order only allows United Water Florida one (1) week to respond to the Procedure Order and prepare and file its direct testimony and exhibits.

4. United Water Florida requires more time to adequately prepare and file its direct testimony and exhibits.

5. If United Water Florida's request for an extension of time is granted, the filing dates for Intervenors' direct testimony and exhibits, Staff's direct testimony and exhibit, rebuttal testimony and exhibits, and Prehearing Statements also can be extended by the same amount of time without requiring the dates for the Prehearing Conference or Hearing to be changed.

6. Kenneth A. Hoffman, attorney for the Jacksonville Electric Authority ("JEA"), has advised the attorneys for United Water Florida that (1) he consents to the requested extension of time provided that JEA's needs set forth in the rest of this paragraph 6 are satisfied; (2) an April 5, 1999, date for filing Intervenors' direct testimony and exhibits is not acceptable because of scheduling conflicts; and (3) an April 12, 1999, date for filing Intervenors' direct testimony and exhibits is acceptable.

7. Granting the extension of time will allow United Water Florida to help develop a better and more complete record upon which the Commission can base its final decision.

8. No prejudice will occur to any party in this matter if United Water Florida is granted the requested extension of time and all parties will benefit if United Water Florida is provided the time to provide correct and accurate testimony and exhibits.

9. United Water Florida has contacted Mr. Hoffman, attorney for the JEA, and F. Marshall Deterding, attorney for Intercoastal Utilities, Inc. United Water Florida also has contacted Suzanne Brownless, attorney for St. Johns County, even though the Commission has not yet ruled on St. Johns County's motion regarding its participation and intervention. The three (3) attorneys do not object to this extension of time.


WHEREFORE, United Water Florida moves the Florida Public Service Commission to grant an extension of time as follows:

- | | |
|--|----------------|
| 1. Utility's direct testimony
and exhibits | March 22, 1999 |
| 2. Intervenors' direct testimony
and exhibits | April 12, 1999 |
| 3. Staff's direct testimony
and exhibits | May 3, 1999 |
| 4. Rebuttal testimony
and exhibits | May 24, 1999 |
| 5. Prehearing Statements | June 1, 1999 |

Dated this 24th day of February, 1999.

Respectfully submitted,

**MARTIN, ADE, BIRCHFIELD &
MICKLER, P.A.**

By: 
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**Attorneys for United Water
Florida Inc.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and seven copies of United Water Florida Inc.'s Motion for Extension of Time has been furnished by Federal Express this 24th day of February, 1999, to Blanca Bayo, Director, Division of Records and Reporting, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, and a copy of the foregoing has been furnished to Rosanne Gervasi, Esquire, Florida Public Service Commission, Division of Legal Services, Tallahassee, Florida 32399-0850, Kenneth A. Hoffman, Esquire, Rutledge Law Firm, Post Office Box 551, Tallahassee, Florida 32302, Suzanne Brownless, Esquire, Suzanne Brownless, P.A., 1311-B Paul Russell Road, Suite 201, Tallahassee, Florida 32301, and F. Marshall Deterding, Esquire, Rose, Sundstrom & Bentley, LLP, 2548 Blaiirstone Pines Drive, Tallahassee, Florida 32301, by U.S. Mail, this 24th day of February, 1999.



Attorney