

In re: Application of United Water)
Florida, Inc. for amendment of water)
and wastewater certificates in St.)
Johns County, Florida.)
_____)

Docket No. 98-0373-W

RECORDS AND
REPORTING

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MOTION FOR EXTENSION OF TIME

Comes now, Intercoastal Utilities, Inc. (hereinafter "Intercoastal"), by and through their undersigned attorneys, and files this Motion for Extension of Time to file its direct testimony and other controlling dates as outlined in pre-hearing Procedural Order No. PSC-99-0373-PCO-WS, dated February 22, 1999 as amended by Order No. PSC-99-0424-PCO-WS and in support thereof states as follows:

I.

The Pre-hearing Procedural Order as amended (collectively referred hereinafter as the "Pre-hearing Procedure Order") provides that United Water Florida, Inc.'s (hereinafter "UWF" or "Applicant") direct testimony in support of its Application was due to be filed on

ACK _____ March 22, 1999. The final hearing date is currently scheduled for
AFA _____ June 30, 1999. In between the filing of direct testimony of UWF and
APP _____
CAF _____ the date of hearing, there is substantial time to permit all parties
CMU _____
CTR _____ additional time to prepare their case and submit appropriate testimony
EAG _____ well in advance of the hearing, even with an extension as proposed
LEG 1 _____
LIN 3 _____ herein.
OPC _____
RCH _____
SEC 1 _____
WAS _____
OTH _____

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II.

United Water Florida, Inc. provided very extensive testimony in support of their Application for Extension of Service Territory on March 22, 1999. Under the current schedule, the testimony of "Intervenors" (more correctly Protestants) including Intercoastal is due to be filed on April 12, 1999, exactly three weeks after the filing of the direct testimony by the Applicant. The staff testimony is then due to be filed on May 3, 1999 with rebuttal testimony by the Applicant due on May 24, 1999.

III.

The undersigned representatives of Intercoastal have discussed their concerns and available solutions with representatives of the Commission staff. Based upon staff counsel's suggestions, Intercoastal hereby proposes that the dates in the Pre-hearing Procedure Order be revised so as to allow the Protestants (including Intercoastal Utilities) an additional 10 days in which to file their testimony, and a like change to the other controlling dates outlined in the pre-hearing order, up to and through the date for the pre-hearing conference.

IV.

Between Thursday, April 1, 1999 and Monday, April 5, 1999, the undersigned counsel has contacted the attorneys representing the Complainants (JEA and St. Johns County), as well as counsel to the Applicant, UWF, to seek their approval of this Motion for Extension of

Time in which to file direct testimony of the Complainants and revision to the other controlling dates. Both of the other Protestants agreed they had no objection to extensions of the type proposed herein. Counsel to the Applicant has taken no position as of the date of filing this Motion.

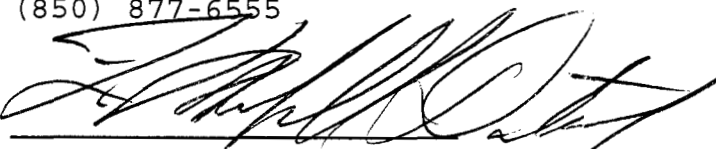
V.

Given that the hearing as scheduled for this proceeding is not to occur until June 30 through July 2, 1999, an extension of the controlling dates as outlined herein will still provide ample time prior to hearing for the completion of those requirements and will also allow more appropriate allocation of that time between the various parties, no parties are prejudiced by this Extension of Time and the majority of the parties are in agreement that it is acceptable and in the public interest.

WHEREFORE, Intercoastal Utilities, Inc. hereby requests that the Pre-hearing Officer revise the controlling dates as outlined in the body of this Motion.

Respectfully submitted this
5th day of April, 1999, by:

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(850) 877-6555


F. MARSHALL DETERDING
JOHN L. WHARTON

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing has been furnished by telecopy, regular U.S. Mail and *hand delivery to the following on this 5th day of April, 1999.

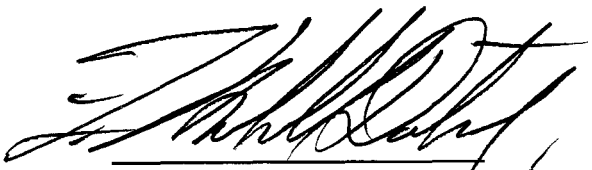
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