



JACK SHREVE PUBLIC COUNSEL

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 RECEIVED-FPSC 01 FEB 21 PM 4: 21 RECORUS AND REPORTING

February 21, 2001

Ms. Blanca S. Bayó, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0870

RE: Docket No. 991643-SU

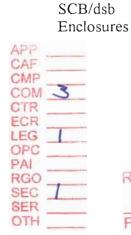
Dear Ms. Bayó:

Enclosed are an original and fifteen copies each of a Motion for Reconsideration and Request for Oral Argument for filing in the above-referenced docket.

Also Enclosed is a 3.5 inch diskette containing the Motion for Reconsideration in WordPerfect for Windows 6.1 format. Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,

Stephen C. Burgess Deputy Public Counsel







FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Application for increase in wastewater rates in Seven Springs System in Pasco County by Aloha Utilities, Inc.

Docket No. 991643-SU Filed: February 21, 2001

REQUEST FOR ORAL ARGUMENT

The Citizens of the State of Florida, through their attorney, the Public Counsel, pursuant to Rule 25-22.058, Florida Administrative Code, hereby request oral argument on their Motion for Reconsideration, filed in this docket contemporaneously with this pleading. As grounds, the Citizens submit:

1. In their motion, the Citizens assert, among other allegations, that in reaching its findings, the Commission applied policy from two previous cases that are factually distinguishable from the current set of circumstances. If, in fact, the Commission did apply factually distinguishable cases, then obviously the Commission overlooked the nuances that distinguish the current case from the cited cases. The OPC seeks the opportunity to demonstrate the distinctions, and believes that the give-and-take format of oral argument would be the most effective means to assure that demonstration. Accordingly, in the interest of assuring that the Commission does not perpetuate this unintentional injustice caused by overlooking a significant factual distinction, the Commission should grant oral argument for this motion.

Respectfully submitted,

Jack Shreve

Public Counsel Stephen C. Burgess

Deputy Public Counsel

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Office of the Public Counsel c/o The Florida Legislature 111 West Madison Street Tallahassee, Florida 32399-1400 (850) 488-9330

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Attorneys for the Citizens of the State of Florida

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CERTIFICATE OF SERVICE DOCKET NO. 991643-SU

I HEREBY CERTIFY that a copy of the foregoing REQUEST FOR ORAL ARGUMENT

has been furnished by U.S. Mail or *hand-delivery to the following parties this 21st day of February,

2001.

Ralph Jaeger* Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

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F. Marshall Deterding, Esquire Rose, Sundstrom and Bentley, LLP 2548 Blairstone Pines Drive Tallahassee, Florida 32301

Stephen C. Burgess Deputy Public Counsel