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August 28, 2001

HAND DELIVERY

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

> Re: Docket No. 010006-WS

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Florida Waterworks Association ("FWA") are the original and fifteen copies of Florida Waterworks' Agreed Motion for Extension of Time to File Prefiled Testimony.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

JSM/knb Enclosures

Counsel of Record

RECEIVED & FILED

DOCUMENT NUMBER-DATE 10698 AUG 28 =

FPSC-COMMISSION CLERK

In re: Water and wastewater)	
industry annual reestablishment)	
of authorized range of return on)	Docket No. 010006-WS
on common equity for water and)	
wastewater utilities pursuant to)	Filed: August 28, 2001
Section 367.081(4)(f), F.S.)	
)	

FLORIDA WATERWORKS ASSOCIATION'S AGREED MOTION FOR EXTENSION OF TIME TO FILE PREFILED TESTIMONY

Florida Waterworks Association ("FWA"), by and through its undersigned counsel and pursuant to Rule 28-106.204, Florida Administrative Code, hereby files this agreed motion requesting a seven day extension of time for the filing of Prefiled Testimony and Exhibits. In support of this motion, FWA states as follows:

Pursuant to the Order Establishing Procedure entered in this docket, Order No. PSC-01-1447-PCO-WS issued July 6, 2001, the prefiled direct testimony and exhibits of FWA are due on August 31, 2001. On August 23, 2001, the Office of Public Counsel filed Citizens' Notice of Intervention which was confirmed by the Order Acknowledging Intervention, Order No. PSC-01-1727-PCO-WS issued August 24, 2001. Under the current schedule established in the Order Establishing Procedure, the Intervenor's prefiled direct testimony and exhibits are also due on August 31, 2001.

During the course of preparation of the prefiled direct testimony, counsel for FWA has concluded that the testimony of an additional expert witness who can explain some of the unique issues facing water and wastewater utilities in the state of Florida may be beneficial for the Commission. Efforts have been undertaken to develop such testimony with an appropriate expert witness. However, due to summer vacations and scheduling conflicts the ability to fully develop the

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complex issues in this docket has been limited. Additional time to finalize the testimony would enable FWA to better frame the issues for the Commission.

Undersigned counsel for FWA has contacted counsel for Intervenor and counsel for Staff and has been advised that they do not object to this request for a seven day extension for filing prefiled direct testimony for both FWA and Intervenor. Granting this extension should not otherwise impact upon the controlling dates for this docket. If granted, the prefiled direct testimony of FWA and the Intervenor would be due September 7, 2001. Staff's direct testimony and exhibits are due September 21, 2001. Rebuttal Testimony and Exhibits are currently due September 28, 2001. Prehearing statements are due October 5, 2001 with a prehearing conference scheduled for October 22. The hearing is scheduled for November 5, 2001.

WHEREFORE, for the foregoing reasons, Florida Waterworks Association respectfully requests that the Order Establishing Procedure be amended to reflect a seven day extension of time, up to and until September 7, 2001, for the filing of Prefiled Direct Testimony and Exhibits of FWA and Intervenor in this proceeding.

Respectfully submitted,

Kenneth A. Hoffman, Esq.

J. Stephen Menton, Esq.

Rutledge, Ecenia, Purnell & Hoffman, P.A.

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Attorneys for Florida Waterworks Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing testimony has been furnished by Hand Delivery this 27th day of August, 2001 to:

Stephen C. Burgess Deputy Public Counsel Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400

Ralph Jaeger Florida Public Service Commission 2540 Shumard Oak Blvd. Room 370 Tallahassee, FL 32399-0850

J. Stephen Menton

 $F: \verb|VISERS| ROXANNE| Leveraging| motion extension$