

HOPPING GREEN SAMS & SMITH
PROFESSIONAL ASSOCIATION

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET
POST OFFICE BOX 6526
TALLAHASSEE, FLORIDA 32314

(850) 222-7500

FAX (850) 224-8551

FAX (850) 425-3415

www.hgss.com

ANGELA R. MORRISON
ERIC T. OLSEN
GARY V. PERKO
MICHAEL P. PETROVICH
DAVID L. POWELL
CAROLYN S. RAEPPLE
DOUGLAS S. ROBERTS
D. KENT SAFRIET
GARY P. SAMS
TIMOTHY G. SCHOENWALDER
ROBERT P. SMITH
DAN R. STENGLE
CHERYL G. STUART
JENNIFER A. TSCHETTER
—
OF COUNSEL
ELIZABETH C. BOWMAN

JAMES S. ALVES
BRIAN H. BIBEAU
RICHARD S. BRIGHTMAN
DIANE W. CARR
KEVIN B. COVINGTON
T. SPENCER CROWLEY, III
BRIAN A. CRUMBAKER
PETER C. CUNNINGHAM
RALPH A. DeMEO
WILLIAM H. GREEN
MATTHEW L. HICKS
WADE L. HOPPING
GARY K. HUNTER, JR.
JONATHAN T. JOHNSON
ROBERT A. MANNING
FRANK E. MATTHEWS
RICHARD D. MELSON
KYLE V. MITCHELL

October 29, 2001

BY HAND DELIVERY

Blanca Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket No. 000694-WU

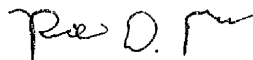
Dear Ms. Bayó:

Enclosed for filing on behalf of Water Management Services, Inc. are the original and fifteen copies of its Motion for Extension of Time.

If you have any questions regarding this filing, please give me a call.

By copy of this letter, copies of this motion are being furnished to the parties on the attached service list.

Very truly yours,



Richard D. Melson

cc: Gene Brown

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Water)
Management Services, Inc. for) Docket No. 000694-WU
limited proceeding to increase)
water rates in Franklin County) Filed: October 29, 2001
_____)

MOTION FOR EXTENSION OF TIME

Water Management Services, Inc. (WMSI) hereby moves for an extension of time to file its request to establish Phase Two temporary rates in this docket. In support of this motion, WMSI states:

1. By Order No. PSC-00-2227-PAA-WU issued on November 21, 2000 ("Order"), the Commission approved WMSI's limited proceeding petition ("Petition") for Phase One of a temporary rate increase in connection with the installation of a new water main to connect its wells on the mainland to its service territory on St. George Island.

2. In its Petition, WMSI originally requested that the Phase One rates be replaced by Phase Two rates on January 1, 2002. In the Order, the Commission found that it would be more logical to extend Phase One through June 30, 2002. (Order, page 8) This decision was based in part on the fact that there was some uncertainty regarding the appropriate Phase Two rates and time-frame, and that better estimates of construction and loan

costs would be available if the Phase Two date were delayed. (Order, page 9) While the Order contemplated that Phase Two rates would be implemented on June 30, 2002, the Order did not contain a specific termination date for Phase One rates and it did not contain a specific filing date for Phase Two rates.

3. WMSI requests that it be permitted to extend the date for filing its Phase Two rate request until November 1, 2002. The reasons for this request are:

a. Given the current project schedule and the availability of funding from the DEP's revolving trust fund, the Phase One rates are now projected to provide sufficient cash flow to cover the utility's requirements through early 2003.

b. The contracts for major construction are now projected to be let during the first quarter of 2002.

c. The eminent domain case through which WMSI is seeking to recover all or part of the costs of constructing the new main is now projected to go to trial during the second quarter of 2002.

d. WMSI's regulatory counsel will be on sabbatical from approximately May 15 to October 15, 2002 and hence will be unavailable to assist in processing the Phase Two request during that time frame.

4. Given these factors, it is not possible for WMSI to file its Phase Two application with the best available information on final projected costs and to process that application to completion prior to the time that its counsel becomes temporarily unavailable.

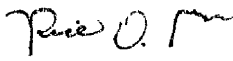
5. Delaying the filing for and implementation of Phase Two rates will not prejudice the utility's customers or the utility. First, it will delay the date that customers experience any additional rate increase. Second, both the Phase One and Phase Two rates will be trued-up in Phase Three of this proceeding, protecting both the customers and the utility against any over- or under-recovery during the time the temporary rates are in effect.

6. Because the Order did not establish either a specific termination date for Phase One rates or a specific filing timeframe for Phase Two rates, it is not clear that further action by the Commission is required in order for WMSI to delay its Phase Two filing. This motion is filed out of an abundance of caution to provide the Commission notice of WMSI's desire to delay filing until November 1, 2002 and to obtain any approval that the Commission deems necessary.

WHEREFORE, WMSI moves the Commission to acknowledge and/or approve WMSI delaying its Phase Two filing until November 1, 2002.

RESPECTFULLY SUBMITTED this 29th day of October, 2001.

HOPPING GREEN & SAMS, P.A.

By: 

Richard D. Melson
P.O. Box 6526
Tallahassee, FL 32314
(850) 425-2313

Attorneys for
Water Management Services, Inc.

CERTIFICATE OF SERVICE

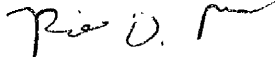
I HEREBY CERTIFY that a true copy of the foregoing was furnished by this 29th day of October, 2001 to the following:

Jason Fudge
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

by hand delivery

Jack Shreve
Office of Public Counsel
111 W. Madison St., Room 812
Claude Pepper Building
Tallahassee, FL 32399-1400

by U.S. Mail



Attorney