

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Water and wastewater
industry annual reestablishment
on authorized range of return on
common equity for water and wastewater
utilities pursuant to Section 367.081(4)(f), F.S.

Docket No. 020006-WS

Filed: September 16, 2002

**FLORIDA WATER SERVICES CORPORATION'S
MOTION FOR CONTINUANCE AND RESCHEDULING OF
REMAINING CONTROLLING DATES**

Florida Water Services Corporation ("Florida Water"), by and through its undersigned counsel and pursuant to Rule 28-106.210, Florida Administrative Code, hereby requests that the Prehearing Officer grant a continuance of the final hearing currently scheduled for October 16, 2002, and a postponement and rescheduling of the current dates for the filing of rebuttal testimony, and for the prehearing conference. In support of this Motion, Florida Water states as follows:

1. Pursuant Order No. PSC-02-0898-PAA-WS (the "PAA Order"), issued July 5, 2002, the Commission proposed to establish the authorized range of returns on common equity for water and wastewater utilities.

2. On July 26, 2002, Florida Water filed an Amended Petition protesting that portion of the PAA Order proposing to apply the leverage formula methodology to all water and wastewater utilities that currently have an authorized return on equity. On the same day, the Office of Public Counsel ("OPC") filed an objection to that portion of the PAA Order addressing the leverage formula methodology and results. On August 26, 2002, OPC withdrew its objection and petition for formal proceedings.

DOCUMENT NUMBER-DATE

09828 SEP 16 02

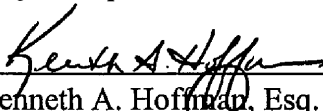
FPSC-COMMISSION CLERK

3. Accordingly, the only issues that remain pending for hearing are those issues set forth in Florida Water's Amended Petition filed on July 26, 2002. Pursuant to the Order Establishing Procedure (Order No. PSC-02-1104-PCO-WS) issued August 12, 2002, the final hearing on Florida Water's protest is scheduled for October 16, 2002. In addition, under the Order Establishing Procedure, Intervenor and Staff testimony as well as Prehearing Statements are due September 16, 2002; Florida Water's rebuttal testimony is due September 30, 2002; and the Prehearing Conference is scheduled for September 30, 2002.

4. In view of the potential sale of Florida Water's assets, Florida Water requests that the remaining controlling dates, including the date for the final hearing, be continued and rescheduled at future dates as determined to be appropriate by the Prehearing Officer. Florida Water believes that a continuance and rescheduling of all remaining controlling dates will provide administrative economy and potentially avoid the unnecessary expenditure of resources by the Commission, Commission staff and Florida Water.

WHEREFORE, for the foregoing reasons, Florida Water respectfully requests that the Prehearing Officer enter an order granting this Motion, continuing the date for final hearing, and rescheduling the remaining controlling dates set forth in the Order Establishing Procedure.

RESPECTFULLY submitted this 16th day of September, 2002.



Kenneth A. Hoffman, Esq.
J. Stephen Menton, Esq.
Rutledge, Ecenia, Purnell & Hoffman, P.A.
P. O. Box 551
Tallahassee, FL 32302
(850) 681-6788 (telephone)
(850) 681-6515 (fax)

Attorneys for *Florida Water Services Corporation*

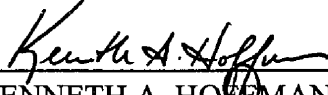
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U.S. Mail (* hand delivery) to the following this 16th day of September, 2002:

Adrienne Vining, Esq. (*)
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 370
Tallahassee, FL 32399-0850

Mary Anne Helton, Esq. (*)
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 370
Tallahassee, FL 32399-0850

Stephen C. Burgess, Esq.
Office of Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400



KENNETH A. HOFFMAN, ESQ.

F:\USERS\ROXANNE\Leveraging\motionforcontinuance