

RUTLEDGE, ECENIA, PURNELL & HOFFMAN ORIGINAL

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA
RICHARD M. ELLIS
KENNETH A. HOFFMAN
THOMAS W. KONRAD
MICHAEL G. MAIDA
MARTIN P. McDONNELL
J. STEPHEN MENTON

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

R. DAVID PRESCOTT
HAROLD F. X. PURNELL
MARSHA E. RULE
GARY R. RUTLEDGE
GOVERNMENTAL CONSULTANTS
MARGARET A. MENDUNI
M. LANE STEPHENS

December 20, 2002

Ms. Blanca Bayo, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

HAND DELIVERY

RECEIVED FPSC
22 DEC 20 PM 3:42
COMMISSION
CLERK

Re: Docket No. 021066-WS

Dear Ms. Bayo:

Enclosed with this letter on behalf of Florida Services Corporation ("Florida Water") are the original and fifteen copies of Florida Water's Motion for Extension of Time to File Response to Office of Public Counsel's Motion to Compel.

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,


Kenneth A. Hoffman

KAH/rl
Enclosures
cc: All Parties of Record
021066\Bayo.1220

US _____
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
13913 DEC 20 02

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into proposed sale of)
Florida Water Services Corporation)
_____)

Docket No. 021066-WS
Filed: December 20, 2002

**FLORIDA WATER SERVICES CORPORATION'S
MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO OFFICE OF PUBLIC COUNSEL'S
MOTION TO COMPEL**

Florida Water Services Corporation ("Florida Water"), by and through its undersigned counsel, and pursuant to Rule 28-106.204(5), Florida Administrative Code, hereby requests a seven day extension of time for the filing of Florida Water's Response to the Office of Public Counsel's ("OPC") Motion to Compel filed December 17, 2002, in the above-referenced docket. In support of this Motion, Florida Water states as follows:

1. On November 8, 2002, OPC served its First Set of Requests for Production of Documents to Florida Water. On November 25, 2002, Florida Water filed Objections to OPC's document requests. In the meantime, and notwithstanding Florida Water's Objections, Florida Water has provided OPC with copies of numerous documents related to Florida Water's anticipated sale of assets to the Florida Water Services Authority.

2. On December 17, 2002, OPC filed a Motion to Compel. OPC faxed a copy of its Motion to the undersigned counsel thereby requiring a response to the Motion on December 24, Christmas Eve.¹

3. The undersigned counsel is engaged in a number of prior existing commitments that make it difficult to timely file a response to OPC's Motion to Compel on or before Christmas Eve.

¹See Fla.Admin.Code R. 28-106.103 and 28-106.204(1).

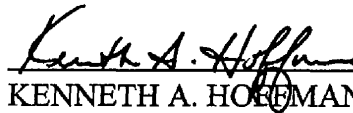
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FPSC-COMMISSION CLERK

Accordingly, Florida Water requests a seven day extension of time up to and until December 31, 2002, for the filing of its response (which amounts to only two additional days had OPC served its Motion to Compel on Florida Water, as it did other parties, by U.S. Mail).

4. Counsel for Florida Water has conferred with counsel for OPC and is authorized to represent that OPC does not object to the extension of time requested in this Motion.

WHEREFORE, for the foregoing reasons, Florida Water respectfully requests that the Prehearing Officer enter an Order granting this Motion authorizing an extension of time up to and until December 31, 2002 for Florida Water to file its Response to OPC's Motion to Compel.

Respectfully submitted,



KENNETH A. HOFFMAN, ESQUIRE
J. STEPHEN MENTON, ESQUIRE
RUTLEDGE, ECENIA, PURNELL & HOFFMAN, P.A.
P.O. BOX 551
TALLAHASSEE, FLORIDA 32302
(850) 681-6788 (Telephone)
(850) 681-6515 (Telecopier)

Attorneys for Florida Water Services Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of Florida Water Motion for Extension of Time to File Response to Office of Public Counsel's Motion to Compel was furnished by U.S. Mail, this 20th day of December, 2002, to the following:

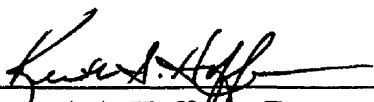
John R. Marks, III,
Knowles, Marks & Randolph, P.A.
215 S. Monroe Street, Suite 130
Tallahassee, Florida 32301

Lorena Holley, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard, 3rd Floor
Gunter Building
Tallahassee, Florida 32399-0850

Charles J. Beck
Deputy Public Counsel
Office of Public Counsel
c/o the Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400

Thomas C. Palmer, Esquire
Collier County Board of Commissioner
3301 East Tamiami Trail
Administrative Building, 8th Floor
Naples, Florida 34112

Mr. Chuck Lewis
Hernando County Board of County Commissioners
20 North Main Street, Room 461
Brooksville, Florida 34601-2849



Kenneth A. Hoffman, Esq.