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REPLY TO ALTAMONTE SPRINGS

January 8, 2003

**VIA HAND DELIVERY**

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

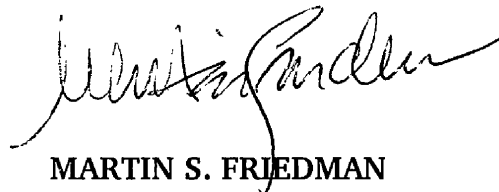
Re: Docket No. 020010-WS; Highvest Corporation's and L.P. Utilities Corporation's  
Protest of PAA SARC Order  
Our File No.: 37074.01

Dear Ms. Bayo:

Enclosed please find for filing in the above-referenced docket an original and seven (7) copies of Highvest Corporation's and L.P. Utilities Corporation's Motion to Amend Petition for Formal Administrative Hearing.

Please give me a call should you have any questions concerning this matter.

Very truly yours,



MARTIN S. FRIEDMAN  
For the Firm

MSF:dmp  
Enclosures

cc: Mr. John H. Lovelette (w/enclosure)

DOCUMENT NUMBER-DATE

00245 JAN-8 8

FPSC-COMMISSION CLERK

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for staff-assisted  
rate case in Highlands County by  
the Woodlands of Lake Placid, L.P.

DOCKET NO.: 020010-WS

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**MOTION TO AMEND PETITION FOR FORMAL  
ADMINISTRATIVE HEARING**

Petitioners, HIGHVEST CORPORATION (“Highvest”), and L.P. UTILITIES CORPORATION (“L.P.”), by and through their undersigned attorneys and pursuant to Rule 28-106.202, Florida Administrative Code, move this Commission for an order allowing amendment to their Petition for Formal Administrative Hearing, and in support thereof state:

1. On December 30, 2002, Petitioners filed a Petition for Formal Administrative Hearing with regard to Commission Order No. PSC 02-1739-PAA-WS (“PAA Order”).
2. Upon further review of the PAA Order, Petitioners believe that the imputation of revenue for the cost of the water and wastewater service that should have been billed to the Resort for its rental lots is overstated.
3. No procedural order has been entered and obviously no pre-filed testimony has been filed. Thus, there is no prejudice to the Staff or any other party by allowing this amendment.
4. Pursuant to Rule 28-106-202, Florida Administrative Code, a petition may be amended after designation of the presiding officer only upon order of the presiding officer.
5. The Commission has broad discretion to allow amendment of pleadings and the Commission has followed a “policy of allowing pleadings to be freely amended in order that disputes may be resolved on the events.” PSC Order No. PSC-01-1168-PCO-TP, issued May 22, 2001 (Commissioner Deason as Prehearing Officer).

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

WHEREFORE, Petitioners request the Prehearing Officer allow amendment to their Petition to include the issue set forth in paragraph 2 hereof.

Respectfully submitted on this 8<sup>th</sup> day of January, 2003, by:

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By:   
MARTIN S. FRIEDMAN

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

Hand Delivery this 8<sup>th</sup> day of January, 2003, to:

Katherine Echternacht, Esquire  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Larry Harris, Esquire  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

By:   
MARTIN S. FRIEDMAN