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REPLY TO ALTAMONTE SPRINGS

MARTIN S. FRIEDMAN, P.A.

VALERIE L. LORD, *OF COUNSEL*
(LICENSED IN TEXAS ONLY)

RECEIVED-FPSC
SEP 12 PM 3:49
COMMISSION
CLERK

September 11, 2003

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

Re: Docket No. 020745-SU; Application of Island Environmental Utility, Inc., for
Original Certificate
Our File No.: 37025.01

Dear Ms. Bayo:

Enclosed please find for filing in the above-referenced docket the original and seven (7) copies of Island Environmental Utility, Inc.'s Response to Motion for Extension of Time to File Testimony.

Very truly yours,



MARTIN S. FRIEDMAN
For the Firm

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC _____
OTH _____

MSF/mp
Enclosures

cc: Rosanne Gervasi, Esquire (w/enclosure)
Mr. Daniel Nolan (w/enclosure)
Mrs. Linda Bamfield (w/enclosure)
Mr. Ronald Koenig (w/enclosure)
Mr. John R. Boyer (w/enclosure)

DOCUMENT NUMBER DATE

08649 SEP 12 6

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application of ISLAND)
ENVIRONMENTAL UTILITY, INC., for) DOCKET NO. 020745-SU
original Water Certificate in Charlotte)
County, Florida.)
_____)

RESPONSE TO MOTION FOR EXTENSION OF TIME TO FILE TESTIMONY

ISLAND ENVIRONMENTAL UTILITY, INC. ("Utility"), pursuant to Rule 28-106.204, F.A.C., files this response to Linda Bamfield's Motion for Extension of Time to File Testimony, and states as follows:

1. First, the Motion purports to be filed not only on her own behalf, but also on behalf of Mr. Nolan and Mr. Koenig, the other Intervenors. Ms. Bamfield has no authority to represent the other Intervenors and her Motion must be construed as being applicable only as to her.

2. Ms. Bamfield's request is based upon her assertion that she does not have sufficient information from which to prepare her testimony. She states that she is confused because of the amendment to the legal description. She also complains regarding the lack of specificity regarding several documents and requirements in the Application. What Ms. Bamfield fails to recognize is that until the Commission grants the Application, there are many details that must remain open. For instance, obviously the Utility would not begin the permitting process for the intercoastal crossing to the mainland until its rights to serve the Island are confirmed.

3. Ms. Bamfield's perceived omissions in the filings by the Utility are the

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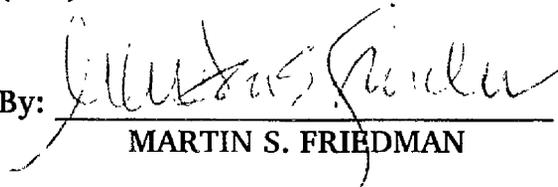
FPSC-COMMISSION CLERK

types of matters which are addressed in discovery. She has failed to avail herself of her rights to discovery. What Ms. Bamfield is attempting to do is to place the blame on the Company for her inadequacy in preparation for filing her prefiled testimony and exhibits. **Ms. Bamfield's complaint regarding this Application as set forth in her original Objection is that she believes that the County, and not a private utility, should provide wastewater services, pointing out the debacle when the County purchased the General Development Utilities' assets, and not wanting it repeated.** None of the issues which she is now raising were included in her original Objection. The issues which she is now seeking to contest are a mere smokescreen for her real objection, which is private ownership of the utility serving the Island.

4. If Ms. Bamfield does not believe that the Utility has filed sufficient information as to a particular issue, her prefiled testimony can state as much. She can then cross-examine witnesses at the final hearing.

Respectfully submitted on this
11th day of September, 2003, by:

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By: 
MARTIN S. FRIEDMAN

CERTIFICATE OF SERVICE
DOCKET NO. 020745-SU

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to the following parties on this 11th day of September, 2003:

Mrs. Linda Bamfield
P.O. Box 5063
Grove City, FL 34224

Mr. Daniel Nolan
156 Bayview Avenue
POB 23 S 4
Port McNicoll, Canada L0K 1R0

Mr. Ronald Koenig
8006 Lago Vista Drive
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Rosanne Gervasi, Esquire
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