

ORIGINAL

Dorothy Menasco

030458-WU

From: Linda Strumski [lstrumski@pascocountyfl.net]  
 Sent: Wednesday, January 10, 2007 4:56 PM  
 To: Filings@psc.state.fl.us  
 Cc: Katherine Fleming; barmstrong@ngn-tally.com; Joseph Richards  
 Subject: Holiday Utility Company  
 Attachments: Objection Ltr.pdf

Attached please find Pasco County's objection to Holiday Utility Company's request for amended service territory.

Linda Strumski  
 Senior Legal Secretary  
 on behalf of  
 Joseph D. Richards  
 Senior Assistant County Attorney  
 Pasco County Attorney's Office  
 7530 Little Road, Suite 340  
 New Port Richey, FL 34654  
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SEC 1

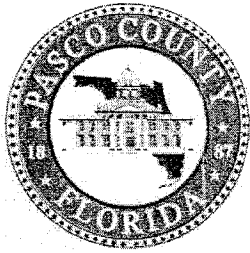
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## PASCO COUNTY, FLORIDA

### OFFICE OF THE COUNTY ATTORNEY

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**Kristi A. Wooden**

January 10, 2007

Director, Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Application for Amended Service Territory  
Notice of appearance and request for formal hearing

Dear Director:

Please accept this as formal notification of Pasco County's objection to Holiday Utility Company's (hereinafter "Holiday") request for amended service territory as described in the December 19, 2006, Legal Notice. Pasco County received a copy of the notice on or about December 20, 2006.

Pursuant to Section 367.045, Florida Statutes, when applying for an amendment of a certificate of authorization, a utility shall provide information, which "may include . . . the need for service in the area involved, and the existence or nonexistence of service from other sources within geographical proximity to the area in which the applicant seeks to provide service." Sec. 357.045(2)(b), Fla. Stat.

We understand that Holiday is requesting expansion of its service area to include a public school it is currently serving outside its certificated area. Pasco County maintains water lines in or adjacent to the area in question. Pasco County also provides wastewater service to the area. Pasco County objects to any expansion of the current service area. Any area not within the certificated service area of a private utility or within a municipality is in the service area of Pasco County and the County is willing and

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Administrative Services  
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better able to serve the areas adjacent to and neighboring Holiday's current service area. Additionally, Holiday's current service to the school is inadequate because it does not provide fire protection water service.

Because Holiday's proposed expansion encroaches into Pasco County's Service area and because of Pasco County's existing lines and ability to provide service, Pasco County objects to the application to amend the certificate of authorization.

Please accept this as Pasco County's request for a formal hearing regarding Holiday's Application for Amendment of Certificate to provide service in Pasco County. This letter also serves as our notice of appearance for this hearing.

Thank you for your attention to this matter.

Respectfully submitted,



Joseph D. Richards,  
Assistant County Attorney

cc: John J. Gallagher, County Administrator  
Bruce E. Kennedy, P.E., Assistant County Administrator, Utilities Services  
Katherine Fleming, PSC Office of General Counsel  
Holiday Utility Company, Inc., P.O. Box 398, New Port Richey, Florida 34652