

**Eric Fryson**

**From:** Michele Parks [mparks@sfflaw.com]  
**Sent:** Monday, May 21, 2012 3:42 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Saylor, Erik; Ralph Jaeger  
**Subject:** {BULK} Docket No.: 110200-WU; Application for Increase in Water Rates in Franklin County by Water Management Services, Inc.

**Importance:** Low

**Attachments:** Request for Oral Argument.pdf

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- b. Docket No.: 110200-WU; Application for Increase in Water Rates in Franklin County by Water Management Services, Inc.
- c. Water Management Services, Inc.
- d. 3 pages
- e. WMSI Request for Oral Argument on Response to OPC's Motion to Establish Discovery Procedures and Motion to Compel Discovery Responses

**MICHELE PARKS**

*Paralegal for Martin S. Friedman and Bridget M. Grimsley*

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DOCUMENT NUMBER DATE

03218 MAY 21 2012

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5/21/2012

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Docket No. 110200-WU

In re: Application for increase in  
Water Rates in Franklin County by  
Water Management Services, Inc.

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**WATER MANAGEMENT SERVICES, INC.'S REQUEST FOR  
ORAL ARGUMENT ON OPC'S MOTION TO ESTABLISH DISCOVERY  
PROCEDURES AND MOTION TO COMPEL DISCOVERY RESPONSES**

Applicant, WATER MANAGEMENT SERVICES, INC. ("WMSI" or the "Utility"), by and through its undersigned attorneys, requests this Commission to allow oral argument on Office of Public Counsel's ("OPC") Motion to Establish Discovery Procedures and Motion to Compel Discovery Responses, and WMSI's Response thereto and, in support thereof, states:

1. The sheer breadth of discovery propounded by OPC in this PAA case is unprecedented, when coupled with Staff's 6 Data Requests consisting of 58 questions with 90 subparts, and Staff's 7 Interrogatories with 41 subparts, and sixteen 16 document requests with at least 28 subparts.

2. The issue of the breadth of OPC's discovery rights in a PAA case has never been decided in a water and/or wastewater case, and it would benefit the Commission to have the ability to question the parties about the practical and legal implications of such rights.

WHEREFORE, WATER MANAGEMENT SERVICES, INC., respectfully requests this Commission to allow oral argument on OPC's Motion to Establish Discovery Procedures,

DOCUMENT NUMBER DATE

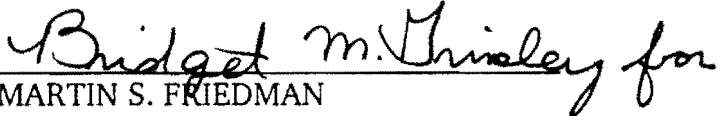
03218 MAY 21 2011

FPSC-COMMISSION CLERK

and Motion to Compel Discovery Responses.

Respectfully submitted on this 21<sup>st</sup> day of  
May, 2012 by:

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MARTIN S. FRIEDMAN  
For the Firm

CERTIFICATE OF SERVICE  
DOCKET NO. 110200-WU

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail and/or E-mail to the following parties this 21<sup>st</sup> day of May, 2012:

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