

Eric Fryson

From: Michele Parks [mparks@sfflaw.com]
Sent: Friday, September 21, 2012 2:22 PM
To: Filings@psc.state.fl.us
Cc: Saylor, Erik; Martha Barrera
Subject: {BULK} b. 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. <![endif]>Water Management Services, Inc.
- d. Request (3 pages)
- e. Request for Oral Argument on Water Management Services, Inc.'s Motion to Allow Withdrawals from Escrow

MICHELE PARKS

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DOCUMENT NUMBER-DATE

06372 SEP 21 2012

FPSC-COMMISSION CLERK

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.

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

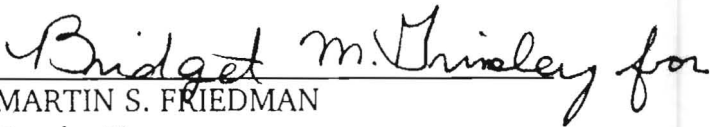
06372 SEP 21 09

FPSC-COMMISSION CLERK

and Motion to Compel Discovery Responses.

Respectfully submitted on this 21st 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 21st day of May, 2012:

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