

Eric Fryson

From: A Tobin <tobinlaw2@gmail.com>
Sent: Wednesday, March 20, 2013 4:56 PM
To: Filings@psc.state.fl.us; Martha Brown; Larry Harris; bart@bartonsmithpl.com; greg@bartonsmithpl.com; kelly.jr@leg.state.fl.us; Shillinger-Bob; dedenkwf@bellsouth.net; AMT
Subject: Docket No. 120054-EM (No Name Key)
Attachments: 2013-03-20 NNKPOA M 4 Leave 2 Renew Petition 2 Intervene.pdf

Please see attached Motion for Leave to Renew Petition to Intervene.

Pamela Piton
Legal Assistant

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Law Offices of Andrew M. Tobin
P.O. Box 620
Tavernier, FL 33070
305.852.3388

DOCUMENT NUMBER-DATE

01404 MAR 20 13

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:

Complaint of Robert D. Reynolds and Julianne C. Reynolds against Utility Board of the City of Key West, Florida d/b/a Keys Energy Services regarding extending commercial electrical transmission lines to each property owner of No Name Key, Florida.

DOCKET NO. 120054-EM

**NO NAME KEY PROPERTY OWNERS ASSOCIATION'S
MOTION FOR LEAVE TO RENEW PETITION TO INTERVENE**

No Name Key Property Owners Association, Inc. (the Association) pursuant to Chapters 120 and 366, Florida Statutes, and Rules 25-22.039, 28-106.201, and 28-106.205, Florida Administrative Code (FAC), hereby renews its petition to intervene in the above-styled matter as a party, and states as follows.

ORDERS GRANTING INTERVENTION

On March 17, 2012 Petitioner Reynolds, et al., filed a petition with the Public Service Commission (the Commission). Thereafter, by order dated May 22, 2012, the Commission granted party status to Monroe County based on its allegation it would lose the ability to enforce its land development regulations if the Commission should grant relief to Reynolds. Thereafter by order dated September 12, 2012, the Commission granted party status to the Association.

REYNOLDS AMENDED PETITION

On March 14, 2013, the PSC granted Reynolds motion to amend. On March 18, 2013, Reynolds served a "Second Amended Complaint."

As the Association seeks the same relief as set forth in Reynold's Second Amended Complaint, the Association should continue to be afforded full party status to participate this proceeding to resolve whether Monroe County may (through its Comprehensive Plan or land development regulations) frustrate the provision of electricity by Keys Energy by denying building permits to homeowners who desire to connect to the electrical grid.

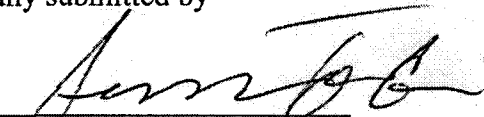
RESTATEMENT OF ASSOCIATION'S PETITION

The Association hereby re-states and re-alleges its prior Petition (filed on 7/26/12) as if set forth herein.

CONCLUSION

Based on the foregoing, No Name Key Property Owner's Association, Inc., prays for an order that allows it to continue to be accorded full party status in the proceedings as amended.

Respectfully submitted by



Andrew M. Tobin, Esq.
Florida Bar No. 184825
Counsel for No Name Key Property Owners
Association, Inc
P.O. Box 620
Tavernier, Florida
(305) 852-3388
tobinlaw@terranovalaw.com
tobinlaw2@gmail.com

CERTIFICATE OF SERVICE

I CERTIFY THAT a true copy of the foregoing was furnished to the following persons by email only on this 20th day of March 2013.

**ROBERT S. WRIGHT and
JOHN T. LAVIA, III**
Attorney for Monroe County
1300 Thomaswood Drive
Tallahassee, Florida 32308
Telephone (850) 385-0070
Facsimile (850) 385-5416

**BARTON W. SMITH, ESQ. and
GREGORY S. OROPEZA, ESQ.,**
Attorney for Reynolds
624 Whitehead Street
Key West, FL 33040
Tele: (305) 296-7227
Fax:(305) 296-8448
Bart@bartonsmithpl.com
Greg@bartonsmithpl.com

J.R. KELLY, ESQ.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400
KELLY.JR@leg.state.fl.us

ROBERT B. SHILLINGER, ESQ.
Chief Assistant County Attorney
1111 12th Street, Suite 408
Key West, Florida 33040
Telephone (305) 292-3470
Telecopier (305) 292-3516

NATHAN EDEN, ESQ.,
Attorney for Keys Energy
302 Southard Street, Suite 205B
Key West FL 33040
Tele: (305) 294-5588
dedenkwf@bellsouth.net

**LAWRENCE HARRIS, ESQ.
MARTHA C. BROWN, ESQ.**
Office of the General Counsel
Public Service Commission
2540 Shumard Oak Boulevard Tallahassee,
Florida 32399
Tele: (850) 413-6187
lharris@psc.state.fl.us
mcbrown@psc.state.fl.us



Andrew M. Tobin, Esq.