

FILE COPY

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December 24, 1996

VIA FEDERAL EXPRESS

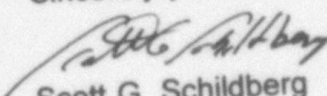
Blanca Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Building, Room 110  
Tallahassee, Florida 32399-0850

RE: Application for Rate Increase in Duval, Nassau, and St. Johns  
Counties by United Water Florida Inc., Docket No. 960451-WS

Dear Ms. Bayo:

In connection with the above-referenced matter, please find enclosed for filing an original and seven copies of a Motion for Extension of Time on behalf of United Water Florida Inc. Please file the original and distribute the copies in accordance with your usual procedures.

If you have any questions or comments regarding this matter, please do not hesitate to call.

Sincerely yours,  
  
Scott G. Schildberg

- ACK
- AFA 1
- APP
- CAF  SGS/msa
- CMU  Enclosures
- CTR  cc:
- EAG
- LEG 1
- LIN 5
- OPC
- RCH
- SEC 1
- WAS Willis
- OTH

- Mr. David E. Chardavoyne
- Mr. Walton F. Hill
- Mr. Robert J. Iacullo
- Mr. Frank J. McGuire
- Mr. Munipli Sambamurthi
- Ms. Rosanne Capeless
- Mr. Harold McLean
- Mr. James L. Ade

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DOCUMENT NUMBER-DATE  
13725 DEC 26 1996  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
FILE COPY

In re: Application for Rate ) DOCKET NO. 960451-WS  
Increase in Duval, Nassau and )  
St. Johns Counties by United ) DATE SUBMITTED FOR FILING:  
Water Florida Inc. ) December 24, 1996  
\_\_\_\_\_ )

United Water Florida Inc.'s  
Motion for Extension of Time

United Water Florida Inc. ("United Water Florida"), pursuant to Rules 1.090(b) and 1.100(b), Florida Rules of Civil Procedure, and Rules 25-22.035(3) and 25-22.037(2), Florida Administrative Code ("FAC"), by and through its undersigned attorneys, hereby moves the Florida Public Service Commission ("Commission") to extend the time for United Water Florida to file its rebuttal testimony from January 8, 1997, to January 10, 1997, and as grounds therefore states as follows:

1. United Water Florida is currently providing answers to Commission Staff's Third Set of Interrogatories - Nos. 79-102.
2. United Water Florida is currently providing documents in response to Commission Staff's Third Request for Production of Documents Nos. 30 and 31. United Water Florida provided the other documents requested in Commission Staff's Third Request for Production on an accelerated basis pursuant to the Staff's request.
3. United Water Florida received testimony on behalf of the Office of Public Counsel on December 12, 1996.
4. United Water Florida received testimony on behalf of the Staff on December 19, 1996.
5. United Water Florida is preparing documents in response to the Staff's requests for approximately 40 late filed exhibits.

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FPSC-RECORDS/REPORTING



The Staff made such requests in its depositions of six (6) of United Water Florida's witnesses, which occurred December 10, 1996, through December 18, 1996. The late filed exhibits are due from December 31, 1996, through January 6, 1997.

6. United Water Florida is preparing an extensive exhibit of rate case expense.

7. United Water Florida is preparing answers to the Commission Staff's Fourth Set of Interrogatories - Nos. 103-136.

8. United Water Florida is obtaining documents for the Commission Staff's Fourth Request for Production of Documents - No. 50.

9. United Water Florida prepared and timely filed its Prehearing Statement on December 20, 1996, which responded to the 73 issues proposed by the Staff in its second draft of issues dated December 6, 1996.

10. The holidays for Christmas and New Year reduce the time available for preparing rebuttal testimony.

11. The same personnel who will be preparing rebuttal testimony and exhibits also are needed to prepare the late filed exhibits, the rate case expense exhibit, answers to interrogatories, responses to requests for production of documents, and other items for the rate case.

12. The rebuttal witnesses will need time to consult with the other witnesses in the preparation of their testimony.

13. Some of the witnesses and United Water Florida Inc.'s attorneys will be participating in the January 3, 1997, preprehearing meeting and the January 6, 1997, prehearing

conference, both of which will require their time for preparation and attendance, either in person or by telephone.

14. United Water Florida anticipates that it will need two (2) additional days to complete and file its Rebuttal Testimony and exhibits and provide them to the Staff and Public Counsel. No prejudice will occur to any party in this matter if United Water Florida is granted an extension of two days and all parties will benefit if United Water Florida is provided the time to provide correct and accurate rebuttal testimony.

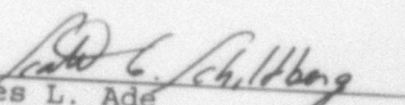
15. United Water Florida has contacted Ms. Rosanne G. Capeless, the attorney for the Staff of the Commission, and Mr. Harold McLean, attorney for the Office of Public Counsel, and the two attorneys do not object to this extension of time.

WHEREFORE, United Water Florida moves the Florida Public Service Commission to grant it an extension of time until January 10, 1997, to file its Rebuttal Testimony.

Dated this 24th day of December, 1996.

Respectfully submitted,

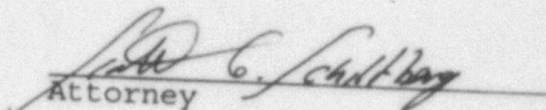
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Telephone: (904) 354-2050  
Attorneys for United Water  
Florida Inc.



Certificate of Service

I HEREBY CERTIFY that the original and seven copies of the United Water Florida Inc.'s Motion for Extension of Time has been furnished by Federal Express and one copy by facsimile this 24th day of December, 1996, to Blanca Bayo, Director, Division of Records and Reporting, Florida Public Service Commission, 2450 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, and a copy of the foregoing has been furnished to Rosanne G. Capeless, Attorney for the Staff of the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, and to Harold McLean, Esquire, Office of Public Counsel, c/o The Florida Legislature, 111 W. Madison Street, Room 812, Tallahassee, Florida 32399-1400, by U.S. Mail and by facsimile, this 24th day of December, 1996.

  
Attorney

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