

ORIGINAL
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for rate)
increase and increase in service)
availability charges by Southern)
States Utilities, Inc., for)
Orange-Osceola Utilities, Inc. in)
Osceola County, and in Bradford,)
Brevard, Charlotte, Citrus, Clay,)
Collier, Duval, Highlands, Lake,)
Lee, Marion Martin, Nassau, Orange,)
Osceola, Pasco, Putnam, Seminole,)
St. Johns, St. Lucie, Volusia,)
and Washington Counties.)

Docket No. 950495-WS

Filed: February 11, 1997

FLORIDA WATER SERVICES CORPORATION'S
REQUEST FOR ORAL ARGUMENT ON MOTION FOR RECONSIDERATION
OF ORDER NO. PSC-97-0099-FOF-WS

FLORIDA WATER SERVICES CORPORATION, formerly known as Southern States Utilities, Inc. (hereinafter "Florida Water" or "Utility"), by and through its undersigned counsel, and pursuant to Rule 25-22.060(1)(f), Florida Administrative Code, hereby requests the Commission to grant it oral argument on Florida Water's Motion for Reconsideration of Order No. PSC-97-0099-FOF-WS, filed on even date herewith. In support of this Request, Florida Water states as follows:

1. Order No. PSC-97-0099-FOF-WS (the "Stay Order") granted in part and denied in part Florida Water's Motion to Stay Refund of Interim Rates and Reduction to AFPI Charges Pending Appeal and Motion to Release/Modify Bond Securing Refund of Interim Rates. Specifically, the Stay Order (1) granted a stay of the refund of interim rates to Lehigh and Marco Island wastewater customers required by Order No. PSC-99-1320-FOF-WS, issued October 30, 1996 (the "Final Order"); (2) denied any reduction to the amount of the bond securing a refund of interim revenues during the pendency of

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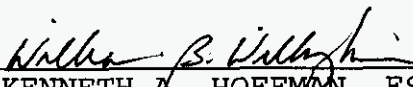
the appeal; and (3) denied a stay of reduced Allowance for Funds Prudently Invested ("AFPI") charges imposed by the Final Order. Florida Water seeks reconsideration of the Stay Order insofar as it denied Florida Water's Motion to Stay Reduction to AFPI Charges Pending Appeal (the "AFPI Stay Motion").

2. By Motion filed on even date herewith, Florida Water has sought reconsideration of that portion of the Stay Order which denied Florida Water's AFPI Stay Motion. Florida Water requests oral argument on said Motion for Reconsideration.

3. Oral argument will aid the Commission's understanding of the mistakes of law and fact which the Commission made in denying the AFPI Stay Motion. Oral argument is particularly useful and critical in this case because of the complex nature of the primary and alternative requests for relief underlying the AFPI Stay Motion and the resulting errors the Commission made in evaluating such in the Stay Order.

WHEREFORE, in consideration of the foregoing, Florida Water Services Corporation requests that the Commission grant oral argument of Motion for Reconsideration of Order No. PSC-97-0099-FOF-WS.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U.S. Mail to the following on this 11th day of February, 1997:

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