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September 12, 1997

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Ms. Blanca Bayo, Director  
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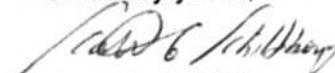
Re: Application for Certificates to Provide Water and Wastewater Service  
In Clay County by Point Water and Sewer, Inc., Docket No. 961321-WS

Dear Ms. Bayo:

In connection with the above-referenced matter, enclosed please find an original and seven copies of Joint Motion for Continuance.

Please file the original and distribute the copies in accordance with your usual procedures. If you have any questions or comments, please do not hesitate to call me.

Sincerely yours,

  
Scott G. Schildberg

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
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ROH \_\_\_\_\_  
SEC 1  
WAS \_\_\_\_\_  
DTH \_\_\_\_\_

SGS/msa

Enclosures

cc: Mr. Mark J. Easterling  
Mr. Steven C. Glenn  
Douglas H. Reynolds, Esq.  
J. Michael Lindell, Esq.  
Rosanne Gervasi, Esq.

DOCUMENT NUMBER-DATE

09370 SEP 15 6

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
FILE COPY

In re: Application for Certificates)  
to provide Water and Wastewater )  
Service in Clay County by Point )  
Water and Sewer, Inc. )

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DOCKET NO. 961321-WS

DATE SUBMITTED FOR FILING:  
September 12, 1997

JOINT MOTION FOR CONTINUANCE

Pursuant to Rule 1.460, Florida Rules of Civil Procedure, and Rule 25-22.037, Florida Administrative Code ("FAC"), Point Water and Sewer, Inc. ("PWS"), and The Point Property Owners Association, Inc. ("the Association"), by and through the undersigned attorneys, hereby jointly move the Florida Public Service Commission ("Commission") to grant a continuance in this docket, and as grounds therefore, state as follows:

1. A hearing before the Commission on the application for an original certificate by PWS has been rescheduled from August 1, 1997, to a future unspecified date.

2. The dates for completing conducting and filing the adverse depositions of Frank Kasper and Lori Easterling and filing the intervenor or Staff testimony in response thereto are September 16, 1997, and September 30, 1997, respectively.

3. The parties are pursuing a negotiated settlement which would address the concerns of the respective parties, including, but not limited to, the method and manner of future service.

4. The parties have met with each other and have also met with representatives of the Clay County Utility Authority ("Authority").

5. The parties and the Authority are in the process of drafting settlement documents.

DOCUMENT NUMBER-DATE

09370 SEP 15 97

FPSC-RECORDS/REPORTING

6. The negotiations are currently proceeding satisfactorily; however, the negotiations will not be completed prior to September 16, 1997. The parties believe that taking the depositions prior to formal negotiations are attempted would be cost ineffective and would not be conducive to facilitate a settlement.

7. Both PWS and the Association state that it is in the best interest of all concerned for the Commission to extend the deposition and responsive testimony deadlines pending the results of negotiations. There will be no prejudice to any party.

8. The requested continuance in the proceedings may result in the resolution of this matter and avoid a substantial expenditure of unnecessary time and expense for the Commission and the parties if they can resolve this matter amongst themselves.

9. The parties agree that the time to conduct and file the adverse depositions of Frank Kasper and Lori Easterling would be extended through and including January 15, 1998. The parties further agree that the date for filing intervenor or Staff testimony in response thereto be extended through and including January 29, 1998.

10. WHEREFORE, PWS and the Association move the Commission to extend the date for adverse depositions and the date for responsive testimony as set forth above.

Dated this 12th day of September, 1997.

Respectfully submitted,

COX & REYNOLDS

*Douglas H. Reynolds*  
By: *by [Signature]*  
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Attorneys for The Point Property  
Owners Association

Certificate of Service

I HEREBY CERTIFY that the original and seven copies of the Joint Motion for Continuance has been furnished by Federal Express and a copy by Facsimile, this 12th day of September, 1997, 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 J. Michael Lindell, Esquire, Hayes & Lindell, P.A., 233 E. Bay Street, Suite 620, Jacksonville, Florida 32202; Rosanne Gervasi, Staff Counsel, Division of Legal Services, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850; and Douglas H. Reynolds, Esquire, Cox & Reynolds, 4875 North Federal Highway, 10th Floor, Fort Lauderdale, Florida 33308, Attorneys for Point Water and Sewer, Inc., by Facsimile and U.S. Mail, this 12th day of September, 1997.

  
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Attorney