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FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Investigation of)
possible overearnings by)
SANLANDO UTILITIES CORPORATION)
in Seminole County.)

DOCKET NO. 980670-~~W~~ RECORDS AND REPORTING

MOTION FOR RECONSIDERATION

SANLANDO UTILITIES CORPORATION ("Sanlando"), by and through its undersigned attorneys and pursuant to Rule 25-22.060, Florida Administrative Code, files this Motion for Reconsideration of PSC Order No. PSC-98-0892-PCO-WS ("the Order") and as grounds therefor states:

1. The initiation of a rate investigation is duplicative of the action which the Staff has proposed in Docket No. 971186-SU in its April 30, 1998 Memorandum.

2. The Order does not properly consider the capital expenditures and operating expenses of the reuse project being proposed by Sanlando in light of Section 367.0817, Florida Statutes.

3. The Order does not properly consider Sanlando's disproportionally high level of contributions in and of construction.

- ACK _____
- AFA 2 _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 1 _____
- LIN _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH _____

4. The Order would impair the ability of Sanlando to raise capital necessary to fund the cost of the reuse project by providing insufficient revenue for Sanlando to be able to borrow the necessary funds.

5. The Order erroneously reduced allowable legal expenses.

6. The Order erroneously reduced director fees.

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7. The Order erroneously subjected index rate increases to the possibility of refund.

Respectfully submitted this 21st day of July, 1998, by:

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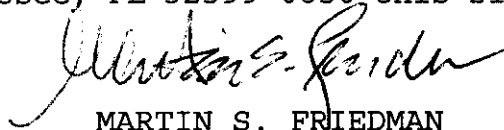
MARTIN S. FRIEDMAN
FL Bar ID No. 0199060
For the Firm

and

Cleatous J. Simmons, Esquire
Lowndes, Drosdick, Doster,
Kantor & Reed
215 North Eola Drive
Orlando, Florida 32801-2028

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Hand Delivery to Roseanne Gervasi, Esquire, Legal Division, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850, this 21st day of July, 1998.



MARTIN S. FRIEDMAN

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