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December 1, 1999

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

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RECORDS AND REPORTING

Re: Docket No. 980242-SU

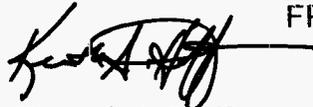
Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Lindrick Service Corporation ("Lindrick") are the original and fifteen copies of Lindrick's Motion for Extension of Time for Filing Objections and Serving Responses to OPC's First Set of Interrogatories and First Request for Production of Documents.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

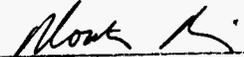
Thank you for your assistance with this filing.

Sincerely,



Kenneth A. Hoffman

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14636 DEC-1 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Amended Petition of Lindrick)	
Service Corporation for a Limited)	Docket No. 980242-SU
Proceeding to Implement a Two-Step)	
Increase in Wastewater Rates.)	Filed: December 1, 1999
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**LINDRICK SERVICE CORPORATION'S
MOTION FOR EXTENSION OF TIME FOR
FILING OBJECTIONS AND SERVING RESPONSES
TO OPC'S FIRST SET OF INTERROGATORIES AND FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS**

Lindrick Service Corporation ("Lindrick"), by and through its undersigned counsel, and pursuant to Rule 106.204(1), Florida Administrative Code, hereby files this Motion for an extension of time of thirty days for the filing of any objections to and service of responses to the First Set of Interrogatories and the First Request for Production of Documents served by the Office of Public Counsel ("OPC"). In support of this Motion, Lindrick states as follows:

1. On November 18, 1999, OPC served its First Set of Interrogatories and First Request for Production of Documents on Lindrick. Under the Order Establishing Procedure issued October 29, 1999 in this docket (Order No. PSC-99-2137-PCO-SU), Lindrick has until December 3, 1999 to file any objections to OPC's pending discovery requests and until December 23, 1999 to serve responses to the discovery requests that are not subject to an objection.

2. Lindrick requests a thirty day extension of time to file objections and serve responses to the discovery requests for two reasons. First, Lindrick has limited personnel and resources available to dedicate the time necessary to put together the information and documents which are not already part of the public record to respond to the discovery requests. The timing of OPC's discovery requests is particularly difficult in view of the fact that the responses would be due during

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14636 DEC-18

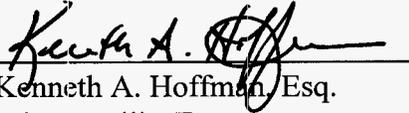
FPSC-RECORDS/REPORTING

Christmas week. Second, Lindrick is in the process of discussing the sale of Lindrick to the City of Port Richey ("City"). Lindrick expects to have an affirmative indication from the City as to whether the purchase of Lindrick will move forward by mid-December, 1999. If the City and Lindrick reach agreement on the purchase and sale of Lindrick, then depending on the timing of such purchase and sale, it is quite possible that this limited proceeding will not move through the formal hearing process. In light of these circumstances, Lindrick believes it is prudent at this time to avoid the expenditure of costs for its attorney, accountant, engineer and in-house personnel to file objections and serve responses to OPC's pending discovery requests until the City makes a decision on whether it intends to purchase Lindrick.

3. The undersigned counsel has conferred with counsel for OPC and is authorized to represent that OPC does not object to the relief requested in this Motion; however, OPC places Lindrick and the Commission on notice that additional time for the filing of OPC's testimony may be necessitated due to the extension of time requested herein by Lindrick depending on how discovery ultimately ensues in this docket.

WHEREFORE, for the foregoing reasons, Lindrick requests the Prehearing Officer to enter an Order granting Lindrick a thirty day extension for the filing of objections and the service of responses to the Office of Public Counsel's First Set of Interrogatories and First Request for Production of Documents.

Respectfully submitted,



Kenneth A. Hoffman, Esq.

John R. Ellis, Esq.

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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 this 1st day of December, 1999:

Ralph Jaeger, Esq.

Division of Legal Services

Florida Public Service Commission

2540 Shumard Oak Boulevard

Room 370

Tallahassee, Florida 32399-0850

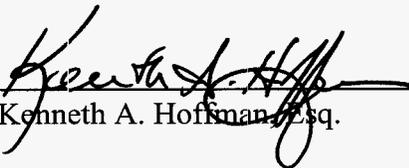
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