

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application of)
Florida Water Services)
Corporation for Amendment of) DOCKET NO. 990054-WU
Certificate No. 106 to add and)
delete territory in Lake County,)
Florida.)
_____)

PREHEARING STATEMENT OF
CRYSTAL RIVER UTILITIES, INC.

CRYSTAL RIVER UTILITIES, INC. ("CRU"), by and through its undersigned attorneys and pursuant to Order Nos. 99-1264-PCO-WU and PSC-00-2463-PCO-WU, files this Prehearing Statement.

(a) Witnesses: The names of all known witnesses that may be called by CRU and the subject matter of their testimony:

1. Johnnie M. Overton, P.E., will testify regarding the lack of need of service in a majority of the territory requested by Florida Water as well as Florida Water's illegal service to property adjacent to CRU's Haines Creek system. He will also address other issues which may be designated by the Prehearing Officer at the Prehearing Conference on August 6, 2001.

(b) Exhibits. A description of all known Exhibits that may be used by CRU.

1. Resume of Johnnie M. Overton, P.E., to be sponsored by Johnnie M. Overton, P.E.

(c) Basic Position. There is no reasonable need for service in the majority of the territory into which Florida Water seeks to

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extend. For serving in territory illegally Florida Water should face substantial fines. It is not in the public interest to grant Florida Water's application.

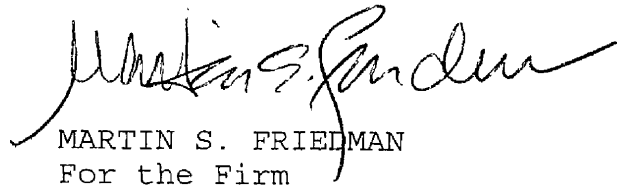
(d)-(f) Issues of Fact, Law and Policy. The following are questions of fact, law and policy which CRU considers at issue, its position on each question, and which witness of CRU will address the issue:

1. Is there a need for service in the area requested by Florida Water?
 - a. No, there is no need for service in the reasonably foreseeable future in a majority of the area.
 - b. Overton.
2. Does Florida Water have the financial ability to serve the requested territory?
 - a. Yes.
 - b. No witness.
3. Does Florida Water have the capacity and technical ability to serve the requested territory?
 - a. Yes.
 - b. No witness.
4. Would service to the territory that Florida Water seeks to add to its Certificate be consistent with the local Comprehensive Plan?

- a. Not as to all of the territory.
 - b. No witness.
5. Should Florida Water be fined for serving customers outside of its certificated service area?
- a. In this particular instance, yes.
 - b. Overton.
6. Is it in the public interest for Florida Water to be granted the proposed amended territory requested in its application?
- a. No.
 - b. Overton.

Respectfully submitted this 2nd
day of July, 2001, by:

ROSE, SUNDSTROM & BENTLEY, LLP
2548 Blainstone Pines Drive
Tallahassee, Florida 32301



MARTIN S. FRIEDMAN
For the Firm

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that an original and one copy of the foregoing has been furnished by U.S. Mail on this 2nd day of July, 2001 to:

J. Stephen Menton, Esquire
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