

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Complaint by Bayside Mobile Home Park)
against Bayside Utility Services, Inc. regarding)
water and sewer service in an area within a)
territory assigned by the Commission)

DOCKET NO. 010726-WS
ORDER NO. PSC-01-2095-PAA-66

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COMMISSION CLERK

DATE: NOVEMBER 13, 2001

TO: DIRECTOR, DIVISION OF THE COMMISSION CLERK AND
ADMINISTRATIVE SERVICES

FROM: BAYSIDE PARTNERSHIP d/b/a BAYSIDE MOBILE HOME PARK

PETITION TO AMEND PETITION AS PER RULE 28-106.202
FLORIDA ADMINISTRATIVE CODE

For the purposes of this petition, the following definitions shall apply. Bayside Mobile Home Park shall be BMHP, Bayside Utility Services, Inc. shall be BUSI, The Florida Public Service Commission Staff shall be PSC, and the Florida Public Service Commissioners shall be The Commissioners.

THEREBY, BMHP hereby respectfully request that the Commissioners as per Rule 28-106.201(3) FLORIDA ADMINISTRATIVE CODE, "refer this matter to the Division of Administrative Hearings and request that an Administrative Law Judge be assigned to conduct the hearing" as soon as possible.

BMHP also respectfully request that RULE 28-106.207(1) FLORIDA ADMINISTRATIVE CODE be adhered to, and we submit to the Commissioners that the Hearing should be set to be heard "in the area of residence of the of the non-governmental parties affected by agency action, or at the place most convenient to all parties....". We submit to you that that place is here in Panama City Beach, Florida, since both "non-governmental parties" are located here.

BMHP has only asked that since The Commissioners claim to have jurisdiction in this matter that they as the Tribunal with the responsibility to enforce the laws concerning this matter, **DO SO**.

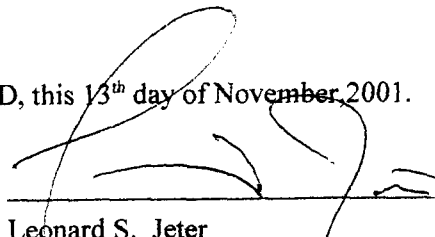
WHEREFORE, Bayside Mobile Home Park respectfully request the Commission and The Commissioners consider the above request of **BMHP** to make certain that Florida Law is applied in the

- APP _____
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- CMP _____
- COM 5 _____
- CTR _____
- ECR _____
- LEG _____
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- OTH Hong _____

DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

manner that it was intended.

RESPECTFULLY SUBMITTED, this 13th day of November, 2001.



Leonard S. Jeter
Bayside Mobile Home Park
6325 Big Daddy Drive
Panama City Beach, Florida 32407
(850) 234-6668

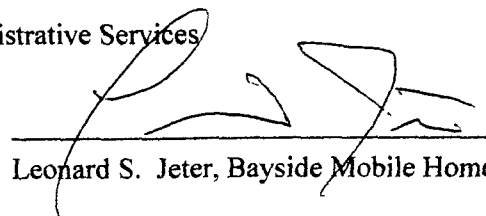
I HEREBY CERTIFY that a copy of the foregoing has been sent to the following by
Telefax and U.S. Mail this 13th day of November, 2001.

Florida Public Service Commission

Director, Division of the Commission Clerk and Administrative Services

2540 Shumard Oak Boulevard

Tallahassee, Florida 32399-0850



Leonard S. Jeter, Bayside Mobile Home Park

Also Telefaxed to Ralph Jaeger, Esq. and Ben E. Girtman, Attorney