

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 020010-WS  
THE WOODLANDS OF LAKE PLACID, L.P.

APPLICATION OF THE WOODLANDS OF LAKE PLACID, L.P.

FOR A STAFF-ASSISTED RATE CASE IN

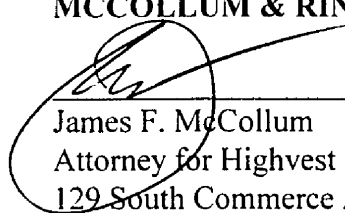
HIGHLANDS COUNTY

OBJECTION OR IN THE ALTERNATIVE  
MOTION TO CANCEL PROPOSED AGENCY ACTION

COMES NOW, Highvest Corp., the owner of the water and wastewater facilities formerly owned by **THE WOODLANDS OF LAKE PLACID, L.P.**, by and through its undersigned attorney, respectfully requests that the agenda for proposed agency action of the above referenced matter scheduled for October 15, 2021, be canceled, and in support of its motion, states:

1. Highvest Corp. owns all of the facilities of **THE WOODLANDS OF LAKE PLACID, L.P.**, including the utility's property which furnishes the water and wastewater services to customers, by virtue of a recent foreclosure (see attached documents).
2. Ownership of the facilities of the utility has changed since the completion of the Staff-Assisted Rate Study and therefore, due to a complete change of factual circumstances, it is premature for the Public Service Commission to consider this matter at this time.
3. The facts supporting the proposed Final Agency Action has changed.
4. An Application for Sale, Assignment or Transfer of Certificate or Facilities will be filed within the next seven (7) days.

MCCOLLUM & RINALDO, P.L.




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James F. McCollum  
Attorney for Highvest Corp.  
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Florida Bar No. 0152027

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DOCUMENT NUMBER-DATE

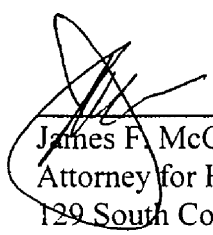
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FILED-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the attached Objection or in the Alternative Motion to Cancel Proposed Agency Action has been furnished via regular United States Mail and facsimile to: **Jason K. Fudge**, Senior Attorney, Florida Public Commission, Capital Circle Office Center, 2540 Shumard Oak Blvd, Tallahassee, FL 32399-0850; **Blanca S. Bayo**, Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850; **James V. Lobo**, Esquire, Attorney At Law, 329 South Commerce Avenue, Sebring, FL 33870 and Andrew B. Jackson, Attorney at Law, 150 North Commerce Avenue, PO Box 2025, Sebring, FL 33871-2025 this 14<sup>th</sup> day of October, 2002.

**MCCOLLUM & RINALDO, P.L.**

  
\_\_\_\_\_  
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