

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Hartwood Properties, Inc., Groveland, Inc.,
BLR-Shell Pond, LLC, Marina Landing, Inc.,
and Floribra USA, Inc.,

Petitioners

v.

Docket No. 020907-WS

LAKE UTILITY SERVICES, INC.

Application for extension of water
and wastewater service in
Lake County, Florida,

Respondent.

**OBJECTION TO APPLICATION FOR AMENDMENT TO
CERTIFICATES OF AUTHORIZATION AND
REQUEST FOR FORMAL ADMINISTRATIVE HEARING**

Petitioners, Hartwood Properties, Inc., Groveland, Inc., BLR-Shell Pond, LLC, Marina Landing, Inc., and Floribra USA, Inc., (Hartwood et al.) object to the application of Lake Utility Services, Inc. (Lake Utility) and request a formal hearing pursuant to §§120.569 and 129.57(1), Florida Statutes, Rule 28-106.201, Rule 25-30.031, and Ch. 25-22, Florida Administrative Code, and say as follows:

1. Petitioners own approximately 2000 acres in the area proposed to be served by Lake Utility. For purposes of this proceeding, their address is that of undersigned counsel.
2. Lake Utility is an existing utility which has filed an application to extend its service to the properties owned by Hartwood et al., and the Public Service Commission is the agency which has jurisdiction over these matters.

3. Hartwood et al. dispute the material asserted fact that Lake Utility has the financial and technical ability to provide service to the area proposed.

4. Hartwood et al. dispute the material asserted fact that there is currently a need for service to the area, which is largely rural and without significant population, or that there will be in the reasonably foreseeable future. The application by Lake Utility is premature, and simply seeks to preempt other, more cost effective and efficient providers.

5. Hartwood et al. dispute Lake Utility's material assertion that it is capable of serving this property with its existing water and wastewater treatment plants. While this may be true currently, it is only because there is no need for the services. As the area develops and the need exists, additional construction will be needed, and this is not taken into consideration in Lake Utility's application.

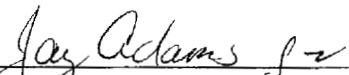
6. Lake Utility's failure to consider the proposed growth demonstrates the current lack of need, and its inability to provide timely and cost effective service when the services will be needed.

7. The application of Lake Utility should be denied as it does not meet the provisions of Rule 25-30.036, Florida Administrative Code.

8. As landholders and potential customers with an interest in ensuring timely and cost effective services, Hartwood et al. would be adversely affected by the approval of Lake Utility's application. Hartwood et al. have plans to develop their property, which plans are not considered in the application by Lake Utility.

WHEREFORE, Petitioners request that this matter be set for a formal administrative hearing, and that the application of Respondent be denied.

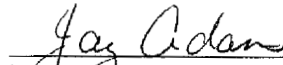
Respectfully Submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been furnished via first class mail to Martin S. Friedman, Esquire, Rose, Sundstrom, & Bentley, LLP, 650 S. North Lake Boulevard, Suite 420, Altamonte Springs, Florida 32701, this 20th day of November, 2002.



Attorney