

# ORIGINAL HOLLAND & KNIGHT LLP

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August 29, 2003

**D. BRUCE MAY, JR.**  
850-425-5607

Internet Address:  
dbmay@hklaw.com

**Via Hand-Delivery**

Blanca S. Bayo, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

COMMISSION  
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AUG 29 PM 4:22

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Re: In re: Application by Florida Water Services Corporation for Acknowledgment of Transfer of Nassau County Land and Facilities to Nassau County and Cancellation of Certificates Nos. 171-W and 122-S, Docket No. 030542-WS

Dear Ms. Bayo:

Enclosed for filing in the captioned matter are the original and seven (7) copies of American Beach Property Owners' Association, Inc.'s:

- 08108-03 1. Motion for Reconsideration; and  
08107-03 2. Request for Oral Argument.

A diskette containing these filings in Word format is also enclosed.

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
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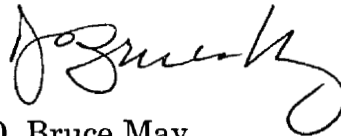
FPSC-BUREAU OF RECORDS

Blanca S. Bayo  
August 29, 2003  
Page 2

For our records, please acknowledge your receipt of these filings on the enclosed copy of this letter. Thank you for your consideration.

Sincerely,

HOLLAND & KNIGHT LLP

A handwritten signature in black ink, appearing to read "D. Bruce May". The signature is fluid and cursive, with a large loop at the end.

D. Bruce May

DBM:kjg  
Enclosures

cc: Parties of Record  
Ronald Austin, Esquire (w/enclosures)  
The Honorable Henry Lee Adams, President,  
American Beach Property Owners' Association, Inc. (w/enclosures)

TAL1 #270179 v1

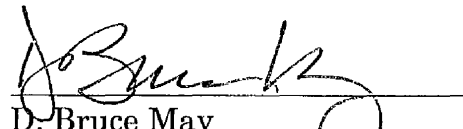
**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

IN RE: Application by Florida Water ) Docket No. 030542-WS  
Services Corporation for Acknowledgment )  
Of Transfer of Nassau County Land and ) Filed: August 29, 2003  
Facilities to Nassau County, and )  
Cancellation Of Certificates Nos. 171-W )  
and 122-S )  
\_\_\_\_\_ /

**AMERICAN BEACH PROPERTY OWNERS' ASSOCIATION, INC.'S**  
**REQUEST FOR ORAL ARGUMENT**

American Beach Property Owners' Association, Inc. ("ABPOA") pursuant to Rule 25-22.058, Florida Administrative Code, respectfully requests oral argument on its Motion for Reconsideration filed simultaneously herewith. As grounds for the request, ABPOA states that the Prehearing Officer's Order denying ABPOA's Amended Petition for Leave to Intervene fails to consider the Commission's past practices of addressing injuries suffered as a result of Florida Water Services Corporation's refusal to serve residents of American Beach. ABOPA respectfully submits that oral argument would assist the Commission in addressing the implications of its past practices concerning American Beach and resolving these important matters.

Respectfully submitted,

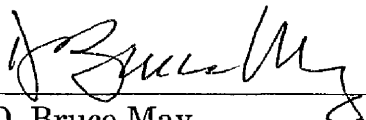


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DOCUMENT NUMBER DATE  
08107 AUG 29 8  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand-delivery to Kenneth A. Hoffman and J. Stephen Menton, Rutledge, Ecenia, Purnell & Hoffman, P.A., 215 S. Monroe Street, Suite 420, Tallahassee, Florida; and by facsimile to Mike Mullin, Attorney for Nassau County, Post Office Box 1010, Fernandina Beach, Florida 32035; and a true and correct copy has been furnished by U.S. Mail to: Florida Water Services Corporation, P. O. Box 609520, Orlando, FL 32860-9520 and Nassau County Board of Commissioners, P.O. Box 456, Fernandina Beach, FL 32034-5456 all on this 29<sup>th</sup> day of August, 2003.

  
\_\_\_\_\_  
D. Bruce May