



ORIGINAL

City of Longwood

175 WEST WARREN AVENUE
PHONE (407) 260-3440

LONGWOOD, FLORIDA 32750-4197
FAX (407) 260-3419

February 1, 2006

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COMMISSION
CLERK

VIA OVERNIGHT DELIVERY

Ms. Blanca Bayo
Commission Clerk and Administrative Services Director
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Re: Docket No. 040384-WS; Application of Sanlando Utilities Corporation for an
Amendment of Water and Wastewater Certificates in Seminole County,
Florida

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket is the original Motion for
Continuance by the City of Longwood.

Should you have any questions regarding this filing, please do not hesitate to contact
me.

Sincerely,

Richard S. Taylor, Jr.

- CMP _____
- COM 3
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- RCA _____
- SCR _____
- SGA _____
- SEC 1
- DTH Kim P.

RST/ps
Enclosures
cc: Jennifer Brubaker, Esquire (with enclosures)
Valerie Lord, Esquire (with enclosures)

DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO.: 040384-WS

IN RE: Application of
SANLANDO UTILITIES
CORPORATION for amendment
of water and wastewater certificates
in Seminole County, Florida.

MOTION FOR CONTINUANCE

COMES NOW the City of Longwood, by and through undersigned counsel and respectfully requests that the Public Service Commission (PSC) continue the hearing in the above captioned application and in support thereof states:

1. That the undersigned attorney has relatively little experience in dealing with this type of case. The undersigned attorney, together with the concurrence of John Drago, City Administrator, desires to retain as co-counsel an attorney with more experience in PSC matters.
2. That the City of Longwood believes that both parties, as well as the PSC, will benefit by the addition of experienced co-counsel.
3. That the Applicant, Sanlando Utilities Corporation, Inc. will not be in any way prejudiced by a continuance since they are already serving the designated area with water and sewer service.
4. That the attorney for the Applicant has stated that Sanlando will not consent to a continuance but does consent to the Mediation of this matter.
5. That the City of Longwood believes that there are compromises that could be reached between the parties that would not only resolve the dispute involved

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FPSO-COMMISSION OF ERM

in this application, but also other disputes that exist between the City of Longwood and Sanlando Utilities Corporation, Inc. A global settlement of all issues and disputes between the parties would benefit not only the parties but would also serve the public's interest as well.

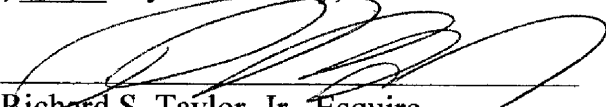
6. That the preparation and scheduling of Mediation will take time and may not effectively be able to be completed prior to a scheduled hearing.
7. That this application has not previously been continued.
8. That the City of Longwood is making this Motion for Continuance in good faith and not for the purpose of delay.

Respectfully submitted on this 15th day of February, 2006, by:



Richard S. Taylor, Jr., Esquire
Florida Bar No.: 221686
531 Dog Track Road
Post Office Box 1117
Longwood, Florida 32752-1117
Telephone: (407) 339-7888
Attorney for City of Longwood

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail delivery to: Valerie L. Lord, Esquire, Rose, Sundstrom & Bentley, LLP, Sanlando Center, 2180 West State Road 434, Suite 2118, Longwood, FL 32779 and Jennifer Brubaker, Esquire, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 this 15th day of February, 2006.



Richard S. Taylor, Jr., Esquire
Florida Bar No.: 221686
531 Dog Track Road
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Telephone: (407) 339-7888
Attorney for City of Longwood