

**Matilda Sanders**

**From:** MAHARAJ-LUCAS.ASHA [MAHARAJLUCAS.ASHA@leg.state.fl.us]  
**Sent:** Tuesday, March 27, 2007 3:49 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** REILLY.STEVE  
**Subject:** 060258-SU  
**Attachments:** 060258 petition on proposed.doc

**ORIGINAL**

CMP \_\_\_\_\_  
COM 5  
CTR \_\_\_\_\_  
ECR 1  
GCL 1  
OPC \_\_\_\_\_  
RCA \_\_\_\_\_  
SCR \_\_\_\_\_  
SGA \_\_\_\_\_  
SEC \_\_\_\_\_  
OTH K.P.

Electronic Filing

a. Person responsible for this electronic filing:

Stephen C. Reilly, Associate Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400  
(850) 488-9330  
Reilly.steve@leg.state.fl.us

b. Docket No. 060257-WS

In re: Application for increase in water and wastewater rates in Seminole County by Sanlando Utilities, Corp.

c. Document being filed on behalf of Office of Public Counsel

d. There are a total of 4 pages.

e. The document attached for electronic filing is Notice of Service.

(See attached file: 060258 petition on proposed.doc)

Thank you for your attention and cooperation to this request.

Asha Maharaj-Lucas  
Secretary to Steve Reilly, Associate Public Counsel.  
Office of Public Counsel  
Telephone: (850) 488-9330  
Fax: (850) 488-4491

DOCUMENT NUMBER-DATE

02655 MAR 27 6

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Application for increase in  
water and wastewater rates in  
Seminole County by Sanlando  
Utilities Corp.

---

DOCKET NO. 060258-SU

Filed: March 27, 2007

**PETITION ON PROPOSED AGENCY ACTION**

The Citizens of the State of Florida (“Citizens”) by and through their undersigned attorney, pursuant to Section 120.57, Florida Statutes, and Rules 25-22.029 and 28-106.201, Florida Administrative Code, file this objection to the Florida Public Service Commission’s (“Commission”) Order No. PSC-07-0205-PAA-WS (“Order”), issued March 6, 2007, and state:

1. The name and address of the agency affected and the agency’s file number:

Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Docket No. 060256-SU

2. The Citizens include customers of Sanlando Utilities Corp. (“Sanlando”, “Utility”, or “Company”) whose substantial interests will be affected by the Order because the Order authorizes the Utility to increase the rates and charges it imposes upon its customers.

3. Pursuant to Section 350.0611, Florida Statutes, the Citizens’ who file this petition are represented by the Office of Public Counsel (“Citizens”, “Petitioner” or “OPC”) with the following address and telephone number: Office of Public Counsel, c/o The Florida

Legislature, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400, telephone No. (850) 488-9330.

4. The Citizens received a copy of the Order by inter-office courier on March 8, 2007.

5. At this time the ultimate facts alleged, including the specific facts which the Petitioner contends warrants reversal or modification of the agency's proposed action are as follows:

Rate Base

a. Water Treatment Plants used and useful percentages are overstated.

b. Wastewater Treatment Plants used and useful percentages are overstated.

6. Each of the foregoing matters involve disputed issues of material fact.

7. Order No. PSC-07-0205-PAA-WS establishes March 27, 2007 as the date by which protests must be filed.

8. Chapter 367.081, Florida Statutes, is a specific statute the Petitioner contends requires reversal of the agency's proposed action.

9. The Petitioner seeks the Commission to take the following actions with respect to the agency's proposed action:

a. Determine the proper water and wastewater revenue requirements and resulting rates after making adjustments to Water Treatment Plants and Wastewater Treatment Plants used and useful percentages.

WHEREFORE, the Citizens hereby protest and object to Commission Order No. PSC-07-0205-PAA-WS as provided above, and petitions the Commission to conduct a formal evidentiary hearing, under the provisions of Section 120.57(1), Florida Statutes,

and further petitions that such hearing be scheduled at a convenient time within or as close as practical to the Utility's certificated service area.

Respectfully submitted,

s/ Stephen C. Reilly  
Stephen C. Reilly  
Associate Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400

Attorney for the Citizens  
of the State of Florida

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 060258-SU**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Petition on Proposed Agency Action has been furnished by U.S. Mail and electronic mail to the following parties this 27<sup>th</sup> day of March, 2007.

Jennifer Burbaker, Esquire  
Florida Public Service Commission  
Division of Legal Service  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Martin S. Friedman, Esquire  
Valerie L. Lord, Esquire  
Rose Sundstrom & Bentley, LLP  
2180 W. State Road 434, Suite 2118  
Longwood, FL 32779

s/ Stephen C. Reilly  
Stephen C. Reilly  
Associate Public Counsel