

**Eric Fryson**

**From:** Michele Parks [mparks@sfflaw.com]  
**Sent:** Wednesday, June 27, 2012 4:13 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Martha Barrera; Ralph Jaeger; Gene Brown; sandymchase@comcast.net; Martin Friedman; SAYLER.ERIK@leg.state.fl.us  
**Subject:** {BULK} Docket No.: 110200-WU; Application for Increase in Water Rates in Franklin County by Water Management Services, Inc.

**Importance:** Low

**Attachments:** Request for Oral Argument (Staff's Discovery).pdf

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- b. Docket No.: 110200-WU; Application for Increase in Water Rates in Franklin County by Water Management Services, Inc.
- c. Water Management Services, Inc.
- d. 2 pages
- e. WMSI's Request for Oral Argument on Staff's Motion to Compel Discovery

**MICHELE PARKS**

*Paralegal for Martin S. Friedman and Bridget M. Grimsley*

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Docket No. 110200-WU

In re: Application for increase in  
Water Rates in Franklin County by  
Water Management Services, Inc.

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WATER MANAGEMENT SERVICES, INC.'S REQUEST FOR ORAL ARGUMENT ON  
STAFF'S MOTION TO COMPEL DISCOVERY

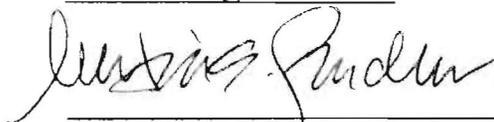
Applicant, WATER MANAGEMENT SERVICES, INC. ("WMSI" or the "Utility"), by and through its undersigned attorneys, requests the Pre-Hearing Commissioner or the Commission to allow oral argument on Staff's Motion to Compel Discovery, WMSI's Objections, and WMSI's Response thereto, and in support thereof, states:

1. The issue of the breadth of formal discovery rights by the Staff in a PAA case has never been decided in a water and/or wastewater case, and it would benefit the Pre-Hearing Commissioner or the Commission to have the ability to question the parties about the practical and legal implications of such rights.

WHEREFORE, WATER MANAGEMENT SERVICES, INC., respectfully requests this Commission to allow oral argument on Staff's Motion to Compel Discovery.

Respectfully submitted on this 27<sup>th</sup> day of  
June, 2012, by:

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For the Firm

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CERTIFICATE OF SERVICE  
DOCKET NO. 110200-WU

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail and/or E-mail to the following parties this 27<sup>th</sup> day of June, 2012:

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