### **Eric Fryson**

From:

Michele Parks [mparks@sfflaw.com]

Sent:

Friday, September 21, 2012 4:49 PM

To:

Filings@psc.state.fl.us

Cc:

Sayler, Erik; Martha Barrera

Subject:

{BULK} b. 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 (re Escrow) (09-21-12).pdf

a. Martin S. Friedman, Esquire

Sundstrom, Friedman & Fumero, LLP

766 N. Sun Drive, Suite 4030 Lake Mary, FL 32746

PHONE: (407) 830-6331

FAX: (407) 830-8522

#### mfriedman@sfflaw.com

- b. Docket No.: 110200-WU; Application for Increase in Water Rates in Franklin County by Water Management Services, Inc.
- c. <![endif]>Water Management Services, Inc.
- d. Request (3 pages)
- e. Request for Oral Argument on Water Management Services, Inc.'s Motion to Allow Withdrawals from Escrow

#### MICHELE PARKS

Paralegal for Martin S. Friedman and Bridget M. Grimsley





SUNDSTROM, FRIEDMAN & FUMERO,

LLP

Attorneys at Law 766 North Sun Drive, Suite 4030

Lake Mary, Florida 32746

T: 407.830.6331

F: 407.830.8522

mparks@sfflaw.com

www.sfflaw.com

#### Tallahassee • Lake Mary • Boca Raton

Notice: This email message, and any attachments hereto, contains confidential information that is legally privileged. If you are not the intended recipient, you must not review, transmit, convert to hard copy, copy, use or disseminate this email or any attachments to it. If you have received this email in error, please notify us immediately by return mail or by telephone at (888)-877-6555 and del ete the original and all copies of this transmission, including any attachments. Thank you.

DOCUMENT NUMBER-DATE

06394 SEP 21 2

#### 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.

# WATER MANAGEMENT SERVICES, INC.'S REQUEST FOR ORAL ARGUMENT ON ITS MOTION TO ALLOW WITHDRAWALS FROM ESCROW

Applicant, WATER MANAGEMENT SERVICES, INC. ("WMSI"), by and through its undersigned attorneys, requests this Commission to allow oral argument on its Motion to Allow Withdrawals from Escrow and, in support thereof, states:

- 1. For the reasons stated in WMSI's Motion filed contemporaneously herewith, there is a narrow window of opportunity to obtain a substantial savings in the cost of the pro forma project.
- 2. In addition, the settlement concerning the repayment of the loan to DEP is time sensitive with the payment of \$40,000 being due on or before November 15, 2012.
- 3. WMSI believes it would be of benefit to the Commission if the Commissioners were given the opportunity to ask any questions of WMSI in order to address any issues or concerns they may have in granting WMSI's Motion to Allow Withdrawals from Escrow.

WHEREFORE, Applicant, WATER MANAGEMENT SERVICES, INC., respectfully

DOCUMENT NUMBER-DATE

requests that this Commission allow oral argument on WMSI's Motion to Allow Withdrawals from Escrow.

Respectfully submitted on this 21st day of September, 2012 by:

SUNDSTROM, FRIEDMAN & FUMERO, LLP 766 North Sun Drive, Suite 4030 Lake Mary, FL 32746

PHONE: (407) 830-6331 FAX: (407) 830 8255 <u>mfriedman@sfflaw.com</u>

MARTIN S. FRIEDMAN

For the Firm

## CERTIFICATE OF SERVICE DOCKET NO. 110200-WU

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent to furnished by U.S. Mail and E-Mail to the following parties this 21st day of September, 2012:

Erik Sayler, Associate Public Counsel Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400

Martha Barrera, General Counsel Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

MARTIN S. FRIEDMAN

For the Firm