

Eric Fryson

From: Dana Rudolf [drudolf@sfflaw.com]
Sent: Tuesday, October 30, 2012 4:30 PM
To: Filings@psc.state.fl.us
Cc: Martin Friedman; gdb5@comcast.net; SAYLER.ERIK@leg.state.fl.us; Martha Barrera; Lisa Bennett
Subject: Docket No. 110200-WU; Application for increase in water rates in Franklin County by Water Management Services, Inc.

Attachments: Request for Oral Argument (MTC Disc).pdf

- a) Martin S. Friedman, Esquire
Sundstrom, Friedman & Fumero, LLP
766 North Sun Drive, Suite 4030
Lake Mary, FL 32746
(407) 830-6331
mfriedman@sfflaw.com
- 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) Request for Oral Argument on Staff's Motion to Compel Discovery

10/30/2012

DOCUMENT NUMBER-DATE
07366 OCT 30 2012
FPSC-COMMISSION CLERK

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
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 WMSI's Motion to Dismiss the Office of Public Counsel's ("OPC") Protest of the PAA Order, and in support thereof, states:

1. The issue of the breadth of OPC's standing independent of representing customers of a utility is an issue of first impression 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 OPC's standing or lack thereof.

WHEREFORE, WATER MANAGEMENT SERVICES, INC., respectfully requests this Commission to allow oral argument on its Motion to Dismiss OPC's Protest.

Respectfully submitted on this 30th day of
October, 2012, by:

SUNDSTROM, FRIEDMAN & FUMERO, LLP
766 North Sun Drive, Suite 4030
Lake Mary, FL 32746
PHONE: (407) 830-6331
FAX: (407) 830 8255
mfriedman@sflaw.com



MARTIN S. FRIEDMAN
For the Firm

DOCUMENT NUMBER-DATE

07366 OCT 30 12

FPSC-COMMISSION CLERK

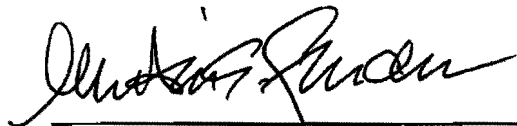
CERTIFICATE OF SERVICE
DOCKET NO. 110200-WU

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 30th day of October, 2012:

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

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

Lisa Bennett, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



MARTIN S. FRIEDMAN
For the Firm