

**Eric Fryson**

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**From:** Dana Rudolf [drudolf@sflaw.com]  
**Sent:** Tuesday, October 30, 2012 4:47 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 (MTD Protest) (AMENDED).pdf

- a) Martin S. Friedman, Esquire  
Sundstrom, Friedman & Fumero, LLP  
766 North Sun Drive, Suite 4030  
Lake Mary, FL 32746  
(407) 830-6331  
[mfriedman@sflaw.com](mailto:mfriedman@sflaw.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) Amended Request for Oral Argument on OPC's Protest of the PAA Order

DOCUMENT NUMBER DATE  
07368 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.

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**AMENDED WATER MANAGEMENT SERVICES, INC.'S REQUEST FOR ORAL ARGUMENT  
ON OPC'S PROTEST OF THE PAA ORDER**  
(Amended as to Title of Document)

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 30<sup>th</sup> day of  
October, 2012, by:

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MARTIN S. FRIEDMAN  
For the Firm

DOCUMENT NUMBER-DATE

07368 OCT 30 2012

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**CERTIFICATE OF SERVICE**  
**DOCKET NO. 110200-WU**

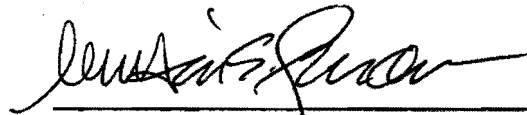
I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail and/or E-mail to the following parties this 30<sup>th</sup> day of October,

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, Esquire  
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Lisa Bennett, Esquire  
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