

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:

DOCKET NO. 130209-SU

Application for expansion of certificate (CIAC)
(new wastewater line extension Charge) by North Peninsula
Utilities Corp.

UNOPPOSED SECOND MOTION FOR EXTENSION OF TIME

Pursuant to rule 28-106.111(3) of the Florida Administrative Code, County of Volusia, Florida (“County of Volusia”) hereby files this unopposed second motion for extension of time for which to file its initial pleading in the form of a written objection to the application for expansion, and in support, states:

1. County of Volusia, on notice of the above referenced application as published on April 1, 2014, and pursuant to an agreed extension of time, must file a written objection to the instant application for expansion no later than June 2, 2014.

2. County of Volusia and North Peninsula Utilities Corporation are presently engaged in negotiations regarding the proposed expansion and a possible acquisition of the wastewater utility service. Said discussions remain ongoing and have the potential to be resolved in the near future, obviating the need for the filing of a written objection.

3. As a result of these ongoing and fluid negotiations, County of Volusia seeks a second extension of time for which to file its written objection (its initial pleading) in accordance with rule 28.106.111(3).

4. The undersigned is authorized to state that Clay Henderson, Esq., counsel for North Peninsula Utilities Corporation, has no objection to an additional thirty (30) day extension, to and including June 30, 2014, for the filing of the written objection.

WHEREFORE, County of Volusia, Florida, respectfully requests an extension of time, to and including June 30, 2014, for which to file its written objection to application for expansion.

Respectfully submitted,

s/Mary G. Jolley
MARY G. JOLLEY, ESQUIRE
Assistant County Attorney
Fla. Bar No.: 080454
mjolley@volusia.org
COUNTY OF VOLUSIA
123 W. Indiana Avenue, Ste. 301
DeLand, FL 32720
(386) 736-5950
(386) 736-5990 (Fax)
COUNSEL FOR COUNTY OF VOLUSIA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion has been furnished by electronic mail and United States Mail to John L. Wharton, Esq., counsel for North Peninsula Utilities Corporation, jwharton@deanmead.com, Dean Mean Law Firm, 215 S. Monroe Street, Suite 815, Tallahassee, Florida, 32301, and Clay Henderson, Holland & Knight, 200 South Orange Avenue, Suite 2600, Orlando, Florida 32801, on this 30th day of May, 2014.

s/Mary G. Jolley
MARY G. JOLLEY, ESQUIRE
Assistant County Attorney
Fla. Bar No.: 080454
mjolley@volusia.org
COUNTY OF VOLUSIA
123 W. Indiana Avenue, Ste. 301
DeLand, FL 32720
(386) 736-5950
(386) 736-5990 (Fax)
COUNSEL FOR COUNTY OF VOLUSIA