BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Public Counsel for Declaratory Statement Regarding Discovery in Dockets or Proceedings Affecting Rates or Cost of Service Processed with the Commission's Proposed Agency Action Procedure

DOCKET NO. 140107-OT

UTILITIES, INC.'S MOTION TO INTERVENE

UTILITIES, INC., on behalf of its regulated subsidiaries in Florida¹ (the "Utility"), by and through its undersigned attorneys and pursuant to Section 120.565, Florida Statutes, and Rule 28-105.0027, Florida Administrative Code, files this Motion to Intervene in the above-styled Docket filed by the Office of Public Counsel ("OPC") and states:

1. The name of the Utility and its mailing address is:

Utilities, Inc. 2335 Sanders Road Northbrook, IL 60062

The address of the Florida office is:

200 Weathersfield Avenue Altamonte Springs, FL 32714-4099

3. The name and address of the person authorized to receive notices and communications in respect to this application is:

Martin S. Friedman, Esquire Friedman, Friedman & Long, P.A. 766 N. Sun Drive, Suite 4030 Lake Mary, FL 32746

Telephone: (407) 830-6331 Facsimile: (407) 878-2178 Email: mfriedman@ffllegal.com

4. The interests of the Utility are substantially affected by this proceeding. The Utility's twelve regulated subsidiaries in Florida regularly file for rate relief utilizing the Proposed Agency Action ("PAA") procedure. If the interpretation of the PAA procedure sought by OPC is adopted by

this Commission, it will drastically increase the rate case expense incurred by the Utility's subsidiaries (already a sensitive issue for Commissioners) and will otherwise exacerbate an already tight deadline within which the Commission has to rule in a PAA proceeding, and is contrary to the purpose of the PAA process.

WHEREFORE, the Utility requests this Commission grant it's Motion to Intervene and to provide it with full party status in this proceeding.

Respectfully submitted this 12th day of June 2014, by:

FRIEDMAN, FRIEDMAN & LONG, P.A.

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

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MARTIN S. FRIEDMAN

For the Firm

¹ Cypress Lakes Utilities, Inc., Labrador Utilities, Inc., Lake Placid Utilities, Inc., Lake Utility Services, Inc., Mid-County Services, Inc., Sanlando Utilities Corp., Tierra Verde Utilities, Inc., Utilities Inc. of Eagle Ridge, Utilities Inc. of Florida, Utilities Inc. of Longwood, Utilities Inc. of Pennbrooke and Utilities Inc. of Sandalhaven.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion has been served upon the following parties by E-Mail this 12th day of June, 2014:

J. R. Kelly, Public Counsel Joseph A. McGlothlin, Associate Public Counsel Office of Public Counsel 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 Mcglothlin.joseph@leg.state.fl.us

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MARTIN S. FRIEDMAN