

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Application for an increase in water rates )  
in Franklin County by Water Management ) Docket No: 110200-WU  
Services, Inc. )  
 ) Filed: September 29, 2014  
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**CITIZEN’S REQUEST FOR ORAL ARGUMENT ON CITIZEN’S RESPONSE TO WATER MANAGEMENT SERVICES, INC.’S MOTION FOR EXTENSION OF TIME TO COMPLETE FINANCING AND CONSTRUCTION REQUIREMENTS**

The Citizens of the State of Florida, through the Office of Public Counsel (OPC), pursuant to Rule 25-22.0022, Florida Administrative Code, respectfully requests the Commission provide OPC an opportunity to address the Commission in oral argument on Water Management Services, Inc.’s (WMSI) Motion for Extension of Time to Complete Financing and Construction Requirements (Motion) and Citizen’s Response to Water Management Services, Inc.’s Motion for Extension of Time to Complete Financing and Construction Requirements (Response), and states:

1. On September 22, 2014, WMSI submitted the Motion requesting an extension of time from the deadlines set forth in Order No. PSC-12-0435-PAA-WU (PAA Order) that were placed into effect by Order No. PSC-13-1097-FOF-WU (Final Order).
2. Concurrently with this Request, OPC is filing a Response to WMSI’s Motion listing reasons why the extension should be denied or, in the alternative, require a showing, beyond the motion, as to why the deadlines from the PAA and Final Orders should be extended.
3. WMSI’s Motion and OPC’s Response call upon the Commission to resolve significant, fundamental disagreements regarding the terms of the Commission’s PAA and Final Orders as well as the application of the doctrine of administrative finality to material terms in

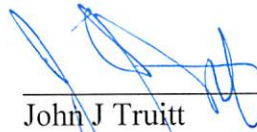
Commission orders that are not part of an enumerated list of terms for which the docket remains open. OPC submits that oral argument on these issues would be beneficial to the Commission as it considers WMSI's Motion and OPC's Response, especially since similar issues may present themselves before the Commission in the future.

4. OPC requests the Commission schedule oral argument on WMSI's Motion and OPC's Response. OPC suggests that allowing 10 minutes per side would be appropriate under the circumstances.

WHEREFORE, the Office of Public Counsel, on behalf of the customers of WMSI, respectfully requests the opportunity to present oral argument to the Commission on WMSI's Motion and OPC's Response.

Respectfully submitted by:

**J.R. KELLY**  
PUBLIC COUNSEL



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing **CITIZEN'S REQUEST FOR ORAL ARGUMENT ON CITIZEN'S RESPONSE TO WATER MANAGEMENT SERVICES, INC.'S MOTION FOR EXTENSION OF TIME TO COMPLETE FINANCING AND CONSTRUCTION REQUIREMENTS** has been furnished by electronic mail and U.S. Mail to the following parties on this 29th day of September, 2014, to the following:

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