

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for an increase in
water rates in Franklin County by
WATER MANAGEMENT SERVICES, INC.

Docket No. 110200-WU

AMENDED MOTION FOR EXTENSION OF TIME
TO COMPLETE FINANCING AND CONSTRUCTION REQUIREMENTS

WATER MANAGEMENT SERVICES, INC. ("WMSI"), by and through its undersigned attorneys, hereby files this amended request for this Commission issue an Order extending time to complete the financing and construction of pro-forma projects, and in support thereof states:

1. In Order No. PSC-12-0435-PAA-WU ("PAA Order") this Commission approved certain pro forma projects proposed by WMSI and provided that WMSI should secure financing and complete the pro-forma projects within 18 months of issuance of the Consummating Order.

2. The PAA Order was protested by Office of Public Counsel and cross protested by WMSI which resulted in the issuance of Order No. PSC-13-1097-FOF-WU on May 16, 2013 ("Final Order"). The issuance of the Final Order became the commencement date for starting the 18 month deadline within which WMSI was to complete the financing and construction. It will not be possible to meet that deadline.

3. Despite WMSI's best efforts to secure financing it became evident that it was more challenging than originally anticipated. Efforts to obtain financing commenced during the rate case proceeding but suffered a setback when Office of Public Counsel contacted the proposed lender, resulting in the termination of that lender's consideration of WMSI's loan application. Since that time WMSI has been working virtually non-stop to obtain an

alternative source of financing.

4. WMSI has commenced construction within the constraints of WMSI's cash flow and the construction escrowed funds. The property has been acquired, the permitting is in place, and work has been commenced as set forth in the documentation supporting the three draws from the escrow account.

5. The loan with Ameris Bank is scheduled to close on January 20, 2015. The construction will be accelerated immediately after closing, with an anticipated construction completion date by the end of December 2015.

WHEREFORE, WMSI requests this Commission issue an Order extending the financing and construction deadline through the end of December 2105.

Respectfully submitted this 22nd day of
December, 2014, by:

Friedman, Friedman & Long, P.A.
766 North Sun Drive, Suite 4030
Lake Mary, FL 32746
Phone: (407) 830-6331
Fax: (407) 878-2178
mfriedman@ffllegal.com



MARTIN S. FRIEDMAN
Florida Bar No.: 0199060
For the Firm

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished
by E-Mail this 22nd day of December, 2014, to:

John Truitt, Esquire
Office of the Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400
truitt.john@leg.state.fl.us

Martha Barrera, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
MBARRERA@PSC.STATE.FL.US



MARTIN S. FRIEDMAN
Florida Bar No.: 0199060
For the Firm