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August 18, 2020  
VIA E-FILING

Adam Tietzman, Commission Clerk  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RE: Docket No.: 20200185-WS; Application for original water and wastewater certificates in Lake and Sumter Counties by Gibson Place Utility Company, LLC  
Our Matter No.: 073275

Dear Mr. Tietzman:

The legal staff has asked that I expand upon the Motion to Bifurcate and for Rule Waiver. The Rules from which the temporary waiver is being sought are implementing Section 367.045(1)(c), Florida Statutes. As this Statute relates to an original certificate application, it requires filing of financial information for the establishment of original rates and charges. Section 367.031, Florida Statutes, requires a utility to obtain certificates from the Commission prior to the Department of Environmental Protection issuing construction permits. Until such permits are issued the utility will not have the financial information required for the Commission to set initial rates. Therein lies the "catch 22". This inconsistency between the two aforementioned statutes necessitates that the Commission's Rules on setting initial rates be temporarily waived.

The purpose of Section 367.045(1)(c), Florida Statutes, of providing the Commission with financial information to set initial rates prior to the utility beginning to provide service is being met such that the initial rates will be set before the utility begins providing service, and will contain more accurate information. In the instant case the temporary waiver is being requested through the first quarter of 2021, which will allow the Commission sufficient time to evaluate the financial information prior to the utility beginning to serve customers.

Adam Tietzman, Clerk  
Florida Public Service Commission  
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Should you have any questions, please do not hesitate to give me a call.

Very truly yours,



MARTIN S. FRIEDMAN  
For the Firm

MSF/

cc: IV Chandler (via e-mail)  
Trey Arnett (via e-mail)  
JAPC (w/original Motion)