## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application for certificate to provide	DOCKET NO. 20200226-SU
Wastewater service in Charlotte County, by	
Environmental Utilities, LLC /	

## <u>LINDA COTHERMAN'S RESPONSE TO ENVIRONMENTAL UTILITIES, LLC'S</u> REQUEST FOR ORAL ARGUMENT ON ITS MOTION FOR RECONSIDERATION

Linda Cotherman, Party of Record, hereby files this response to Environmental Utilities, LLC's (EU) Request for Oral Argument on its Motion for Reconsideration of Order No. PSC 2022-0267-FOF-SU filed on July 22<sup>nd</sup>, 2022, and respectfully requests denial. In support, Linda Cotherman states:

- Oral arguments, as proposed by EU, would constitute a re-litigation of 16
  months of submittals, analysis and summarizing of testimony and evidence in
  this docket.
- 2. EU had sufficient time and opportunity to clarify their interpretations of any arguments or documents contained within the docket prior to the closing of the record on February 8<sup>th</sup>, 2022.
- 3. The pleadings are sufficient on their face for the Commission to render a decision on the Motion for Reconsideration.
- 4. EU should not be given further opportunity in oral arguments to use the Charlotte County letter that was submitted subsequent to both the closing of the record and the posting of the final Order.
- It would be an undue burden of time and expense to the other Parties of Record to appear before the Commission for Oral Arguments in a case that has already been decided.

WHEREFORE, based on the facts and arguments set forth herein, for this and all of the reasons indicated above the PSC should deny Environmental Utilities, LLC'S

Request for Oral Argument on its Motion for Reconsideration of Order No. PSC 2022-0267-FOF-SU.

Respectfully submitted this 28<sup>th</sup> day of July, 2022, by:

Linda Cotherman P. O. Box 881 Placida, FL 33946 Telephone: 941-697-0871 lcotherman@yahoo.com

/s/ Linda Cotherman Linda Cotherman

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-mail to the following parties this 28<sup>th</sup> day of July, 2022:

Martin S. Friedman, Esquire John L. Wharton, Esquire Dean, Mead & Dunbar 420 S. Orange Ave., Suite 700 Orlando, FL 32801 Telephone: (407) 310-2077 Fax: (407) 423-1831 mfriedman@deanmead.com jwharton@deanmead.com

Brad Kelsky, Esquire 1250 S. Pine Island Road, Suite 250 Plantation, FL 33324 <u>bradkelsky@kelskylaw.com</u> barbarallinas@kelskylaw.com

Richard Gentry, Esquire Charles Rehwinkel, Esquire Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 richard.gentry@leg.state.fl.us rehwinkel.charles@leg.state.fl.us

Jennifer Crawford, Esquire Ryan Sandy, Esquire Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 rsandy@psc.state.fl.us jcrawfor@psc.state.fl.us

/s/ Linda Cotherman Linda Cotherman