

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for increase in water and
wastewater rates in Charlotte, Highlands, Lake,
Lee, Marion, Orange, Pasco, Pinellas, Polk and
Seminole Counties by Sunshine Water Services
Company

Docket No. 20240068-WS

SUNSHINE WATER SERVICES COMPANY’S RESPONSE TO OFFICE OF
PUBLIC COUNSEL’S REQUEST FOR ORAL ARGUMENT ON ITS
MOTION FOR RECONSIDERATION

Sunshine Water Services Company (“SWS”), by and through its undersigned attorneys and pursuant to Rule 25-22.0022, Florida Administrative Code, files this response to Office of Public Counsel’s Request for Oral Argument on its Motion to for Reconsideration of Order No PSC-2025-0196-FOF-WS and states:

OPC argues that oral argument would provide it with an opportunity to “provide additional details and context concerning the arguments made within the Motion.” OPC had ample opportunity to include in its Motion OPC’s complete and fully supported positions in order to give SWS a meaningful opportunity to respond and the Commission sufficient information for a decision on reconsideration. There is no statutory limitation on the length or breadth of OPC’s Motion in this case. The allusion to “additional details” concerning relevant arguments indicates a desire to limit SWS’s ability to fully analyze and sufficiently respond to OPC’s assertions and claims.

OPC argues that oral argument would “aid the Commissioners in understanding and evaluating the issues raised in the motion”. Again, OPC had the ability to present its position fully and completely, with all necessary context and detail, in drafting its Motion. OPC’s Motion is focused on claimed points of law and thus makes several assertions of violations of law. OPC’s presented arguments are extensive, detailed and leave little room for further explanation.

OPC argues that oral argument would “provide an opportunity for Citizens to answer any questions that Commissioners may have regarding the Motion”. As stated above, the Motion is based on asserted violations of law – laws with which the Commission is highly capable of understanding and interpreting, as they are Rules which the Commission itself has codified. If Commissioners have any questions, then the Commissioners have the right to address them to the appropriate party without the necessity of an oral presentation by the parties.

WHEREFORE, Sunshine Water Services Company, requests that this Commission enter an Order denying the Request for Oral Argument filed by Office of Public Counsel.

Respectfully submitted this 30th day of June,
2025, by:

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/s/Martin S. Friedman
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

Electronic mail to the following parties this 30th day of June, 2025:

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