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December 2, 1997

HAND-DELIVERED

Blanca S. Bayo, Director
Division of Records and Reporting
Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

Re: Docket No. 920199-WS

Dear Ms. Bayo:

Enclosed for filing are the original and 15 copies of the Florida United Methodist Children's Home, Inc.'s Petition for Leave to Intervene in the above docket.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

Sincerely,

Joseph A. McGlothlin

ACK 1
AFA 4
APP Moore
CAF _____
CMU _____
CTR JAM/jg
EAG Enclosures
LEG 1
LIV 5
OPC _____
RCH _____
SEC 1
WAS 1
OTH Org Don

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
12225 DEC-25 004840
FPSC-BUREAU OF RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for rate increase in Brevard, Charlotte/ Lee, Citrus, Clay, Duval, Highlands, Lake, Marion, Martin, Nassau, Orange, Osceola, Pasco, Putnam, Seminole, Volusia, and Washington Counties by SOUTHERN STATES UTILITIES INC.; Collier County by MARCO SHORES UTILITIES (Deltona); Hernando County by SPRING HILL UTILITIES (Deltona); and Volusia County by DELTONA LAKES UTILITIES (Deltona)

Docket No. 920199-WS

Filed: December 2, 1997

PETITION FOR LEAVE TO INTERVENE

Pursuant to Rules 25-22.039 and 25-22.036(7)(a), Florida Administrative Code, the FLORIDA UNITED METHODIST CHILDREN'S HOME, INC., by and through its undersigned attorney, petitions for leave to intervene in this docket as a full party, and in support states:

- 1. The full name and address of Petitioner:

Florida United Methodist Children's Home, Inc. Post Office Box 6299 Deltona, Florida 32728

- 2. The name and address of the individuals who should receive copies of notices, pleadings and orders:

Dr. Alex Carmichel Florida United Methodist Children's Home, Inc. Post Office Box 6299 Deltona, Florida 32728

Joseph A. McGlothlin Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A. 117 South Gadsden Street Tallahassee, Florida 32301

DOCUMENT NUMBER-DATE

12225 DEC-25 7313

POST-FILED/CROSS-RECORDING

Statement of How Petitioner's Substantial Interests Will Be Affected:

3. The Florida United Methodist Children's Home, Inc. is a customer of Florida Water Services Corporation (formerly Southern States Utilities). Florida Water Services provides only sewer service to Petitioner. In this docket, the Commission is considering several optional courses available to it upon remand from the First District Court of Appeal. One option under consideration involves ordering a refund to some customers, to be funded by a surcharge on others. The amount of the potential surcharge that would be imposed on the Florida United Methodist Children's Home, Inc. under such a scenario would be extraordinary and onerous. Petitioner's most recent monthly sewer bill was \$6,000.00. Its total annual bill has increased from \$33,000.00 in 1994 to at least \$60,000.00 per year currently. Recently Florida Water Services informed Petitioner that, if a refund is ordered, the Florida United Methodist Children's Home, Inc. would have to bear a surcharge of \$52,000.00. Such a surcharge would impose a severe hardship on Petitioner, whose operations are funded totally by non-profit, public dollars. If Petitioner is required to pay a surcharge of \$52,000.00, the monies used to pay the surcharge would have to be taken from, and would thereby reduce, the funds available to meet the needs of children.

Ultimate Facts Alleged:

4. The Florida United Methodist Children's Home, Inc.'s position is that, given all of the circumstances, imposing a surcharge in this situation would be inequitable and unreasonable. The Commission should implement neither a refund nor a surcharge. Instead, the final rate structure should take effect prospectively.

Adoption of Brief:

5. The Florida United Methodist Children's Home, Inc. adopts the brief submitted on November 5, 1997, by Marion Oaks Civic Association and the City of Keystone Heights.

WHEREFORE, the Florida United Methodist Children's Home, Inc. requests the Commission to enter an order authorizing it to intervene as a full party.



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Telephone: (850) 222-2525

Attorneys for Petitioner,
Florida United Methodist
Children's Home, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the **Florida United Methodist Children's Home, Inc.'s** foregoing **Petition to Intervene** has been served by U.S. Mail or hand-delivery* to the following on this **2nd** day of **December, 1997**:

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Florida Public Service Commission
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