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October 27, 2000

HAND DELIVERY

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

Re:

Docket No. 991666-WU

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Florida Water Services Corporation ("Florida Water") are the original and fifteen copies of Florida Water's and City of Groveland's Joint Motion for Extension of Time to File Rebuttal Testimony and Joint Motion for Continuance in the above-referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me. Thank you for your assistance with this filing.

Sincerely,

Kenneth A. Haffmar

APP CAF KAH/rl Enclosures COM 3 CTR Trib.3 ECR LEG 1 OPC PAL RGO SEC 1 SER OTH

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| IN RE: Application for amendment of |) | |
|--|---------|-------------------------|
| Certificate No. 106-W to add territory |) | |
| in Lake County by Florida Water Services |) | Docket No. 991666-WU |
| Corporation. |) | |
| | Ĵ | Filed: October 27, 2000 |
| Corporation. |) _/ | Filed: October 27, 2000 |

FLORIDA WATER SERVICES CORPORATION'S AND CITY OF GROVELAND'S JOINT MOTION FOR EXTENSION OF TIME TO FILE REBUTTAL TESTIMONY AND JOINT MOTION FOR CONTINUANCE

Florida Water Services Corporation ("Florida Water"), and Intervenor, City of Groveland ("City"), by and through their respective undersigned counsel, pursuant to Rule 28-106.204, Florida Administrative Code, jointly request a thirty day extension of time for the filing of Prefiled Rebuttal Testimony and Exhibits. In addition, Florida Water and the City, pursuant to Rule 28-106.210, Florida Administrative Code, jointly move for a continuance of the final hearing in this cause for a period of sixty to ninety days so that the parties may continue to explore and engage in discussions directed toward a settlement. In support of these Motions, the parties state as follows:

I. JOINT MOTION FOR EXTENSION OF TIME TO FILE PREFILED REBUTTAL TESTIMONY AND EXHIBITS

- 1. Florida Water has filed its Prefiled Direct Testimony and Exhibits. Intervenor City has also filed its Prefiled Testimony and Exhibits. Rebuttal Testimony and Exhibits are currently due October 31, 2000.
- 2. Florida Water's Prefiled Direct Testimony was sponsored by Charles Sweat. Mr. Sweat is no longer employed by Florida Water. Mr. Sweat's Prefiled Direct Testimony will be adopted by Mr. John Tillman. Mr. Tillman is currently in the process of assuming a number of duties previously handled by Mr. Sweat. Further, Mr. Tillman is scheduled be out of the country DOCUMENT NUMBER-DATE

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during the week November 13, 2000. Finally, Mr. Tillman is the individual from Florida Water charged with and engaged in the process of exploring a potential settlement with the City.

3. The City joins in this request as it would allow additional time to explore settlement and prepare any Rebuttal Testimony to the testimony filed by Staff witness Charles R. Gauthier. The City desires to file any Rebuttal Testimony contemporaneously with the filing of Florida Water's Rebuttal Testimony.

WHEREFORE, for the foregoing reasons, Florida Water and the City respectfully request that they be granted a thirty day extension of time, up to and until November 30, 2000, for the filing of Prefiled Rebuttal Testimony and Exhibits in this proceeding.

II. JOINT MOTION FOR CONTINUANCE

- 4. As previously discussed, Florida Water and the City have initiated settlement discussions concerning this case. The City has made a settlement proposal to Florida Water. Florida Water has contacted the City Manager and requested the opportunity to make a settlement proposal before the City Commission which is scheduled to take place on December 4, 2000.
- 5. While there is no guarantee that this case will settle, both Florida Water and the City maintain that a continuance of sixty to ninety days is appropriate to allow the parties to focus their efforts on settlement and to determine if material progress toward a settlement can be achieved.

WHEREFORE, for the foregoing reasons, Florida Water and the City of Groveland respectfully request that the Commission grant this Joint Motion for Continuance, postpone the final hearing scheduled for December 11-12, 2000, and reschedule the final hearing for a two-day period within sixty to ninety days after December 12, 2000.

Respectfully submitted,

Kenneth A. Hetiman, Esq. J. Stephen Mexion, Esq.

Rutledge, Ecenia, Purnell & Hoffman, P.A.

P. O. Box 551

Tallahassee, FL 32302

Attorneys for Florida Water Services Corporation

- - and - -

Suzanne Brownless, Esq. 1311-B Paul Russell Road Suite 201 Tallahassee, FL 32301

Attorney for the City of Groveland

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing testimony has been furnished by hand delivery this 27th day of October, 2000 to:

Patricia Christensen Senior Attorney Florida Public Service Commission 2540 Shumard Oak Blvd. Room 370 Tallahassee, FL 32399-0850

Suzanne Brownless, Esq. 1311-B Paul Russell Road Suite 201 Tallahassee, FL 32301

Kenneth A. Hoffman

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