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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION 00 DEC -5 PM 4:37

IN RE: Application for amendment of)
Certificate No. 106-W to add territory)
in Lake County by Florida Water Services)
Corporation.

DOCKET SO 991666 WU

REQUEST FOR ORAL ARGUMENT

Pursuant to Rule 25-22.058, Florida Administrative Code, the City of Groveland, Florida, files this request for oral argument on its Response in Opposition to Florida Water Services Corporation's Motion to Strike and Motion for Extension of Time to File Rebuttal Testimony, and in support thereof, states as follows:

- 1. Florida Water Services Corporation (FWSC) has filed a request to strike the testimony of City witnesses regarding the ability of the City to provide sewer service to the proposed service area at issue in this docket. FWSC has also requested that if its motion is denied, it be allowed to file rebuttal testimony on this issue within ten days of the date of the Commission's decision on its motion to strike.
- 2. Essentially what FWSC is arguing is that the Commission does not have the authority to consider the provision of sewer services in this water only certificate docket. The City disagrees. Oral argument will aid the Commission in better comprehending and evaluating the arguments presented by the parties regarding the Commission's authority in certificate cases and in reaching a just and equitable decision.

WHEREFORE, the City of Groveland, Florida requests that its

Request For Oral Argument on its Response in Opposition to Florida

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Water Services Corporation's Motion to Strike and Motion for Extension of Time to File Rebuttal Testimony filed in this docket be granted.

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Tallahassee, Florida 32301

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing were furnished by Hand Delivery (*) or regular U.S. Mail to the following on this 5th day of December, 2000:

J. L Yarborough, City Manager 156 South Lake Avenue Groveland, FL 34736 (*) Patricia Christensen, Esq. Division of Legal Services Florida Public Service Comm. 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

J. Stephen Menton, Esq. Kenneth A. Hoffman, Esq. Rutledge Law Firm P.O. Box 551 Tallahassee, Florida 32302

Suzanne Brownless, Esq.