

**Eric Fryson**

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**From:** Roberts, Brenda [ROBERTS.BRENDA@leg.state.fl.us]  
**Sent:** Monday, November 05, 2012 2:05 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Saylor, Erik; Vandiver, Denise; Gene Brown; Lisa Bennett; Martha Barrera; Marty Friedman; Ralph Jaeger  
**Subject:** E-filing (Dkt. No. 110200-SU)  
**Attachments:** 110200.OPC response to WMSI amended request for oral argument.pdf  
Electronic Filing

a. Person responsible for this electronic filing:

Erik L. Saylor, Associate Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400  
(850) 488-9330  
[Saylor.erik@leg.state.fl.us](mailto:Saylor.erik@leg.state.fl.us)

b. Docket No. 110200-WU

In re: Application for increase in water rates in Franklin County by Water Management Services, Inc.

c. Document being filed on behalf of Office of Public Counsel

d. There are a total of 2 pages.

e. The document attached for electronic filing is 110200.OPC response to WMSI amended request for oral argument.pdf

Thank you for your attention and cooperation to this request.

Brenda S. Roberts  
Office of Public Counsel  
Telephone: (850) 488-9330  
Fax: (850) 488-4491

DOCUMENT NUMBER-DATE

07467 NOV-5 2012

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11/5/2012

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Application for increase in water rates in )  
Franklin County by Water Management )  
Services, Inc. )

Docket No: 110200-SU

Filed: November 5, 2012

**OPC'S RESPONSE IN OPPOSITION TO  
WMSI'S AMENDED REQUEST FOR ORAL ARGUMENT ON  
OPC'S PROTEST OF THE PAA ORDER**

The Office of Public Counsel (OPC) hereby responds to WMSI's Amended Request For Oral Argument On OPC's Protest Of The PAA Order.

OPC opposes the request. Contrary to the argument that WMSI has raised "an issue of first impression," Section 120.52(13)(b), F.S. and Section 350.0611, F.S., both of which sections are cited in OPC's Response to WMSI's Motion to Dismiss OPC's Protest of the PAA Order, establish that there is no issue of OPC's standing to protest the PAA. As OPC's statutory right to intervene and participate as a party is straightforwardly dispositive of WMSI's pending motion, no time and resources should be wasted on WMSI's request.

WHEREFORE, the Office of Public Counsel respectfully submits that the Commission should deny WMSI's amended request for oral argument.

**J.R. KELLY  
PUBLIC COUNSEL**

  
Erik L. Saylor  
Associate Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Rm. 812  
Tallahassee, FL 32399-1400  
(850) 488-9330

Attorneys for the Citizens  
of the State of Florida

DOCUMENT NUMBER-DATE

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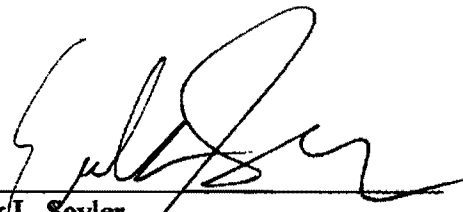
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Office of Public Counsel OPC'S **RESPONSE IN OPPOSITION TO WMSI'S AMENDED REQUEST FOR ORAL ARGUMENT ON OPC'S PROTEST OF THE PAA ORDER** has been furnished by electronic mail and U.S. Mail to the following parties on this 5th day of November, 2012, to the following:

Martha Barrera  
Lisa Bennett  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Mr. Gene D. Brown  
Water Management Service, Inc.  
250 John Knox Road, #4  
Tallahassee, Fl 32303-4234

Martin S. Friedman  
Sundstrom, Friedman & Fumero, LLP  
766 North Sun Drive, Suite 4030  
Lake Mary, Florida 32746

  
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Erik L. Saylor  
Associate Public Counsel