

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:

Application for expansion of certificate (CIAC)
(new wastewater line extension Charge) by North Peninsula
Utilities Corp.

DOCKET NO. 130209-SU

_____ /

UNOPPOSED MOTION FOR EXTENSION OF TIME

Pursuant to rule 28.106.111(3) of the Florida Administrative Code, County of Volusia, Florida (“County of Volusia”) hereby files this unopposed motion for extension of time for which to file its initial pleading in the form of a written objection to the application for expansion, and in support, states:

1. County of Volusia, on notice of the above referenced application as published on April 1, 2014, must file a written objection to the instant application for expansion no later than May 1, 2014, in accordance with section 367.045(4) of the Florida Statutes (2013) and rule 25-30.031 of the Florida Administrative Code (2013).

2. County of Volusia and North Peninsula Utilities Corporation are presently engaged in negotiations regarding the proposed expansion and a possible acquisition of the wastewater utility service. Said discussions remain ongoing and have the potential to be resolved in the near future, obviating the need for the filing of a written objection. Likewise, County of Volusia is also consulting with both engineering and financial experts in conjunction with these negotiations and for its written objection should no resolution be reached.

3. As a result of these ongoing negotiations, County of Volusia seeks an extension of time for which to file its written objection (its initial pleading) in accordance with rule 28.106.111(3).

4. The undersigned has spoken with John L. Wharton, Esq., counsel for North Peninsula Utilities Corporation, and he has stated that there is no objection to an extension of time to and including June 1, 2014 for the filing of the written objection.

WHEREFORE, County of Volusia, Florida, respectfully requests an extension of time to and including June 1, 2014 for which to file its written objection to application for expansion.

Respectfully submitted,

s/Mary G. Jolley

MARY G. JOLLEY, ESQUIRE

Assistant County Attorney

Fla. Bar No.: 080454

mjolley@volusia.org

COUNTY OF VOLUSIA

123 W. Indiana Avenue, Ste. 301

DeLand, FL 32720

(386) 736-5950

(386) 736-5990 (Fax)

COUNSEL FOR COUNTY OF VOLUSIA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion has been furnished by electronic mail and United States Mail to John L. Wharton, Esq., counsel for North Peninsula Utilities Corporation, jwharton@deanmead.com, Dean Mean Law Firm, 215 S. Monroe Street, Suite 815, Tallahassee, Florida 323301, on this 25th day of April, 2014.

s/Mary G. Jolley
MARY G. JOLLEY, ESQUIRE
Assistant County Attorney
Fla. Bar No.: 080454
mjolley@volusia.org
COUNTY OF VOLUSIA
123 W. Indiana Avenue, Ste. 301
DeLand, FL 32720
(386) 736-5950
(386) 736-5990 (Fax)

COUNSEL FOR
COUNTY OF VOLUSIA