

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for an increase in water rates)
in Franklin County by Water Management) Docket No: 110200-WU
Services, Inc.)
) Filed: September 29, 2014
)
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**CITIZEN’S REQUEST FOR ORAL ARGUMENT ON CITIZEN’S RESPONSE TO
WATER MANAGEMENT SERVICES, INC.’S MOTION FOR ORDER APPROVING
INTERCREDITOR AGREEMENT AND AMENDING ESCROW REQUIREMENT**

The Citizens of the State of Florida, through the Office of Public Counsel (OPC), pursuant to Rule 25-22.0022, Florida Administrative Code, respectfully requests the Commission provide OPC an opportunity to address the Commission in oral argument on Water Management Services, Inc.’s (WMSI) Motion for Order Approving Intercreditor Agreement and Amending Escrow Requirement (Motion) and Citizen’s Response to Water Management Services, Inc.’s Motion for Order Approving Intercreditor Agreement and Amending Escrow Requirement (Response), and states:

1. On September 22, 2014, WMSI submitted the Motion requesting the approval of a new escrow account and cancellation of the escrow account set forth in Order No. PSC-12-0435-PAA-WU (PAA Order) that was affirmed by Order No. PSC-13-1097-FOF-WU (Final Order).
2. Concurrently with this Request, OPC is filing a Response to WMSI’s Motion listing reasons why the Motion should be denied or, in the alternative, require a showing, beyond the motion, as to why this Commission should relinquish control over the escrow account designed to protect customers.
3. WMSI’s Motion and OPC’s Response call upon the Commission to resolve significant, fundamental disagreements regarding the terms of the Commission’s PAA and Final

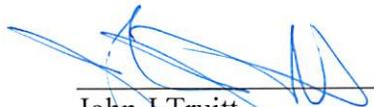
Orders as well as the application of the doctrine of administrative finality to material terms in Commission orders that are not part of an enumerated list of terms for which the docket remains open. OPC submits that oral argument on these issues would be beneficial to the Commission as it considers WMSI's Motion and OPC's Response, especially since similar issues may present themselves before the Commission in the future.

4. OPC requests the Commission schedule oral argument on WMSI's Motion and OPC's Response. OPC suggests that allowing 10 minutes per side would be appropriate under the circumstances.

WHEREFORE, the Office of Public Counsel, on behalf of the customers of WMSI, respectfully requests the opportunity to present oral argument to the Commission on WMSI's Motion and OPC's Response.

Respectfully submitted by:

J.R. KELLY
PUBLIC COUNSEL



John J Truitt
Associate Public Counsel
Florida Bar No. 0084752
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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing **CITIZEN'S REQUEST FOR ORAL ARGUMENT ON CITIZEN'S RESPONSE TO WATER MANAGEMENT SERVICES, INC.'S MOTION FOR ORDER APPROVING INTERCREDITOR AGREEMENT AND AMENDING ESCROW REQUIREMENT** has been furnished by electronic mail and U.S. Mail to the following parties on this 29th day of September, 2014, to the following:

Martha Barrera
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



John J. Truitt
Associate Public Counsel