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February 11, 1999

RECEIVED 11 FEB 11 1999  
RECORDS AND REPORTING

Ms. Blanca S. Bayó  
Director, Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Lake Utility Services, Inc. -- Docket No. 960444-WU

Dear Ms. Bayo:

Enclosed for filing on behalf of Lake Utility Services, Inc. are the original and fifteen copies of its Motion for Extension of Time to File Rebuttal Testimony.

By copy of this letter, this document is being furnished to the parties on the attached service list.

Very truly yours,

RECEIVED & FILED

*R.D.M.*

*[Signature]*  
FPSC-BUREAU OF RECORDS

Richard D. Melson

- ACK \_\_\_\_\_
- AFA 1
- APP \_\_\_\_\_ RDM/kcg
- CAF \_\_\_\_\_ Enclosures
- CMU \_\_\_\_\_ CC: Parties of Record
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1
- LIN 3
- OPC \_\_\_\_\_ 112569.1
- RCH \_\_\_\_\_
- SEC 1
- WAS *Willis*
- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**ORIGINAL**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Application for rate	)	
increase and for increase in	)	Docket No. 960444-WU
service availability charges in	)	
Lake County by Lake Utility	)	Filed: February 11, 1999
Services, Inc.	)	
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**LAKE UTILITY SERVICES, INC.'S  
MOTION FOR EXTENSION OF TIME TO FILE REBUTTAL TESTIMONY**

Lake Utility Services, Inc. (LUSI) hereby moves that the date for filing rebuttal testimony be extended by one week, from Monday, February 15, 1999 to Monday, February 22, 1999. As grounds therefor, LUSI states:

1. OPC's testimony was filed at the close of business on January 25, 1999 and Staff's testimony was filed at the close of business on February 8, 1999. The current February 15, 1999 date for rebuttal testimony allows only one week after Staff's testimony was filed for LUSI to file its rebuttal. This is a short time period under the best of circumstances.

2. The Vice President of Regulatory Matters for LUSI's parent company, who is expected to be the sole witness filing rebuttal testimony, has been ill since the afternoon of Monday, February 8, before Staff's testimony was received. As of today (Thursday, February 11), he has not been able to return to work, and it is uncertain whether he will be able to return before

Monday, February 15, 1999, the current due date for LUSI's rebuttal.

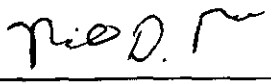
3. LUSI therefore requests a one week extension of time to file its rebuttal testimony. Absent an extension, LUSI will be unable to file meaningful rebuttal and will be denied its due process right to respond to the case in opposition to its rate increase. LUSI does not object to the Commission granting a similar one week extension to any other party that intends to file rebuttal.

4. The requested extension should have no impact on the prehearing statements due on February 15, 1999, the prehearing conference scheduled for March 2, 1999 or on the March 10-11, 1999 hearing dates. LUSI believes that no party will be prejudiced by this extension.

5. LUSI has consulted counsel for OPC. At this time, OPC has not yet determined its position on this request.

RESPECTFULLY SUBMITTED this 11th day of February, 1999.

HOPPING GREEN SAMS & SMITH, P.A.

By:   
Richard D. Melson  
P.O. Box 6526  
Tallahassee, FL 32314  
(850) 425-2313

Attorney for Lake Utility Services,  
Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by hand delivery this 11th day of February, 1999, to the following:

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Tallahassee, FL 32399

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Office of Public Counsel  
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Tallahassee, FL 32399

*Tim D. Mc*

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Attorney