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September 9, 2002

KAREN D. WALKER
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Internet Address:
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VIA HAND DELIVERY

Blanca S. Bayo
Division of Commission Clerk and
Administrative Services
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RECEIVED-FPSC
02 SEP -9 PM 4:07
COMMISSION
CLERK

Re: In Re: Application for Limited Proceeding to Recover Costs of Water
System Improvements In Marion County By Sunshine Utilities of
Central Florida, Inc., Docket No. 992015-WU

Dear Ms. Bayo:

Enclosed for filing on behalf of Sunshine Utilities of Central Florida, Inc. ("Sunshine") are the original and seven (7) copies each of Sunshine's Notice of Serving its First Set of Interrogatories (Nos. 1-23) and First Request for Production (Nos. 1-25) to the Citizens of the State of Florida.

For our records, please acknowledge your receipt of these filings on the enclosed copy of this letter. Thank you for your consideration.

Sincerely,

HOLLAND & KNIGHT LLP


Karen D. Walker

KDW:kjg
Enclosures

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FPSC-BUREAU OF RECORDS

1st Set of Interrogatories
DOCUMENT NUMBER-DATE

09543 SEP-98

FPSC-COMMISSION CLERK

Request for
Production of Documents
DOCUMENT NUMBER-DATE

09544 SEP-98

FPSC-COMMISSION CLERK

Blanca Bayo
September 9, 2002
Page 2

cc: Ralph Jaeger
Stephen C. Reilly

TAL1 #256219 v1

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for Limited)	
Proceeding to Recover Costs of Water)	Docket No. 992015-WU
System Improvements In Marion County)	
By Sunshine Utilities of Central Florida,)	Filed: September 9, 2002
Inc.)	
	/	

**SUNSHINE UTILITIES OF CENTRAL FLORIDA, INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-25)
TO THE CITIZENS OF THE STATE OF FLORIDA**

SUNSHINE UTILITIES OF CENTRAL FLORIDA, INC. ("Sunshine"), pursuant to Rule 28-106.206, Florida Administrative Code, Rule 1.350, Florida Rules of Civil Procedure, the Order Establishing Procedure in this docket on June 20, 2002, and the First Order Revising Order Establishing Procedure and Controlling Dates, Granting in Part and Denying in Part Expedited Discovery and Setting Uniform Expedited Discovery Deadlines issued in this docket on August 15, 2002, hereby serves its First Request for Production of Documents (Nos. 1-25) on the Citizens of the State of Florida, Office of Public Counsel ("Citizens") and requests Citizens to produce the documents designated below to the undersigned within fifteen (15) days of service of this request.

DOCUMENT NUMBER-DATE

09544 SEP-9 8

FPSC-COMMISSION CLERK

DEFINITIONS AND INSTRUCTIONS

1. "Document" includes all materials so defined in Rule 1.350(a) of the Florida Rules of Civil Procedure, as currently or hereafter construed by the appropriate courts, including, without limitation the following: any written or graphic matter, and any electronic, photographic, digital or other means of recording, preserving or transmitting data, visual images, sounds, thought or expression, and all tangible things from which information can be processed or transcribed, including, but not limited to, all reports, memoranda, letters, minutes, correspondence, electronic-mail, notes, notebooks, manuals, books, brochures, lists, publications, computer printouts, printed forms, drawings, sketches, graphs, maps, charts, photographs, films, tapes, computer discs or drives, photo records, receipts, and other writings or data compilations of any kind from which information can be obtained, including drafts, typings, printouts and copies or reproductions which bear notation or are in any way different in content from the original, whether hand written, printed, or otherwise recorded, that is in the possession, custody or control of the Citizens and/or the Office of Public Counsel. If the documents to be provided are maintained in a computer-readable format, provide a printed copy of the document or other means by which they can be accessed and reviewed by Sunshine's counsel (i.e. if provided on a disc, the documents should be in a readily readable format).

2. The terms "relate to," "relates to" or "relating to" means having any connection, association, or concern with or any relevance, relation, pertinence or

applicability to, or any implication for or bearing upon the subject matter of the inquiry.

3. The term "person" means any natural person, firm, partnership, corporation, incorporated association, organization, joint venture, cooperative, governmental body, or other form of legal entity.

4. The term "you" or "yours" means the party or parties to whom this request for production of documents is addressed, including its divisions, departments, subsidiaries, affiliates, predecessors, present or former officers, directors, owners, agents, attorneys and all other persons acting or purporting to act on its behalf.

5. "All" includes the word "any" and "any" includes the word "all." "Each" includes the word "every" and "every" includes the word "each." "And," as well as "or," shall be construed disjunctively or conjunctively as necessary in order to bring within the scope of the request for production documents that might otherwise be construed to be outside its scope.

6. "Sunshine" means Sunshine Utilities of Central Florida, Inc. and includes all of its members, employees, agents, divisions, affiliates and any person or entity acting for or on behalf of Sunshine in any capacity.

7. "Citizens" means the Citizens of the State of Florida and/or the Office of Public Counsel, and includes all of its members, employees, agents, divisions, affiliates and any person or entity acting for or on behalf of Citizens in any capacity.

8. "FDEP" means the Florida Department of Environmental Protection and includes all of its employees, agents, divisions, and any person or entity acting for or on behalf of the FDEP in any capacity.

9. "FPSC" means the Florida Public Service Commission and includes all of its employees, agents, divisions and any person or entity acting for or on behalf of the FPSC in any capacity.

10. The use of a verb in any tense shall be construed as the use of the verb in all other tenses, wherever necessary to bring within the scope of the request for production documents that might otherwise be construed to be outside its scope.

11. A plural noun shall be construed as a singular noun, and a singular noun shall be construed as a plural noun, whenever necessary to bring within the scope of the request for production documents that might otherwise be construed to be outside its scope.

12. If production is withheld pursuant to a claim of privilege, please provide the following identifying information:

- (a) date;
- (b) author;
- (c) addressee;
- (d) brief description of the subject matter and form of the document and attachments, including number of pages;
- (e) statement of the basis upon which the privilege is claimed; and

- (f) the numbers of each specific request to which the document or thing would be responsive.

13. If there is any document or other tangible item described by this request which is no longer in your possession, custody or control, or is no longer in existence or accessible to you, please indicate:

- (a) the date and nature of the disposition of such document or other tangible item, including, but not limited to, whether such: (a) is missing or lost, (b) has been destroyed, or (c) has been transferred to another person;
- (b) the circumstances surrounding such disposition, including any authorization therefore; and
- (c) where applicable, the person currently in possession, custody or control of such document or item.

DOCUMENTS TO BE PRODUCED

1. All documents that you intend to introduce into evidence or otherwise rely on at the hearing in this proceeding.

2. All documents identified in response to Sunshine's First Set of Interrogatories to the Citizens of the State of Florida.

3. All letters of engagement, contracts or agreements between the Citizens and its witnesses in this proceeding relating to this proceeding.

4. All workpapers, source documents, and all other documents relied upon and/or created by all witnesses offered by Sunshine in this proceeding that relate to this proceeding.

5. All documents (including, but not limited to, correspondence, e-mail communications, and telephone logs) reflecting communications between the Citizens and its witnesses in this proceeding relating to this proceeding.

6. All documents (including, but not limited to, correspondence, e-mail communications, and telephone logs) reflecting communications between the Citizens and/or its witnesses and FPSC staff relating to this proceeding.

7. All documents (including, but not limited to, correspondence, e-mail communications, and telephone logs) reflecting communications between the Citizens and/or its witnesses and DEP relating to this proceeding.

8. All documents (including, but not limited to, correspondence, e-mail communications, and telephone logs) reflecting communications between the Citizens and/or its witnesses and any representatives of Marion County relating to this proceeding.

9. All documents which set forth any used and useful analysis performed in whole or in part by Ted. L. Biddy in this or in any other regulatory, administrative or judicial proceeding.

10. Copies of all prefiled testimony submitted by Ted. L. Biddy in any regulatory, administrative or judicial proceeding addressing used and useful formulas for utility plant and/or water utility distribution systems.

11. Transcripts of any testimony by Ted. L. Biddy in any regulatory, administrative or judicial proceeding addressing used and useful formulas for utility plant and/or water utility distribution systems.

12. Copies of all prefiled testimony submitted by Ted L. Biddy in any regulatory, administrative or judicial proceeding addressing the prudence of a utility project or a utility's proposed project.

13. Transcripts of any testimony by Ted. L. Biddy in any regulatory, administrative or judicial proceeding addressing the prudence of a utility project or a utility's proposed project.

14. Copies of all prefiled testimony submitted by Ted. L. Biddy in any regulatory, administrative or judicial proceeding involving water contamination.

15. Transcripts of any testimony by Ted. L. Biddy in any regulatory, administrative or judicial proceeding involving water contamination.

16. Copies of all prefiled testimony submitted by Kimberly H. Dismukes in any regulatory, administrative or judicial proceeding involving water contamination.

17. Transcripts of any testimony by Kimberly H. Dismukes in any regulatory, administrative or judicial proceeding involving water contamination.

18. Copies of all prefiled testimony submitted by Kimberly H. Dismukes in any regulatory, administrative or judicial proceeding addressing the appropriate salary for a utility officer.

19. Transcripts of all testimony by Kimberly H. Dismukes in any regulatory, administrative or judicial proceeding addressing the appropriate salary for a utility officer.

20. All documents reflecting any and all communications between Ted. L. Biddy and FPSC staff, whether or not in connection with this proceeding, relating to the FPSC's or FPSC staff's used and useful formula.

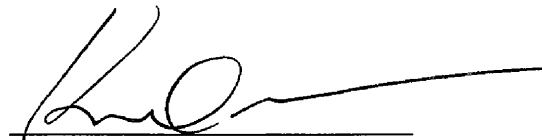
21. All documents relating to any analysis performed (in whole or in part) by any witness for the Citizens in this proceeding relating to water contamination in Marion County, regardless of whether such analysis was conducted in connection with this proceeding.

22. All documents relating to any analysis performed (in whole or in part) by any witness for the Citizens in this proceeding relating to any utility system in Marion County, regardless of whether such analysis was conducted in connection with this proceeding.

23. All documents evidencing Ted. L. Biddy's knowledge and experience relating to activated carbon filters used to address water contamination.

24. All documents reflecting the sizes of "off the shelf" storage tanks of less than 500,000 gallons and the cost of such storage tanks. For purposes of this request, "off the shelf" means a storage tank that is not custom made.

25. With respect to page 13 of Ted L. Biddy's prefiled direct testimony, provide any maps, drawings or other documents showing the proposed location of a remote well to replace the Lakeview Hills wells.

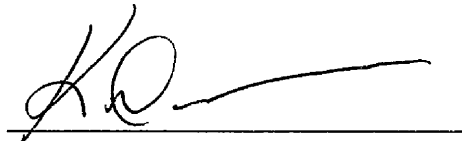


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**Attorneys for Sunshine Utilities
of Central Florida, Inc.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Sunshine's First Request for Production of Documents to the Citizens of the State of Florida was furnished by hand delivery to Stephen C. Reilly, Associate Public Counsel, Office of Public Counsel, c/o The Florida Legislature, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400; and to Ralph Jaeger, Esquire, Florida Public Service Commission, Division of Legal Services, Room 370, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 all on this 9th day of September, 2002.



Karen D. Walker