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November 4, 1996

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L PETER JOHNSON (1942-1968)

## VIA FEDERAL EXPRESS

JAMES L. ADE

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MICHAEL E. GOODBREAD, JR.

CHARLES L. CRANFORD

Blanca Bayo, Director
Department of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RE: Application by United Water Florida Inc. For Increased Rates in Duval, Nassau and St. Johns Counties, Docket No. 960451-WS

Dear Ms. Bayo:

Enclosed for filing is an original and seven copies of United Water Florida Inc.'s Objection to Interrogatory No. 73 of Commission Staff's Second Set of Interrogatories to United Water Florida Inc. Please file the original and distribute the copies in accordance with your usual procedures.

If you have any questions or comments regarding this matter, please do not hesitate to call.

Sincerely yours,

Scott G. Schildberg

ACK \_\_\_\_SGS/msa

AFA \_/\_Enclosures
CC: Mr. David E. Chardavoyne
Mr. Walton F. Hill
Mr. Robert J. Iacullo
Mr. Richard A. Hensch
Mr. Frank J. McGuire
Mr. Munipalli Sambamurthi
Mr. James L. Ade
Ms. Rosanne Capeless
Ms. Bobbie L.Reyes
Mr. Harold McLean

DOCUMENT NUMBER-DATE

11829 NOV-58

FPSC-RECORDS/REPORTING

# . . . BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION DOCKET NO.: 960451-WS Date Submitted for In re: Application of United Water ) Filing: November 4, 1996 Florida Inc. for Rate Adjustment Objection to Interrogatory No. 73 of Commission Staff's Second Set of Interrogatories to United Water Florida Inc. Pursuant to Order No. PSC 96-1230-PCO-WS, United Water Florida Inc. ("United Water Florida"), by and through its undersigned attorneys, hereby files this Objection and states as follows: 1. On or about October 21, 1996, the Staff of the Florida

- Public Service Commission ("Commission") served upon United Water Florida by U.S. Mail the Commission Staff's Second Set of Interrogatories to United Water Florida Inc., ("Staff's Second Set").
  - Interrogatory No. 73 of Staff's Second Set requires United Water Florida to "provide the annual salary for 1995 and as projected for 1996 and 1997 for any person employed by UWR, UWW, and UWM&S which is testifying in this case and/or which has charged time to the company during the historic test year 1995."
    - 3. The information sought in Interrogatory No. 73 is proprietary confidential business information of United Water Florida and its affiliates and United Water Florida objects to DOCUMENT NUMBER - DATE Interrogatory No. 73. 11829 NOV-5%

FPSC-RECORDS/REPORTING

4. United Water Florida hereby gives notice of its intent to request confidential classification for any material requested by 5. Rule 25-22.006(7)(b), Florida Administrative Code, Interrogatory No. 73. states that "all persons are urged to seek mutual agreement regarding access prior to bringing a controversy to the Commission." Accordingly, United Water Florida intends to discuss this matter with the Staff prior to filing a motion for protective Respectfully submitted, order. MARTIN, ADE, BIRCHFIELD & MICKLER, P.A. By: / or James L. Ade Florida Bar No. 0000460 Scott G. Schildberg Florida Bar No. 0613990 3000 Independent Square Jacksonville, FL 32202 Telephone: (904) 354-2050 Attorneys for United Water Florida Inc.

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and seven copies of the Objection to Interrogatory No. 73 of Commission Staff's Second Set of Interrogatories to United Water Florida Inc. has been furnished by Federal Express to Blanca Bayo, Director, Division of Records and Reporting, Florida Public Service Commission, 2450 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, and that a copy of the foregoing has been furnished to Bobbie L. Reyes, Staff Counsel, Florida Public Service Commission 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, and to Harold McLean, Esquire, Office of Public Counsel, c/o The Florida Legislature, 111 W. Madison Street, Room 812, Tallahassee, Florida 32399-1400, by U.S. Mail, this 4th day of November, 1996.

Attorney