

ORIGINAL
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application for Certificates)	
to provide Water and Wastewater)	DOCKET NO. 961321-WS
Service in Clay County by Point)	Date Submitted for
Water and Sewer, Inc.)	Filing: July 10, 1997
_____)	

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**POINT WATER AND SEWER'S RESPONSE
TO STAFF'S OBJECTION TO POINT WATER AND SEWER'S
FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION AND REQUEST FOR A PROTECTIVE ORDER**

COMES NOW, POINT WATER AND SEWER, INC., a Florida corporation (hereinafter referred to as "PWS"), by and through its undersigned attorney, and hereby responds to Staff's Objection to Point Water and Sewer's First Set of Interrogatories and Request for Production, and states as follows:

1. On June 20, 1997, PWS filed a First Set of Interrogatories and Requests for Production purporting to seek information from Commission staff related to the issues in this matter.
2. On June 30, 1997, Staff filed its Objection.
3. Staff has represented that it will not be calling any members of the Staff as witnesses. Therefore, PWS hereby withdraws its Interrogatories directed to Staff.
4. PWS, in a spirit of cooperation, hereby withdraws its document request directed to Staff without prejudice and will attempt to acquire said documents through a public records request. To the extent Staff wishes to raise attorney/client privilege or work product, it is entitled to do so.

ACK _____
 AFA _____ WHEREFORE, Point Water and Sewer, Inc. respectfully requests that Staff's Objection
 APP ~~to Point Water and Sewer's First Set of Interrogatories and Requests for Production and Request~~
 CAF ~~for a Protective Order be denied as moot.~~

CMU _____
 CTR _____
 EAG _____
 LEG 1 _____
 LIN 3 _____
 OFC _____
 RCH _____
 REC 1 _____
 (S)

DOCUMENT NUMBER-DATE
07130 JUL 16 97
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by mail this 10th day of July, 1997 to: J. Michael Lindell, Esq. (Fax no. (904) 633-9561), Hayes & Lindell, P.A., 233 E. Bay Street, Suite 620, Jacksonville, Florida 32202; Margaret Parker O'Sullivan (Fax no. (904) 413-6250), Staff Counsel Division of Legal Services, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850; and Scott G. Schildberg, Esq., (Fax no. (904) 354-5842), Martin, Ade, Birchfield & Mickler, 3000 Independent Square, Jacksonville, Florida 32201.

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BY: _____

DOUGLAS H. REYNOLDS
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