

**RUTLEDGE, ECENIA, PURNELL & HOFFMAN**

PROFESSIONAL ASSOCIATION  
ATTORNEYS AND COUNSELORS AT LAW

**ORIGINAL**

STEPHEN A. ECENIA  
JOHN R. ELLIS  
KENNETH A. HOFFMAN  
THOMAS W. KONRAD  
MICHAEL G. MAIDA  
MARTIN P. McDONNELL

POST OFFICE BOX 551, 32302-0551  
215 SOUTH MONROE STREET, SUITE 420  
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788  
TELECOPIER (850) 681-6515

J. STEPHEN MENTON  
R. DAVID PRESCOTT  
HAROLD F. X. PURNELL  
GARY R. RUTLEDGE

GOVERNMENTAL CONSULTANTS  
MARGARET A. MENDUNI  
M. LANE STEPHENS

June 4, 2001

**HAND DELIVERY**

RECEIVED - FPSC  
JUN - 4 AM 10:40  
RECORDS AND REPORTING

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center, Room 110  
Tallahassee, Florida 32399-0850

Re: Docket No. 991666-WU

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Florida Water Services Corporation ("Florida Water") are the following documents:

1. Original and one copy of Florida Water's First Request for Production of Documents to Intervenor City of Groveland; and
2. Original and one copy of Florida Water's Notice of Service of First Set of Interrogatories to Intervenor City of Groveland.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me. Thank you for your assistance with this filing.

Sincerely,

*J. Stephen Menton*  
J. Stephen Menton

APP \_\_\_\_\_  
 CAF \_\_\_\_\_  
 CMP \_\_\_\_\_  
 COM \_\_\_\_\_  
 CTR \_\_\_\_\_  
 ECR \_\_\_\_\_  
 LEG \_\_\_\_\_ ISM/knb  
 OPC \_\_\_\_\_ Enclosures  
 PAI \_\_\_\_\_  
 RGO \_\_\_\_\_  
 SEC \_\_\_\_\_ Bayo.504  
 SER \_\_\_\_\_  
 OTH \_\_\_\_\_

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

(1) DOCUMENT NUMBER-DATE  
06939 JUN-4 2001

(2) DOCUMENT NUMBER-DATE  
06940 JUN-4 2001

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

IN RE: Application for amendment of )  
Certificate No. 106-W to add territory )  
in Lake County by Florida Water Services )  
Corporation. )  
\_\_\_\_\_ /

Docket No. 991666-WU

Filed: June 4, 2001

**FLORIDA WATER SERVICES CORPORATION'S  
FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS TO INTERVENOR CITY OF GROVELAND**

Florida Water Services Corporation ("Florida Water"), by and through its undersigned counsel, and pursuant to Rule 1.350, Florida Rules of Civil Procedure, hereby requests that the City of Groveland ("City") produce copies of the following documents, to undersigned counsel, within thirty (30) days of service of this request.

**DEFINITIONS**

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or interoffice memorandum, memorandum reflecting an oral communication, handwritten, or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet or data processing card, computer printout, or any other written, recorded, transcribed, file or graphic matter, however produced or reproduced.

1. Please provide a copy of the most recent 10 months of monthly operating reports for the City's water and wastewater systems.

DOCUMENT NUMBER-DATE  
06939 JUN-4 01  
FPSC-RECORDS/REPORTING

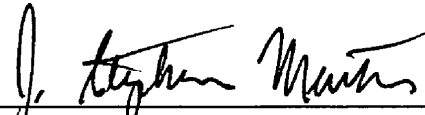
2. Please provide a copy of any and all developer agreements, letters or correspondence from customers or developers who have inquired or requested service from the City in areas outside of the municipal boundaries of the City.

3. Please provide a copy of any updates to the maps previously produced in response to Staff's First Request for Production of Documents showing the location of current and proposed water lines, wastewater lines and fire hydrants for the City's system.

4. Please provide a copy of all diagrams, schematics, construction documents, plans or maps that depict the lines that would provide service to the Requested Area at issue in this docket.

5. Please provide a copy of the financial reports including balance sheets and operating statements for the City's water and sewer system for the most recently completed fiscal year.

Respectfully submitted,



---

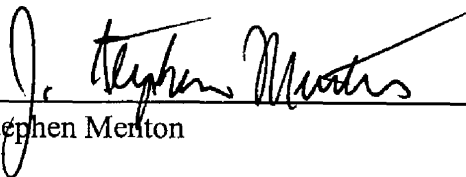
Kenneth A. Hoffman, Esq.  
J. Stephen Menton, Esq.  
Rutledge, Ecenia, Purnell & Hoffman, P.A.  
P. O. Box 551  
Tallahassee, FL 32302  
Attorneys for Florida Water Services Corporation

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Hand Delivery this 4 day of June, 2001 to:

Patricia Christensen, Esq.  
Senior Attorney  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Room 370  
Tallahassee, FL 32399-0850

Suzanne Brownless, Esq.  
1311-B Paul Russell Road  
Suite 201  
Tallahassee, FL 32301

  
\_\_\_\_\_  
J. Stephen Merton