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August 7, 2001

BY HAND DELIVERY

Ms. Blanca Bayó, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket Nos. 980992-WS and 981609-WS

Dear Ms. Bayó:

Enclosed for filing on behalf of Worthwhile Development II, Ltd. are the following documents:

1. An original and fifteen copies of a Motion to Shorten Time to Produce Documents; 09591-01
2. An original and one copy of a Notice of Service of First Request for Production of Documents to Southlake Utilities, Inc.; 09592-01
3. An original and fifteen copies of a Motion to Shorten Time to Answer Interrogatories; and 09593-01
4. An original and one copy of a Notice of Service of First Set of Interrogatories to Southlake Utilities, Inc. 09594-01

DOCUMENT NUMBER-DATE

09591 AUG-7 01

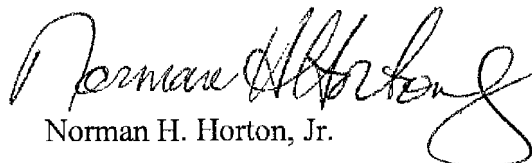
FPSC-COMMISSION CLERK

Ms. Blanca Bayó, Director
August 7, 2001
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Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me in the enclosed self-addressed stamped envelope.

Thank you for your assistance with this filing.

Sincerely,


Norman H. Horton, Jr.

NHH/amb
Enclosures

cc: David A. Barrett, Esq.
Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by D.R. Horton)
Custom Homes, Inc. against)
Southlake Utilities, Inc. in) Docket No. 980992-WS
Lake County Regarding collection)
of certain AFPI charges.)
_____)

In re: Emergency petition by)
D. R. Horton Custom Homes, Inc.) Docket No. 981609-WS
to eliminate authority of) Filed: August 7, 2001
Southlake Utilities, Inc. to)
collect service availability)
charges and AFPI charges in Lake)
County.)
_____)

MOTION TO SHORTEN TIME TO PRODUCE DOCUMENTS

Comes now, Worthwhile Development II, Ltd. (“Worthwhile”), pursuant to Rule 1.350, Florida Rules of Civil Procedure, and requests the Commission to shorten the time for Production of Documents and as basis cites:

1. On June 14, 2001 the FPSC issued PAA Order No. PSC-01-1297-PAA-WS and on July 5, 2001 Worthwhile timely filed a protest to the order. Subsequently Worthwhile filed a Motion for Continuance of the Scheduled Hearing to allow the company an opportunity to conduct discovery and prepare its case and presentation. On August 2, 2001 the Commission granted the Continuance but only changed the relevant dates by a limited period. The filing of prefiled testimony from Worthwhile was extended from August 6, 2001 to August 22, 2001 and the prehearing was moved

DOCUMENT NUMBER DATE
09591 AUG-7 01
FPSC-COMMISSION CLERK

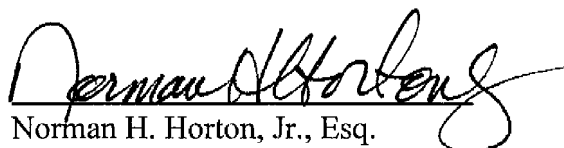
from August 16, 2001 to August 24, 2001 with the hearing rescheduled from August 24, 2001 to September 17, 2001. The short time extension leaves Worthwhile little time to request, receive, review analyze and respond to data that other parties have had months to review and places Worthwhile and its consultants at a severe disadvantage in preparing testimony and positions. Notwithstanding the foregoing, Worthwhile has served a Request for Production of Documents on Southlake seeking documents essential to the review of Southlake's position and to the preparation of Worthwhile's presentations.

2. Rule 1.350, Florida Rules of Civil Procedure, requires a "reasonable time, place and manner" for the production and gives the party to whom the request is directed 30 days to provide a written response. The Commission is permitted to allow a shorter time for response and should do so in the instance.

3. Worthwhile requests that the time for production be shortened to 10 days and for objections to 5 days which would make the production due August 17th. That allows Worthwhile only 5 days to review and prepare testimony. Under the circumstances, a due date of August 17th would be a "reasonable time" for production.

Wherefore, Worthwhile Development II, Ltd., requests the Commission to grant the motion to shorten time and direct Southlake to produce the requested documents not later than August 17, 2001.

Respectfully submitted,



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and

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Attorneys for Worthwhile Development II, Ltd

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing in Docket Nos. 980992-WS and 981609-WS have been served upon the following parties by Hand Delivery (*), Facsimile (**), and/or U. S. Mail this 7th day of August, 2001.

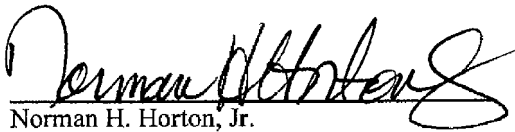
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