

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application of ALOHA )  
UTILITIES, INC. for an increase )  
in water rates for its Seven )  
Springs System in Pasco County, )  
Florida. )  
\_\_\_\_\_ )

DOCKET NO. 010503-WU

**ALOHA’S OBJECTIONS TO OPC’S  
THIRD SET OF INTERROGATORIES (NOS. 70-75)**

ALOHA UTILITIES, INC. (“Aloha” or “Utility”), by and through undersigned counsel, hereby files Aloha’s Objections to OPC’s Third Set of Interrogatories (Nos. 70-75), and in support thereof would state as follows:

**Interrogatory No. 70:**

Objection. The Order Establishing Procedure entitles each party to serve up to 100 “interrogatories, including all sub-parts”. This interrogatory exceeds 100, including sub-parts.

This interrogatory is vague, burdensome, cumbersome, over broad, comprises an incalculable number of sub-parts, and is not reasonably calculated to lead to discovery of admissible evidence. This interrogatory would require an astonishing amount of work and would require the compilation of information which is neither categorized and/or kept by Aloha in the ordinary course of business. Some of the information could be calculated as easily by OPC as by Aloha. This interrogatory, taken literally, probably exceeds the number of interrogatories allowed in this case in and of itself.

The interrogatory is not sufficiently phrased so that Aloha can reasonably frame a response.

**Interrogatory No. 71:**

Objection. The Order Establishing Procedure entitles each party to serve up to 100 “interrogatories, including all sub-parts”. This interrogatory exceeds 100, including sub-parts.

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This interrogatory is burdensome, oppressive, over broad, and not reasonably calculated to lead to the discovery of admissible evidence.

**Interrogatory No. 72:**

Objection. The Order Establishing Procedure entitles each party to serve up to 100 “interrogatories, including all sub-parts”. This interrogatory exceeds 100, including sub-parts.

This interrogatory is vague, burdensome, oppressive, over broad, and not reasonably calculated to lead to the discovery of admissible evidence.

**Interrogatory No. 73:**

Objection. The Order Establishing Procedure entitles each party to serve up to 100 “interrogatories, including all sub-parts”. This interrogatory exceeds 100, including sub-parts.

This interrogatory is vague, burdensome, oppressive, over broad, and not reasonably calculated to lead to the discovery of admissible evidence.

**Interrogatory No. 74:**

Objection. The Order Establishing Procedure entitles each party to serve up to 100 “interrogatories, including all sub-parts”. This interrogatory exceeds 100, including sub-parts.

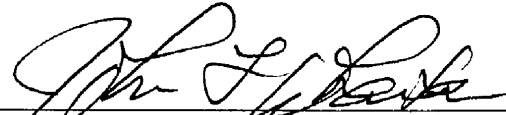
This interrogatory is vague, burdensome, oppressive, over broad, and not reasonably calculated to lead to the discovery of admissible evidence.

**Interrogatory No. 75:**

Objection. The Order Establishing Procedure entitles each party to serve up to 100 “interrogatories, including all sub-parts”. This interrogatory exceeds 100, including sub-parts.

This interrogatory is vague, burdensome, oppressive, over broad, and not reasonably calculated to lead to the discovery of admissible evidence.

RESPECTFULLY SUBMITTED this 15<sup>th</sup> day of October, 2001.



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**CERTIFICATE OF SERVICE**

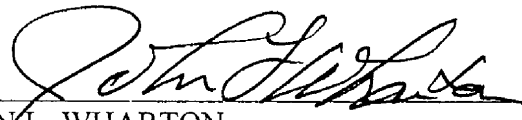
I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail and by Facsimile (\*) to the following this 15<sup>th</sup> day of October, 2001:

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