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ORIGINAL

September 11, 2002

D. BRUCE MAY, JR.
850-425-5607

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VIA HAND DELIVERY

Blanca S. Bayo
Division of Commission Clerk and
Administrative Services
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

SEP 11 11 42 AM '02
COMMISSION CLERK
FSC

Re: In Re: Application for Limited Proceeding to Recover Costs of Water System Improvements In Marion County By Sunshine Utilities of Central Florida, Inc., Docket No. 992015-WU

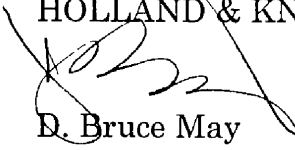
Dear Ms. Bayo:

Enclosed for filing on behalf of Sunshine Utilities of Central Florida, Inc. ("Sunshine") are the original and seven (7) copies of its Response to Citizens' Motion to Permit Additional Interrogatories.


For our records, please acknowledge your receipt of this filing on the enclosed copy of this letter. Thank you for your consideration.

Sincerely,

HOLLAND & KNIGHT LLP


D. Bruce May

DBM:kjg
Enclosure

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DOCUMENT NUMBER-DATE

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Blanca Bayo
September 11, 2002
Page 2

cc: Ralph Jaeger
Stephen C. Reilly

TAL1 #256391 v1

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for Limited)
Proceeding to Recover Costs of Water) Docket No. 992015-WU
System Improvements In Marion County)
By Sunshine Utilities of Central Florida,) Filed: September 11, 2002
Inc.)
_____ /

**SUNSHINE UTILITIES OF CENTRAL FLORIDA, INC'S
RESPONSE TO CITIZENS' MOTION TO
PERMIT ADDITIONAL INTERROGATORIES**

Sunshine Utilities of Central Florida, Inc. ("Sunshine") by and through its undersigned counsel, pursuant to Rule 28-106.204, Florida Administrative Code, hereby responds to the Citizens of the State of Florida's ("Citizens") Motion to Permit Additional Interrogatories ("Motion") as follows:

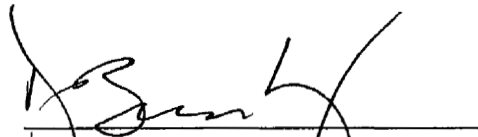
1. Citizens filed its Motion on September 4, 2002 stating that it had propounded on Sunshine twenty-five (25) interrogatories on August 2, 2002 and an additional ten (10) interrogatories on September 3, 2002 for a total of thirty-five (35) interrogatories including eight (8) additional numbered subparts.
2. Citizens' Motion requests permission to exceed the limit of thirty (30) interrogatories, including subparts, provided in Rule 1.340(a), Florida Rules of Civil Procedure. Sunshine does not oppose Citizens' Motion to the extent that it simply requests leave to propound a total of thirty-five (35) interrogatories, including eight (8) additional numbered subparts. Sunshine however, would point out that Citizens have not requested, nor have they provided any justification for expanding the number of interrogatories beyond

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the number set forth in the Commission's Order Establishing Procedure, Order No. PSC-02-0852-PCO-WU as revised by Order No. PSC-02-1118-PCO-WU. Accordingly, it is Sunshine's position that the referenced procedural orders continue to govern discovery in this case, including limitations on the number of interrogatories.

Respectfully submitted,

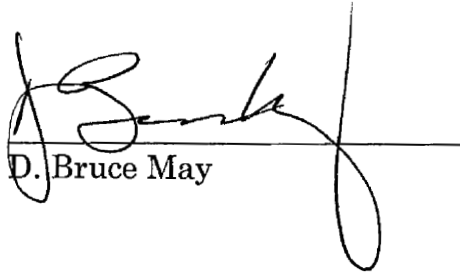
A handwritten signature in black ink, appearing to read "D. Bruce May", is written over a horizontal line.

D. Bruce May
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Florida Bar No. 0982921
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**Attorneys for Sunshine Utilities of
Central Florida, Inc.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by hand delivery to Ralph Jaeger, Esquire, Florida Public Service Commission, Division of Legal Services, Room 370, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 and to Stephen C. Reilly, Associate Public Counsel, Office of Public Counsel, c/o The Florida Legislature, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400 all on this 11th day of September, 2002.


D. Bruce May

TAL1 #256342 v1