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PLEASE REPLY TO:  
  
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(850) 222-2525  
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November 4, 2002

VIA HAND DELIVERY

Blanca S. Bayo, Director  
Division of Records and Reporting  
Betty Easley Conference Center  
4075 Esplanade Way  
Tallahassee, Florida 32399-0870

RECEIVED-FPSC  
02 NOV -4 PM 4:46  
COMMISSION  
CLERK

Re: Docket No.: 020413-SU

Dear Ms. Bayo:

On behalf of Adam Smith Enterprises, Inc. I am enclosing the original and 15 copies of Adam Smith Enterprises, Inc.'s Objections to Aloha Utilities, Inc.'s First Set of Interrogatories (Nos. 1-7) and First Request for Production of Documents (No. 1) to Adam Smith Enterprises, Inc.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and pleading by returning the same. Thank you for your assistance in this matter.

Thank you for your assistance in this matter.

Yours truly,

*Joe A. McGlothlin*

Joseph A. McGlothlin

First Request for  
Production of Documents  
DOCUMENT NUMBER-DATE  
1209 | NOV -4 28  
FPSC-COMMISSION CLERK

First Set of  
Interrogatories  
DOCUMENT NUMBER-DATE  
12090 NOV -4 28  
FPSC-COMMISSION CLERK

- JAM/mls
- Enclosure
- AUS
- CAF
- CMP
- COM
- CTR
- ECR
- GCL
- OPC
- MMS
- SEC
- OTH

RECEIVED & FILED  
*RJM*  
FPSC-BUREAU OF RECORDS

**BEFORE THE PUBLIC SERVICE COMMISSION**

In re: Initiation of show cause proceedings  
Against Aloha Utilities, Inc. in Pasco  
County for failure to charge approved  
Service availability charges, in violation  
Of Order No. PSC-01-0326-FOF-SU and  
Section 367.091, Florida Statutes

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Docket No. 020413-SU

Filed: November 4, 2002

**OBJECTIONS OF ADAM SMITH ENTERPRISES, INC. TO  
ALOHA UTILITIES, INC.'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1)**

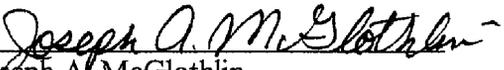
Adam Smith Enterprises, Inc. (Adam Smith) files this objection to Aloha Utilities, Inc.'s First Request for Production of Documents (No. 1).

**PRODUCTION OF DOCUMENTS**

**REQUEST NO. 1:** Please provide the work papers supporting the answers to Interrogatories Nos. 4(c), 5(c), 6(c) and 7(c).

**OBJECTION:** Adam Smith objects to Request No. 1 on the grounds that the request seeks information which is neither relevant to any issues in the case nor reasonably calculated to lead to the discovery of admissible evidence. While this fundamental consideration is dispositive, Adam Smith further objects on the grounds that the information sought is confidential and proprietary business information. Adam Smith further objects on the grounds that the information sought is so irrelevant and so sensitive as to render the request oppressive and harassing in nature. Adam Smith objects on the basis that the term "work papers" is vague. Adam Smith further objects on the grounds that the requests refers to hundreds of transactions, for each of which Adam Smith would have to examine numerous documents covering periods of years to provide the requested information. Adam Smith's files relating to developments within

Aloha's service area date back to 1982 and fill several 10'x 20' mini-storage units. Accordingly, the request is unduly burdensome.

  
Joseph A. McGlothlin  
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Attorneys for Adam Smith Enterprises, Inc.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Objections of Adam Smith Enterprises, Inc. to Aloha Utilities, Inc.'s First Request for Production of Documents (No.1) was sent via (\*)Hand Delivery or U.S. Mail on this 4<sup>th</sup> day of November, 2002 to the following:

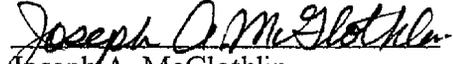
(\*)Rosanne Gervasi  
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Joseph A. McGlothlin