

ORIGINAL

LAW OFFICES

ROSE, SUNDBSTROM & BENTLEY, LLP

2548 BLAIRSTONE PINES DRIVE
TALLAHASSEE, FLORIDA 32301

(850) 877-6555
Fax (850) 656-4029
www.rsbatorneys.com

CHRIS H. BENTLEY, P.A.
ROBERT C. BRANNAN
F. MARSHALL DETERDING
DAVID F. CHESTER
MARTIN S. FRIEDMAN, P.A.
JOHN R. JENKINS, P.A.
STEVEN T. MINDLIN, P.A.
DAREN L. SHIPPY
WILLIAM E. SUNDBSTROM, P.A.
DIANE D. TREMOR, P.A.
JOHN L. WHARTON
ROBERT M. C. ROSE, OF COUNSEL
WAYNE L. SCHIEFELBEIN, OF COUNSEL

CENTRAL FLORIDA OFFICE

600 S. NORTH LAKE BLVD., SUITE 160
ALTAMONTE SPRINGS, FLORIDA 32701
(407) 830-6331
FAX (407) 830-8522

REPLY TO ALTAMONTE SPRINGS

January 17, 2003

VIA HAND DELIVERY

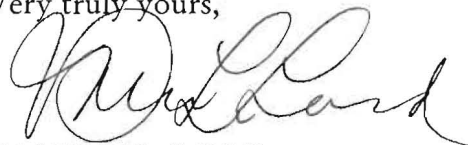
Ms. Blanca Bayo
Commission Clerk and Administrative Services Director
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket No. 020071-WS; Application for Rate Increase by Utilities, Inc. of Florida
Our File No.: 30057.40

Dear Ms. Bayo:

Enclosed is the original of Utilities, Inc. of Florida's Motion for Protective Order with the documents sealed in a confidential envelope, per instructions of the Clerk, for filing in the above-referenced docket.

Very truly yours,



VALERIE L. LORD
Of Counsel

VLL:pd
Enclosures

cc: Charles J. Beck, Deputy Public Counsel (w/enclosure w/o documents)
Rosanne Gervasi, Esquire (w/enclosure w/o documents)
Mr. Steve Lubertozzi (w/enclosure w/o documents)
Mr. Frank Seidman (w/o enclosure w/o documents)
David L. Orr, EI (w/o enclosure w/o documents)

DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

OF 0111

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application of
UTILITIES, INC. OF FLORIDA
for a rate increase in Marion,
Orange, Pasco, Pinellas
and Seminole Counties

Docket No. 020071-WS

UTILITIES, INC. OF FLORIDA'S MOTION FOR PROTECTIVE ORDER

Utilities, Inc. of Florida (*UIF*), by and through its undersigned counsel, files this Motion for Protective Order in relation to documents submitted in connection with UIF's Supplemental Response to Citizens' Second Request for Production of Documents.

1. UIF is producing certain responsive documents in connection with its Supplemental Response to Citizens' Second Request for Production of Documents filed contemporaneously herewith. The responsive documents contain information that is either proprietary confidential business information, as defined in Section 367.156, Fla. Stats., or consists of privileged communications between UIF and its attorneys which is outside the scope of discovery.

2. Under Section 367.156(2), Florida Statutes, this Commission has the authority to classify certain material as proprietary confidential business information. This classification exempts the material from public disclosure under Section 119.07(1), Fla. Stats.

3. UIF requests that all or part of the responsive documents which contain proprietary confidential business information be protected under a protective order issued pursuant to Rule 1.280(c), Fla.R.C.P.. and Rule 25-22.06(6), F.A.C. and exempt from Section 119.07(1), Fla. Stats.

4. UIF has redacted the information from the responsive documents that is privileged and

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outside the scope of discovery. Attached hereto is a privilege log which meets the requirements of Rule 1.280(b)(5), Fla.R.C.P.

5. UIF respectfully requests that, as to the information that is proprietary confidential business information, this Commission enter a protective order specifically providing that:

(A) Copies of the responsive documents and any other documents, such as internal memoranda and notes that may be created, that contain any of the information covered by the protective order, are protected from disclosure to any persons other than persons within the Commission Staff and the Office of the Public Counsel who are working on this matter;

(B) The number of copies of the responsive documents, and any other documents, internal memoranda and notes that may be created, that contain any of the information covered by the protective order are limited to five (5); and

(C) Once the protected materials are no longer needed to proceed on this matter, the Commission and Office of Public Counsel Staff who have the original or any copies in their possession must return the original response and all copies to UIF.

WHEREFORE, UTILITIES, INC. OF FLORIDA requests:

(1) a protective order providing (a) restricting disclosure of the responsive documents to persons within the Commission Staff and the Office of the Public Counsel who are working on this matter; (b) limiting the number of copies of the responsive documents, and any other documents, internal memoranda and notes that may be created that contain any of the information covered by the protective order, to five (5) copies; and (c) the return of the responsive material and all copies to Utilities, Inc. of Florida; and

(2) such other relief to which Utilities, Inc. of Florida may show itself entitled.

Respectfully submitted on this _____ day of January,
2003 by:

ROSE, SUNDSTROM & BENTLEY, LLP
600 S. North Lake Boulevard
Suite 160
Altamonte Springs, Florida 32701
Telephone: (407) 830-6331
Facsimile: (407) 830 8255

Martin S. Friedman
Florida Bar No.: 199060
For the Firm

CERTIFICATE OF SERVICE
DOCKET NO. 020071-WS

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Protective Order has been furnished by Federal Express to the following parties on this _____ day of January, 2003:

Charles J. Beck, Deputy Public Counsel.
Office of Public Counsel
C/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400

Roseanne Gervasi, Esq.
Lorena Holley, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



Martin S. Friedman