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MARTIN S. FRIEDMAN, P.A.
VALERIE L. LORD, OF COUNSEL
(LICENSED IN TEXAS ONLY)

RECEIVED - PSC
MAR 18 PM 4:06
COMMISSION
CLERK

March 17, 2003

HAND DELIVERY

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

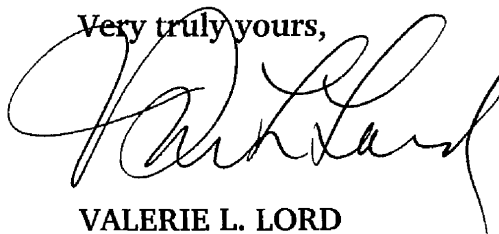
Re: Docket No. 020071-WS, Application of Utilities, Inc. of Florida for a rate increase
Our File No.: 30057.40

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are an original and one (1) copy of Utilities, Inc. of Florida's Objections Citizens' Thirteenth Set of Interrogatories and Objections to Citizens' Thirteenth Set of Requests for Production of Documents.

Please contact me if you have any questions.

AUS _____
CAF _____
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CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC IVLL/dmp
OTH _____
Enclosures

Very truly yours,


VALERIE L. LORD
Of Counsel

cc: Charles J. Beck, Deputy Public Counsel (w/enclosures)
Rosanne Gervasi, Esquire (w/enclosures) (by facsimile)
Mr. Steve Lubertozi (w/enclosures)
Mr. Donald Rasmussen (w/enclosures)
Mr. David Orr, EI, (w/enclosures)

DOCUMENT NUMBER-DATE
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.FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application of)
UTILITIES, INC. OF FLORIDA)
for a rate increase in Marion, Orange,) Docket No. 020071-WS
Pasco, Pinellas and Seminole Counties)
_____)

UTILITIES, INC. OF FLORIDA’S OBJECTIONS TO CITIZENS’ THIRTEENTH SET OF INTERROGATORIES (NOS. 177 & 187)

UTILITIES, INC. OF FLORIDA (hereinafter “UIF”), by and through its undersigned counsel, hereby files the following Objections to Citizens’ Thirteenth Set of Interrogatories (Nos. 177 & 187), and in support thereof states:

INTERROGATORY NO. 177: For purposes of this request please refer to Citizens’ Interrogatory 119. Please explain in detail why Andrew Dopuch, David Carter, and Carl Wenz were terminated and provide their last known address.

OBJECTION: UIF has previously provided reasons why Mr. Dopuch is no longer employed by UIF or its parent, Utilities, Inc. and stated that none of the costs of his disassociation with UIF or its parent, Utilities, Inc., were charged to ratepayers. Similarly, none of the costs associated with the terminations of Messrs. Carter or Wenz were charged to rate payers or to any system. Citizens’ repeated requests for information of this type are nothing more than fishing expeditions. The information sought is irrelevant and immaterial to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. *City of Miami v. Florida Public Service Commission*, 226 So. 2d 217 (Fla. 1969).

INTERROGATORY NO. 187: Merger.

(a) Please identify the amount of change in control and executive termination payments that were paid to employees of Utilities, Inc. in connection with the merger with Nuon for each year through

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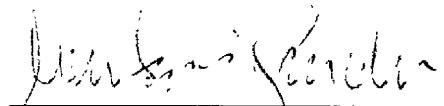
December 2002. Please indicate the amount of the payment, to whom the payment was made, and the company the executive worked for.

(b) Of the amounts identified in response to (a) please indicate how much was charged to each system during the test year and the account the amounts were charged to.

OBJECTION: UIF has previously stated that none of the costs of change in control or executive termination payments were charged to ratepayers or to any system. Citizens' repeated requests for information of this type are nothing more than fishing expeditions. The information sought is irrelevant and immaterial to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. *City of Miami v. Florida Public Service Commission*, 226 So. 2d 217 (Fla. 1969).

Respectfully submitted on this
14th day of March, 2003, by:

ROSE, SUNDSTROM & BENTLEY, LLP
600 S. North Lake Boulevard, Ste. 160
Altamonte Springs, Florida 32701
Telephone:(407) 830-6331
Facsimile:(407) 830-8522
Email:mfriedman@rsbattorneys.com

By: 

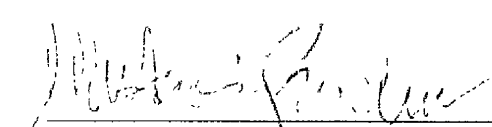
MARTIN S. FRIEDMAN
Florida Bar No.: 199060

CERTIFICATE OF SERVICE
DOCKET NO.: 020071-WS

I HEREBY CERTIFY that a true and correct copy of the foregoing Utilities, Inc. Of Florida's Objections to Citizens' Thirteenth Set of Interrogatories (Nos. 177 & 187) has been served upon the following parties by facsimile and U.S. Mail this 14 day of March, 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, Esquire
Lorena Holley, Esquire
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



MARTIN S. FRIEDMAN

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application of)
UTILITIES, INC. OF FLORIDA)
for a rate increase in Marion, Orange,) Docket No. 020071-WS
Pasco, Pinellas and Seminole Counties)
_____)

**UTILITIES, INC. OF FLORIDA’S OBJECTIONS TO CITIZENS’
THIRTEENTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS (NO. 102)**

UTILITIES, INC. OF FLORIDA (hereinafter “UIF”), by and through its undersigned counsel, hereby files the following Objections to Citizens’ Thirteenth Set of Requests for Production of Documents (No. 102), and in support thereof states:

REQUEST NO. 102: For purposes of this request please refer to the Company’s responses to Citizens’ POD 57, the letter dated December 4, 2001 from the law firm Sidley Austin Brown & Wood to Edward Spacapan, Jr.

- (a) Provide copies of paid invoices indicating that the Company paid for memberships for Mr. Dopuch through the Transitional Compensation Agreement.
- (b) Provide a copy of the Transitional Compensation Agreement with Mr. Dopuch.
- (c) Provide a copy of the Transitional Compensation Agreements with David Carter and Carl Wenz.

OBJECTION: UIF has previously stated that none of the costs of change in control, executive termination payments or associated benefits or compensation were charged to ratepayers or to any system. Citizens’ repeated requests for information of this type are nothing more than fishing expeditions. The information sought is irrelevant and immaterial to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. *City of Miami v. Florida Public Service Commission*, 226 So. 2d 217 (Fla. 1969).

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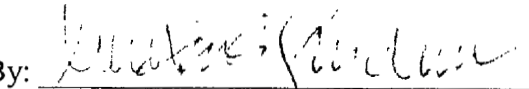
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FPSC-COMMISSION CLERK

Respectfully submitted on this
14th day of March, 2003, by:

ROSE, SUNDSTROM & BENTLEY, LLP
600 S. North Lake Boulevard, Ste. 160
Altamonte Springs, Florida 32701
Telephone:(407) 830-6331
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Email:mfriedman@rsbattorneys.com

By:



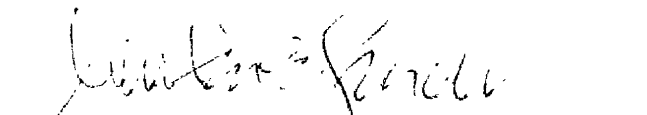
MARTIN S. FRIEDMAN
Florida Bar No.: 199060

CERTIFICATE OF SERVICE
DOCKET NO.: 020071-WS

I HEREBY CERTIFY that a true and correct copy of the foregoing Utilities, Inc. Of Florida's Objections to Citizens' Thirteenth Set of Requests for Production of Documents (No. 102) has been served upon the following parties by facsimile and U.S. Mail this 14 day of March, 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, Esquire
Lorena Holley, Esquire
Division of Legal Services
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2540 Shumard Oak Boulevard
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MARTIN S. FRIEDMAN