

State of Florida



Public Service Commission
-M-E-M-O-R-A-N-D-U-M-

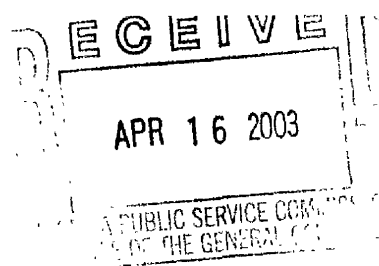
DATE: April 16, 2003
TO: Division of the Commission Clerk and Administrative Services
FROM: Office of the General Counsel (Gervasi) *RG*
RE: Docket No. 020745-SU - Application for certificate to provide wastewater service in Charlotte County by Island Environmental Utility, Inc.

Please file the attached notice of objection to interrogatories and production of documents to Rose, Sundstrom & Bentley, LLP, by Ronald A. Koenig, dated Friday, March 28, 2003, in the docket file for the above-referenced docket.

RG/dm

I:\020745\koenig-object-not rg

DOCUMENT NO.
03539-03
4/17/03



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In response to Notice of Service from Rose, Sundstrom & Bentley, LLP request for production of documents and interrogatories, Ronald A. Koenig gives notice as to the following:

Friday, March 28, 2003

Docket No. 020745-SU

In RE: Application for certificate to provide wastewater service in Charlotte County, Florida by of Island Environmental Utility, Inc.

Ronald A. Koenig objects to Interrogatories (Nos. 1-66) and Production of Documents (Nos. 1-41) under full oath and in accordance with Rule 28-106.206 of Florida Administrative Code and Rule 1.340 of Florida Rules of Civil Procedure Rule 1.340, sub paragraph a. "The interrogatories shall not exceed 30 including all the subparts..." Furthermore, I object and refuse to respond to questions that are of personal nature and not relevant to Docket No. 020745-SU.

I am objecting to a proposal to provide wastewater service at my homestead property. Existing water treatment supported by Septic System on my property is sufficient to maintain our household and conforms to Charlotte County regulations. Answering questions about:

- personal finances,
- addresses where I've previously resided,
- my nationality,
- number of persons residing in my home,
- value of property (tax assessment as well as market value)
- mortgage, liens, other encumbrances on my property
- identify all government bodies that have authority to determine wastewater management on barrier islands

And other matters pertaining to my property have no relevance to Docket No. 020745-SU. These interrogatories and requests for documents are intrusive, objectionable and serve no purpose other than harass, embarrass and annoy.

Respectfully,

Ronald A. Koenig

CC: Florida Public Service Commission including copies of interrogatories and request for documents that shall be posted on the Docket No. 020745-SU official record.