

ORIGINAL

BEFORE THE FLORIDA
PUBLIC SERVICE COMMISSION

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COMMISSION
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IN RE: Application of)
LAKE UTILITY SERVICES, INC.)
for extension of water and)
wastewater service in)
Lake County, Florida.)

Docket No. 020907-WS

**AMES HOLDINGS, LLC, ET AL.
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS
TO LAKE UTILITY SERVICES, INC. (NOS. 14-19)**

Pursuant to Rule 28-106.206, F.A.C., and Rule 1.340 of the Florida Rules of Civil Procedure, Petitioners, Ames Holdings, et al., request Lake Utility Services, Inc. (Lake Utility) to produce the following documents for inspection and copying at the offices of Broad and Cassel, 215 S. Monroe St., Suite 400, Tallahassee, FL 32301, or at such other place as may be mutually agreed upon by counsel, within the timeframe allowed by law.

RECEIVED & FILED



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DEFINITIONS AND INSTRUCTIONS

In order to facilitate completion of this request, the following is offered by way of definition or instruction:

A. "Document," "documents," "documentation" and "writing" are all used interchangeably and mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including but not limited to, memoranda, notes, messages, minutes, records, photographs, drawings, letters, correspondence, speeches, telegrams, diaries, calendar or diary entries, bookkeeping entries, financial statements, tax returns, checks, check stubs, schedules, reports, surveys, studies, opinions, analyses, summaries, charts, graphs, statements, notebooks, instructions, certificates, handwritten notes, questionnaires, applications, contracts, agreements, books, pamphlets, magazines, booklets, brochures, circulars, bulletins, periodicals, appointment calendars, records or recordings of oral conversations, work papers, and also including, but not limited to, originals, drafts and all copies of either which are different in any way from the original or draft, whether by interlineation, receipt stamps, notation, indication of copies sent or received or otherwise, which are in the possession, custody or control of Plaintiff or in the possession, custody or control of the present or former agents, representatives or attorneys of Plaintiff, or any and all persons acting on their behalf, including documents at any time in the possession, custody or control of such individuals or entities or known by Plaintiff to exist.

B. **"Interrogatory"** means any interrogatory previously or concurrently directed to Plaintiff by Defendants in this action.

C. "relate to" means containing, showing, pertaining, relating or referring in any way, directly or indirectly, to, and is meant to include matters that are or were supporting or connected.

D. **"Application"** means the Application for Amendment to Certificates of Authorization filed by Lake Utility Services, Inc., with the Florida Public Service Commission on August 19, 2002.

E. "proposed service area" means the area that Lake Utility is seeking to add to Certificates of Authorization 465-S and 496-W.

F. These requests are deemed to be continuing requests, requiring Lake Utility to furnish documents responsive to such requests as they become known or available.

G. All information sought unless stated otherwise is requested from January 1, 1992 to the present. **"Lake Utilities"** means both Lake Utilities Services, Inc. and Lake Groves Utilities as merged.

DOCUMENTS REQUESTED

14. Copies of all Lake Utility Services, Inc., Monthly Status Reports beginning January 2003, submitted to the Florida Department of Environmental Protection in compliance with the Memorandum of Understanding entered by and between the Florida Department of Environmental Protection and Utilities Inc. of Florida. A copy of the Memorandum of Understanding is attached as Exhibit 1.

15. Any and all documents including internal reports or studies prepared by or at the direction of Lake Utilities regarding and/or explaining or detailing how water is moved between the water systems owned by Lake Utilities within Lake County.

16. Any and all documents including system design maps showing the approximate location of any and all water plants owned by Lake Utilities within Lake County.

17. Any and all documents demonstrating, detailing and/or explaining how the water plants owned by Lake Utilities within Lake County are inter-connected.

18. Copies of any non-compliance letters received by Lake Utilities Services, Inc. or Lake Groves Utilities, Inc. from the Department of Environmental Protection with regard to Wastewater Facility - Permit No. FLA010630.

19. Any and all subsequent correspondence or documentation provided to Department of Environmental Protection by Lake Utilities Services, Inc., or Lake Groves Utilities, Inc., as a result of the receipt of any non-compliance letters.

Dated: May 13, 2003

Respectfully Submitted,

Maura M. Bolivar

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been furnished via first class mail to the parties listed below this 13 day of May, 2003.

Maura M Bolivar
Attorney

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