

STATE OF FLORIDA
PUBLIC SERVICE COMMISSION

IN RE:)
)
Application of Farmton Water Resources,)
LLC for original Water Certificate in Volusia)
and Brevard Counties, Florida)
_____)

DOCKET NO. 021256-WU

TITUSVILLE'S FIRST REQUEST FOR PRODUCTION TO FARMTON

Pursuant to Florida Rules of Civil Procedure 1.280 and 1.350, the City of Titusville, Florida, requests Farmton Water Resources, LLC ("**Farmton**") to produce the documents described herein at a location of mutual convenience for inspection and/or copying.

DEFINITIONS

As used in the following request for production:

A. "**It**" or "**its**" shall refer to Farmton or such entity operating under its direct or indirect control, and any other person acting on its behalf, including agents, servants, employees, or prior employees.

B. "**Documents**" means all items within the scope of Florida Rule of Civil Procedure 1.350(a), without limitation, including but not limited to writings of every kind and all other data compilations by which information can be expressed, stored, or obtained, such as the originals (or, if unavailable, copies) of all memoranda (including written memoranda of telephone conversations, other oral communications, discussions, agreements, acts, and activities), letters, telexes, postcards, telegrams, telephonic facsimiles, interoffice communications, correspondence, handwritten and typewritten notes, working papers, pamphlets, diaries, records of every kind, sound recordings, transcripts of sound recordings, trial transcripts, hearing transcripts, deposition transcripts, meeting transcripts, contracts, agreements, books, magazines, letters, reports, catalogues, price lists, financial statements, books of accounts, journals, ledgers, purchase orders, invoices, indices, data processing cards, other data processing materials, data sheets, computer input, computer output, computer models, computer disks, calculations, tapes, films, negatives, photographs, slides, transparencies, photostats, microfilms, micro fiche, directives, bulletins, circulars, notices, messages, tabulations, notes, economic or statistical studies, polls, minutes, instructions, requests, cancelled checks, calendars, desk pads, appointment books, scrap books, notebooks, specifications, drawings, diagrams, sketches, bills, schedules, accountants, work papers, charts graphs, audio or video tapes, press releases, newspaper clippings, advertisements, formal notices, investigations, claims statements, blueprints, mylars, test reports, printouts, surveys, site plans, appraisals, field delineations, maps permits, licenses, governmental approvals, applications and each draft and nonidentical copies thereof, however produced or reproduced and regardless of location or origin.

DOCUMENT NUMBER DATE

05771 JUN 30 8

C. "**Certificate**" shall mean an Original Certificate of Authorization and Initial Rates and Charges by the Florida Public Service Commission for Farmton to operate a water utility in Volusia and Brevard Counties pursuant to Chapter 367, Florida Statutes and Chapter 25-30, Florida Administrative Code.

D. "**Purposed Service Area**" shall mean the geographic area described in Attachment A of Exhibit A and Exhibit H of Farmton's application for the Certificate.

REQUEST FOR PRODUCTION

Farmton is requested to produce the documents in its possession, custody or control that relate or pertain to the following:

1. Any documents demonstrating compliance with the requirements of Rule 25-30.030.
2. Any documents demonstrating compliance with the requirements of Rule 25-30.032.
3. Any analysis, research, exhibits or other documents Farmton will rely upon in providing reasonable assurance that its application for the Certificate will meet the criteria in Rule 25-30.033, Florida Administrative Code.
4. Any analysis, research or other documents regarding whether the services proposed in Farmton's application for the Certificate are consistent with the applicable comprehensive plans.
5. Any analysis, research or other documents regarding the ability of utilities other than Farmton to potentially provide the services proposed in its application for the Certificate.
6. Any analysis, research or other documents regarding the number of equivalent residential connections proposed to be served within the Proposed Service Area.
7. Any analysis, research or other documents regarding the types of customers Farmton anticipates to be served by the services proposed in its application for the Certificate.
8. Any analysis, research or other documents regarding customer growth within the Proposed Service Area.

9. Any analysis, research or other documents regarding the cost to provide the services proposed in its application for the Certificate.
10. Any analysis, research or other documents regarding the financial ability of Farmton to provide the services proposed in its application for the Certificate.
11. Any analysis, research or other documents regarding the technical ability of Farmton to provide the services proposed in its application for the Certificate.

Respectfully submitted,

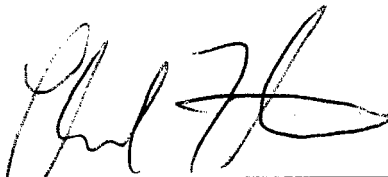
de la PARTE & GILBERT, P.A.



Edward P. de la Parte, Jr.
Florida Bar No. 236950
Charles Fletcher
Florida Bar No. 0093920
Post Office Box 2350
Tampa, Florida 33601-2350
Telephone: (813) 229-2775
Facsimile: (813) 229-2712
Counsel for City of Titusville, Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by **Telefacsimile and U.S. Mail** on Scott L. Knox, Esquire, Brevard County Attorney, 2725 Judge Fran Jamieson Way Viera, FL 32940, Telefacsimile (321) 633-2096; F. Marshall Rodan, Esquire, Rose, Sundstrom & Bentley, LLP, 2548 Blairstone Pines Drive, Tallahassee, FL 32301, Telefacsimile (850) 656-4029; and William J. Bosch, III, Esquire, Volusia County Attorney, 123 West Indiana Avenue, DeLand, FL 32720-4613, Telefacsimile (386) 736-5990 on this 25th day of June, 2003.



Charles R. Fletcher