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REPLY TO ALTAMONTE SPRINGS

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

August 13, 2003

HAND DELIVERY

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

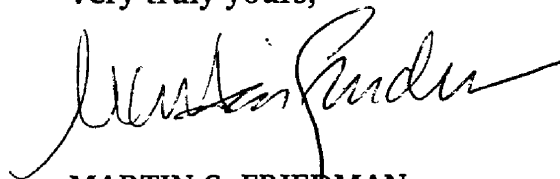
RECEIVED-FPSC
03 AUG 13 AM 11:36
COMMISSION
CLERK

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

Dear Ms. Bayo:

Enclosed please find for filing in the above-referenced docket are the original and seven (7) copies of Utilities, Inc. of Florida's Motion for Protective Order Regarding Response to Interrogatory No. 149.

Very truly yours,



MARTIN S. FRIEDMAN
For the Firm

- AUS MSF/dmp
- CAF Enclosures
- CMP
- COM
- CTR cc:
- ECR
- GCL
- OPC
- MMS
- SEC
- OTH *copy to*

utilities, inc.\2002 rate case\psc clerk (bayo) 092 (MPO - Int 149)

Maguerite

DOCUMENT NUMBER DATE

07426 AUG 13 8

FPSC-COMMISSION CLERK

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
REGARDING RESPONSE TO INTERROGATORY NO. 149

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' Tenth Request for Production of Documents No. 149.

1. 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), Florida Statutes.

2. UIF requests that all of the response to Interrogatory No. 149 be classified as proprietary confidential business information under Section 367.156(2), Florida Statutes, and Rule 25-22.06, Florida Administrative Code. If this request is granted, then all of the response to Interrogatory No. 149 will be exempt from Section 119.07(1), Florida Statutes.

3. The information produced in response to Interrogatory No. 149 consists of the internal memoranda and records concerning the reasons for the termination of a former executive of UIF. It should be classified as proprietary confidential business information because its disclosure would tend to humiliate or embarrass the subject of the report and subject UIF to risk of litigation.

4. UIF requests that the protective order specifically provide that:

(A) Copies of the response to Interrogatory No. 149 and any other documents,

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

such as internal memoranda and notes that may be created, that contain any of the information covered by the protective order, be protected from disclosure to any persons other than those specified in the protective order;

(B) The number of copies of the response to Interrogatory No. 149 and any other documents, internal memoranda and notes that may be created, that contain any of the information covered by the protective order be limited to five (5);

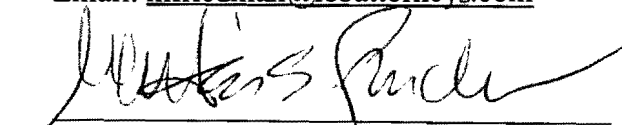
(C) Only persons within the Commission Staff and the Office of the Public Counsel who are working on this matter may view the response to Interrogatory No. 149 and any other documents, internal memoranda and notes that may be created, that contain any of the information covered by the protective order; and

(D) 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 will return the original response and all copies to UIF.

WHEREFORE, UTILITIES, INC. OF FLORIDA prays for the entry of the protective order that is consistent with this Motion.

Respectfully submitted on this 13th day of August,
2003 by:

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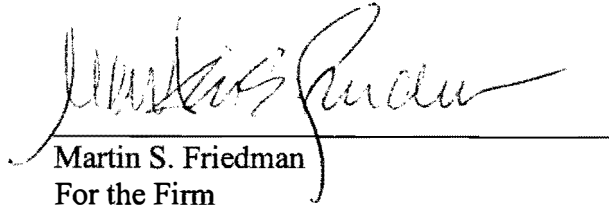
Martin S. Friedman
For the Firm

CERTIFICATE OF SERVICE
DOCKET NO. 020071-WS

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
Federal Express to the following parties this 15th day of August, 2003:

Charles J. Beck, Deputy Public Counsel.
Office of Public Counsel
C/o The Florida Legislature
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