

CERTIFICATE OF SERVICE
DOCKET NO. 020745-SU

I HEREBY CERTIFY that a true and correct copy of the foregoing Ronald A. Koenig's First Requests for Production of Documents to Garfield Beckstead of Island Environmental Utility, Inc. (Nos. 1-~~35~~³¹) has been furnished by U.S. Mail to the following parties on this 19th day of September, 2003:

Roseanne Gervasi, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

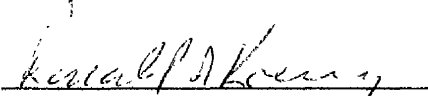
Mr. John R. Boyer
c/o Mr. Martin S. Friedman, Esquire
Rose, Sundstrom & Bentley, LLP
600 S. North Lake Boulevard
Suite 160
Altamonte Springs, FL 32701

Mr. Dean Beckstead
c/o Mr. Martin S. Friedman, Esquire
Rose, Sundstrom & Bentley, LLP
600 S. North Lake Boulevard
Suite 160
Altamonte Springs, FL 32701

Mr. Garfield Beckstead
c/o Mr. Martin S. Friedman, Esquire
Rose, Sundstrom & Bentley, LLP
600 S. North Lake Boulevard
Suite 160
Altamonte Springs, FL 32701

CC: DAN NOLAN
LINDA BAMFIELD
MARTIN FRIEDMAN

Ronald A. Koenig
8006 Lago Vista Drive
Tampa, FL 33614
(813) 933-4132


RONALD A. KOENIG

DOCUMENT NUMBER - DATE

09045 SEP 22 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application of ISLAND)
ENVIRONMENTAL UTILITY, INC.,)
For original Water Certificate in)
Charlotte County, Florida)
_____)

Docket No. 020745-SU

NOTICE OF SERVICE

Intervenor, RONALD A. KOENIG, gives notice that he has served his First Requests for Production of Documents (Nos. 1 to ³¹~~50~~) to Garfield Beckstead of Island Environmental Utility, Inc. (the Applicant) on this 19th day of September, 200~~1~~.

Ronald A. Koenig
8006 Lago Vista Drive
Tampa, FL 33614
(813) 933-4132

CC DAN NOLAN
LINDA BAMPFEL
MARTIN FLEGMAN
ROSEANNA GREVSI


RONALD A. KOENIG

DOCUMENT NUMBER-DATE

09045 SEP 22 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 020745-SU

**RONALD A. KOENIG'S FIRST REQUESTS FOR PRODUCTION OF
DOCUMENTS TO GARFIELD R. BECKSTEAD**

Pursuant to Rule 28-106.206 of the Florida Administrative Code and Rule 1.340 of the Florida Rules of Civil Procedure, Ronald A. Koenig (*Objector*) requests Garfield R. Beckstead of Island Environmental Utility, Inc. (*Applicant*) to produce the following documents by mail to: Ronald A. Koenig, 8006 Lago Vista Drive, Tampa, Florida 33614 within the time frame allowed by the rule.

INSTRUCTIONS

1. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which privilege is claimed, together with the following information; date, sender, recipients, recipient of copies, subject matter of the document and the basis on which such privilege is claimed.
2. If you have possession, custody or control of the originals of the documents requested, please produce the originals or a complete copy of the originals and all copies which are different in any way from the original, whether by interlineations, receipt stamp or notation. If you do not have possession, custody

or control of the originals of the documents requested, please produce any copies in your possession, custody or control, however made.

3. Please construe “and” as well as “or” either disjunctively or conjunctively as necessary to bring within the scope of this production of documents any document which might otherwise be construed to be outside the scope.
4. If you object to any discovery requests, in whole or in part, on the basis of confidentiality, please strictly follow the provisions of the Florida Public Service Commission Rule 25-222.006 requiring a motion for protective order no later than the date the response is otherwise due and urging all parties to seek mutual agreement before bringing a controversy to the Commission.
5. Unless otherwise indicated in the discovery request, or if the context of the request otherwise requires, only documents created on or after January 1, 1994 are requested.

DEFINITIONS

1. “Document” or “documents” is meant to have the broadest possible meaning under applicable law and includes, but is not necessarily limited to 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, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals,

appointment calendars, records and recordings of oral conversations, work papers and notes, any of which are in your possession, custody or control.

2. As used herein, "Application" means the Application of Island Environmental for a certificate to provide wastewater service in Charlotte County, Florida, filed with the Commission under Docket No. 020745-SU.
3. As used herein "you" and "your" means the Applicant, together with his or her employees, consultants, agents, representatives, attorneys (unless privileged) and any other person or entity acting on behalf of the Applicant.
4. Words in the past tense include the present, and words in the present tense include the past. Use of the singular includes the plural, and use of the masculine includes the feminine where appropriate, and vice versa.
5. If there is any document or other tangible item described by this request which is no longer in your possession, custody or control, or is no longer in existence or accessible to you, please indicate:
 - a. The date and nature of the disposition of such document or other tangible item, including, but not limited to whether such (i) is missing or lost; (ii) has been destroyed, or (iii) has been transferred to another person.
 - b. The circumstances surrounding such disposition, including any authorization thereof; and
 - c. Where applicable, the person currently in possession, custody or control of such document or item.

6. Usage of acronyms, abbreviations or other symbolic terms are to be taken as having the same meanings as common usage of those terms in the regulation of utilities in the State of Florida have assigned to them.

REQUESTS FOR PRODUCTION OF DOCUMENTS NOS. 1 – 31

1. Please provide documentation of the ownership of all properties listed in Interrogatory No. 8.
2. Please provide documentation of the ownership of all properties listed in Interrogatory No. 9.
3. Please provide a copy of the bills from all taxing authorities relating to the properties identified in Interrogatories Nos. 8 & 9.
4. Please provide the documentation of the purchase price of your property(s).
5. Please provide the documentation for all of the business enterprises identified in Interrogatory No. 24.
6. Please provide the documentation for each corporate entity identified in Interrogatory No. 25.
7. Please provide documentation of your involvement and/or financial interest in any and all the water or wastewater service providers, both certified and not certified, currently providing water and/or wastewater service to the island.
8. Please provide documentation of your involvement with Island Environmental Utilities, Inc.
9. Please provide your financial statement listing all assets and liabilities.
10. Please provide documentation of your answer to Interrogatory No. 30.
11. Please provide documentation of your answer to Interrogatory No. 31.
12. Please provide documentation of your answer to Interrogatory No. 34.
13. Please provide documentation of your answer to Interrogatory No. 35.
14. Please provide documentation of your answer to Interrogatory No. 36.

15. Please provide documentation of any judgments that have ever been rendered against you or any business you have been involved in.
16. Please provide documentation of your answer to Interrogatory No. 37.
17. Please provide documentation of your answer to Interrogatory No. 38.
18. Please provide documentation of your answer to Interrogatory No. 39.
19. Please provide documentation of the legal description of the proposed territory to be served by Island Environmental Utilities, Inc.
20. Please provide any and all documentation supporting the testimony of John R. Boyer (page 4, lines 19, 20 and 21) regarding the statement “The utility anticipates that service will begin two(2) years after certification.”
21. Please provide documentation of your answer to Interrogatory No. 43.
22. Please provide documentation of your answer to Interrogatory No. 44.
23. Please provide documentation of your answer to Interrogatory No. 45.
24. Please provide documentation of your answer to Interrogatory No. 46.
25. Please provide documentation of your answer to Interrogatory No. 47.
26. Please provide documentation of your answer to Interrogatory No. 48.
27. Please provide documentation of your answer to Interrogatory No. 49.
28. Please provide documentation of your answer to Interrogatory No. 50.
29. Please provide documentation of your answer to Interrogatory No. 51.
30. Please provide any documents identified in Interrogatory No. 56.
31. Please provide documentation showing your compliance with the Charlotte County Comprehensive Plan (including, but not limited to, Policy No. 9.1.4).