

BEFORE the PUBLIC SERVICE Commission

DOCKET No. 020745 - SU

IN RE: APPLICATION  
FOR CERTIFICATE TO  
PROVIDE WASTEWATER  
SERVICE IN CHARLOTTE  
COUNTY FL. by ISLAND  
ENVIRONMENTAL UTILITY  
INC (IEU)

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RESPONSE to MOTION FOR RECONSIDERATION

1. I have filed all previous motions, responses and objections in a timely manner.
2. I am compiling my responses to IEU's discovery as instructed by the Commission's Order No. PSC-03-1415-PCO-SU and intend to file this in a timely manner.
3. The discovery to which IEU objects is of a financial nature. This request was made to ~~to~~ evaluate and determine the financial abilities and stability of the applicant (shareholders) to construct, operate and maintain a wastewater treatment system.

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4. It was Mr. Friedman, ATTORNEY for IEU who stated in his MARCH 20, 2003 letter to the PSC that "since IEU is not yet in operation ... it does not have any financial statements" and that "the financial ability of IEU, Inc ... is based upon the financial ability of its share holders..." These share holders are DEAN BECKSTEAD, GARFIELD BECKSTEAD, and John Boyer. ALL FUNDING is to be based upon the financial abilities of these same share holders.

5. there has been no change in the relevant facts from the original Objections to Discovery filed by IEU Oct 3, 2003 that would be germane to the present Motion for Reconsideration, so there is nothing new to reconsider.

6. It appears that the sole reason given to request the ~~reconsideration~~ reconsideration is the misplaced, untrue and improper personal attack against me, that has no role in these proceedings.

7. IEU had requested and received personal financial information from Mr. Koenig.

8. MR FRIEDMAN AT THE JULY 16, 2003 CONFERENCE CALL WITH THE PSC AND INTERVENERS STATED THE FINANCIAL RECORDS WOULD BE AVAILABLE AND BE PROVIDED BY AUG 15, 2003

9. The shareholders have not requested that their personal financial statements be classified as specified confidential material and it is presumptuous of Mr. Friedman to assume that that determination would be meaningless if granted.
10. In a letter dated Feb 20, 2003 the commission also requested that the applicant (shareholder) demonstrate its financial ability.
11. This request is reasonably calculated to lead to the discovery of admissible evidence.
12. It has not been shown that the disclosing of the financial information would hurt the applicant.
13. Based on the above I request that the commission deny the Motion for ~~Record~~ Reconsideration.

Linda B. Gathman  
DEC 30-2003

I hereby certify that this Response  
has been furnished by U.S. mail to the  
following on Dec 30, 2004

Mr. Ronald Koenig  
Jannette Knaulton  
Rosanne Gervasi  
Martin Friedman

Linda B. Bamfield



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