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REPLY TO CENTRAL FLORIDA OFFICE

March 1, 2006

MARTIN S. FRIEDMAN, P.A.  
VALERIE L. LORD  
BRIAN J. STREET

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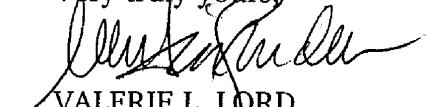
Ms. Blanca Bayo  
Commission Clerk and Administrative Services Director  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

Re: Docket No. 040384-WS; Application of Sanlando Utilities Corporation for an  
Amendment of Water and Wastewater Certificates in Seminole County, Florida  
Our File No.: 30057.61

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies  
of the Amended Notice of Taking Deposition Duces Tecum of Thomas Jensen.

Should you have any questions regarding the enclosed, please do not hesitate to give me  
a call.

Very truly yours,  
  
VALERIE L. LORD  
For the Firm

- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR 1 VLL/tlc
- ECR \_\_\_\_\_ Enclosures
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- RCA \_\_\_\_\_
- SCR \_\_\_\_\_
- SGA \_\_\_\_\_
- SEC 1
- OTH \_\_\_\_\_

cc: Jennifer Brubaker, Esquire (w/enclosures)  
Richard S. Taylor, Esquire (w/enclosures)  
Susan Dietrich, Assistant County Attorney (w/enclosures)  
Mr. Steven M. Lubertozzi (w/o enclosures)  
Mr. Scotty Haws (w/enclosures)  
Mr. Patrick C. Flynn (w/enclosures)

M:\1 ALTAMONTE\UTILITIES INC\SANLANDO\61) SANLANDO (2003 Terr Ext) \SG-DATA\IN\PC Clerk\Amend Depo of Jensen).ltr.wpd

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application of  
SANLANDO UTILITIES CORPORATION  
for amendment of water and wastewater  
certificates in Seminole County

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Docket No. 040384-WS

AMENDED NOTICE OF TAKING DEPOSITION DUCES TECUM

PLEASE TAKE NOTICE that on the 24th day of April, 2006 at 1:00 p.m., the undersigned counsel will take the deposition of THOMAS JENSEN upon oral examination at the offices of Everman & Associates, 1101 North Olive Avenue, West Palm Beach, FL 33401 in accordance with the Florida Rules of Civil Procedure.

The deposition will be conducted before a duly designated representative of Everman & Associates, or some other notary public authorized by law to take depositions in the State of Florida, for the purpose of discovery, for use a trial, or for such other purposes are permitted under the Florida Rules of Civil Procedure, Florida Administrative Code, and Florida Statutes.

This deposition will continue from day to day until completed.

The matters on which examination is requested are:

- The technical and financial ability of the City of Longwood to provide water and wastewater service to customers in the Disputed Area during the period August 30, 2001 to December 31, 2001.
- The City of Longwood's technical and financial ability to provide water and wastewater service to customers in the Disputed Area, as of January 1, 2006.
- The City's existing water and wastewater rates, fees and charges and the rates, fees and charges that the City of Longwood proposes to charge to its

customers after the integration of the customers in the Disputed Area.

- The effect, if any, on the City's rates by the integration of the customers in the Disputed Area into the City's existing system.
- The estimated cost of integrating the customers in the Disputed Area into the City's existing system.
- How the cost of integrating the customers in the Disputed Area into the City's existing system will be borne and who will bear them.
- The City's estimates, as of 2006, of the cost of constructing the facilities necessary to maintain adequate hydraulic capacity and operational capability to enable Sanlando to maintain the current level of water, wastewater and fire service to its customers after disconnection of the customers in the Disputed Area.
- How the remaining customers of Sanlando will be provided with continuous and uninterrupted water and wastewater service should water and wastewater service to the customers in the Disputed Area be transferred from Sanlando's facilities to the City's facilities.
- The capacity of the City of Longwood's water and wastewater treatment plants, and the disposal system, according to its Department of Environmental Protection (DEP) Operating permit.
- The amount of water and wastewater capacity currently being used, based on the permitted capacity by DEP.
- The amount of water and wastewater treatment capacity currently reserved for future growth outside of the Disputed Area, based on the permitted capacity by DEP.
- The amount of wastewater treatment capacity the customers in the Disputed Area will place on the City of Longwood's water and wastewater system, based on the permitted capacity by DEP.
- The size and capacity of the City of Longwood's water transmission system, wastewater collection system, and size of force mains that are currently in place to serve the Disputed Area.
- The size, location and capacity of any proposed water lines and wastewater collection system, and size of force main that would be needed to provide

service to the Disputed Area.

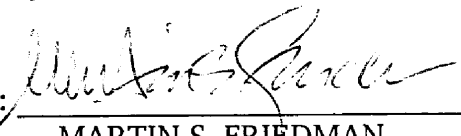
- The City of Longwood's record of compliance with all permit(s) from the DEP, Water Management District, and the EPA.
- The DEP identification numbers for the City of Longwood's water and wastewater systems and plants that would serve the Disputed Area.
- The City of Longwood's experience in operating water and wastewater facilities.
- Any other matter which have been the subject of discovery by the Commission Staff and Sanlando.

The witness shall produce at his deposition all items listed on Exhibit "A" attached hereto.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Respectfully submitted this 1<sup>st</sup> day of March, 2006, by:

ROSE, SUNDSTROM & BENTLEY, LLP  
Sanlando Center  
2180 W. State Road 434, Suite 2118  
Longwood, Florida 32779  
(407) 830-6331  
(407) 830-8522 Fax

By:   
\_\_\_\_\_  
MARTIN S. FRIEDMAN  
VALERIE L. LORD  
For the Firm

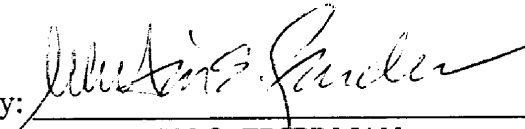
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished  
by U.S. Mail on this 1<sup>st</sup> day of March, 2006, to:

Jennifer Brubaker, Esquire  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Richard S. Taylor, Esquire  
531 Dog Track Road  
Longwood, FL 32752-1117

Susan Dietrich, Assistant County Attorney  
Seminole County, Florida  
1101 East First Street  
Sanford, FL 32771-1468

By:   
MARTIN S. FRIEDMAN  
VALERIE L. LORD

cc: Everman & Associates (via facsimile (561) 659-3201)

## EXHIBIT "A"

1. Any and all letters, writings, memoranda, or similar or analogous documentation that the you reviewed, relied upon, or referenced in relation to the matters which will be examined at this deposition.
2. Any and all letters, writings, memoranda, or similar or analogous documentation that you reviewed, relied upon, or referenced in your testimony filed in this case.
3. Any and all letters, writings, memoranda, or similar or analogous documentation that you, relied upon, or referenced in relation to the matters on which you will testify at the hearing.