

Eric Fryson

From: Dana Rudolf [drudolf@sfflaw.com]
Sent: Monday, June 18, 2012 12:45 PM
To: Filings@psc.state.fl.us
Cc: Martin Friedman
Subject: Docket No. 110200-WU; Application for increase in water rates in Franklin County by Water Management Services, Inc.

Attachments: Answer & Objection to Staff's 1st Interrogatories.pdf

- a) Martin S. Friedman, Esquire
Sundstrom, Friedman & Fumero, LLP
766 North Sun Drive, Suite 4030
Lake Mary, FL 32746
(407) 830-6331
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- b) Docket No. 110200-WU
Application for increase in water rates in Franklin County by Water Management Services, Inc.
- c) Water Management Services, Inc.
- d) 4 pages
- e) Answer and Objections to Staff's First Set of Interrogatories.

6/18/2012

DOCUMENT NUMBER-DATE

0394 | JUN 18 2012

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for increase in
Water Rates in Franklin County by
Water Management Services, Inc.

Docket No. 110200-WU

**WATER MANAGEMENT SERVICES, INC.'S ANSWER
AND OBJECTIONS TO STAFF'S FIRST SET OF INTERROGATORIES**

WATER MANAGEMENT SERVICES, INC. (the "Utility"), by and through its undersigned attorneys and pursuant to Fla. R. Civ. P. 1.340, hereby answers and objects to Staff's First Set of Interrogatories as follows:

1. Attached hereto is a Schedule responsive to this Interrogatory.
2. – 6. These Interrogatories are directed to the testimony filed by Gene Brown which has been withdrawn. Since WMSI no longer relies upon that testimony, interrogatories addressed to it are irrelevant, immaterial and not likely to lead to the discovery of admissible evidence. Further, these Interrogatories relate to Account 123, and based upon WMSI's argument in its Objection to Staff's First Request for Production of Documents incorporated herein by reference, they are equally irrelevant.
7. This Interrogatory relates to Account 123, and based upon WMSI's argument in its objection to Staff's First Request for Production of Documents incorporated herein by reference, it is irrelevant.
8. Further, for the reasons set forth in WMSI's Response to OPC's Motion to

DOCUMENT NUMBER-DATE

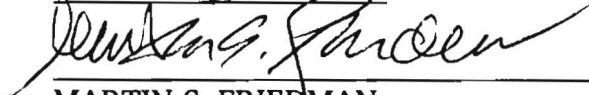
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FPSC-COMMISSION CLERK

Establish Discovery Procedures, formal discovery is not authorized or contemplated in a PAA proceeding.

Respectfully submitted on this 18th day of June, 2012 by:

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MARTIN S. FRIEDMAN
For the Firm

CERTIFICATE OF SERVICE
DOCKET NO. 110200-WU

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail and E-Mail to the following parties this 18th day of June, 2012:

Erik Sayler, Associate Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400

Ralph Jaeger, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



MARTIN S. FRIEDMAN
For the Firm

RESPONSE TO PSC STAFF INTERROGATORY NO. 1
DATED MAY 18, 2012
DOCKET NO. 110200-WU

SALE DATE	DESCRIPTION	BUYER	ORIGINAL COST	A/D	NET BOOK VALUE	MARKET VALUE	PROCEEDS	GAIN/(LOSS)
1/1/11	2007 Chev. Tahoe	Sandy Chase	30,413	12,672	17,741	17,913	13,393*	(4,348)
12/31/10	2008 Chev. Tahoe	Brown Management Group	42,580	5,358	37,222	23,787	35,471*	(1,751)
3/10/10	2008 GMC Truck	Brown Management Group	43,202	21,489	21,713	17,414	22,612*	899
7/19/11	200 Non-functioning Meters	Junkman	5,086	5,086	0	500	500	500
	*Assumption/release of debt							