

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Analysis of UTILITIES, INC.'S financial
accounting and customer service computer
system

Docket No.: 120161-WS

UTILITIES, INC.'S OBJECTION TO CITIZENS' SECOND SET OF INTERROGATORIES

UTILITIES, INC. ("UI"), by and through its undersigned attorneys, files this Objection to Citizens' Second Set of Interrogatories, Numbered 18, 25 and 29 and states as follows:

18. Please identify all Utilities, Inc. employees (or affiliate employees), if any, who worked with Deloitte Consulting on developing Project Phoenix, and as part of this response, please explain:

- a. the reason they worked with Deloitte Consulting,
- b. the amount of hours budgeted for these UI employees (or affiliate employees) to work with Deloitte Consulting,
- c. actual number hours they worked with Deloitte Consulting, and
- d. whether and how much of their time, if any, was capitalized to Project Phoenix.

Objection: This Interrogatory is essentially the same as 2 j, to which Utilities, Inc. objected and which objection was sustained by the Prehearing Commissioner.

25. Alternative Software Programs. The following questions relate to any software programs that Utilities Inc. analyzed or considered prior to hiring Deloitte Consulting to design a custom-made software system.

- e. Please state all software options Utilities Inc. considered prior to hiring Deloitte Consulting to design the Project Phoenix accounting and customer care system.
- f. Please describe what steps UI took to investigate what other companies (including utility companies) used prior to hiring Deloitte Consulting to design Project Phoenix.

Objection: This Interrogatory requests information beyond the scope of this docket and thus is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence. This docket was opened pursuant to UI's Petition For Establishment of Generic Docket "to address the impact of divested systems on the recovery of the cost of UI's financial accounting and customer service system referred to as 'Project Phoenix' ", and the request for relief was limited to addressing "the impact of divested systems on the Project Phoenix costs." The requested information goes beyond the scope of the Docket.

29. Computer Maintenance and Supplies. Please refer to OPC's Interrogatory 14. For each of the types of costs included in Accounts 5735 – Computer Maintenance and 5740 – Computer Supplies for 2013, please state whether the costs are fixed costs or whether the costs are variable

either upon the number of transactions, customers, or any other factor. Also state whether the type of cost was incurred prior to implementation of Project Phoenix or whether the cost was necessary as a result of implementing Project Phoenix.

Objection: This Interrogatory is essentially the same as 14, to which Utilities, Inc. objected and which objection was sustained by the Prehearing Commissioner.

CERTIFICATE OF SERVICE

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 19th day of March, 2014:

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Respectfully submitted this 19th day of March,
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