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July 29, 1993

Mr. Steve Tribble, Director
Division of Records & Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

RE: Turkey Creek Utilities, Inc.
Docket No. [REDACTED]

Dear Mr. Tribble:

Enclosed please find the original and fifteen copies of the Notice of Response To Commission Staff's First Set Of Interrogatories filed on behalf of our client, Turkey Creek Utilities, Inc.

Should you have any questions or concerns regarding the above, please do not hesitate to contact me at your earliest convenience.

Sincerely,

ROSE, SUNDSTROM & BENTLEY



John L. Wharton, Esq.
For The Firm

JLW/lm

Encl.

DOCUMENT NUMBER-DATE

08186 JUL 29 83

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

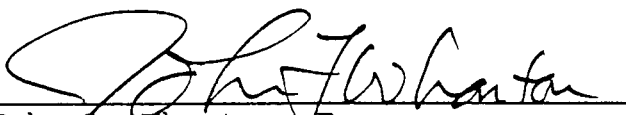
IN RE: Application for certificates)
to provide water and wastewater)
service in Alachua County under)
grandfather rights by TURKEY CREEK,)
INC. & FAMILY DINER, INC. d/b/a)
TURKEY CREEK UTILITIES)
_____)

DOCKET NO. 921098-WS

NOTICE OF RESPONSE TO
COMMISSION STAFF'S FIRST SET OF INTERROGATORIES

Applicant, Turkey Creek, Inc. and Family Diner, Inc. d/b/a Turkey Creek Utilities, by its undersigned attorneys, files this Notice of its response to the Commission Staff's First Set of Interrogatories.

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice was furnished by Hand Delivery to Catherine Bedell, Esq., Division of Legal Services, Florida Public Service Commission, 101 East Gaines Street, Tallahassee, FL 32301 on this 29th day of July, 1993.



John L. Wharton, Esq.
ROSE, SUNDSTROM & BENTLEY
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Tallahassee, FL 32301
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DOCUMENT NUMBER-DATE

08186 JUL 29 83

ROSE, SUNDSTROM & BENTLEY

2548 BLAIRSTONE PINES DRIVE, TALLAHASSEE, FLORIDA 32301

11-00-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for) DOCKET NO. 921098-WS
Certificates to Provide Water) FILED:
and Wastewater Service in)
Alachua County Under Grandfather)
Rights by TURKEY CREEK, INC. &)
FAMILY DINER, INC. d/b/a TURKEY)
CREEK UTILITIES.)
_____)

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES TO
TURKEY CREEK, INC. & FAMILY DINER, INC. d/b/a
TURKEY CREEK UTILITIES

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby propounds the following interrogatories, numbered 1 through 5, to Turkey Creek Utilities (Turkey Creek), pursuant to Rule 1.340, Florida Rules of Civil Procedure. These interrogatories shall be answered under oath by Turkey Creek, Inc., and Family Diner, Inc. d/b/a Turkey Creek Utilities, or its agent who is qualified to answer and who shall be fully identified, within thirty (30) days.

INSTRUCTIONS

A. Turkey Creek shall answer these interrogatories to the fullest extent possible and shall furnish all information which is reasonably available to Turkey Creek, its principals, agents, attorneys, affiliates or other representatives. Turkey Creek may respond to an interrogatory by indicating that the requested information is reported on a specific schedule in the minimum filing requirements.

B. If Turkey Creek cannot answer a particular interrogatory in full, after exercising due diligence to secure the information to do so, it should state the answer to the extent possible and specify why it is unable to answer the remainder. In addition, Turkey Creek shall state whatever information or knowledge that it has concerning the unanswered portion.

C. If the requested information is not applicable, that response should be reported as well as the reason why. If the requested information is not available, that response should be reported as well as the reason why.

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES
TO TURKEY CREEK UTILITIES
DOCKET NO. 921098-WS
PAGE 2

D. If the utility is an operating division of a larger company, but separate records permit isolation of the subject utility system, the utility's response to these interrogatories may reflect such information. For example, cost of capital information for the utility may be on a divisional basis and similar information for the combined company will be reported under the heading "parent company." This adaptation should be disclosed in the utility's response.

E. Please report the name(s) of each person responding to each of the following interrogatories, the business address and telephone number of each such person, and the relationship of each person to Turkey Creek. Also, identify which interrogatory each such person has answered.

F. If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided to the Commission through a Commission audit, please so state, indicating the date provided and the audit document/record request number.

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES
TO TURKEY CREEK UTILITIES
DOCKET NO. 921098-WS
PAGE 3

INTERROGATORIES

1. Please identify the ownership interests of Family Diner, Inc. and Turkey Creek, Inc. in Turkey Creek Utilities. In so doing, please identify the percentage of ownership each of the corporations has in Turkey Creek Utilities, and the primary business activities of each corporation.

Family Diner, Inc. owns 100% of Turkey Creek Utilities. Family Diner, Inc. is in the landscaping and maintenance service, nursery, water and wastewater, and food businesses. Turkey Creek, Inc. is a building and development company.

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES
TO TURKEY CREEK UTILITIES
DOCKET NO. 921098-WS
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2. Please explain why the Turkey Creek Utilities plant sites are owned solely by Turkey Creek, Inc., as described in the quick-claim deed.

Turkey Creek, Inc. owns the plant sites because there are things on the plant sites other than utilities. However, Turkey Creek Utilities, through Family Diner, Inc., has easements.

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES
TO TURKEY CREEK UTILITIES
DOCKET NO. 921098-WS
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3. Please identify the case name and number of the circuit court case concerning the unmetered irrigation account of the Turkey Creek Master Owners Association.

Case No. 92-4725-SC; Family Diner, Inc. d/b/a Turkey Creek Utilities v. Turkey Creek Master Owners Association, Inc.

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES
TO TURKEY CREEK UTILITIES
DOCKET NO. 921098-WS
PAGE 6

4. Section 21 of the utility's Development of Regional Impact (DRI) refers to a second wastewater treatment facility. Was this second wastewater treatment facility ever constructed? If not, are there any plans to construct such a facility.

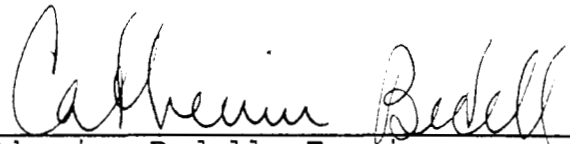
Our present wastewater treatment plant is rated at 350,000 gpd. The second wastewater facility referred to in the DRI was to be an addition to the present plant, which hopefully will come at some much later date. We presently are only treating approximately 50,000 gpd which is one-seventh of the capacity.

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES
TO TURKEY CREEK UTILITIES
DOCKET NO. 921098-WS
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5. Section 21 of the DRI refers to spray irrigation on the golf course. Does the utility provide spray irrigation to the golf course? If not, why not? If the utility has any plans to provide spray irrigation to the golf course in the future, please describe these plans.

Turkey Creek Utilities sends approximately 50,000 gallons of treated effluent to a mixing lake on the No. 18 hole at Turkey Creek Country Club. The Turkey Creek Country Club mixes well water with this effluent and then uses this lake for spraying irrigation on the golf course. This has been done for the past 17 years in the same manner.

DATED: June 29, 1993



Catherine Bedell, Esquire
Senior Attorney

FLORIDA PUBLIC SERVICE COMMISSION
Bureau of Water and Wastewater
Division of Legal Services

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for) DOCKET NO. 921098-WS
Certificates to Provide Water) FILED:
and Wastewater Service in)
Alachua County Under Grandfather)
Rights by TURKEY CREEK, INC. &)
FAMILY DINER, INC. d/b/a TURKEY)
CREEK UTILITIES.)
_____)

I HEREBY DECLARE that the responses to the above interrogatories are true and correct to my best knowledge and belief.

By: Storwood H. Hoge, Pres

STATE OF FLORIDA

COUNTY OF ~~DEKOT~~ ALACHUA

SWORN to and subscribed before me at Alachua, Alachua County, Florida, this 28th day of July, 1993.

Helen H De Carlis
Notary Public
State of Florida
My Commission Expires: 3/31/95

(S E A L)

CB

