

FILED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Interim and Permanent Rate Increase in Franklin County, Florida by ST. GEORGE ISLAND UTILITY COMPANY, LTD.

DOCKET NO. [REDACTED] Filed: March 31, 1994

OBJECTION TO CITIZENS' SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO ST. ISLAND UTILITY CO., LTD.

St. George Island Utility Company, Ltd., a Florida limited partnership, ("Utility") objects to the second request for production of documents filed by the "Citizens" and as grounds for this objection would show the Commission as follows:

1. In its first request for production of documents filed in this cause on February 11, 1994, the "Citizens" made a request for documents which, including subparts, exceeded the limitation of 75 as established by PSC Order No. 94-0320-PCO-WU issued March 21, 1994.

2. Despite the fact that the "Citizens'" first request for production exceeded the limitation of 75 as established in the above-referenced Commission order, the Utility nevertheless responded to the entire request for production, including those in excess of the 75 limitation.

3. The "Citizens'" second request for production is far in excess of the 75 limitation set forth in the above-referenced order, and the Utility should not be compelled to respond to such request in violation of this Commission's order.

4. The "Citizens'" second request for production amounts to

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APP [initials]
CAF [initials]
CMU [initials]
CIR [initials]
E [initials]
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OPD [initials]
RCH [initials]
SEC [initials]
T [initials]

nothing more than additional, continued harassment of the Utility, which will have no result other than to increase the cost of this rate case.

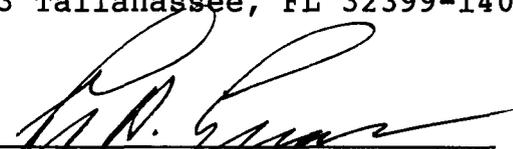
5. The "Citizens'" request for production numbered 61 through 72 requests the Utility to produce documents which are not relevant or material to any issue before the Commission in this rate case.

6. As to request for production number 74, all financial statements, income statements and balance sheets from 1979 through 1987 are irrelevant and immaterial to any issue before the Commission in this rate case.

7. The Commission should enter an order directing the "Citizens" to stop harassing this Utility with unreasonable and unduly burdensome discovery requests in violation of the Commission's above-referenced order and the Florida Rules of Civil Procedure.

I HEREBY CERTIFY that copies of this response have been furnished by U. S. Mail this 31st day of March, 1994 to:

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