

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' THIRD SET OF INTERROGATORIES TO ST. GEORGE ISLAND UTILITY CO., LTD.

St. George Island Utility Co., Ltd., a Florida limited partnership, ("Utility") objects to the third set of interrogatories filed by the "Citizens," and as grounds for this objection would show the Commission as follows:

1. In its first set of interrogatories filed in this cause on February 11, 1994, the "Citizens" propounded approximately 75 interrogatories, including subparts, to the Utility. By PSC Order No. 94-0320-PCO-WU issued March 21, 1994, the Commission limited interrogatories by any party, including all subparts, to

ACK 50.

2. Despite the fact that the "Citizens'" first set of interrogatories exceeded both the limitation of 30 set forth in the Florida Rules of Civil Procedure, and the limitation of 50 set forth in the above-referenced Commission order, the Utility nevertheless responded to all of the approximately 75 Interrogatories previously propounded by the "Citizens."

3. The "Citizens'" third set of interrogatories is far in excess of the 50 limitation set forth in the above-referenced

order, and the Utility should not be compelled to answer interrogatories in violation of such order.

4. The "Citizens'" third set of interrogatories amounts to 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. Interrogatories numbered 37, 39, 41 and 49 are not relevant or material to any issue before the Commission in this docket.

6. Interrogatory number 5 is identical to interrogatory number 23, to which the Utility has already responded.

7. Interrogatory number 46 is substantially the same as interrogatory number 25, to which the Utility has already responded.

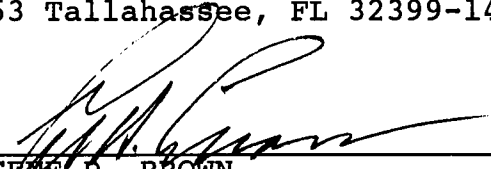
8. Interrogatory number 48 is substantially the same as interrogatory number 26, to which the Utility has already responded.

9. 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 *3/15* day of March, 1994 to:

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