

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]

ORIGINAL
FILE COPY

ST. GEORGE ISLAND UTILITY CO., LTD.'S
SECOND MOTION TO COMPEL DISCOVERY

ST. GEORGE ISLAND UTILITY CO. LTD. ("SGIU"), by and through its undersigned counsel, in accordance with Section 120.58, Florida Statutes; Rule 25-22.034, Florida Administrative Code; and The Florida Rules of Civil Procedure, files this Second Motion to Compel Discovery.

SGIU is seeking an order compelling the Citizens of the State of Florida ("Citizens") to answer interrogatories and to produce documents in response to discovery requests that have been duly served by SGIU.

1. SGIU filed and served interrogatories and a request for production of documents directed to Citizens on June 2, 1994. Citizens have failed to answer the interrogatories and have failed to respond to the request for production of documents within the time constraints set out in Rules 1.340(a) and 1.350(b), Florida Rules of Civil Procedure.

2. Citizens has not objected to the discovery requests, but has merely stated that it will not respond until SGIU responds to discovery requests that Citizens contend is outstanding. This is not a valid objection.

DOCUMENT NUMBER-DATE

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WHEREUPON, SGIU respectfully requests that the Commission enter an order directing Citizens to answer interrogatories and produce documents in accordance with the outstanding requests.

Respectfully submitted this 11th day of July, 1994.



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**Attorneys for St. George
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery to Robert Pierson and Suzanne Summerlin, Florida Public Service Commission, 101 East Gaines Street, Tallahassee, Florida 32399-0863; and to Harold McLean, Associate Public Counsel, Claude Pepper Building, Room 812, 111 West Madison Street, Tallahassee, Florida 32399-1400; and a copy has been furnished by U.S. Mail to Barbara Sanders, St. George Island Water and Sewer District, Post Office Box 157, Apalachicola, Florida 32320 this 11th day of July, 1994.



Attorney