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June 3, 1996

HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-1850

RE: Docket No. ~~051056-WS~~
Application by PALM COAST UTILITY CORPORATION
for a rate increase in Flagler County, Florida

Dear Ms. Bayo:

Enclosed for filing are an original and fifteen copies of Palm Coast Utility Corporation's Requests for Clarification and Objections to Staff's First Set of Interrogatories and First Request for Production of Documents, in reference to the above docket.

Please acknowledge receipt of the foregoing by stamping the enclosed extra copy of this letter and returning same to my attention. Thank you for your assistance.

- ACK _____
- AFA 1
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG BKG/met
- LEG Edmonds
- LNH 3
- OTD _____
- PLN _____
- SEC 1
- WAS _____
- WTH _____

Very truly yours,

B. Kenneth Gatlin

B. Kenneth Gatlin

DOCUMENT NUMBER-DATE
06075 JUN-3 88
FPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for rate increase in)
Flagler County by PALM COAST)
UTILITY CORPORATION)

Docket No. 951056-WS

Filed: June 3, 1996

PALM COAST UTILITY CORPORATION'S
REQUESTS FOR CLARIFICATION AND OBJECTIONS TO
STAFF'S FIRST SET OF INTERROGATORIES AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

Palm Coast Utility Corporation (PCUC) hereby files its requests for clarification and objection to Commission Staff's First Set of Interrogatories to PCUC and Commission Staff's First Request for Production of Documents to PCUC, pursuant to the Procedural Order in this case. PCUC is attempting to resolve these discovery responses informally with Staff. Questions arose on certain discovery questions, which PCUC has been unable to discuss with Staff Counsel, who is out of town. PCUC intends to try to resolve these objections informally as soon as possible.

Staff's First Request for Production of Documents to PCUC

1. Objection to Document Request Nos. 1, 3, 4, 5, and 7, as having been provided, or to be provided, in response to OPC's Document Request Nos. 3, 29, 34, 26, and 62, respectively.

2. Request for Production of Document No. 11:

11. Provide a copy of Palm Coast Utility's 1994 Strategic Plan.

PCUC's response:

11. Objection. Irrelevant; not reasonably calculated to lead to the discovery of admissible evidence.

3. Request for Production of Document No. 13.

PCUC has verified with Staff Counsel that the reference to "Envirotech" was meant to be a reference to "Aquatech."

Staff's First Set of Interrogatories to PCUC

4. Interrogatory No. 3. PCUC has requested clarification from Staff that reference to "intercompany" is meant to be "intracompany."

5. Interrogatory No. 35.

35. Please cite the specific DEP rules which require 50% overdraft on well sources and for any component oversizing.

PCUC's response:

35. Request clarification. This interrogatory is not understood.

6. Interrogatory No. 40.

40. Provide the estimated cost to increase the capacity of water treatment plant number one to 6.0 mgd. Also include a description of the additional plant which is needed to increase the plant capacity.

PCUC's response:

40. Objection. Irrelevant; not reasonably expected to lead to admissible evidence. Unduly burdensome and expensive. PCUC has no plans other than future conceptual to increase the capacity of the water treatment plant.

7. Interrogatories Nos. 45 and 46.

PCUC has verified with Staff Counsel that the references to "Envirotech" are meant to be to "Aquatech."

8. Interrogatory No. 48.

PCUC has requested clarification from Staff as to whether this interrogatory refers to water or effluent.

DATED this 3rd day of June, 1996.

Respectfully submitted,

B. Kenneth Gatlin

B. Kenneth Gatlin
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Attorneys for
PALM COAST UTILITY CORPORATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery to Mr. Scott Edmonds, Esquire, Division of Legal Services, Florida Public Service Commission, 2540 Shumard Oak Blvd., Tallahassee, Florida 32399-0850, Mr. Stephen C. Reilly, Associate Public Counsel, Office of Public Counsel, 111 W. Madison Street, Room 812, Claude Pepper Building, Tallahassee, Florida 32399-1400, and to Richard D. Melson, Esquire, Hopping, Green, Sams & Smith, 123 South Calhoun Street, Tallahassee, Florida 32314, on this 3rd day of June, 1996.

B. Kenneth Gatlin

B. Kenneth Gatlin