MARTIN, ADE, BIRCHFIELD & MICKLER, P.A.

ONE INDEPENDENT DRIVE - SUITE 3000 JACKSONVILLE, FLORIDA 32202

> MAILING ADDRESS POST OFFICE BOX 59 JACKBONVILLE, FLORIDA 32201

TELEPHONE (904) 364-2060 TELECOPIER (904) 354-5842

November 22, 1996

BARBARA CHRISTIE JOHNSTON WILHELMINA F KIGHTLINGER MYRA LOUGHRAN RALPH H. MARTIN ROBERT O. MICHLER JOHN D. MILTON, JR DANIEL & NUNN, JR BCOTT G. BCHILDBERG GARY L WILKINSON L PETER JOHNSON (1942-1986)

VIA FEDERAL EXPRESS

JAMES L. ADE

LYNDA R. AYCOCK

W. O. BIRCHPIELD

TIMOTHY A. BURLEIGH

CHARLES L. CRANFORD

PHILLIP A. DELMONT

STEPHEN H. DURANT

T. WILLIAM GLOCKER

STEPHEN D. HALKER

MICHAEL E. GOODBREAD, JR

Blanca Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

> Application by United Water Florida Inc. For Adjustment of Rates, Docket No. 960451-WS, ("Application")

Dear Ms. Bayo:

In connection with the above-referenced matter, please find enclosed for filing an original and seven copies of a Supplement to Response of Untied Water Florida Inc. To Commission Staff's First Request for Production of Documents to United Water Florida Inc. on behalf of United Water Florida Inc. Please file the original and distribute the copies in accordance with your usual procedures.

If you have any questions or comments regarding this matter, please do not hesitate to call.

Sincerely yours,

Scott G. Schildberg

ACK __ AFA ____SGS/msa Enclosures cc: Mr. David E. Chardavoyne CAF Mr. Walton F. Hill Mr. Robert J. Iacullo CMII _____ Mr. Richard A. Hensch Mr. Frank J. McGuire Mr. Munipalli Sambamurthi Mr. James L. Ade Mr. Harold McLean Ms. Rosanne G. Capeless

WAS ____

OTH ____

POCUMENT NUMBER-DATE 12589 NOV 25 %

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application For Rate Increase) in Duval, Nassau, and St. Johns) Counties by United Water Florida) Inc.

DOCKET NO.: 960451-WS

Date Submitted for Filing: November 22, 1996

Supplement to Response of United Water Florida Inc. To Commission Staff's First Request for Production of Documents to United Water Florida Inc.

United Water Florida Inc. ("United Water Florida"), by and through its undersigned attorneys, hereby serves this supplement to its response to Commission Staff's First Request for Production of Documents to United Water Florida Inc. ("Staff's First Request") as follows:

- 1. United Water Florida has provided two copies to Rosanne G. Capeless, Attorney for the Staff of the Florida Public Service Commission, and one copy to Harold McLean, Attorney for the Office of Public Counsel, of the documents requested in Request Nos. 1-16, inclusive and No. 20 of Staff's First Request. The copies were sent by Federal Express on November 7, 1996. United Water Florida received an extension of time until February 22, 1996, from Rosanne G. Capeless to provide the documents requested in Request Nos. 17, 18, and 19.
- 2. United Water Florida has provided two copies to Rosanne G. Capeless, and one copy to Harold McLean, of the documents

DOCUMENT NUMBER-DATE 12589 NOV 25日 FPSC-RECORDS/REPORTING requested in Request Nos. 17, 18, and 19 of Staff's First Request.

The copies were sent by Federal Express on November 21, 1996.

Dated this 22nd day of November, 1996.

Respectfully Submitted,

MARTIN, ADE, BIRCHFIELD & MICKLER, P.A.

By:

James L. Ade
Florida Bar No. 0000460
Scott G. Schildberg
Florida Bar No. 0613990
3000 Independent Square
Jacksonville, FL 32202
Telephone: (904) 354-2050

Florida Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and seven copies of the Supplement to Response of United Water Florida Inc. To Commission Staff's First Request for Production of Documents to United Water Florida Inc. has been furnished by Federal Express this 22nd day of November, 1996 to Blanca Bayo, Director, Division of Records and Reporting, Florida Public Service Commission, 2450 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, and a copy of the Staff of the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, and to Harold McLean, Esquire, Office of Public Counsel, c/o The Florida Legislature, 111 W. Madison Street, Room 812, Tallahassee, Florida 32399-1400, by Federal Express, this 22nd day of November, 1996.

Attorney 6. Schillberg