LAW OFFICES

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

ONE INDEPENDENT DRIVE - BUITE 3000 JACKSONVILLE, FLORIDA 32202

MAILING ADDRESS: POST OFFICE BOX 59 JACKBONVILLE, FLORIDA 32201

TELEPHONE (904) 384-2050 TELECOPIER (904) 384-8842

December 2, 1996

BHARON ROBERTS HENDERBON BARBARA CHRISTIE JOHNSTON WILHELMINA F. RIGHTLINGER MYRA LOUGHRAN RALPH H. MARTIN ROBERT O. HICKLER JOHN D. MILTON JR GONTE G. SCHIEDBERRO GARY L. WILKIRBON

-2 PM 9 3

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

RE: Application by United Water Florida Inc. For Adjustrent of Rates, Docket No. 960451-WS, ("Application")

Dear Ms. Bayo:

In connection with the above-referenced matter, please find enclosed an original and seven copies of the following:

- Notice of Service of Answers of United Water Florida Inc. To Citizens' First Set of Interrogatories to United Water Florida Inc. 12851-96 12/03/96
- Notice of Service of Answers of United Water Florida Inc. To Citizens' Second Set of Interrogatories to United Water Florida Inc. /2852-96
- 3. Response of United Water Florida Inc. To Citizens' First Request for Production of Documents to United Water Florida Inc. 12853-96
- APP \_\_\_\_\_ 4. Response of United Water Florida Inc. To Citizens' Second Request for Production of Documents to United Water Florida Inc. 12854-96

CMU \_\_\_\_ Please file the original and distribute the copies in accordance with your usual procedures.

EAG \_\_\_\_

ACK \_\_\_\_

. .

JAMES L. ADE

LYNDA R. AYOOCH

W. O. BIRCHPIELD

TIMOTHY A. BURLEIGH

PHILLIP A DELHONT

STEPHEN H. DURANT

T. WILLIAM GLOCKER

STEPHEN D. HALKER

MICHAEL E. GOODBREAD, JR.

CHARLES L. CRANFORD

LIN \_\_\_\_

OPC \_\_\_\_\_

SEC \_\_\_

WAS \_\_\_\_

Blanca Bayo, Director December 2, 1996 Page 2

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

Scott G. Schildberg

#### SGS/msa Enclosures

cc: Mr. David E. Chardavoyne

Mr. Walton F. Hill

Mr. Robert J. Iacullo Mr. Frank J. McGuire

Mr. Munipalli Sambamurthi

Mr. James L. Ade

Ms. Rosanne G. Capeless

Mr. Harold McLean

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

OPC -

RCH -

S

DOCKET NO .: 960451-WS

Date Submitted for Filing: December 2, 1996

# Response of United Water Florida Inc. To Citizens' 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 its response to Citizens' First Request for Production of Documents to United Water Florida Inc. ("Citizens' First Request") as follows:

1. United Water Florida has provided one copy to Harold
McLean, Associate Public Counsel, Attorney for the Citizens of the
State of Florida, and two copies to Rosanne G. Capeless, Attorney
for the Staff of the Florida Public Service Commission of the
documents requested in Request Nos. 1-30, inclusive, of Citizens'
ACK were sent by Federal Express on November 30, 1996. The copies of
were sent by Federal Express on November 30, 1996. The copies of
The documents for Request Nos. 1 and 2 were sent by Federal Express
AFA on December 2, 1996. Mr. McLean's copies of the documents provided
CAF on December 2 Request No. 2 were sent to Mr. McLean, c/o Donna
CMU fin response to Request No. 2 were sent to Mr. McLean, c/o Donna
CMU Deroni, at 15728 Farmington Road, Livonia, Michigan 48154.

EAG LEG

12853 DEC-3%

FPSC-RECORDS/REPORTING

Dated this 2nd day of December, 1996.

Respectfully submitted,

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

James L. Ade
Florida Bar No. 0000460
Scott G. Schildberg
Florida Bar No. 0613990
3000 Independent Square
Jacksonville, FL 32202

Telephone: (904) 354-2050

Attorneys for United Water Florida Inc.

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and seven copies of the Response of United Water Florida Inc. To Citizens' First Request for Production of Documents to United Water Florida Inc. has been furnished by U.S. Mail this 2nd day of December, 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 foregoing has been furnished to Rosanne G. Capeless, Attorney for 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 U.S. Mail, this 2nd day of Attorney 6 /ch, ld berg December, 1996.

DOCUMENT NUMBER -DATE 12853 DEC-3% FPSC-RECORDS/REPORTING