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December 2, 1996

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-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.

DOCKET NO.: 960451-WS

Date Submitted for Filing: December 2, 1996

Response of United Water Florida Inc. To Citizens' Second 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' Second Request") as follows:

United Water Florida has provided one copy to Harold 1. 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. 32-34 and 36-40, inclusive, of Citizens' Second Request. The copies were sent by Federal Express on November 30, 1996. Mr. McLean granted United Water Florida an extension until December 9, 1996, to serve the documents requested APP in Request Nos. 31, 35, and 41.

CAF -CMU ____ CTR ____ EAG ____ LEG ____ LIN ____ OPC ____ RCH ____ SEC -WAS ____ OTH ____

ACK .

DOCUMENT NUMBER - DATE 1 2854 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' Second 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 December, 1996.

Attorney 6 Joh, Hong

12854 DEC-3%

EPSC-RECORDS/REPORTING