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December 20, 1996

**ORIGINAL
FILE COPY**

HAND DELIVERY

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

RE: Docket No. ~~96000~~-WS
Application of GULF UTILITY COMPANY for
an increase in Wastewater Rates, approval of a decrease in
Water Rates and approval of Service Availability Charges in Lee
County, Florida

Dear Ms. Bayo:

Enclosed for filing are an original and fifteen copies of Attachment A which was inadvertently omitted from Gulf Utility Company's Objections to Citizens' Fourth Set of Interrogatories to Gulf Utility Company filed on December 18, 1996, in reference to the above docket.

ACK _____ Please acknowledge receipt of the foregoing by stamping the enclosed extra copy of this
AFA _____ letter and return same to my attention.

AFP _____

CAF _____

CMU _____

CTR _____

EAG _____

LEG 2 KGW/met

LIN 3 cc: Maggie O'Sullivan, Esq.

OPC _____

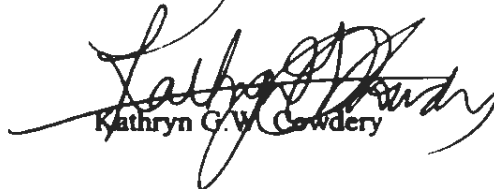
RCH _____

SEC 1

WAS _____

OTH _____

Sincerely,


Kathryn G. W. Cowdery

Enclosures
Division of Legal Services
Stephen C. Reilly, Office of Public Counsel

DOCUMENT NUMBER DATE

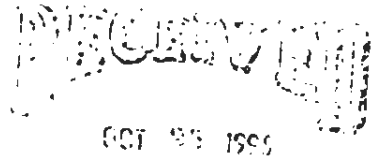
13568 DEC 20 96

FPSC RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re. Application for Increase in)
rates and service)
availability charges in Lee)
County by Gulf Utility Company.)

Docket No. 960329-WS
Filed: October 25, 1996



**CITIZENS FIRST SET OF INTERROGATORIES
TO GULF UTILITY COMPANY**

Office of
Public Utilities

Florida's Citizens ("Citizens"), by and through their undersigned attorney, propound the following interrogatories to Gulf Utility Company (Gulf, Utility or Company) to be answered under oath in full accordance with Rules 25-22.034 and 25-22.035 of the Florida Administrative Code and Rule 1.340 of the Florida Rules of Civil Procedure. Typewritten annotations such as "response submitted by" are insufficient; responses must be provided under oath as required by the Florida Rules of Civil Procedure. All answers must be served upon the attorneys for the Citizens by Monday, November 25, 1996.

Each interrogatory is to be answered based upon the knowledge and information or belief of the Company, and any answer based upon information and belief is to state that it is given on such basis. If the complete answer to an interrogatory is not known, so state and answer as fully as possible the part of the interrogatory to which an answer is known. For each answer, or part thereof, please identify the individual or individuals who provided the information or helped in providing the information contained in the responses.

For each interrogatory response, indicate the witnesses that will sponsor the response and be able to answer cross-examination questions concerning the response.

DEFINITIONS

1. "Document" or "documents" means any written, recorded, filmed or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, memoranda, notes, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, and notes, any of which are in your possession, custody, or control.

2. As used herein "you" and "your" means the Company together with its officers, employees, consultants, agents, representatives, attorneys (unless privileged), and any other person or entity acting on behalf of the Company.

3. Words in the past tense include the present, and words in the present tense include the past. Use of the singular includes the plural, and use of the masculine includes the feminine where appropriate, and vice versa.

4. If there is any document or other tangible item described by this request which is no longer in your possession, custody, or control, or is no longer in existence or accessible to you, please indicate:

(a) the date and nature of the disposition of such document or other tangible item, including, but not limited to, whether such (i) is missing or lost, (ii) has been destroyed or (iii) has been transferred to another person;

(b) the circumstances surrounding such disposition, including any authorization thereof; and

(c) where applicable, the person currently in possession, custody, or control of such document or item

As used herein: "you" and "your" means the Company, and unless stated otherwise, or unless clearly apparent otherwise from the context of the discovery, "Gulf" or "Company" or "Utility" includes Gulf Utility Company together with its officers, employees, consultants, agents, representatives, attorneys, and any other person or entity acting on behalf of the Company. Usage of acronyms, abbreviations, or other symbolic terms are to be taken as having the same meaning as common usage of those terms in the regulation of utilities in the State of Florida have assigned to them.

"Financial statements" includes, but is not limited to, balance sheet, income statement, cashflow statement, and notes related thereto.

"Test years" means the historical test year ending 1995 and the budgeted test year ending 1996

INTERROGATORIES

1. (1) Please list all legal expenses included in the historic and budgeted test years, please state for each separate legal expense the nature of the legal problem and the outcome of the problem. For all lawsuits to which the Company was a party or otherwise participated in state whether or not the lawsuit has been resolved or settled; whether or not the Company is requesting recovery of legal fees as part of its claims; the circumstances of each lawsuit; the name of the plaintiff and defendant; and explain why it is appropriate to include such expenses in test year expenses. (2) (3) (4) (5) (6)
2. (7) (a) Do any of the Company's personnel actively participate on Committees and/or perform any other work for industry organizations to which the Company belongs?
(8) (b) If so, state specifically which employees participate, how they are compensated for their time (amount and source of compensation), and the purpose and accomplishments of any such association related work.
(9) (c) List any and all reimbursements received from industry associations, for work performed for such organizations by Company employees.
3. (10) Please list each industry organization to which the Company belongs and detail any payments made to each organization for each of the test years, indicating date made, amount paid, payee, account, the company's reason for making the payment, and the Company's perceived benefits to the ratepayers from such expenditure. (11) (12) (13) (14) (15) (16) (17)
4. Please list each athletic or employee association to which the Company contributes and the associated amounts for the historic and budgeted test years. State how the Company has treated these expenses in the test years and state in what accounts they were booked. (18) (19)
5. (18) Please list and describe each fringe benefit available to the Company's employees, identify the categories of employees entitled to receive such benefit, and state the annual cost to the Company of providing such benefit for historic and budgeted test years. (20)
6. Please provide the following information for the test years and two preceding years: a list of the Company's officers and managers and their salaries and a list of salaries and the names for all administrative and general personnel. (21) (22) (23) (24)
7. Has the Company reacquired or repurchased any debt within the last four years. If so, provide a summary of each gain or loss on reacquired debt, the date on which the Company commenced amortization of such gain or loss, the regulatory commission decision addressing the treatment of such gain or loss on reacquired debt and the associated accounting and ratemaking treatment, and the impact, if any, on test year interest expense. (25) (26) (27) (28)

(29)

8 30 Provide a detailed description of any IRS audit, settlements with the Internal Revenue Service, or IRS audit adjustments made during the last four years.

9 31 For any and all transfers and/or sales of parcels of land or assets to or from utility operations from non-related or related parties (former or present: parent company, affiliated company, or greater than 5% owners), please provide:

32 (a) A description of and state the original cost of such land and/or assets

33 (b) The cost of any and all improvements to such land or assets, itemized by improvement.

34 (c) The total sale and/or transfer price, and show in detail how it was determined

35 (d) The date of the sale and/or transfer.

36 (e) The amount of gain or loss (both before and after tax) on such sale and/or transfer, and show in detail how it was calculated and indicate whether it was booked above or below the line for ratemaking purposes.

10 37 For costs charged from any parent company which are charged or allocated costs to the Company, state the annual amount of such costs charged to the Company, by account, for 1993 through the budgeted test year.

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41 42 State the amount, percent increases, and effective dates for general wage increases and, separately, for merit increases granted by the Company during 1992 through the budgeted test year.

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12 45 Please state the amount and describe any and all penalties and fines incurred by the Company during the historical test year and the preceding two years. Indicate in which account each such item was recorded.

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47 13. Please provide a detailed breakdown of each item included in Other Deferred Credits on the Company's balance sheet for each month of the test years.

48 49 14. List, by account and source, any and all miscellaneous and non-water and non-wastewater sales revenue the Company recorded during the test years and the previous two years

50 51 15. (a) For the budgeted test year and the preceding five years, has the Company sold any property which had formerly been included in Plant Held for Future Use, Plant in Service, or devoted to utility service?

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(b) ⁵⁹ If the response to (a) is affirmative, for each sale, describe the property sold; state whether, when, and in what manner it had been included in rate base; show the details of how the gain or loss was calculated; indicate when the sale occurred and to whom; explain how and whether the Company is amortizing such gain or loss; show how such amortization was computed; and state if booked above or below the line for ratemaking purposes.

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16 ⁶⁷ ₆₈ Itemize all nonutility property included on the Company's balance sheet for the years ending 1994 and 1995. (Provide a description of each piece of property and the amount of the investment for each year.)

17 (a) ⁶⁹ Provide the name and title of all employees (including those employed by subsidiaries or affiliates, including parent companies) who engage in public relations on behalf of the Company.

(b) ⁷⁰ State the salary and associated benefit amounts for each employee listed in response to (a) for the years 1994, 1995 and as budgeted for 1996.

18 (a) ⁷³ ⁷⁴ ⁷¹ ⁷⁵ ⁷² For the years 1993, 1994 and 1995, please identify the total amount of interest earned on Company deposits to utilities (for example, Florida Power and Light, etc.)

(b) ⁷⁶ ⁷⁷ Indicate where on the Company's books this interest income is charged and if it is below the line, explain why this is an appropriate treatment of this interest income.

19 ⁸⁰ ⁷⁹ Please itemize all interest and dividend income on the Company's books for the years 1993, 1994, and 1995, and the budgeted test year. For each item of interest and dividend income, indicate the item which earned the income and/or dividend, the amount of expense if any associated with generating the income and/or dividend, the account to which the income or dividend was booked, and indicate how the interest and/or dividend was treated for ratemaking purposes. ⁸¹ ⁸² ⁸⁴

20 ⁸⁵ ⁸⁶ Please itemize all non-utility income on the Company's books for the years 1994, 1995, and the budgeted test year. For each item of income, indicate the amount of expense, if any, associated with generating the income and the account to which the expense was booked. ⁸⁸ ⁸⁹

21 List each party to whom the Company sells reclaimed water, indicate when the Company began reselling the effluent, and provide the gallons sold for years 1989 through 1995. ⁹⁰ ⁹¹ ⁹²

22 ⁹³ ⁹⁴ ⁹⁵ Please provide an itemization of the Company's advertising expense for the historic and budgeted test years and the two preceding years into the following components: rate case; conservation; public relations; safety; other.

23. State the amount of ⁽⁹⁶⁾ chamber of commerce dues included in test year expenses. Indicate in what account these expenses are booked. - (97)

24. State the amount of ⁽⁹⁸⁾ lobbying ⁽⁹⁹⁾ expenses included in the test year. Indicate in what account these expenses are booked.

25. State the amount of ⁽¹⁰⁰⁾ donations and ⁽¹⁰¹⁾ charitable contributions included in the test year. Indicate in what account these expenses are booked.

26. Please identify the amount it will cost ⁽¹⁰²⁾ the utility to provide service to the new university. Please specifically identify each piece of new equipment installed as a result of serving the new university and the cost of the new equipment. Please identify each additional expense the Company will incur ⁽¹⁰⁶⁾ as a result of serving the new university and the amount of each additional expense.

27. With respect to the **Miscellaneous Expenses** shown on Appendix C, page 2 of the attachment to the letter of August 23, 1996 responding to the MFR deficiencies, please explain what the Sara Title IV registration relates to, how often the company conducts customer service questionnaires, please describe the employee summer outing, and breakdown the expenses associated with the holiday party and gift certificates. ⁽¹⁰⁷⁾ ⁽¹⁰⁸⁾ ⁽¹⁰⁹⁾ ⁽¹¹⁰⁾

28. With respect to the **Miscellaneous Expenses** shown on Appendix C, page 3 of the attachment to the letter of August 23, 1996 responding to the MFR deficiencies, please explain what the company uses cable TV service for, what the trustee expenses relate to, how much the company spent on pond cleaning in 1993, 1994, and 1995, who in the company utilizes the company's cellular phones, and how much the company spent on lift station coating and repairs in 1993, 1994, and 1995. ⁽¹¹¹⁾ ⁽¹¹²⁾ ⁽¹¹³⁾ ⁽¹¹⁴⁾ ⁽¹¹⁵⁾ ⁽¹¹⁶⁾ ⁽¹¹⁷⁾ ⁽¹¹⁸⁾ ⁽¹¹⁹⁾ ⁽¹²⁰⁾

29. Please identify all of the directors of the Company and how often they met during 1995 through 1996. ⁽¹²¹⁾ ⁽¹²²⁾

30. Please indicate if and how much of the service availability charges/CIAC associated with the new university are included (as an offset) in the projected test year rate base. If no CIAC has been included as an offset to rate base, please indicate the amount of CIAC the company expects to collect when it begins providing service to the new university. ⁽¹²³⁾ ⁽¹²⁴⁾

31. For each expense the Company has amortized into the budgeted test year, please state the date amortization began, the total cost of the item being amortized, the length of the amortization period, and the date amortization will end. ⁽¹²⁵⁾ ⁽¹²⁶⁾ ⁽¹²⁷⁾ ⁽¹²⁸⁾ ⁽¹²⁹⁾

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32 Please list the amount of the Company's phone bills for each month of 1995 and 1996 to date

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33 Please explain the Company's administrative office arrangements prior to the lease of the new office building and the disposition of the prior arrangement or building

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AFFIDAVIT

STATE OF _____
COUNTY OF _____

BEFORE ME, the undersigned authority, personally appeared _____, who deposed and stated that he/she provided the answers to interrogatories _____ served on _____ by _____ on _____ and that the responses are true and correct to the best of his/her information and belief.

DATED at _____, _____, this day of _____, 1996.

Sworn to and subscribed before me this _____ day of _____, 1996.

NOTARY PUBLIC

State of _____ at Large


My Commission Expires _____

**CERTIFICATE OF SERVICE
DOCKET NO. 960329-WS**

I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U S Mail
or *hand -delivery to the following parties on this 25th day of October, 1996

*B Kenneth Gatlin, Esquire
Gatlin, Woods & Carlson
The Mahan Station
1709-D Mahan Drive
Tallahassee, FL 32308

*Maggi O'Sullivan, Esquire
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



Stephen C. Reilly
Associate Public Counsel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re Application for Increase in)
rates and service)
availability charges in Lee)
County by Gulf Utility Company)
_____)

Docket No 960329-WS
Filed November 8, 1996

**CITIZENS SECOND SET OF INTERROGATORIES
TO GULF UTILITY COMPANY**

Florida's Citizens ("Citizens"), by and through their undersigned attorney, propound the following interrogatories to Gulf Utility Company (Gulf, Utility or Company) to be answered under oath in full accordance with Rules 25-22.034 and 25-22.035 of the Florida Administrative Code and Rule 1.340 of the Florida Rules of Civil Procedure. Typewritten annotations such as "response submitted by" are insufficient; responses must be provided under oath as required by the Florida Rules of Civil Procedure. All answers must be served upon the attorneys for the Citizens by Monday, December 9, 1996.

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For each interrogatory response, indicate the witnesses that will sponsor the response and be able to answer cross-examination questions concerning the response.

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2. As used herein "you" and "your" means the Company together with its officers, employees, consultants, agents, representatives, attorneys (unless privileged), and any other person or entity acting on behalf of the Company.

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4. If there is any document or other tangible item described by this request which is no longer in your possession, custody, or control, or is no longer in existence or accessible to you, please indicate:

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(b) the circumstances surrounding such disposition, including any authorization thereof; and

((

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"Financial statements" includes, but is not limited to, balance sheet, income statement, cashflow statement, and notes related thereto.

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Interrogatories

34. (132) Identify each automobile owned by the utility, the date the automobile was purchased, the (133) name(s) on the title of the automobile, the amount on the books of the company to account (134) for the automobile as of 1995, the person(s) that drove the automobile, and any logs kept of (135) the automobile's use. (136) (137)

35. (a) (138) Is any revenue from connecting the Florida Gulf Coast University included in the Company's projected test year revenue?

(139) (b) If the response to (a) is affirmative, please provide an explanation of how this revenue has been included and where it is shown in the MFRs

(140) (c) If the response to (a) is not affirmative, please explain why this revenue has not been included in projected test year revenue.

(141) 36. Please explain why the Company did not require its affiliate to contribute water and wastewater lines that were booked by the utility on February 20, 1990. State the amount of all lines and hydrants purchased from an affiliate, the date purchased, the amount currently on the utility's books as of December 1995, and the accounts in which these assets were booked. (142) (143) (144) (145)

37. For purposes of this request, please refer to the Company's working capital calculations. Does any of the cash included in working capital earn interest? If yes, please state the amount earned in 1995 and as projected for 1996. Please explain why accounts payable FGCU is not included in the Company's working capital calculations. (150) (151) (152) (153)

38. For purposes of this request, please refer to Schedule A-19, page 2 of 4. Please describe the nature of the account payable to FGCU and explain why there is a zero balance shown for the average shown under column 15. (154) (155)

(156) 39. For purposes of this request, please refer to Schedule A-18, page 2 of 4. Please describe the nature of the item labeled special funds and what gave rise to these funds.

40. By person, please show the amount of salary and benefits (separately) paid for each employee of the utility and each employee of Caloosa, for the years 1993, 1994, 1995, and 1996 as projected

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41. If the Company does not maintain time records for Mr James Moore, Mr. Randall Mann and Mr. Russell Newton, please provide an estimate of the time these individuals devoted to utility operations, Caloosa operations, and other nonutility operations for the years 1995 and 1996

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42. Please state the cost of the new office building and the cost of the associated land upon which it sits, please provide the square feet of the entire office building and the amount occupied by the utility.

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43. For purposes of this request, please refer to Schedule D-2. Please explain why each of the adjustments shown in footnotes (a) and (b) were made to the capital structure and explain how the calculation was performed.

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44. For purposes of this request, please refer to Schedule D-2. Please explain what gave rise to the non-jurisdictional deferred taxes.

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45. Please explain how adjustments are reflected on the Company's books for reimbursements from Caloosa. Please provide for 1995 and the projected test year, all adjustments reflected

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on the Company's books and the MFRs which relate to charges to and reimbursements from Caloosa

(178)

46 Please refer to page 15, lines 10-12 of Mr. Cardey's testimony. Mr. Cardey states that Caloosa reimburses each of the five employees directly for these services. If Caloosa reimburses each employee directly, is the salary for these employees included in the projected test year for a work week which is less than a full 40 hours?

(179)

47. Please refer to page 15, lines 17-18 of Mr. Cardey's testimony. Is the increased charge for office rent and office supplies reflected in the projected test year? If yes, please explain where this adjustment can be found and explain how it was included in the projected test year results

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(181)

(182)

(183)

48 For each month of 1995 and 1996, please provide the actual number of bills by meter size by customer class and the actual gallons sold. Provide this information for both water and wastewater separately.

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(185)

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49. For each of the years 1993 and 1994, please provide by customer class and meter size the average number of bills rendered and the gallons sold, for both water and wastewater.

(188)

(189)

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(191)

50. Please provide the derivation of the 396 gpd for FGCU shown on Schedule F-5 of the MFRs.

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51. Please provide the derivation of the 250 gpd for FGCU shown on Schedule F-6 of the MFRs.

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52 For each golf course where the Company disposes effluent please indicate if the golf course has a consumptive use permit and the capacity of any such permit

55 According to page 9, line 4 of Mr. Keith R. Cardey's testimony, the average day of the peak month wastewater flow is .851 mgd for 1996. The source is Schedule F-6 of Exhibit (196) (KRC-1). Explain how the number .851 mgd was derived

56 (197) On page 10, line 15 of Mr. Keith R. Cardey's testimony, it states "Utility lines will be in service in 1996 and..." Can these lines also serve customers other than the Florida Gulf Coast University? If yes, how many ERC's. (198)

57. According to Mr. Keith R. Cardey's testimony on page 9, lines 15 to 18, "The Company's extension policy is for the developer to install the on-site facilities and contribute them to the Company. Since there is no rate base consideration under this practice, the facilities are considered used and useful." Respond to the following questions

(199 a) What is the definition of on-site facilities and off-site facilities?

b) (200) How many customers or ERCs can the existing water transmission and distribution system and wastewater collection system serve? Provide proper supporting documents or reports. (201)

58. According to Mr. James Moore's testimony on page 9, lines 16 to 20, it states "In 1996 we will construct an effluent line to dispose of reject water from the Corkscrew WTP, a low pressure membrane treatment facility. The line will also be used to dispose of treated effluent from the Three Oaks Wastewater Treatment Plant." Respond to the following questions.

(202) a) What is the total project cost?

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- b) 203 If the cost is included in rate base, provide the amount included by account number
- c) 204 Provide the engineering design report that shows the amount of reject concentrate and treated wastewater effluent that will be disposed of through this effluent line.

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59. What is the current status of projects related to Florida Gulf Coast University and the shopping center mentioned in the response to Staff's Interrogatory number 4? 206 When is the projected date that these customers will actually consume drinking water and contribute wastewater to the treatment plants?

AFFIDAVIT

STATE OF _____
COUNTY OF _____

BEFORE ME, the undersigned authority, personally appeared _____, who deposed and stated that he/she provided the answers to interrogatories _____ served on _____ b. _____ on _____ and that the responses are true and correct to the best of his/her information and belief

DATED at _____, _____, this day of _____, 1996.

Sworn to and subscribed before me this _____ day of _____, 1996.

NOTARY PUBLIC

State of _____ at Large

My Commission Expires: _____

**CERTIFICATE OF SERVICE
DOCKET NO. 960329-WS**

I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U S Mail
or *hand-delivery to the following parties on this 14th day of November, 1996.

*B Kenneth Gatlin, Esquire
Gatlin, Woods & Carlson
The Mahan Station
1709-D Mahan Drive
Tallahassee, FL 32308

*Maggi O'Sullivan, Esquire
Division of Legal Services
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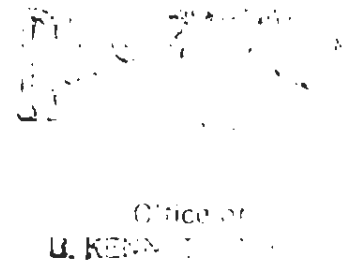


Stephen C. Reilly
Associate Public Counsel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re. Application for Increase in)
rates and service)
availability charges in Lee)
County by Gulf Utility Company.)
_____)

Docket No. 960329-WS
Filed: December 10, 1996



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(b) the circumstances surrounding such disposition, including any authorization thereof; and

(c) where applicable, the person currently in possession, custody, or control of such document or item.

As used herein: "you" and "your" means the Company, and unless stated otherwise, or unless clearly apparent otherwise from the context of the discovery, "Gulf" or "Company" or "Utility" includes Gulf Utility Company together with its officers, employees, consultants, agents, representatives, attorneys, and any other person or entity acting on behalf of the Company. Usage of acronyms, abbreviations, or other symbolic terms are to be taken as having the same meaning as common usage of those terms in the regulation of utilities in the State of Florida have assigned to them.

"Financial statements" includes, but is not limited to, balance sheet, income statement, cashflow statement, and notes related thereto.

"Test years" means the historical test year ending 1995 and the budgeted test year ending 1996

Interrogatories

- 60 a) ²⁰⁷ Has the old and off line Three Oaks ~~Wastewater~~ Treatment Plant been retired from the company's books? If not, state the amount ²⁰⁸ of plant in service, by component, (such as aeration tanks and chlorine contact chambers) included in the MFR's for the budgeted test year, state the amount ²⁰⁹ of accumulated depreciation included in the MFR's, state the amount of depreciation expense ²¹⁰ included in the test year, and indicate the accounts ²¹¹ in which these dollars are booked.
- b) ²¹² Are any other water or wastewater facilities included in the utility's plant-in-service which are off line? If so, state the amount of such plant in service included in the MFR's for the ²¹³

(214)

budgeted test year, state the amount of accumulated depreciation included in the MFR's, (215)
state the amount of depreciation expense included in the test year, and indicate the (216)
accounts in which these dollars are booked.

61 With respect to the San Carlos Wastewater Treatment Plant's almost 1 million gallon on-site effluent storage tank, state the amount of plant in service included in the MFR's for the (217)
budgeted test year, state the amount of accumulated depreciation included in the MFR's, (218)
state the amount of depreciation expense in the test year, and indicate the accounts in (219)
which these dollars are booked. (220)

AFFIDAVIT

STATE OF _____
COUNTY OF _____

BEFORE ME, the undersigned authority, personally appeared _____, who deposed and stated that he/she provided the answers to interrogatories _____ served on _____ by _____ on _____ and that the responses are true and correct to the best of his/her information and belief.

DATED at _____, _____, this day of _____, 1996.

Sworn to and subscribed before me this _____ day of _____, 1996.

NOTARY PUBLIC

State of _____ at Large

My Commission Expires: _____

**CERTIFICATE OF SERVICE
DOCKET NO. 960329-WS**

I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U S

Mail or *hand -delivery to the following parties on this 10th day of December, 1996.

*B. Kenneth Gatlin, Esquire
Gatlin, Woods & Carlson
The Mahan Station
1709-D Mahan Drive
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Stephen C. Reilly
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