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April 15, 1997

Blanco Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0862

Re: Mad Hatter Utility, Inc; Docket No. 960576-WS
Application for Amendment of Water and Wastewater
Certificates in Pasco County, Florida
Our File No. 28023.07

Dear Ms. Bayo:

Enclosed for filing please find the original and one copy of
Mad Hatter's First Request For Production Of Documents To Pasco
County in the above-referenced docket.

If you have any questions in this regard, please let me know.

Sincerely,

ROSE, SUNDBSTROM & BENTLEY, LLP

John L. Wharton
John L. Wharton, Esq.
For The Firm

ACK _____
AFA _____
APP _____
CAF _____
CMU _____ JLW/lm
CTR _____ Encl.
EAG _____
LEG _____
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OPC _____
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DOCUMENT NUMBER-DATE
03840 APR 16 1997
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

IN RE: APPLICATION OF MAD HATTER
UTILITY, INC. FOR AMENDMENT OF
WATER AND WASTEWATER CERTIFICATES
IN PASCO COUNTY, FLORIDA

Docket No. 960576-WS

MAD HATTER UTILITY, INC.'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS TO PASCO COUNTY

Mad Hatter hereby requests Pasco County to produce for inspection and/or copying by counsel the following documents and things in its possession, custody or subject to its control. Mad Hatter requests that the production be made at the offices of Rose, Sundstrom & Bentley, 2548 Blairstone Pines Drive, Tallahassee, FL 32301, by no later May 2, 1997, at such places as may be agreed upon between the respective parties, or in default thereof, specified by order of the Commission. Inspection of the documents and things will be made by the undersigned attorneys, who may make copies of documents and things at their own expense.

DEFINITIONS AND INSTRUCTIONS

1. As used in this Request, the terms "you", "your", or "County" means Pasco County, and any employee, agent or other person acting for or on behalf of Pasco County as the context requires.

2. As used herein, "document" and "documents" refer to the original, including an original by reason of any marginal notation, (or if unavailable, a copy of the original) of any written expression, and all tangible things from which such information can be processed or transcribed; graphic or aural records of repre-

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sentations of any kind; and any other information which is stored or processed by means of data processing equipment and which can be retrieved in printed or graphic form.

3. All terms not defined in this request and not having ordinary, nontechnical definitions are used in accordance with their meanings in the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

4. All terms not defined in this request and not having ordinary, nontechnical definitions are used in accordance with their meanings in the Florida Rules of Civil Procedure, Florida Statutes, and Florida Administrative Code.

5. If any document called for in this request is withheld on the basis of any privilege, statute, regulation, or for any other reason, the County shall include in their response a list of such documents by type of document, date, the name and address of the actual and intended recipients of the document or copies thereof, author, title, summary of description of subject matter, and the location of any existing copies of such document. The County must also state the grounds upon which each such document is considered privileged or upon which production is withheld, including the specific privilege, statute or regulation relied upon.

DOCUMENTS AND OTHER THINGS TO BE PRODUCED

1. Please produce all documents which specifically or directly support or explain your contention that you are able to

serve both the water and wastewater area for which Mad Hatter has sought an extension.

2. Please produce all documents relating to how it is in the public interest for you to serve the extended territory.

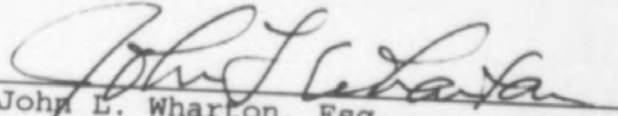
3. Please produce all correspondence, permits, and other documents (which relate to the operation of your utility systems) exchanged between you and DEP, DER, and the Southwest Florida Water Management District from 1993 until the present date.

4. Please produce all documents relating to any plans the County has to increase its capacity to provide water and wastewater treatment to serve the territory for which Mad Hatter has applied.

5. Please produce any document to which any witness for whom you prefiled testimony referred, relied upon, or reviewed in preparation for his or her participation in this case including, but not limited to, those documents reflecting specific information, data, or facts as referred to by such witness in such prefiled testimony.

6. Please produce any document you intend to use or refer to or may use or refer to in your cross-examination in this case.

DATED this 15th day of April, 1997.


John L. Wharton, Esq.
F. Marshall Deterding
ROSE, SUNDSTROM & BENTLEY
2548 Blairstone Pines Drive
Tallahassee, FL 32301
(904) 877-6555

CERTIFICATE OF SERVICE

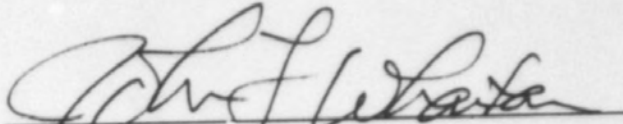
I HEREBY CERTIFY that a true and accurate copy of the foregoing has been furnished by the method indicated below on this 15th day of April, 1997.

Marion Hale, Esq.
Johnson, Blakely, Pope, et al.
Post Office Box 1368
Clearwater, FL 34617

VIA TELECOPY & U.S. MAIL

Roseanne Capeless, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

VIA U.S. MAIL


John L. Wharton, Esq.

mad\county.rfp

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PPSC RECORDS/REPORTING

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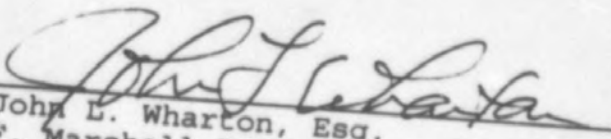
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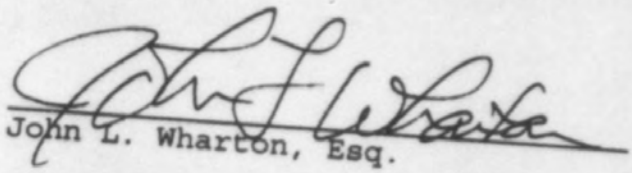
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Roseanne Capeless, Esq.
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John L. Wharton, Esq.

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