

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for certificates to operate a water and wastewater utility in Charlotte and DeSoto Counties by Lake Suzy Utilities, Inc.

DOCKET NO. 970657-WS
FILED:

In re: Application for amendment of Certificates Nos. 570-W and 496-S to add territory in Charlotte County by Florida Water Services Corporation.

DOCKET NO. 980261-WS
FILED:

COMMISSION STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO CHARLOTTE COUNTY

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby requests that Charlotte County produce copies of the following documents, pursuant to Rule 1.350, Florida Rules of Civil Procedure, at the office of Bobbie L. Reyes, Esquire, Division of Legal Services, Florida Public Service Commission, Room 370, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, within thirty (30) days of service of this request.

DEFINITION

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice memorandum, memorandum reflecting an oral communication, handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet or data processing card, computer printout, or any other written, recorded, transcribed, filed or graphic matter, however produced or reproduced.

ACK _____
AFA _____
APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG _____
LIN _____
OPC _____
RCH _____
SEC 1 _____
WAS _____

4. On page 10 of Richard E. Howell's prefiled direct testimony, Mr. Howell refers to written assurances provide by FWSC to Charlotte County indicating that FWSC acknowledged the debt it owes to Charlotte County for the disputed bulk service fees and charges and that payment would be made by certain specified dates. Please provide a copy of all of these written assurances.

DOCUMENT NUMBER-DATE
13867 DEC-9 88

COMMISSION STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS
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DOCKET NOS. 970657-WS AND 980261-WS

5. Please provide a copy of the final demand for payment regarding the disputed fees and charges transmitted by Charlotte County to FWSC which is referenced on page 9 of Richard E. Howell's prefiled direct testimony, as well as any written responses by FWSC to such demand letter.

Dated: December 9, 1988


Bobbie L. Reyes, Senior Attorney

FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
(850) 413-6199

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the Commission Staff's Second Request for Production of Documents to Charlotte County, numbered four through five, has been furnished to John Marks, III, Esquire, 215 South Monroe Street, #130, Tallahassee, Florida 32301 for Charlotte County, and that a true and correct copy thereof has been furnished to Martin Friedman, Esquire, Rose, Sunstrom & Bentley, 2548 Blairstone Pines Drive, Tallahassee, Florida 32301; to Matthew J. Feil, Esquire, Post Office Box 609520, Orlando, Florida 32860-9520; and to Haus Development, Inc., c/o Ms. Charlotte L. Sopko, Post Office Box 3024, Port Charlotte, Florida 33949 by U.S. Mail, this 9th day of December, 1978.


Bobbie L. Reyes, Senior Attorney

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