

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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:

COMMISSION STAFF'S SECOND SET OF INTERROGATORIES TO
CHARLOTTE COUNTY

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby propounds the following interrogatory, number seven, to Charlotte County, pursuant to Rule 1.340, Florida Rules of Civil Procedure. This interrogatory shall be answered under oath by Charlotte County or its agent who is qualified to answer and who shall be fully identified, within thirty (30) days.

INSTRUCTIONS

A. Charlotte County shall answer this interrogatory to the fullest extent possible and shall furnish all information which is reasonably available to Charlotte County, its principals, agents, attorneys, affiliates or other representatives. Charlotte County may respond to the interrogatory by indicating that the requested information is included in one of the applications or one of the exhibits attached thereto.

B. If Charlotte County cannot answer the interrogatory in full, after exercising due diligence to secure the information to do so, it should state the answer to the extent possible and specify why it is unable to answer the remainder. In addition, Charlotte County shall state whatever information or knowledge that it has concerning the unanswered portion.

C. If the requested information is not applicable, that response should be reported as well as the reason why. If the requested information is not available, that response should be reported as well as the reason why.

DOCUMENT NUMBER-DATE

13869 DEC-98

FPSC-RECORDS/REPORTING

ACK _____

AFA _____

APP _____

CAF _____

CMU _____

CTR _____

EAG _____

LEG _____

LIN _____

OPC _____

RCH _____

SEC _____

WAS _____

OTH _____

D. Please report the name(s) of each person responding to the following interrogatory, the business address and telephone number of each such person, and the relationship of each person to Charlotte County.

F. If the interrogatory contained herein asks for information that has already been provided to the Commission, please so state, indicating the date provided.

INTERROGATORIES

7. Please state all actions Charlotte County has taken in regards to the disputed bulk service fees and charges, including whether or not Charlotte County has initiated any legal action against FWSC or has imposed any moratorium on future connections by FWSC.

DATED:

December 9, 1998


Bobbie L. Reyes, Senior Attorney

Bureau of Water and Wastewater
Division of Legal Services
Florida Public Service Commission

I HEREBY DECLARE that the responses to the above interrogatories are true and correct to my best knowledge and belief.

Charlotte County
c/o John Marks, III, Esquire
215 south Monroe Street
#130
Tallahassee, Florida 32301

By: _____

STATE OF FLORIDA

COUNTY OF _____

SWORN to and subscribed before me at _____,
County, Florida, this ____ day of _____, 19__.

Notary Public
State of Florida
My Commission Expires:

(S E A L)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the Commission Staff's Second Set of Interrogatories to Charlotte County, number seven, has been furnished to John Marks, III, Esquire, 215 South Monroe Street, #130, Tallahassee, Florida 32301, and that a true and correct copy thereof has been furnished to Marty Friedman, Esquire, Rose, Sundrom & Bentley, LLP, 2548 Blairstone Pines Drive; Tallahassee, Florida 32301; to Matthew Feil, Esquire, Post Office Box 609520, Orlando, Florida 32860-9520; and to Haus Development, Inc., c/o Ms. Charlotte Sopko, Post Office Box 3024, Port Charlotte, Florida 33949 by U.S. Mail, this 9th day of December, 1998.



Bobbie L. Reyes, Senior Attorney

FLORIDA PUBLIC SERVICE COMMISSION
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