

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into possible overcollection of Allowance for Funds Prudently Invested (AFPI) in Lake County, by Lake Utility Services, Inc.

DOCKET NO. 980483-WU
ISSUED:

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES TO LAKE UTILITY SERVICES, INC.

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby propounds the following interrogatories, numbered one through three, to Lake Utility Services, Inc. (LUSI or utility), pursuant to Rule 1.340, Florida Rules of Civil Procedure. These interrogatories shall be answered under oath by Lake Utility Services, Inc. or its agent who is qualified to answer and who shall be fully identified, within thirty (30) days.

INSTRUCTIONS

A. LUSI shall answer these interrogatories to the fullest extent possible and shall furnish all information which is reasonably available to LUSI, its principals, agents, attorneys, affiliates or other representatives.

B. If LUSI cannot answer a particular 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, LUSI 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.

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

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

DOCUMENT NUMBER-DATE

13947 DEC 10 88

FPSC RECORDS/REPORTING

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person to LUSI. Also, identify which interrogatory each such person has answered.

E. If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided, please so state, indicating the date provided.

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INTERROGATORIES

1. In LUSI's response dated July 21, 1997 to a staff data request dated June 23, 1997, the response to Question #2 indicated that the utility was serving approximately 53 ERCs, as of December 31, 1996, in the Crescent Bay Subdivision. In the response to Question #4, there was a schedule attached providing a list of initial connections, for the Crescent Bay Subdivision, by month and year from the implementation of AFPI. The schedule listed only 27 connections or ERCs from which AFPI was collected.

- (A) Why does the schedule show AFPI collections from 27 ERCs when it was indicated that as of December 31, 1996 the utility was serving 53 ERCs?
- (B) For the Crescent Bay Subdivision, provide a schedule of initial connections by month and year from the implementation of AFPI approved in Order No. 19962, issued September 8, 1988, in Docket No. 871080-WU, up to the implementation of the AFPI approved in Order No. PSC-97-0531-FOF-WU, issued May 9, 1997, in Docket No. 960444-WU.

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2. Provide the total amount of AFPI collected by the utility from the implementation of AFPI approved in Order No. 19962, issued September 8, 1988, in Docket No. 871080-WU, up to the implementation of the AFPI approved in Order No. PSC-97-0531-FOF-WU, issued May 9, 1997, in Docket No. 960444-WU.

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3. In the Agreement for Water Service entered into June 26, 1992 between Tony Hubbard, the developer, and LUSI, did the utility collect AFPI within the development covered by the agreement?

- (A) If the utility has collected AFPI within the development, provide a schedule indicating the number of connections by month and year, and the total amount collected for AFPI.

DATED:

12/10/98



Tim Vaccaro, Senior Attorney

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

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

Lake Utility Services, Inc.
c/o Ben Girtman, Esquire
1020 East Lafayette Street #207
Tallahassee, Florida 32301-4552

By: _____

STATE OF FLORIDA

COUNTY OF _____

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

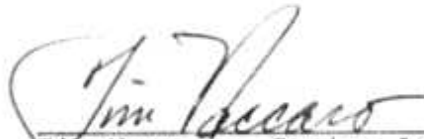
Notary Public
State of Florida
My Commission Expires:

(S E A L)

TV

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the Commission Staff's First Set of Interrogatories to Lake Utility Services, Inc., numbered one through three, has been furnished to Ben Girtman, Esquire, 1020 East Lafayette Street, #207, Tallahassee, Florida 32301-4552 and that a true and correct copy thereof has been furnished to Sandy Baron, 12838 Anderson Hill Road, Clermont, Florida 34711, and to Kathy Shutts, 12906 Anderson Hill Road, Clermont, Florida 34711 by U.S. Mail, this 10th day of December, 1998.



Tim Vaccaro, Senior Attorney

FLORIDA PUBLIC SERVICE COMMISSION
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