

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application of NORTH FORT MYERS UTILITY, INC. for extension of wastewater service in Lee County, Florida) Docket No. 981781-SU

MOTION FOR PROTECTIVE ORDER

COME NOW, SNOWBIRDLAND VISTAS, INC. and MHC-DEANZA FINANCING LIMITED PARTNERSHIP (hereinafter individually and collectively referred to as "MHC"), by and through its undersigned counsel, and pursuant to Fla. R. Civ. P. 1.280 and Florida Public Service Commission Rule 25-22.006, hereby moves for entry of a Protective Order as to the Public Service Commission's (hereinafter referred to as "PSC") fourth enumerated request set forth in PSC's Request for Production of Documents (hereinafter "Document Request No. 4"), and, in support thereof, states:

1. Document Request No. 4 requests discovery of matters which constitute confidential and/or proprietary business information by requesting any study or economic analysis of the feasibility of operating the Buccaneer Wastewater Treatment Plant versus connecting with North Fort Myers Utility.

2. To the extent that such documentation exists, if at all, any information contained therein was acquired at the expense of MHC solely for confidential analysis, and will have the unwarranted and highly prejudicial collateral effect of exposing MHC's confidential business decisions to competitors in the marketplace.

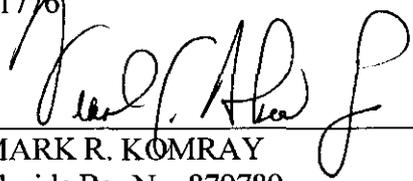
WHEREFORE, MHC respectfully requests the entry of a Protective Order or, alternatively, deeming the disclosures discussed herein as classified.

- AFA APP CAF CMU CTR EAG LEG MAS CPC RRR SEC WAW OTH

I HEREBY CERTIFY that a true and accurate copy of the foregoing has been served to Stephen C. Reilly, Associate Public Counsel, Office of Public Counsel, c/o The Florida Legislature, 111 W. Madison Street, Room 812, Tallahassee, Florida, 32399-1400 via facsimile (850/488-4491) and regular U.S. mail this 22nd day of June, 1999.

ANNIS MITCHELL COCKEY EDWARDS
& ROEHN, P.A.
Counsel for SNOWBIRDLAND VISTAS, INC.
and MHC-DEANZA FINANCING LIMITED
PARTNERSHIP
Post Office Box 60259
Fort Myers, Florida 33906-6259
941/489-1776

By: _____


MARK R. KOMRAY
Florida Bar No. 879789
FRANK J. ALOIA, JR..
Florida Bar No. 0087051