

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Investigation of utility )  
rates of Aloha Utilities, Inc. in )  
Pasco County, Florida )  
\_\_\_\_\_ )

DOCKET NO. 960545-WS

**ALOHA UTILITIES, INC.'S OBJECTIONS TO CITIZENS'**  
**FIRST SET OF INTERROGATORIES**

Aloha Utilities, Inc., pursuant to Rule 28-106.26, Fla. Admin. Code, and the Order No. PSC-99-0514-PCO-WS, hereby files this Aloha Utilities, Inc.'s Objections To Citizens' First Set Of Interrogatories, and would object to the Citizens' First Set Of Interrogatories as follows:

As to introductory paragraphs:

1. Rule 25-22.35 does not apply to this proceeding.
2. To the extent the second paragraph of Citizens' First Set Of Interrogatories requires information not requested within the context of any Interrogatory, Aloha objects. Aloha will respond to information properly requested within any of the tendered Interrogatories.

As to "definitions":

Aloha objects to the definition of "referring or relating to" as apparently being the result of a scrivener's error or a typographical error.

As to instructions:

Aloha objects to the extent that the instructions require or attempt to require more information than that properly required to be responsive under the Florida Rules of Civil Procedure.

DOCUMENT NUMBER-DATE

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As to Interrogatories:

Interrogatory No. 2: Aloha objects to this Interrogatory to the extent it seeks the identity of persons unknown to Aloha. Aloha is only able to respond to those persons who had "physical access" to Aloha's well-sites during the week of August 2-6, 1999 when such "physical access" was within Aloha's knowledge.

Interrogatory No. 3: Aloha objects to Interrogatory No. 3 as being over-broad, burdensome, seeking information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The Interrogatory, as worded, does not seek information relevant to any issue in this case.

DATED this 21<sup>st</sup> day of September, 1999.

  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and accurate copy of the foregoing has been furnished via Hand Delivery (denoted by \*) and by Regular U.S. Mail to the following on this 21<sup>st</sup> day of September, 1999:

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