

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In Re: Application of)
Florida Water Services)
Corporation for Amendment of) DOCKET NO. 990054-WU
Certificate No. 106 to add and)
delete territory in Lake County,)
Florida.)
_____)

RECEIVED - FPSC
NOV 23 PM 4: 11
RECORDS AND
REPORTING

INTERVENER'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS

TO: FLORIDA WATER SERVICES CORPORATION
c/o Matthew J. Feil, Esquire
Post Office Box 609520
Orlando, FL 32860-9520

Please take notice that CRYSTAL RIVER UTILITIES, INC. requests, pursuant to Rule 1.350, Fla.R.Civ.P. and Rule 25-22.034, Florida Administrative Code, that FLORIDA WATER SERVICES CORPORATION ("FWSC") produce and permit CRYSTAL RIVER UTILITIES, INC. to inspect and copy the things enumerated herein at ROSE, SUNDSTROM & BENTLEY, 2548 Blairstone Pines Drive, Tallahassee, Florida, 32301 by December 29, 1999.

I. DEFINITIONS

1. "Document" means any document in your custody, possession or control, including, but not limited to, any printed, written, recorded, taped, electronic, graphic, or other tangible matter from whatever source, however produced or reproduced, whether in draft or otherwise, whether sent or received or neither, including the original, all amendments and addenda and any non-identical copy (whether different from the original because of notes made on or attached to such copy or otherwise) of any and all writings, correspondence, letters, e-mails, telegrams, telex communications, cables, notes, notations, papers, newsletters, memoranda, inter-office communications, releases, agreements, contracts, books,

REC
WAV
OTM
BEC
PAI
OPC
MAS
LEO
EAG
CTR
OML
G/P
WFO
APC

RECEIVED & FILED

Mur

DOCUMENT NUMBER-DATE

14464 NOV 23 99

FPSC-RECORDS/REPORTING

pamphlets, studies, minutes of meetings, recordings or other memorials of any type of personal telephone conversations, meetings or conferences, reports analyses, evaluations, estimates, projections, forecasts, receipts, statements, accounts, books of account, diaries, calendars, desk pads, appointment books, stenographer's notebooks, transcripts, ledgers, registers, worksheets, journals, statistical records, cost sheets, summaries, lists, tabulations, digests, canceled or uncanceled checks or drafts, vouchers, charge slips, invoices, purchase orders, accountant's reports, financial statements, and any material underlying supporting or used in the preparation of any documents.

2. "Person(s)" means any natural person or any legal entity, including but not limited to, a corporation, partnership and unincorporated association, and any officer, director, employee, agent or other person acting or purporting to act on its behalf.

3. "And" and "or" shall be construed disjunctively or conjunctively as necessary in order to bring within the scope of each request all documents that might otherwise be construed to be outside its scope.

II. INSTRUCTIONS

1. Any document as to which a claim of privilege is or will be asserted should be identified by author, signatory, description (e.g., letter, memorandum, telex, recording, etc.), title (if any), date, addresses (if any), general subject matter, present depository and present custodian, and a complete statement of the ground for any claim of privilege should be set forth.

2. If it is maintained that any document which is requested has been destroyed, set forth the contents of the document, the date of such destruction, and the name of the person who authorized or directed such destruction.

3. If any of the documents cannot be produced in full, produce to the extent possible, specifying the reasons for the inability to produce the remainder.

4. This request is a continuing one. If after producing documents, you become aware of any further documents responsive to this request, you are required to produce such additional documents.

PRODUCTION

1. All documents relied upon responding to Intervenor's First Interrogatories to FWSC.

2. All documents by which FWSC is providing water service in Section 1, Township 95 South, Range 25 East.

3. All permits authorizing FWSC to provide water service in Section 1, Township 95 South, Range 25 East.

4. All documents of the original cost to FWSC of the water distribution system serving those customers in Section 1, Township 95 South, Range 25 East.

5. All documents relating to the request for service by the New Life Baptist Church.

6. All documents analyzing the economic viability of providing service to the New Life Baptist Church.

7. All documents relating to market research conducted for providing service in Sections 2 and 11 as discussed in Mr. Sweat's prefiled testimony.

8. All requests for service in Sections 2 and 11 from homeowners currently on wells.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Request for Production of Documents was served via U.S. Mail upon Matthew J. Feil, Esquire, Florida Water Services Corporation, Post Office Box 609520, Orlando, Florida 32860-9520 and Samantha Cibula, Esquire, Florida Public Service Commission, Legal Division, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850 on this 23rd day of November, 1999.

Respectfully submitted this 23rd day of November, 1999, by:

ROSE, SUNDSTROM & BENTLEY, LLP
2548 Blairstone Pines Drive
Tallahassee, FL 32301
(850) 877-6555
(850) 656-4029 FAX



MARTIN S. FRIEDMAN
FL Bar ID No. 0199060
For the Firm