

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for amendment of Certificate No. 106-W to add and delete territory in Lake County by Florida Water Services Corporation.

DOCKET NO. 990054-WU

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the Commission Staff's First Request for Production of Documents to Crystal River Utilities, Inc., numbered one through seven, has been furnished to Martin Friedman, Esquire, Rose, Sundstrom & Bentley, LLP, 2548 Blairstone Pines Drive, Tallahassee, Florida 32301, and that a true and correct copy thereof has been furnished to Matthew J. Feil, Esquire, P.O. Box 609520, Orlando, Florida 32860-9520 by U.S. Mail, this 3rd day of December, 1999.

*Samantha M. Cibula*  
Samantha Cibula, Staff Attorney  
FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
(850) 413-6199

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- MAS \_\_\_\_\_
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- SEC   /
- WAW \_\_\_\_\_
- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

~~14807~~ DEC-3 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for amendment  
of Certificate No. 106-W to add  
and delete territory in Lake  
County by Florida Water Services  
Corporation.

DOCKET NO. 990054-WU  
ISSUED: DECEMBER 3, 1999

COMMISSION STAFF'S FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS TO CRYSTAL RIVER UTILITIES, INC.

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby requests that Crystal River Utilities, Inc. produce copies of the following documents, pursuant to Rule 1.350, Florida Rules of Civil Procedure, at the office of Samantha Cibula, Esquire, Division of Legal Services, Florida Public Service Commission, Room 370, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, within thirty (30) days of service of this request.

DEFINITION

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice memorandum, memorandum reflecting an oral communication, handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet or data processing card, computer printout, or any other written, recorded, transcribed, filed or graphic matter, however produced or reproduced.

1. Please provide a copy of the territory description for the area in Lake County that Crystal River is objecting to the provision of service by Florida Water. The territory description should be in a quarter section description or a metes and bounds description with all angles, distances and references that describe the proposed territory.
2. Please provide a copy of a territory map(s) for the area in Lake County that Crystal River is objecting to the provision of service by Florida Water with the proposed territory description

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OF DOCUMENTS CRYSTAL RIVER UTILITIES, INC.  
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plotted thereon. Label all angles, distances and references that describe the proposed territory on the territory map(s). The map(s) can be any reasonable size that will allow correlation of the territory description to the map(s).

3. Please provide a copy of a system map(s) for Crystal River - Haines Creek Water System with the current water line(s) and the proposed water lines plotted thereon. Identify all fire hydrants. Label the size in inches of all water lines and other proposed distribution items such as fire hydrants, if any. The map(s) can be any reasonable size that will allow correlation of the territory description to the map(s). The system and territory map(s) can be the same map.

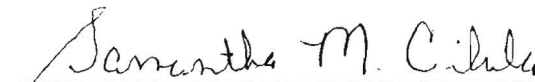
4. Please provide a copy of the most recent 12 months of the Department of Environmental Protection's (DEP) monthly operating reports for water.

5. Please provide any past DEP notices of violation or corrective orders in the last 5 years.

6. Please provide any developer agreements, letters or correspondence from customers or developers who have inquired about or requested service from Crystal River - Haines Creek Water System in the disputed area.

7. Please provide an income statement or other appropriate information to reflect Crystal River's financial ability to serve the proposed area in Lake County.

Dated: 12-3-99

  
Samantha Cibula, Staff Attorney  
FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
(850) 413-6199