

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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RECORDS AND REPORTING

In Re: Application for)
certificates to operate a water)
and wastewater utility in)
Charlotte and DeSoto Counties)
by Lake Suzy Utilities, Inc.)

DOCKET NO. 970657-WS

In Re: Application for)
Amendment of Certificate Nos.)
570-W and 496-S in Charlotte)
County by Florida Water Services)
Corporation.)

DOCKET NO. 980261-WS

LAKE SUZY UTILITIES, INC.'S
OBJECTION TO FLORIDA WATER SERVICES CORPORATION'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

LAKE SUZY UTILITIES, INC. ("Lake Suzy"), by and through its undersigned attorneys, hereby objects to the production of the following documents requested by Florida Water Services Corporation ("Florida Water"):

2. Irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence. These documents appear to be a fishing expedition by Florida Water to explore Dallas Shepard's reasons for selling the stock of Lake Suzy to AquaSource Utility, Inc. instead of Florida Water.

4. Irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence. These documents appear to be a

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

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BUREAU OF RECORDS

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Redemption

[Handwritten Signature]

fishing expedition by Florida Water to explore Dallas Shepard's reasons for selling the stock of Lake Suzy to AquaSource Utility, Inc. instead of Florida Water.

5. Irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence. These documents appear to be a fishing expedition by Florida Water to explore Dallas Shepard's reasons for selling the stock of Lake Suzy to AquaSource Utility, Inc. instead of Florida Water.

6. Irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence. These documents appear to be a fishing expedition by Florida Water to explore Dallas Shepard's reasons for selling the stock of Lake Suzy to AquaSource Utility, Inc. instead of Florida Water.

7. Irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence. These documents appear to be a fishing expedition by Florida Water to explore Dallas Shepard's reasons for selling the stock of Lake Suzy to AquaSource Utility, Inc. instead of Florida Water.

8. Irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence. These documents appear to be a fishing expedition by Florida Water to explore Dallas Shepard's

reasons for selling the stock of Lake Suzy to AquaSource Utility, Inc. instead of Florida Water.

9. Irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence. These documents appear to be a fishing expedition by Florida Water to explore Dallas Shepard's reasons for selling the stock of Lake Suzy to AquaSource Utility, Inc. instead of Florida Water.

14. Irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence. The corporate record book contains no documents which are relevant to the issues in this proceeding.

Since it is not possible from the document production request which Florida Water believes to be the relevance of the documents requested, Lake Suzy reserves the right to address Florida Water's positions.

WHEREFORE, Lake Suzy Utilities, Inc. requests this Commission enter an Order not requiring the production of the documents requested in paragraphs 2, 4, 5, 6, 7, 8, 9, and 14 of Florida Water Services Corporation's Request for Production of Documents.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to Matthew J. Feil,

Esquire, Florida Water Services Corporation, P.O. Box 609520, Orlando, Florida 32860-9520, Ms. Charlotte L. Sopko, Haus Development, Inc., 603 North Eastwood Avenue, Mount Prospect, Illinois 60056-2007, John Marks, Esquire, Knowles, Marks & Randolph, 215 South Monroe Street, Tallahassee, Florida 32301, Anthony P. Pires, Jr., Woodward, Pires & Lombardo, P.A., 801 Laurel Oak Drive, Suite 710, Naples, Florida 34108 and by hand delivery to Tim Vaccaro, Esquire, Florida Public Service Commission, Legal Division, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 this 13th day of December, 1999.

Respectfully submitted this 13th day of December, 1999, by:

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For the Firm

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