

RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA
JOHN R. ELLIS
KENNETH A. HOFFMAN
THOMAS W. KONRAD
MICHAEL G. MAIDA
J. STEPHEN MENTON
R. DAVID PRESCOTT
HAROLD F. X. PURNELL
GARY R. RUTLEDGE

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

December 29, 1999

OF COUNSEL:
CHARLES F. DUDLEY
GOVERNMENTAL CONSULTANTS:
PATRICK MALLOY
AMY J. YOUNG
RECEIVED-FPSC
99 DEC 29 PM 12:33
RECORDS AND REPORTING

HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

Re: Docket No. 980242-SU

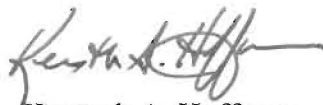
Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Lindrick Service Corporation ("Lindrick") are the original and fifteen copies of Lindrick's Objections to the Commission Staff's First Request for Production of Documents.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,



Kenneth A. Hoffman

AFA 1
APP
CAF
CMU
CTR
EAG
LEG 1
WAS 3
OPC
RFR
SEC 1
VAW
OTH

KAH/rl
Enclosures
cc: Parties of Record
Trib.3

RECEIVED & FILED
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

15828 DEC 29 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Amended Petition of Lindrick)
Service Corporation for a Limited)
Proceeding to Implement a Two-Step)
Increase in Wastewater Rates.)
_____)

Docket No. 980242-SU

Filed: December 29, 1999

ORIGINAL

**LINDRICK SERVICE CORPORATION'S
OBJECTIONS TO THE COMMISSION STAFF'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Lindrick Service Corporation ("Lindrick"), by and through its undersigned counsel, hereby files its objections to the Commission Staff's First Request for Production of Documents filed December 14, 1999, and states as follows:

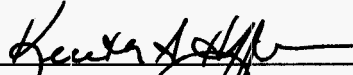
1. The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with Order No. PSC-99-2137-PCO-SU issued by the Commission in this docket on October 29, 1999. Should additional grounds for objection be discovered as Lindrick prepares its responses to the above-referenced set of document requests, Lindrick reserves the right to supplement, revise or modify its objections at the time that it serves its responses. Moreover, should Lindrick determine that a protective order is necessary with respect to any of the material requested, Lindrick reserves the right to file a motion with the Commission seeking such an order at the time that it serves its responses.

2. Lindrick objects to the Commission Staff's First Request for Production of Documents (Document Request Nos. 1-10), to the extent such requests include documents previously produced to the Commission Staff and/or filed with the Commission in this docket or in response to or as part of previous Commission Staff audits.

DOCUMENT NUMBER-DATE
15828 DEC 29 99
FPSC-RECORDS/REPORTING



Respectfully submitted,



Kenneth A. Hoffman, Esq.

John R. Ellis, Esq.

Rutledge, Ecenia, Purnell & Hoffman, P.A.

P. O. Box 551

Tallahassee, FL 32302

(850) 681-6788 (Telephone)

(850) 681-6515 (Telecopier)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 29th day of December, 1999:

Ralph Jaeger, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 370
Tallahassee, Florida 32399-0850

Stephen Burgess, Esq.
Office of Public Counsel
111 West Madison Street
Suite 812
Tallahassee, Florida 32399-1400



Kenneth A. Hoffman, Esq.

Borda/objections