

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for )  
 certificates to operate a water )  
 and wastewater utility in ) DOCKET NO. 970657-WS  
 Charlotte and DeSoto Counties )  
 by Lake Suzy Utilities, Inc. )  
 \_\_\_\_\_ )

In Re: Application for )  
 Amendment of Certificate Nos. )  
 570-W and 496-S in Charlotte ) DOCKET NO. 980261-WS  
 County by Florida Water Services )  
 Corporation. )  
 \_\_\_\_\_ )

**LAKE SUZY UTILITIES, INC.'S RESPONSE TO FLORIDA WATER'S  
 FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Lake Suzy Utilities, Inc. ("Lake Suzy"), by and through its undersigned attorneys and pursuant to Florida Rules of Civil Procedure 1.350 responds to Florida Water's First Request For Production Of Documents as follows (All exhibits have been produced to Florida Water and the Commission Staff):

1. Most recent audited financial statements for AquaSource, Inc.

**The document requested does not exist.**

2. Request objected to by counsel.
3. All documents which prove work performed on Lake Suzy's percolation pond(s) from the date of the most recent Florida Department of Environmental Protection's Consent Order issued against Lake Suzy to the present date.

Exhibit DAS-1 is the letter from the Florida Department of Environmental Protection indicating that Lake Suzy Utilities, Inc. has complied with the requirements of Consent Order OGC 93-3668. Since that time, no work other than routine maintenance of berms has been performed.

DOCUMENT NUMBER-DATE  
 00320 JAN-78  
 FPSC-RECORDS/REPORTING

AFA \_\_\_\_\_  
 APP \_\_\_\_\_  
 CAF \_\_\_\_\_  
 CMU \_\_\_\_\_  
 CTR \_\_\_\_\_  
 EAG \_\_\_\_\_  
 LEG \_\_\_\_\_  
 MAS \_\_\_\_\_  
 OPC \_\_\_\_\_  
 RRR \_\_\_\_\_  
 SEC \_\_\_\_\_  
 WAW \_\_\_\_\_  
 OTH \_\_\_\_\_

4. Request objected to by counsel.
5. Request objected to by counsel.
6. Request objected to by counsel.
7. Request objected to by counsel.
8. Request objected to by counsel.
9. Request objected to by counsel.

10. The capital expense and revenue budgets for 1999, 2000 and all available subsequent years for Lake Suzy and for AquaSource Utility, Inc. and AquaSource, Inc. to the extent pertaining to Lake Suzy.

**No such document exists.**

**The prior owner of Lake Suzy Utilities did not prepare capital expense or revenue budgets. Since AquaSource acquired Lake Suzy in June, 1999, no budgets were prepared. The AquaSource year 2000 capital expense and revenue budgets for the Lake Suzy Utility system are not complete at this time.**

11. All variance reports for any of the budgets requested in the prior request.

**The document requested does not exist.**

12. All document and reports regarding customer growth for Lake Suzy which you have created since 1990.

**The prior owner of Lake Suzy Utilities prepared various customer growth reports for Desoto County and/or the Peace River Water Authority. A copy of various reports of growth at Lake Suzy are provided as Exhibit DAS-2.**

13. Resume/statement of qualifications for Mr. Anthony J. Villiotti.

**The document requested does not exist.**

14. Request objected to by counsel.

15. Resume/statement of qualifications for all persons operating Lake Suzy's utility facilities.

No such document exists, however, the following AquaSource employees have operated the Lake Suzy Utility wastewater treatment facility.

Johnny Chamberlain -	Class "C" Wastewater License
Richard Todd -	Class "C" Wastewater License
Bruce Morris -	Class "C" Wastewater License
Randy Farrington -	Class "C" Wastewater License

Respectfully submitted this 7th day of January, 2000, by:

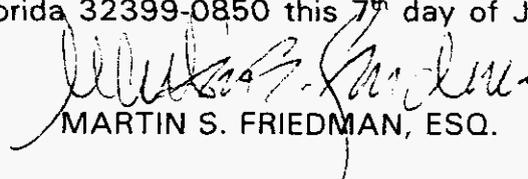
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MARTIN S. FRIEDMAN  
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For the Firm

#### 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 7<sup>th</sup> day of January, 2000.



MARTIN S. FRIEDMAN, ESQ.