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RECORDS AND REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Applications For An Amendment Of Certificate For An Extension Of Territory And For an Original Water And Wastewater Certificate (for a utility in existence and charging for service)

Docket No. 992040-WS

In re: Application by Nocatee Utility Corporation for Original Certificates for Water & Wastewater Service in Duval and St. Johns Counties, Florida

Docket No. 990696-WS

OBJECTIONS OF INTERCOASTAL UTILITIES TO NOCATEE UTILITY CORPORATION'S FIRST SET OF INTERROGATORIES

Intercoastal Utilities, Inc., by and through its undersigned counsel, hereby files Intercoastal's Objections to Nocatee Utility Corporation's First Set Of Interrogatories and responds as follows:

GENERAL OBJECTION: Intercoastal objects to any Interrogatory which would require a response revealing information which is privileged, work product, or subject to similar or analogous protections under Florida law.

OBJECTIONS TO INTERROGATORIES

6. Objection. This Interrogatory seeks information wholly irrelevant to this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. The Interrogatory does not seek information about Intercoastal but about other utilities in other locations at unknown times in the past. The Interrogatory has no temporal parameters. Nothing gained from the Interrogatory could have any

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relevance to whether Intercoastal's application should be granted by the PSC in this docket. The Interrogatory is burdensome, harassing, and over-broad.

DATED this 27th day of March, 2000.



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and accurate copy of the foregoing has been furnished by the method indicated below to the following on this 27th day of March, 2000.

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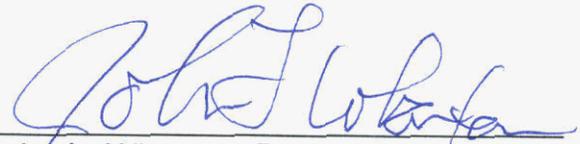
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