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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, INC. TO NOCATEE UTILITY CORPORATION'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

Intercoastal Utilities, Inc., by and through its undersigned counsel, hereby responds to Nocatee Utility Corporation's First Request For Production Of Document as follows:

GENERAL OBJECTION: To the extent that any Request For Production calls for the production of a document which contains information which is privileged, work product, or afforded similar or analogous protections under Florida law, Intercoastal objects. This general objection is applicable to each and every Request For Production as if set forth therein. Intercoastal also objects to "Definition and Instruction" No. 5 in that it requires the creation of a list which is not a proper request within a Request For Production Of Documents.

AFA
APP
CAF
CMM
OTR
EAG
LEG
MAS
OPC
RRR
SEC
WAW
OTH

RESPONSE TO REQUESTS FOR PRODUCTION

1. Objection. This Request For Production is over-broad, vague, lacks temporal parameters, and is not reasonably calculated to lead to the discovery of admissible evidence. Documents responsive to this Request For Production will be produced to

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Handwritten signature

FPSC-BUREAU OF RECORDS

ROSE, SUNDSTROM & BENTLEY, LLP

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DOCUMENT NUMBER-DATE

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RECORDS REPORTING

the extent they fall within the parameters of the Request and they were either relied upon, referenced, or utilized in the filing of the application in this docket.

2. Objection. This Request For Production is over-broad, vague, lacks temporal parameters, and is not reasonably calculated to lead to the discovery of admissible evidence. Documents responsive to this Request For Production will be produced to the extent they fall within the parameters of the Request and they were either relied upon, referenced, or utilized in the filing of the application in this docket.

3. Objection. This Request For Production is over-broad, vague, lacks temporal parameters, and is not reasonably calculated to lead to the discovery of admissible evidence. Documents responsive to this Request For Production will be produced to the extent they fall within the parameters of the Request and they were either relied upon, referenced, or utilized in the filing of the application in this docket.

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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