

ORIGINAL

991643-SU

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished

via fax and U.S. Mail to:

Ralph Jaeger, Esquire
Jason Fudge, Esquire
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Stephen Burgess, Esq.
Office of Public Counsel
111 Madison Street
Tallahassee, FL 32399-1400

Respectfully submitted on this
25th day of September, 2000, by:

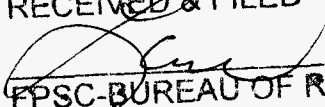
ROSE, SUNDSTROM & BENTLEY,LLP
2548 Blairstone Pines Drive
Tallahassee, Florida 32301
(850) 877 - 6555



JOHN L. WHARTON
For the Firm

aloha\30\citizens.rfp

- APP _____
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
12137 SEP 26 8
FPSC-RECORDS/REPORTING

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In Re: Application of Aloha Utilities, Inc.
for Increase in Wastewater Rates in its Seven
Springs System in Pasco County, Florida

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RECORDS AND
DOCKET NUMBER 9901543-SU

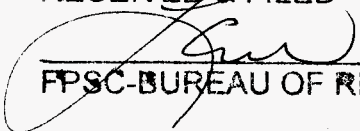
ALOHA'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS TO THE CITIZENS

Please take notice that ALOHA UTILITIES, INC. requests, pursuant to Rule 1.350, Fla.R.Civ.P. and Rule 25-22.034, Florida Administrative Code, that CITIZENS produce and permit ALOHA UTILITIES, INC. to inspect and copy the things enumerated herein at ROSE, SUNDSTROM & BENTLEY, 2548 Blairstone Pines Drive, Tallahassee, Florida, 32301 by October 16, 2000.

I. DEFINITIONS

1. "Document" means any document in your custody, possession or control, including, but not limited to, any printed, written, recorded, taped, electronic, graphic, or other tangible matter from whatever source, however produced or reproduced, whether in draft or otherwise, whether sent or received or neither, including the original, all amendments and addenda and any non-identical copy (whether different from the original because of notes made on or attached to such copy or otherwise) of any and all writings, correspondence, letters, telegrams, telex communications, cables, notes, notations, papers, newsletters, memoranda, inter-office communications, releases, agreements, contracts, books, pamphlets, studies, minutes of meetings, recordings or other memorials of any type of personal telephone conversations, meetings or conferences, reports analyses, evaluations, estimates, projections, forecasts, receipts, statements, accounts, books of account, diaries, calendars, desk pads, appointment books, stenographer's notebooks, transcripts, ledgers, registers,

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FPSC-BUREAU OF RECORDS

worksheets, journals, statistical records, cost sheets, summaries, lists, tabulations, digests, canceled or uncanceled checks or drafts, vouchers, charge slips, invoices, purchase orders, accountant's reports, financial statements, and any material underlying supporting or used in the preparation of any documents.

2. "Person(s)" means any natural person or any legal entity, including but not limited to, a corporation, partnership and unincorporated association, and any officer, director, employee, agent or other person acting or purporting to act on its behalf.

3. "And" and "or" shall be construed disjunctively or conjunctively as necessary in order to bring within the scope of each request all documents that might otherwise be construed to be outside its scope.

II. INSTRUCTIONS

1. Any document as to which a claim of privilege is or will be asserted should be identified by author, signatory, description (e.g., letter, memorandum, telex, recording, etc.), title (if any), date, addresses (if any), general subject matter, present depository and present custodian, and a complete statement of the ground for any claim of privilege should be set forth.

2. If it is maintained that any document which is requested has been destroyed, set forth the contents of the document, the date of such destruction, and the name of the person who authorized or directed such destruction.

3. If any of the documents cannot be produced in full, produce to the extent possible, specifying the reasons for the inability to produce the remainder.

4. This request is a continuing one. If after producing documents, you become aware of any further documents responsive to this request, you are required to produce such additional documents.

PRODUCTION

1. Please provide copies of all documents, reports, compilations of data, exhibits, summaries, analyses, treatises, facts, figures, appraisals, calculations, and/or estimates related to your calculation of the Utility's acquisition costs and annual operating expenses for its proposed new office building facility. The documents you provide should include, but not necessarily be limited to, documents addressing purchase price, annual mortgage and interest expense, annual tax expense, annual insurance expense, annual maintenance expense, and offsetting annual rental income potential.

2. Please provide copies of all documents, reports, compilations of data, exhibits, summaries, analyses, treatises, facts, figures, appraisals, calculations, and/or estimates related to your calculation of the estimated market rents for the Utility's present rented office space.

3. Please provide copies of all documents, materials, reports or analyses which any representative, consultant, witness, expert, or employee has referenced, relied upon, reviewed, or analyzed in connection with the matters and issues related to the Supplemental Direct Testimony of Stephen G. Watford.

4. Please provide copies of all documents, reports, compilations of data, exhibits, summaries, analyses and treatises which support or tend to support your position or positions related to the matters and issues presented in the Supplemental Direct Testimony of Stephen G. Watford.

5. Please provide copies of all documents, reports, compilations of data, exhibits, summaries, analyses and treatises which support or tend to support your position related to the necessity of the Utility to vacate its present rented office space on December 31, 2000.