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November 26, 2001

VIA FEDERAL EXPRESS

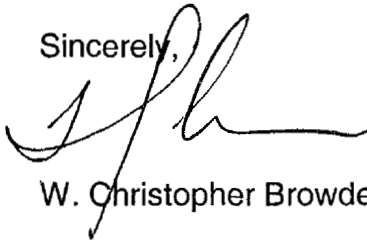
Blanca S. Bayó, Director
Division of Records and Reporting
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0870

Re: Docket No. 010492-WS
Zellwood Station Co-Op, Inc.'s Objections to Citizens' First Request for
Production of Documents

Dear Ms. Bayó:

Enclosed please find the original and fifteen (15) copies of Zellwood Station Co-Op's Objections to Citizens' First Request for Production of Documents. This pleading was originally filed on November 19, 2001 electronically and is being re-submitted in hard copy at the request of the Division of Commission Clerk and Administrative Services. All parties of record and interested parties on the service list were provided hard copies on the original filing date of November 19, 2001 by U.S. Mail in accordance with Commission rules. A copy of this filing has also been provided on a 1.44MB floppy disc in Word Perfect 8.

Sincerely,



W. Christopher Browder

GRAY, HARRIS & ROBINSON, P.A.

APP
CAF
CMP
COM
CTR
ECR
LEG
OPC
PAI
RGO
SEC
SER
OTH
TAC:gcj
Enclosures
cc: All individuals on docketing service list
Clermont
LAKELAND
MELBOURNE

DOCUMENT NUMBER-DATE

14921 NOV 27 01

TALLAHASSEE TAMPA
FPCC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for Rate
Increase in Orange County
by Zellwood Co-Op, Inc.

Docket No. 010492-WS

**ZELLWOOD STATION CO-OP, INC.'S OBJECTIONS TO CITIZENS' FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Fla. Admin. Code R. 28-106.206 and Rule 1.350, Florida Rules of Civil Procedure, Zellwood Station Co-Op, Inc. (hereafter "Zellwood"), hereby objects to Florida's Citizens' (hereafter "Citizens") First Request of Production of Documents to Zellwood Station Co-op, Inc. (Nos. 1-22), and in support thereof states the following:

1. General Objections.

A. Zellwood objects to any request that calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time the response is first made to these requests or is later determined to be applicable based on the discovery of documents, investigation or analysis. Zellwood may determine upon investigation and analysis that information responsive to certain requests to which objections are not otherwise asserted are confidential and proprietary and should be produced only under an appropriate confidentiality agreement and protective order if at all. By agreeing to provide such information in response to such request, Zellwood is not waiving its right to insist upon appropriate protection of confidentiality by means of a confidentiality agreement and protective order. Zellwood hereby asserts its right to require such protection of any and all documents that may qualify for protection under the Florida Rules of Civil Procedure and other applicable statutes, rules, and legal principles.

DOCUMENT NUMBER-DATE

14921 NOV 27 5

FPSC-COMMISSION CLERK

B. Zellwood objects to these requests to the extent that they require Zellwood to prepare information or perform calculations not previously prepared or performed which would expand Zellwood's obligations under applicable law.

C. Zellwood reserves its right to count requests and their subparts (as permitted under applicable rules of procedure) in determining whether it is obligated to respond to additional requests served by any party.

2. Specific Objections to Requests.

Request:

12. Please provide a copy of the December 31, 2000 trial balance, in the most detailed format available, for the water and wastewater operations of the Company also provide a balance sheet as of December 31, 2000 and statement for the 12 months ended December 31, 2000.

Objection:

Zellwood objects to this request for documents as compound and reserves the right to count it as two (2) separate request for production for purposes of determining its obligation to continue to provide documents under the order governing procedure in this case.

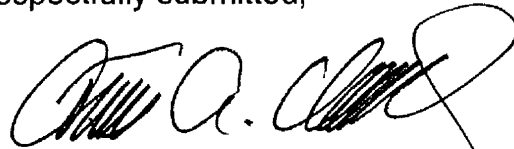
Request:

13. Please provide a copy of the September, 2001 trial balance, in the most detailed format available, for the water and wastewater operations of the Company. Also provide a balance sheet as of September, 2001 and the income statement for the 12 months ended September, 2001.

Objection:

Zellwood objects to this request for documents as compound and reserves the right to count it as two (2) separate request for production for purposes of determining its obligation to continue to provide documents under the order governing procedure in this case.

Respectfully submitted,



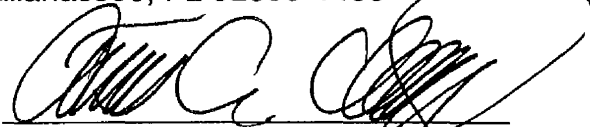
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Fax: (407) 244-5690
Attorneys for Zellwood Station Co-Op, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and exact copy of the above and foregoing has been furnished by U.S. Mail to the following parties of record this 19th day of November, 2001.

Jennifer Brubaker, Esquire
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Jack Shreve, Esquire
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400



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