

GRAY, HARRIS & ROBINSON

PROFESSIONAL ASSOCIATION
ATTORNEYS AT LAW
SUITE 1400
301 EAST PINE STREET
POST OFFICE BOX 3068

ORLANDO, FLORIDA 32802-3068

TELEPHONE 407-843-8880
FAX 407-244-5690
WEBSITE: www.ghrlaw.com

SCANNED ORIGINAL

WRITER'S DIRECT DIAL
407-244-5648

W. Christopher Browder

E-MAIL ADDRESS
cbrowder@ghrlaw.com

November 26, 2001

VIA FEDERAL EXPRESS

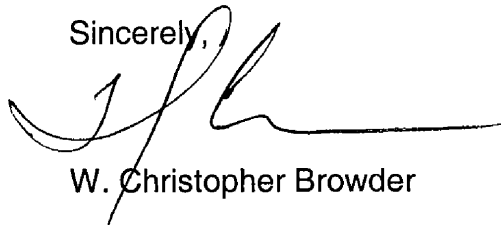
Blanca S. Bayó, Director
Division of Records and Reporting
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0870

Re: Docket No. 010492-WS
Zellwood Station Co-Op, Inc.'s Objections to Citizens' First Set of
Interrogatories

Dear Ms. Bayó:

Enclosed please find the original and fifteen (15) copies of Zellwood Station Co-Op's Objections to Citizens' First Set of Interrogatories. 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.

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Enclosures
cc: All individuals on docketing service list



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TALLAHASSEE TAMPA
FPSC-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 SET OF INTERROGATORIES**

Pursuant to Fla. Admin. Code R. 28-106.206 and Rule 1.340, Florida Rules of Civil Procedure, Zellwood Station Co-Op, Inc. (hereafter "Zellwood"), hereby objects to Florida's Citizens' (hereafter "Citizens") First Set of Interrogatories to Zellwood Station Co-op, Inc. (Nos. 1-17), and in support thereof states the following:

1. General Objections.

A. Zellwood objects to any interrogatory 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 interrogatories 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 interrogatories 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 an interrogatory, 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

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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.

B. Zellwood objects to the interrogatories to the extent they require any expert, consultant, agent, representative or attorney retained by Zellwood in connection with this proceeding to provide a response outside of that expressly permitted under Florida Rules of Civil Procedure 1.280(b)(4).

C. Zellwood objects to these interrogatories 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.

2. Specific Objections to Interrogatories.

Zellwood objects specifically to the following interrogatories:

Interrogatory:

2. Please list all legal expenses included in the test year and the preceding two years, please state for each separate law suit: whether or not the law suit has been resolved or settled; whether or not the company is requesting recovery of legal fees as part of its claims; the circumstances of each lawsuit; the name of the plaintiff and defendant; and explain why it is appropriate to include such expenses in test year expense.

Objection:

Zellwood objects to interrogatory 2 as compound and reserves its right to count this interrogatory as three (3) separate interrogatories for purposes of determining its

obligation to continue to provide responses under the order governing procedure in this docket.

Interrogatory:

8. On Schedule A-3, the Company states that a new hydropneumatic tank is being added to replace the one that is a the end of its useful life.

- (a) Has the Company made an adjustment to remove or retire the old hydropneumatic tank?**
- (b) If the response to (a) is affirmative, please show how this was removed from the test year plant in service.**
- (c) If the response to (a) is not affirmative, please explain why no such adjustment was made and provide the amount of plant and accumulated depreciation associated with the old hydro tank as of the year December 31, 2001.**

Objection:

Zellwood objects to interrogatory eight (8) as compound and reserves its right to count this interrogatory as three (3) separate interrogatories for purposes of determining its obligation to continue to provide responses under the order governing procedure in this docket.

Interrogatory:

12. Please refer to schedule B-7.

- (a) Please provide a detailed description of the “sewer plant berm issue” mentioned on this page.**
- (b) Please explain why the utility manager stopped allocating a portion**

of her salary after four pay periods.

Objection:

Zellwood objects to Interrogatory 12 as compound and reserves its right to count this interrogatory as two (2) separate interrogatories for purposes of determining its obligation to continue to provide responses under the order governing procedure in this docket.

Interrogatory:

13. Please refer to Schedule B-8.

- (a) Please explain why the efficiency of the sewer treatment plant decreased.**
- (b) Please explain what is meant by “401 in cost of hauling sludge.”**

Objection:

Zellwood objects to Interrogatory 13 as compound and reserves its right to count this interrogatory as two (2) separate interrogatories for purposes of determining its obligation to continue to provide responses under the order governing procedure in this docket.

Interrogatory:

14. Please refer to Schedule B-12.

- (a) What other duties does the utility manager have that accounts for 94.68% of her time?**
- (b) What other duties does the meter reader have that accounts for 88.48% of his time?**

Objection:

Zellwood objects to Interrogatory 14 as compound and reserves its right to count this interrogatory as two (2) separate interrogatories for purposes of determining its obligation to continue to provide responses under the order governing procedure in this docket.

Interrogatory:

17. Please refer to Schedule E-13 page 2 and Schedule E-14-A, page 4 which is page 97 of Volume I of the MFRs.

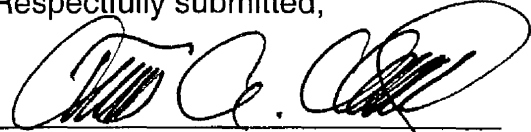
- (a) Please explain why the number of bills shown on Schedule E-13 is 11,880, but the number of bills shown on E-14A is 12,096.**
- (b) Please explain why if one multiplies residential bills of 12,096 times present rate of \$20.57 one arrives at \$248,815, but to obtain the projected revenue requirement of \$213,151 one needs to use 11,880 bills times the proposed rate of \$17.94.**
- (c) Please explain why the number of bills on E-14A, page 4 shows 12,096, but on the same schedule the cumulative number of bills is shown at 12,087.**

Objection:

Zellwood objects to Interrogatory 17 as compound and reserves its right to count this interrogatory as three (3) separate interrogatories for purposes of determining its

obligation to continue to provide responses under the order governing procedure in this docket.

Respectfully submitted,



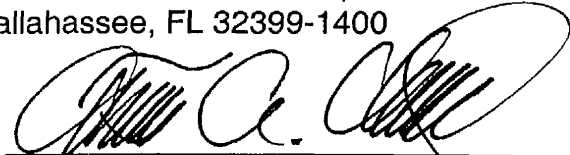
Thomas A. Cloud, Esquire
Florida Bar No. 293326
Gray, Harris & Robinson, P.A.
301 East Pine Street, Suite 1400
Orlando, Florida 32802-3068
Ph. (407) 843-8880
Fax: (407) 244-5690
Attorneys for Zellwood Station Co-Op, Inc.

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



Thomas A. Cloud, Esquire
Florida Bar No. 293326
Gray, Harris & Robinson, P.A.
301 East Pine Street, Suite 1400
Orlando, Florida 32802-3068
Ph. (407) 843-8880
Fax: (407) 244-5690
Attorneys for Zellwood Station Co-Op, Inc.