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August 9, 2002

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VIA HAND DELIVERY

Blanca S. Bayo
Division of Commission Clerk and
Administrative Services
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RECEIVED - FPSC
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COMMISSION
CLERK

Re: In Re: Application for Limited Proceeding to Recover Costs of Water System Improvements In Marion County By Sunshine Utilities of Central Florida, Inc., Docket No. 992015-WU

Dear Ms. Bayo:

Enclosed for filing on behalf of Sunshine Utilities of Central Florida, Inc. ("Sunshine") are the original and seven (7) copies each of:

1. Sunshine's Objections to, and Requests for Clarification of, Citizens' First Request for Production of Documents; and *08436-02*
2. Sunshine's Objections to, and Requests for Clarification of, Citizens' First Set of Interrogatories. *08437-02*

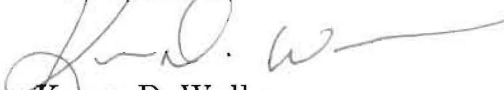
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Blanca Bayo
August 9, 2002
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For our records, please acknowledge your receipt of this filing on the enclosed copy of this letter. Thank you for your consideration.

Sincerely,

HOLLAND & KNIGHT LLP



Karen D. Walker

KDW:kjg
Enclosure

cc: Ralph Jaeger
Stephen C. Reilly

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for Limited)
Proceeding to Recover Costs of Water) Docket No. 992015-WU
System Improvements In Marion County)
By Sunshine Utilities of Central Florida,) Filed: August 9, 2002
Inc.)
_____ /

**SUNSHINE UTILITIES OF CENTRAL FLORIDA, INC.'S
OBJECTIONS TO, AND REQUESTS FOR CLARIFICATION OF,
CITIZENS' FIRST SET OF INTERROGATORIES**

Sunshine Utilities of Central Florida, Inc. ("Sunshine"), pursuant to Rule 28-106.206, Florida Administrative Code, Rule 1.340, Florida Rules of Civil Procedure, and the Order Establishing Procedure issued in this docket on June 20, 2002, hereby submits its objections to, and requests for clarification of, the Citizen of the State of Florida's (the "Citizens") First Set of Interrogatories.

Preliminary Nature of These Objections

The objections stated herein are preliminary in nature and are made at this time in accordance with Order No. PSC-02-0852-PCO-WU, the Order Establishing Procedure in this docket, which requires objections and requests for clarification to be made within ten days of service of a discovery request. Sunshine reserves the right to supplement or modify its objections up to the time that it serves its responses to the Citizens' First Set of Interrogatories. Sunshine also reserves the right to file one or more motions for protective order with the Florida Public Service Commission (the "Commission") when it serves its responses on the Citizens.

DOCUMENT NUMBER-DATE

08437 AUG-98

FPSC-COMMISSION CLERK

General Objections

1. Sunshine objects to each and every one of the interrogatories to the extent that they would require the disclosure of privileged information, including 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 to an interrogatory is first made or is later determined to be applicable for any reason. Sunshine in no way intends to waive such privilege or protection.

2. Sunshine objects to disclosing any proprietary confidential business information or other confidential information without provisions in place to protect the confidentiality of the information. Sunshine has not finalized its responses to the Citizens' First Set of Interrogatories. Thus, Sunshine cannot determine at this time which specific interrogatories would require the disclosure of proprietary confidential business information. However, to the extent that Sunshine determines that any of the discovery requests would require the disclosure of confidential information, Sunshine will either file a motion for protective order requesting confidential classification and procedures for protection or take other actions to protect the confidentiality of the information requested. Sunshine in no way intends to waive claims of confidentiality.

3. Sunshine objects to the Citizens' First Set of Interrogatories to the extent the interrogatories call for the creation of information, rather than the reporting of presently existing information, as purporting to expand Sunshine's obligation under the law.

4. Sunshine objects to the Citizens' First Set of Interrogatories to the extent that the interrogatories purport to impose duties or obligations upon Sunshine that are different from or exceed those imposed upon Sunshine by the Florida Rules of Civil Procedure.

5. Sunshine objects to the Citizens' First Set of Interrogatories to the extent that the interrogatories seek information not in the possession, custody or control of Sunshine.

6. Sunshine objects to providing information to the extent that such information is already in the public record before the Commission and available to the Citizens through normal procedures.

7. Sunshine incorporates by reference all of the foregoing objections into each of its specific objections set forth below as though stated therein.

Specific Objections and Requests for Clarification

Interrogatory No. 2. Sunshine objects to this interrogatory, including all subparts (a)-(d), as irrelevant to any issue in this case. No timely objections were raised to the Commission's proposed agency action relating to Mrs. Clarise G. Hodges. Accordingly, the Commission's proposed agency

action as it relates to Mrs. Hodges is deemed stipulated pursuant to Section 120.80(13)(b), Florida Statutes.

Interrogatory No. 3. Sunshine objects to this interrogatory as irrelevant to any issue in this case to the extent that it seeks information relating to any employee or officer of Sunshine other than James H. Hodges. No timely objections were raised to the Commission's proposed agency action relating to any employees or officers of Sunshine other than James H. Hodges. Accordingly, the Commission's proposed agency action as it relates to all employees or officers of Sunshine other than Mr. Hodges is deemed stipulated pursuant to Section 120.80(13)(b), Florida Statutes.

Interrogatory No. 4. Sunshine objects to this interrogatory as irrelevant to any issue in this case to the extent that it seeks information relating to any employee or officer of Sunshine other than James H. Hodges. No timely objections were raised to the Commission's proposed agency action relating to any employees or officers of Sunshine other than James H. Hodges. Accordingly, the Commission's proposed agency action as it relates to all employees or officers of Sunshine other than Mr. Hodges is deemed stipulated pursuant to Section 120.80(13)(b), Florida Statutes.

Interrogatory No. 5. Sunshine objects to this interrogatory to the extent that it would require Sunshine to disclose the social security numbers of its former employees. The Office of Public Counsel is not authorized by law to collect an individual's social security number, and possession of the social

security numbers of Sunshine's former officers is not imperative for the performance of the duties and responsibilities of the Office of Public Counsel as prescribed by law. Accordingly, Section 119.0721(8), Florida Statutes, prohibits the Office of Public Counsel from requesting the social security numbers of Sunshine's former employees.

Interrogatory No. 11. Sunshine objects to this interrogatory as incomprehensible because there not a "note 2 on RCN-2, page 13" nor is there a reference to "rate case" on page 13 of RCN-2. Sunshine requests that the Citizens clarify this interrogatory by correctly identifying the portion of Exhibit RCN-2 to which they are referring.

Interrogatory No. 17. Sunshine objects to this interrogatory to the extent that it would require Sunshine to create information not currently in Sunshine's possession.

Interrogatory Nos. 18, 19 and 20. Sunshine objects to these interrogatories as irrelevant to any issue in this case to the extent that they seek information relating to the 16 Sunshine systems that are not part of the proposed water system improvements that are at issue in this docket.

Interrogatory No. 22. For purposes of responding to this interrogatory, Sunshine assumes that "or" was intended to be "of." Sunshine objects to this interrogatory because the information requested is contained in Sunshine's annual reports filed with the Commission which are part of the public record and available to the Citizens through normal procedures.

Respectfully submitted,



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Karen D. Walker
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(850) 224-7000

**Attorneys for Sunshine Utilities of
Central Florida, Inc.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by hand delivery to Ralph Jaeger, Esquire, Florida Public Service Commission, Division of Legal Services, Room 370, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 and Stephen C. Reilly, Associate Public Counsel, Office of Public Counsel, c/o The Florida Legislature, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400 all on this 9th day of August, 2002.



Karen D. Walker