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02 SEP - 4 PM 3:57  
COMMISSION  
CLERK

September 4, 2002

Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Re: Docket No. 992015-WU

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of Citizens' Motion to Permit Additional Interrogatories.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Stephen C. Reilly  
Associate Public Counsel

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Enclosures

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
09349 SEP-4 02  
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Filed: September 4, 2002

CITIZENS' MOTION TO PERMIT ADDITIONAL INTERROGATORIES

Pursuant to Rule 1.340(a), Florida Rules of Civil Procedure, the Citizens of the State of Florida ("Citizens"), by and through their undersigned attorney, respectfully request the Prehearing Officer to issue an order to permit additional interrogatories, and as grounds the Citizens state:

1. On August 2, 2002, the Citizens propounded twenty-five (25) interrogatories to Sunshine Utilities of Central Florida, Inc. ("Sunshine", "Utility" or "Company").
2. On September 3, 2002 the Citizens propounded an additional ten (10) interrogatories to Sunshine. The total of thirty-five (35) interrogatories include eight (8) additional numbered subparts.
3. Rule 1.340(a), Florida Rules of Civil Procedure, limits a party to thirty (30) interrogatories, including subparts, unless the Court, or in this case the Prehearing Officer on behalf of the Commission, permits a larger number upon motion and for good cause.
4. The Citizens review of Sunshine's responses to the Citizens' First Set of Discovery necessitated the Citizens' Second Set of Interrogatories. There was a need, acknowledged by Sunshine, to clarify the Citizens' Interrogatory No. 4. Furthermore,

DOCUMENT NUMBER - DATE

09349 SEP-4 02

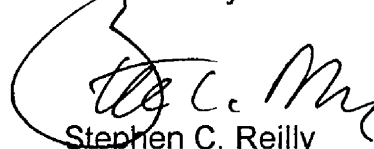
FPSC-COMMISSION CLERK

there was a need to propound follow-up questions to clarify responses received to the First Set of Interrogatories. Many of these follow-up questions pertain to discovering the full range of compensation that is flowing from the ratepayers, through the Utility, and to Mr. James H. Hodges and his immediate family. Only after the Commission fully discovers all of this information will it be able to fairly establish the "salary" compensation for Mr. James H. Hodges.

5. The modest expansion of the number of interrogatories provided by the Citizens' Second Set of Interrogatories should be granted by the Prehearing Officer in order to help bring before the Commission information that will assist the Commission to determine if this proposed interconnection plan is prudent or imprudent and to determine what rates should be imposed upon Sunshine's customers.

WHEREFORE, the Citizens respectfully request the Prehearing Officer to authorize the Citizens' Second Set of Interrogatories and direct the Utility to respond to those interrogatories on or before September 18, 2002.

Respectfully submitted,



Stephen C. Reilly  
Associate Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison St., Rm. 812  
Tallahassee, FL 32399-1400

Attorney for the Citizens  
of the State of Florida

**DOCKET NO. 992015-WU  
CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Citizens' Motion to Permit Additional Interrogatories has been furnished by hand-delivery to the following parties on this 4th day of September, 2002,

  
Stephen C. Reilly

Ralph Jaeger, Esquire  
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Fla. Public Service Commission  
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