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September 13, 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

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 the following:

1. Sunshine's Objections to, and Requests for Clarification of, Citizens' Second Set of Interrogatories; **09774-02**

AUS _____ 2. Sunshine's Objections to, and Requests for Clarification of, Citizens' Second Requests for Production; **09775-02**
CAF _____
CMP _____

COM 3 (# 4+5) 3. Sunshine's Notice of Serving its Second Set of Interrogatories to
CTR _____ Citizens; **09776-02**
ECR _____
GCL _____

OPC _____ 4. Sunshine's Motion in Limine and Motion to Strike Certain Portions
MMS _____ of the Prefiled Direct Testimony of Ted L. Bidy and Kimberly H. Dismukes; and
SEC 1 (all) **09777-02**
OTH _____

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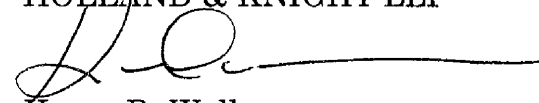
Blanca Bayo
September 13, 2002
Page 2

5. Sunshine's Request for Oral Argument on its Motion in Limine and Motion to Strike Certain Portions of the Prefiled Direct Testimony of Ted L. Bidy and Kimberly H. Dismukes. 09778-02

For our records, please acknowledge your receipt of these filings on the enclosed copy of this letter. Thank you for your consideration.

Sincerely,

HOLLAND & KNIGHT LLP



Karen D. Walker

KDW:kjg
Enclosures

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: September 13, 2002
Inc.)
_____ /

**SUNSHINE UTILITIES OF CENTRAL FLORIDA, INC.'S
OBJECTIONS TO, AND REQUESTS FOR CLARIFICATION OF,
CITIZENS' SECOND 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, the Order Establishing Procedure issued in this docket on June 20, 2002, and the First Order Revising Order Establishing Procedure and Controlling Dates, Granting in Part and Denying in Part Expedited Discovery and Setting Uniform Expedited Discovery Deadlines issued in this docket on August 15, 2002 (collectively the "Procedural Orders"), hereby submits its objections to, and requests for clarification of, the Citizen of the State of Florida's (the "Citizens") Second Set of Interrogatories (Nos. 26 – 35).

Preliminary Nature of These Objections

The objections stated herein are preliminary in nature and are made at this time in accordance with the referenced Procedural Orders which require 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 answers to the Citizens'

DOCUMENT NUMBER DATE

09774 SEP 13 08

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Second 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 interrogatories answers on the Citizens.

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' Second 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' Second 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' Second 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' Second 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. 26. Sunshine objects to this interrogatory as irrelevant to any issue in this limited proceeding to the extent that it seeks information relating to any employee or officer of Sunshine other than James H. Hodges, and to the extent that it seeks information relating to James H. Hodges that is not relevant to the issue of the appropriateness of his 2001 salary. No timely objections were raised to the Commission's proposed agency action relating to any issues involving any employees or officers of Sunshine other than to James H. Hodges' 2001 salary. Accordingly, the Commission's proposed agency action as it relates to all employees or officers of Sunshine, other than the issue of Mr. Hodges' 2001 salary, is deemed stipulated pursuant to Section 120.80(13)(b), Florida Statutes.

Interrogatory No. 27. Sunshine objects to this interrogatory as irrelevant to any issue in this limited proceeding to the extent that it seeks information relating to Mrs. Clarise Hodges or any employee or officer of Sunshine other than James H. Hodges, and to the extent that it seeks information relating to James H. Hodges that is not relevant to the issue of the appropriateness of his 2001 salary. No timely objections were raised to the Commission's proposed agency action relating to any issues involving any employees or officers of Sunshine other than James H. Hodges' 2001 salary. Accordingly, the Commission's proposed agency action as it relates to all employees or officers of Sunshine, other than the issue of Mr. Hodges' 2001

salary, is deemed stipulated pursuant to Section 120.80(13)(b), Florida Statutes.

Interrogatory No. 28. Sunshine objects to this interrogatory, including all subparts (a)–(c), as irrelevant to any issue in this limited proceeding to the extent that it seeks information relating to any employee or officer of Sunshine other than James H. Hodges, and to the extent that it seeks information relating to James H. Hodges that is not relevant to the issue of the appropriateness of his 2001 salary. No timely objections were raised to the Commission’s proposed agency action relating to any issues involving any employees or officers of Sunshine other than James H. Hodges’ 2001 salary. Accordingly, the Commission’s proposed agency action as it relates to all employees or officers of Sunshine, other than Mr. Hodges’ 2001 salary, is deemed stipulated pursuant to Section 120.80(13)(b), Florida Statutes.

Interrogatory No. 29. Sunshine objects to this interrogatory as outside the scope of this limited proceeding, irrelevant, intrusive, harassing and not calculated to lead to discovery of admissible evidence. Who is, and who is not, related to Mr. and Mrs. Hodges is not the subject of, and is irrelevant to, this limited proceeding.

Interrogatory No. 30. Sunshine objects to this interrogatory as outside the scope of this limited proceeding, irrelevant, intrusive, harassing and not calculated to lead to the discovery of admissible evidence.

Interrogatory No. 31. Sunshine objects to this interrogatory as outside the scope of this limited proceeding, irrelevant, intrusive, harassing and not calculated to lead to discovery of admissible evidence. The vehicles used by employees of Sunshine are not the subject of, and are irrelevant to, this limited proceeding.

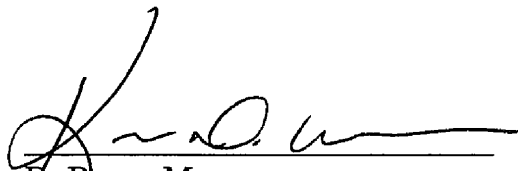
Interrogatory Nos. 32. Sunshine objects to this interrogatory as outside the scope of this limited proceeding, irrelevant, unduly burdensome, oppressive, intrusive, harassing and not calculated to lead to discovery of admissible evidence. Wireless communication devices used by Sunshine's employees are not the subject of, and are irrelevant to, this limited proceeding.

Interrogatory No. 33. Sunshine objects to this interrogatory as outside the scope of this limited proceeding, irrelevant, intrusive, harassing and not calculated to lead to discovery of admissible evidence.

Interrogatory No. 34. Sunshine objects to this interrogatory as vague, ambiguous, and irrelevant to this limited proceeding.

Interrogatory No. 35. Sunshine objects to this interrogatory as vague, ambiguous, and irrelevant to this limited proceeding.

Respectfully submitted,



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Florida Bar No. 354473
Karen D. Walker
Florida Bar No. 0982921
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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 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 and to Ralph Jaeger, Esquire, Florida Public Service Commission, Division of Legal Services, Room 370, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 all on this 13th day of September, 2002.



Karen D. Walker