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December 27, 2002

# ORIGINAL

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Ms. Blanca Bayo, Director Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 021066-WS

Dear Ms. Bayo:

Enclosed with this letter on behalf of Florida Services Corporation ("Florida Water") are the original and fifteen copies of Florida Water's Response to Charlotte County's First Set of Requests for Production of Documents.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

Kenneth A. Hoffman

AUS CAF CMP COM \_ CTR \_\_\_\_ ECR GCL KAH/rl OPC MMS Enclosures SEC -cc: All Parties of Record OTH 

RECEIVED & FILED REAU OF RECORDS FPSC-RÜ

DOCUMENT NUMBER-DATE

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#### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Investigation into proposed sale of Florida Water Services Corporation

Docket No. 021066-WS Filed: December 27, 2002

### FLORIDA WATER SERVICES CORPORATION'S RESPONSE TO CHARLOTTE COUNTY'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS

Florida Water Services Corporation ("Florida Water") by and through its undersigned counsel, hereby files and serves notice that it has provided Charlotte County with a copy of the Objections and Response to the Office of Public Counsel's ("OPC") First Set of Requests for Production of Documents ("First Requests") and has also provided Charlotte County with a copy of the documents produced to OPC. Charlotte County's requests adopted OPC's First Requests. Florida Water hereby adopts and incorporates the objections contained in its Response to OPC's First Requests. By responding to Charlotte County's requests, Florida Water does not waive any legal objections or positions it may have to the nature and scope of this proceeding. This docket was opened in order to investigate the proposed sale of Florida Water's utility assets to the Florida Water Services Authority, a governmental entity created pursuant to Chapter 163, Florida Statutes. An application related to the sale has not yet been filed with the Commission. If and when such an application is filed, under established Commission precedent, the transaction is entitled to approval as a matter of right.

> DOCUMENT NUMBER-DATE 14059 DEC 27 원

> FPSC-COMMISSION CLERK

Respectfully submitted,

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KENNETH A. HOFFMAN, ESQUIRE J. STEPHEN MENTION, ESQUIRE RUTLEDGE, ECENIA, PURNELL & HOFFMAN, P.A. P.O. BOX 551 TALLAHASSEE, FLORIDA (850) 681-6788 (Telephone) (850) 681-6515 (Telecopier)

Attorneys for Florida Water Services Corporation

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of Florida Water Services Corporation's Response to Charlotte County's First Set of Requests for Production of Documents was furnished by U. S. Mail, this 27<sup>th</sup> day of December, 2002, to the following:

John R. Marks, III, Knowles, Marks & Randolph, P.A. 215 S. Monroe Street, Suite 130 Tallahassee, Florida 32301

Lorena Holley, Esquire Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard, 3rd Floor Gunter Building Tallahassee, Florida 32399-0850

Charles J. Beck Deputy Public Counsel Office of Public Counsel c/o the Florida Legislature 111 West Madison Street, Room 812 Tallahassee, Florida 32399-1400

Thomas C. Palmer, Esquire Collier County Board of Commissioner 3301 East Tamiami Trail Administrative Building, 8<sup>th</sup> Floor Naples, Florida 34112

Mr. Chuck Lewis Hernando County Board of County Commissioners 20 North Main Street, Room 461 Brooksville, Florida 34601-2849

KEWNETH A. HOFFMAN, ESQ.

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