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REPLY TO ALTAMONTE SPRINGS

January 22, 2003

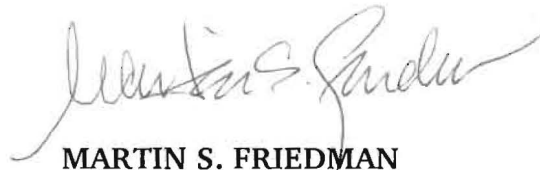
Ms. Blanca Bayo
Commission Clerk and Administrative Services Director
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket No. 020010-WS; Highvest Corporation's and L.P. Utilities Corporation's
Protest of PAA SARC Order
Our File No.: 37074.01

Dear Ms. Bayo:

Enclosed please find for filing in the above-referenced docket an original and one (1) copy of Highvest Corporation's and L.P. Utilities Corporation's Notice of Service of First Set of Interrogatories to PSC Staff and First Request for Production of Documents to PSC Staff.

Very truly yours,



MARTIN S. FRIEDMAN
For the Firm

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC _____
OTH _____

MSF:dmp
Enclosures

cc: Mr. John H. Lovelette (w/enclosures)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for staff-assisted
rate case in Highlands County by
the Woodlands of Lake Placid, L.P.

DOCKET NO.: 020010-WS

_____ /

**NOTICE OF SERVICE OF FIRST SET OF
INTERROGATORIES TO PSC STAFF**

Petitioners, HIGHVEST CORPORATION (“Highvest”), and L.P. UTILITIES CORPORATION (“L.P.”), by and through their undersigned attorneys and pursuant to Rule 1.340, Florida Rules of Civil Procedure, hereby give notice of serving their First Set of Interrogatories to the PSC Staff, numbered 1 through 10, to be answered under oath within the time set forth in the Florida Rules of Civil Procedure.

Respectfully submitted on this 22nd day of
January, 2003, by:

ROSE, SUNDSTROM & BENTLEY, LLP
600 S. North Lake Boulevard, Suite 160
Altamonte Springs, Florida 32701
(407) 830-6331
(407) 830-8522 Fax

By: 
MARTIN S. FRIEDMAN

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for staff-assisted
rate case in Highlands County by
the Woodlands of Lake Placid, L.P.

DOCKET NO.: 020010-WS

FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO PSC STAFF

Petitioners, HIGHVEST CORPORATION (“Highvest”), and L.P. UTILITIES CORPORATION (“L.P.”), by and through their undersigned attorneys, hereby request that the PSC Staff produce copies of the following documents, pursuant to Rule 1.350, Florida Rules of Civil Procedure, at the office of Martin S. Friedman, Esquire, Rose, Sundstrom & Bentley, LLP, 600 S. North Lake Boulevard, Suite 160, Altamonte Springs, Florida 32701, within the time set forth in the Rules of Civil Procedure.

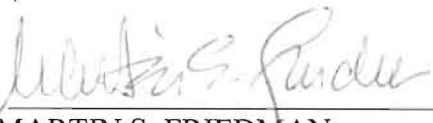
1. All documents supporting the Staff’s position that the Utility is not entitled to office rent.
2. All documents supporting the Staff’s position that underearnings in the wastewater system should not be used to off-set overearnings in the water system.
3. All documents supporting the Staff’s position that the appropriate repression adjustment is 30% including, but not limited to, comparisons with those cases where actual reductions of 60%, 60%, 50% and 44% occurred.
4. All documents supporting the Staff’s position that the purchaser of assets of The Woodlands of Lake Placid, L.P., assumed liability for refund of revenues collected prior to the foreclosure of the assets of The Woodlands of Lake Placid, L.P.

5. All documents supporting the Staff's position that the foreclosure of the assets of the Woodlands of Lake Placid, L.P., was not an arms-length transaction.

Respectfully submitted on this 22nd day of
January, 2003, by:

ROSE, SUNDSTROM & BENTLEY, LLP
600 S. North Lake Boulevard, Suite 160
Altamonte Springs, Florida 32701
(407) 830-6331
(407) 830-8522 Fax

By:



MARTIN S. FRIEDMAN

CERTIFICATE OF SERVICE

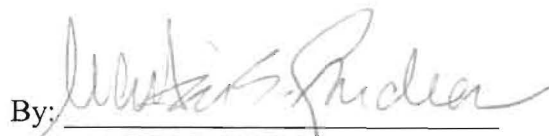
I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

Facsimile and U.S. Mail this 22nd day of January, 2003, to:

Katherine Echernacht, Esquire
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Larry Harris, Esquire
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Stephen C. Burgess, Esquire
Associate Public Counsel
Claude Pepper Building
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400

By: 
MARTIN S. FRIEDMAN