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REPLY TO ALTAMONTE SPRINGS

January 21, 2003

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

Docket No. 020071-WS; Application for Rate Increase by Utilities, Inc. of Florida Re:

Our File No.: 30057.40

Dear Ms. Bayo:

CHRIS H. BENTLEY, P.A.

F. MARSHALL DETERDING DAVID F CHESTER

JOHN R. JENKINS, P.A. STEVEN T. MINDLIN, P.A.

DAREN L. SHIPPY

MARTIN S. FRIEDMAN, P.A.

WILLIAM E. SUNDSTROM, P.A. DIANE D. TREMOR, P.A. JOHN L. WHARTON

ROBERT M. C. ROSE, OF COUNSEL WAYNE L. SCHIEFELBEIN, OF COUNSEL

ROBERT C. BRANNAN

Enclosed is the original and one (1) copy of Utilities, Inc. of Florida's Objections to Citizen's Tenth Set of Interrogatories (Nos. 134-150), Utilities, Inc. of Florida's Objections to Citizen's Ninth Request for Production of Documents (Nos. 79-84), and Utilities, Inc. of Florida's Notice of Service of Responses to Staff's First Set of Interrogatories (Nos. 1-45).

erv truly yours,

VALERIE L. LORD

Of Counsel

VLL:dmp AUS CAF Enclosures **CMP** COM Charles J. Beck, Deputy Public Counsel (w/enclosure) CTR Rosanne Gervasi, Esquire (w/enclosure) ECR Mr. Steve Lubertozzi (w/enclosure) S 8 NV 87 NV 80 GCL OPC Nos. 434-150' Mr. Frank Seidman (w/enclosure) MMS David L. Orr, EI (w/enclosure) SEC 00875 JAN 28 8

PSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application of

UTILITIES, INC. OF FLORIDA

for a rate increase in Marion, Orange,

Pasco, Pinellas and Seminole Counties

Docket No. 020071-WS

<u>UTILITIES, INC. OF FLORIDA'S OBJECTIONS TO CITIZENS'</u>
<u>TENTH SET OF INTERROGATORIES (NOS. 134-150)</u>

UTILITIES, INC. OF FLORIDA (hereinafter "UIF"), by and through its undersigned counsel,

hereby files its Objection to Citizens' Tenth Set of Interrogatories as to Interrogatories 149 and 150,

and in support thereof states:

INTERROGATORY NO. 149: Please explain, in detail, the reason for Andrew Dopuch's

termination, which was authorized in the May 16, 2001 Board meeting. If the reason for his

termination has any impact on historic test year rate base, expenses, or revenues, identify the impact

and the associated accounts.

OBJECTION: The Board of Directors of UIF terminated the employment of Mr. Dopuch for

business reasons. None of the costs associated with his termination, if any, were passed on to rate

payers. Therefore, the information sought is not relevant to this matter and not reasonably calculated

to lead to the discovery of admissible evidence. His termination did affect historic test year rate base

and expenses in that, after his termination, Mr. Dopuch's salary and the costs of his benefits and

other associated expenses were no longer allocated to rate payers.

INTERROGATORY NO. 150: Please provide all costs included in the historic test year associated

with the termination of Andrew Dopuch and any and all associated legal costs for any actual or

potential claims by Mr. Dopuch. Identify the account charged.

DOCUMENT NUMBER - DATE

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OBJECTION: None of the costs attributable to the termination of Mr. Dopuch were passed on to rate payers. Therefore, the information sought is not relevant to this matter and not reasonably calculated to lead to the discovery of admissible evidence.

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

ROSE, SUNDSTROM & BENTLEY, LLP 600 S. North Lake Boulevard Suite 160

Altamonte Springs, Florida 32701

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MARTIN S. FRIEDMAN

Florida Bar No.: 199060

CERTIFICATE OF SERVICE DOCKET NO.: 020071-WS

I HEREBY CERTIFY that a true and correct copy of the foregoing Objection of Utilities,

Inc., of Florida to Citizens' Tenth Set of Interrogatories (134-150) has been served upon the following parties by U.S. Mail this day of January, 2003:

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

Roseanne Gervasi, Esquire Lorena Holley, Esquire Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

MARTIN S. FRIEDMAN