## 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>NINTH REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 79-84)</u>

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

hereby files its Objection to Citizens' Ninth Request for Production of Documents as to Requests

82 and 83, and in support thereof states:

REQUEST FOR PRODUCTION NO. 82: Board of Directors. Provide all materials distributed to

the members of the Board of Directors prior to and/or during the Board of Directors meetings

occurring during the period January 2001 to date. For example, by (sic) not by way of limitation,

the March 19, 2001 meeting references material distributed to the Directors; materials such as these

should be produced.

OBJECTION: The information sought is not relevant to this matter and not reasonably calculated

to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 83: Provide copies of all documents associated with the

termination of Andrew N. Dopuch and subsequent legal action or threatened legal action by either

Mr. Dopuch and/or his counsel and the Company. This should include, but not be limited to, any

lawsuits, the letter mentioned in the November 21, 2001 BOD meeting minutes, and any other

documents related to such claims in the Company's possession.

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:

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MARTIN S. FRIEDMAN

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## 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' Ninth Request for Production (79-84) 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