

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: APPLICATION FOR AMENDMENT  
OF CERTIFICATES NOS. 340-W AND  
397-S TO ADD TERRITORY IN PASCO  
COUNTY BY MAD HATTER UTILITY, INC.

DOCKET NO. 021215-WS

REQUEST FOR PRODUCTION

Pasco County hereby requests Mad Hatter Utility, Inc., to produce for inspection and/or copying by counsel the following documents and things in its possession, custody or subject to its control. Pasco County requests that the production be made at the offices of Mad Hatter Utility, Inc., 1900 Land O'Lakes Boulevard, Suite 114461, Lutz, Florida, at such times and places as may be agreed upon between the respective parties, or in default thereof, specified by order of the court. Inspection of the documents and things will be made by the undersigned attorneys, who may make copies of documents and things at their own expense.

INSTRUCTIONS

1. The documents requested shall be produced as they are maintained in the usual course of business or shall be organized and labeled to correspond to the categories specified in this request.

2. If any document requested is withheld on the basis of any claim of privilege, that document shall be identified by title, author, addressee, date, subject matter, number of

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SEC   1    
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DOCUMENT NUMBER-DATE

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pages, attachments or appendices, and the nature of the privilege asserted with respect to each such document shall be specifically stated.

3. These requests are continuing in nature and effect to the extent provided in the applicable rules and require supplementary production concerning any documents falling within the scope of the request that may come into the knowledge, custody, control or possession of defendant subsequent to its response hereto.

**DOCUMENTS AND THINGS TO BE PRODUCED**

1. All documents you may seek to introduce into evidence at the administrative hearing of this matter.

2. All documents provided to any expert witness consulted or engaged by you or on your behalf regarding this application.

3. All expert witness reports or written opinions prepared for you or on your behalf relating to the issues in this application.

4. For any expert witness identified in the defendant's answer to the Pasco County's interrogatory no. 3 served simultaneously herewith, produce all documents regarding the expert witness' qualifications as an expert.

5. For any witness identified in the defendant's answer to Pasco County's interrogatory no. 2 served simultaneously herewith, produce all documents regarding, referencing or identifying each witness.

6. All agreements with the developers regarding the territory included in the application of Mad Hatter Utility, Inc. for amendment of water and wastewater certificates in Pasco County, Florida

7. All correspondence to or from the developers regarding the property included in the application of Mad Hatter Utility, Inc. for amendment of water and wastewater certificates in Pasco County, Florida.

8. All documents relating to Mad Hatter's present ability to serve both water and sewer service to the area for which it seeks a PSC certificate (the extended territory).

9. All documents relating to how it is in the public interest for Mad Hatter to serve the extended territory.

10. All active and valid permits for Mad Hatter to treat water and wastewater issued by the Florida Department of Environmental Regulation, the Florida Department of Environmental Protection and the Southwest Florida Water Management District.

11. All documents relating to any plans Mad Hatter has to increase its capacity to provide water and wastewater treatment to serve the extended territory.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy hereof has been served upon Jennifer Rodan, Esq., Florida Public Service

Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL  
32399, and F. Marshall Deterding, Rose Sundstrum & Bentley,  
2548 Blairstone Pines Drive, Tallahassee, Florida 32301,  
this 27<sup>th</sup> day of February, 2003.

JOHNSON, BLAKELY, POPE,  
BOKOR, RUPPEL & BURNS, P.A.

By: 

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