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MARTIN S. FRIEDMAN, P.A.
VALERIE L. LORD, OF COUNSEL
(LICENSED IN TEXAS ONLY)

March 11, 2003

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

RECEIVED-FPSC
03 MAR 13 AM 9:27
COMMISSION
CLERK

Re: Docket No. 020071-WS, Application of Utilities, Inc. of Florida for a rate increase
Our File No.: 30057.40

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are an original and one (1) copy of Utilities, Inc. of Florida's Objections to and Motion to Strike Citizens' Thirteenth Set of Interrogatories.

Please contact me if you have any questions.

Very truly yours,



VALERIE L. LORD
Of Counsel

AUS _____
CAF _____
CMP _____
CGM 5 _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC 1 _____
OTH _____
VLL/dmp
Enclosures

cc: Stephen C. Burgess, Associate Public Counsel (w/enclosures) (by facsimile)
Charles J. Beck, Deputy Public Counsel (w/enclosures) (by facsimile)
Rosanne Gervasi, Esquire (w/enclosures) (by facsimile)
Mr. Steve Lubertozi (w/enclosures)
Mr. Donald Rasmussen (w/enclosures)
Mr. David Orr, EI, (w/enclosures)

DOCUMENT NUMBER-DATE

02445 MAR 13 03

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application of)
UTILITIES, INC. OF FLORIDA)
for a rate increase in Marion, Orange,) Docket No. 020071-WS
Pasco, Pinellas and Seminole Counties)
_____)

**UTILITIES, INC. OF FLORIDA’S OBJECTIONS TO AND MOTION TO STRIKE
CITIZENS’ THIRTEENTH SET OF INTERROGATORIES (NOS. 175-187)**

UTILITIES, INC. OF FLORIDA (hereinafter “UIF”), by and through its undersigned counsel, hereby files its Objection to and Motion to Strike Citizens’ Thirteenth Set of Interrogatories (Nos. 175-187), and in support thereof states:

1. The Order Establishing Procedure dated October 31, 2002 (Order No. PSC-02-1495-PCO-WS) (the “Order”) limited the number of interrogatories, including subparts, that a party could propound to 250.
2. The Citizens of the State of Florida, by and through the Office of Public Counsel (“OPC”), have served 13 sets of Interrogatories and 13 sets of requests for production on UIF. The number of interrogatories served to date, including subparts, is over 400, well in excess of the limit mandated by the Order.
3. In the spirit of cooperation, UIF has not objected previously to the excessive number of interrogatories.
4. OPC has not sought a modification of the Order authorizing the service of interrogatories or requests for production of documents in excess of the prescribed limit.
5. UIF objects to Citizens’ Thirteenth Set of Interrogatories in their entirety as being in excess of the limit prescribed by the Order and because OPC has not sought a modification of the Order.

DOCUMENT NUMBER-DATE

02445 MAR 13 03

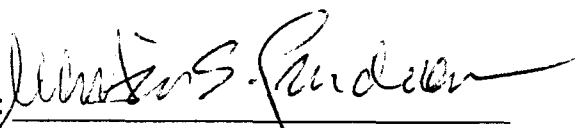
FPSC-COMMISSION CLERK

WHEREFORE, Utilities, Inc. of Florida requests that the Commission strike Citizens' Thirteenth Set of Interrogatories to Utilities, Inc. Of Florida and enter an order prohibiting the Citizens of the State of Florida from propounding further discovery to Utilities, Inc. of Florida.

Respectfully submitted on this
10th day of March, 2003, by:

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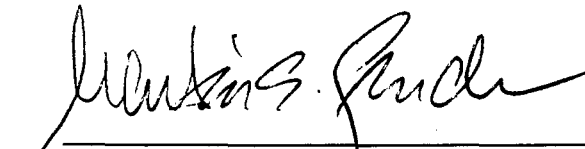

MARTIN S. FRIEDMAN
Florida Bar No.: 199060

CERTIFICATE OF SERVICE
DOCKET NO.: 020071-WS

I HEREBY CERTIFY that a true and correct copy of the foregoing Utilities, Inc. Of Florida's
Objections to and Motion to Strike Citizens' Thirteenth Set of Interrogatories (Nos. 175-187) has
been served upon the following parties by facsimile and U.S. Mail this ^{10th} 11th day of March, 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