

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

COMMISSION CLERK  
JUL 11 AM 10:18  
FPSC

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

DOCKET NO. 021215-WS

PASCO COUNTY'S SECOND REQUEST FOR PRODUCTION

Pasco County, through its undersigned attorney, hereby requests Mad Hatter Utility, Inc. (Mad Hatter), 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 Johnson, Pope, Bokor, Ruppel & Burns, PA, 911 Chestnut Street, Clearwater, Florida, or 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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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 relating to the amount of water currently pumped from the plants which Mad Hatter may use to provide service to the proposed territory.

2. All documents relating to the commitments Mad Hatter has made to provide water from the water plants which Mad Hatter may use to provide service to the proposed territory.

3. All documents relating to Mad Hatter water and wastewater systems that would be used to serve the proposed territory including construction, record, or as-built drawings.

4. All documents relating to planned or proposed improvements to the Mad Hatter water and wastewater systems that may be used to serve the proposed territory.

5. All documents relating to the design and/or construction details and specifications which may be used by Mad Hatter Utility as standard construction or installation procedures required of developers for extensions to Mad Hatter's water, sewer or irrigation systems.

6. All documents relating to the negotiation of utility service agreements with developers of the commercial properties in the proposed territory.

7. All documents relating to the commitments Mad Hatter has made to provide wastewater treatment service in the future for flow to Pasco County.

8. All documents relating to the rates Mad Hatter seeks to charge in the proposed territory.

9. All applications to renew and/or expand permits issued by the Southwest Florida Water Management District (SWFWMD) including but not limited to all service area maps provided to SWFWMD in support of the applications.

10. The most recent water facility permits issued by the Florida Department of Environmental Protection for water supply and water treatment facilities.

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy hereof has been served by regular U.S. mail 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 9<sup>th</sup> day of July, 2003.

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

By: 

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