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(LICENSED IN TEXAS ONLY)

August 15, 2003

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

HAND DELIVERY
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AUG 15 AM 11:28

Re: Docket No. 020071-WS; Application of Utilities, Inc. of Florida for a Rate Increase
Our File No.: 30057.40

Dear Ms. Bayo:

Enclosed please find for filing in the above-referenced docket the original and one (1) copy of Utilities, Inc. of Florida's Motion for Protective Order (dated August 14, 2003) along with a sealed envelope containing the documents for which we are seeking the protective order.

In addition, enclosed please find for filing the original and one (1) copy of Utilities, Inc. of Florida's Notice of Service of Supplemental Responses to Citizens' Tenth Set of Interrogatories (No. 149) (dated 8/14/03) and Utilities, Inc. of Florida's Notice of Service of Responses to Citizens' Ninth Request for Production of Documents (No. 83) (dated 8/14/03).

Very truly yours,



VALERIE L. LORD
Of Counsel

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC _____
OTH _____

/dmp
Enclosures

cc: Charles Beck, Deputy Public Counsel (w/enc.) (via facsimile & U.S. Mail 8/14/03)
Rosanne Gervasi, Esquire (w/enc.) (via facsimile & U.S. Mail 8/14/03)
Mr. Steven M. Lubertozi (w/enc.) (via facsimile & U.S. Mail 8/14/03)
Mr. Patrick Flynn (w/enc.) (via facsimile & U.S. Mail 8/14/03)
David L. Orr, P.E. (w/enc.) (via facsimile & U.S. Mail 8/14/03)

DOCUMENT NUMBER-DATE
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ORIGINAL

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

UTILITIES, INC. OF FLORIDA'S MOTION FOR PROTECTIVE ORDER

Utilities, Inc. of Florida (*UIF*), by and through its undersigned counsel, files this Motion for Protective Order in relation to documents submitted in connection with UIF's Supplemental Response to Citizens' Ninth Request for Production of Documents No. 83 and Citizens' Tenth Set of Interrogatories (No. 149) (*Responses 83 and 149*).

1. Under Section 367.156(2), Florida Statutes, this Commission has the authority to classify certain material as proprietary confidential business information. This classification exempts the material from public disclosure under Section 119.07(1), Florida Statutes.

2. UIF requests that all of the response to Responses 83 and 149 be classified as proprietary confidential business information under Section 367.156(2), Florida Statutes, and Rule 25-22.06, Florida Administrative Code. If this request is granted, then all of the response to Request for Production No. 83 will be exempt from Section 119.07(1), Florida Statutes.

3. The information produced in response to Responses 83 and 149 consists of correspondence concerning the reasons for the termination of a former executive of UIF. It should be classified as proprietary confidential business information because its disclosure would tend to humiliate or embarrass the subject of the report and subject UIF to risk of litigation.

4. UIF requests that the protective order specifically provide that:

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(A) Copies of the response to Responses 83 and 149 and any other documents, such as internal memoranda and notes that may be created, that contain any of the information covered by the protective order, be protected from disclosure to any persons other than those specified in the protective order;

(B) The number of copies of the response to Responses 83 and 149 and any other documents, internal memoranda and notes that may be created, that contain any of the information covered by the protective order be limited to five (5);

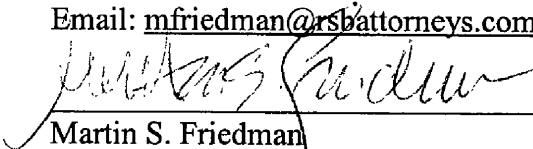
(C) Only persons within the Commission Staff and the Office of the Public Counsel who are working on this matter may view the response to Responses 83 and 149 and any other documents, internal memoranda and notes that may be created, that contain any of the information covered by the protective order; and

(D) Once the protected materials are no longer needed to proceed on this matter, the Commission and Office of Public Counsel Staff who have the original or any copies in their possession will return the original response and all copies to UIF.

WHEREFORE, UTILITIES, INC. OF FLORIDA prays for the entry of the protective order that is consistent with this Motion.

Respectfully submitted on this 14 day of August, 2003 by:

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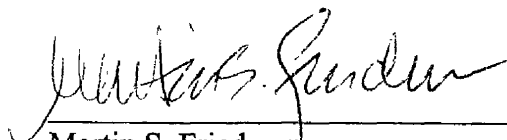
Martin S. Friedman
For the Firm

CERTIFICATE OF SERVICE
DOCKET NO. 020071-WS

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Protective Order has been furnished by facsimile and U.S. Mail to the following parties this 14 day of August, 2003:

Charles J. Beck, Deputy Public Counsel.
Office of Public Counsel
C/o The Florida Legislature
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Tallahassee, FL 32399-1400

Roseanne Gervasi, Esq.
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