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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

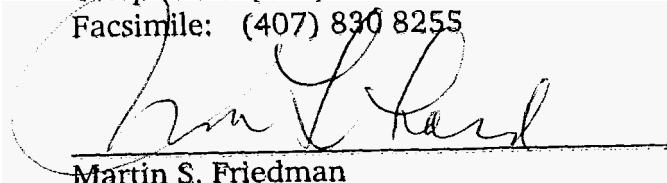
IN RE: Application of
**SANLANDO UTILITIES
CORPORATION** for amendment
of water and wastewater certificates
in Seminole County, Florida

Docket No. 040384-WS

NOTICE OF SERVICE

SANLANDO UTILITIES CORPORATION, by and through the undersigned counsel,
gives notice that it has served its First Requests for Production of Documents to the City of
Longwood, Florida (Nos. 6-21) on this 29th day of April, 2005.

ROSE, SUNDSTROM & BENTLEY, LLP
600 S. North Lake Boulevard
Suite 160
Altamonte Springs, Florida 32701
Telephone: (407) 830-6331
Facsimile: (407) 830 8255



Martin S. Friedman
Valerie L. Lord

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FILED - COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application of
**SANLANDO UTILITIES
CORPORATION** for amendment
of water and wastewater certificates
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Docket No. 040384-WS

**SANLANDO UTILITIES CORPORATION'S SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS TO CITY OF LONGWOOD (Nos. 6-21)**

Pursuant to Rule 28-106.206 of the Florida Administrative Code and Rule 1.340 of the Florida Rules of Civil Procedure, Sanlando Utilities Corporation (**Applicant**), by and through its undersigned attorney, requests the City of Longwood (**City**) to produce the following documents for inspection and copying at the offices of Rose, Sundstrom & Bentley, LLP, 600 S. North Lake Boulevard, Suite 160, Altamonte Springs, Florida 32701, or at such other place as may be mutually agreed upon by counsel, within the time frame allowed by the rule.

INSTRUCTIONS

1. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which privilege is claimed, together with the following information: date, sender, recipients, recipient of copies, subject matter of the document and the basis on which such privilege is claimed.
2. If you have possession, custody or control of the originals of the documents requested, please produce the originals or a complete copy of the originals and all copies which are different in any way from the original, whether by interlineation, receipt stamp or notation. If you do not have possession, custody or control of the

originals of the documents requested, please produce any copies in your possession, custody or control, however made.

3. Please construe “and” as well as “or” either disjunctively or conjunctively as necessary to bring within the scope of this production of documents any document which might otherwise be construed to be outside the scope.
4. If you object to any discovery requests, in whole or in part, on the basis of confidentiality, please strictly follow the provisions of the Florida Public Service Commission Rule 25-222.006 requiring a motion for protective order no later than the date the response is otherwise due and urging all parties to seek mutual agreement before bringing a controversy to the Commission.
5. Unless otherwise indicated in the discovery request, or if the context of the request otherwise requires, only documents created on or after January 1, 1990 are requested.

DEFINITIONS

1. “Document” or “documents” is meant to have the broadest possible meaning under applicable law and includes, but is not necessarily limited to any written, recorded, filmed or graphic matter, whether produced, reproduced or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, memoranda, notes, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment

calendars, records and recordings of oral conversations, work papers and notes, any of which are in your possession, custody or control.

2. As used herein, "Application" means the Application of Sanlando Utilities Corporation to amend its water and wastewater certificates in Seminole County, Florida, filed with the Commission under Docket No. 040384-WS.
3. As used herein: "you" and "your" means the City, together with its employees, consultants, agents, representatives, attorneys (unless privileged) and any other person or entity acting on behalf of the City.
4. Words in the past tense include the present, and words in the present tense include the past. Use of the singular includes the plural, and use of the masculine includes the feminine where appropriate, and vice versa.
5. If there is any document or other tangible item described by this request which is no longer in your possession, custody or control, or is no longer in existence or accessible to you, please indicate:
 - a. **The date and nature of the disposition of such document or other tangible item, including, but not limited to whether such (i) is missing or lost; (ii) has been destroyed, or (iii) has been transferred to another person;**
 - b. The circumstances surrounding such disposition, including any authorization thereof; and
 - c. Where applicable, the person currently in possession, custody or control of such document or item.
6. Usage of acronyms, abbreviations or other symbolic terms are to be taken as having

the same meanings as common usage of those terms in the regulation of utilities in the State of Florida have assigned to them.

DOCUMENTS REQUESTED

6. All deeds, contracts, instruments and other documents by which the City claims the right to provide water and wastewater services to the area described in the Application.
7. All surveys of the land described in the City's response to Interrogatory No. 2.
8. All documents on which the City has relied in responding to Interrogatory No. 4.
9. All documents identified by the City in response to Interrogatory No. 7
10. All documents relied on by the City in determining to object to the applications identified in Interrogatory No. 8.
11. All documents relied on by the City in determining not to object to the applications identified in Interrogatory No. 10.
12. All documents on which the City relied in deciding to object to the Application.
13. All documents relating to objections filed by the City to an application by a water and/or wastewater service provider to provide water and/or wastewater service or to extend its service area within the service area claimed by the City.
14. All water and wastewater facilities identified in response to Interrogatory No. 17.
15. All documents relating to the official action by the City authorizing the City's objection to the Application.
16. All documents relating to the subject matter about which each of the City's non-expert witnesses identified in response to Interrogatory No. 25 is expected to or may

testify.

17. All documents relating to the subject matter about which each of the City's expert witnesses identified in response to Interrogatory No. 26 is expected to or may testify,
18. All reports, papers, opinions or other documents identified in response to Interrogatory No. 29.
19. All monthly operating reports covering water and wastewater operations for the period January, 1998 to December, 2001 for all water and wastewater plants owned, operated or utilized by the City to provide water and wastewater service.
20. All notices of violation, notices of noncompliance, citations or any other notices issued by the Florida Department of Environmental Protection or any other regulatory authority having jurisdiction over all of the water and wastewater plants owned, operated or utilized by the City in connection with the provision of water and wastewater service to customers for the period January 1, 1998 to December 31, 2001.
21. All water and wastewater permits issued by the Florida Department of Environmental Protection or any other regulatory authority having jurisdiction over all of the water and wastewater plants owned, operated or utilized by the City in connection with the provision of water and wastewater service to customers in effect during the period of August 2001 to December 2001.

**CERTIFICATE OF SERVICE
DOCKET NO. 040384-WS**

I HEREBY CERTIFY that a true and correct copy of the foregoing Sanlando Utilities Corporation's First Request for Production of Documents to the City of Longwood, Florida (Nos. 6-21) has been furnished by U.S. Mail to the following parties on this 28th day of April, 2005:

Mr. Kevin J. Grace, County Manager
Seminole County
1101 East First Street
Sanford, FL 32771-1468

Jennifer Brubaker, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Richard S. Taylor, Esq.
531 Dog Track Road
Longwood, FL 32752-1117



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Valerie L. Lord