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REPLY TO ALTAMONTE SPRINGS

June 10, 2005

HAND DELIVERY

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

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JUN 10 PM 3:25

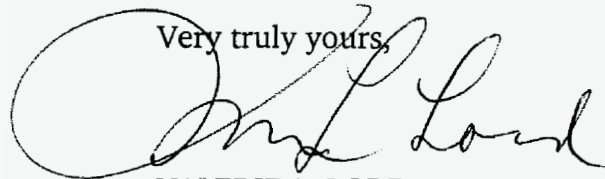
Re: Docket No. 040384-WS; Application of Sanlando Utilities Corporation for an Amendment of Water and Wastewater Certificates in Seminole County, Florida
Our File No.: 30057.61

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket is the original and one (1) copy of Sanlando Utilities Corporation's Motion for Order Compelling Discovery.

- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- RCA _____
- SCR _____
- SEC _____
- OTH _____

Should you have any questions regarding this filing, please do not hesitate to give me a call.

Very truly yours,


VALERIE L. LORD
For the Firm

VLL/tlc
Enclosures

cc: Jennifer Brubaker, Esquire (w/enclosures)
Susan E. Dietrich, Esquire (w/enclosures)
Richard S. Taylor, Esquire (w/enclosures)
Mr. Steven M. Lubertozi (w/enclosures)
Mr. Patrick C. Flynn (w/enclosures)

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

MOTION FOR ORDER COMPELLING DISCOVERY

SANLANDO UTILITIES CORPORATION (*Sanlando*), by through its undersigned attorneys, and pursuant to Rule 1.380, Florida Rules of Civil Procedure, files this Motion for an Order compelling the City of Longwood (*Longwood*) to provide responses to Sanlando's First Set of Interrogatories and Second Request for Production of Documents, and awarding Sanlando its expenses, including attorneys' fees, incurred in obtaining the Order, and in support thereof, states:

1. On April 28, 2005, Sanlando served its First Set of Interrogatories and Second Request for Production of Documents on Longwood, which has objected to Sanlando's Application.

2. Counsel for Longwood telephoned counsel for Sanlando requesting an extension of time to respond. Counsel for Sanlando granted Longwood an extension of time to Monday, June 6, 2005 to answer the First Set of Interrogatories and respond to the Second Request for Production of Documents.

3. Longwood did not answer the First Set of Interrogatories and respond to the Second Request for Production of Documents by close of business on Monday, June 6, 2005. Counsel for Sanlando wrote to Longwood on June 7, 2005, notifying them of Sanlando's

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

intention to file this Motion if Longwood failed to serve its responses to Sanlando's First Set of Interrogatories and Second Request for Production before 10:00 a.m. on Wednesday, June 8, 2005.

4. Longwood has neither objected to nor served any responses to Sanlando's First Set of Interrogatories or Second Request for Production.

5. The information sought by Sanlando is necessary to determine substantial issues raised by Longwood in this matter. Among these issues are whether Sanlando or Longwood has the right to serve the areas claimed by Longwood. Sanlando's discovery was directed specifically at those issues.

6. Sanlando requires responses to its First Set of Interrogatories and Second Request for Production in order to give it a fair and reasonable opportunity to assess the nature and extent of Longwood's claims to serve the same areas and to respond to Longwood's objections to the Application.

7. Longwood's delays in responding to Sanlando's First Set of Interrogatories and Second Request for Production has prevented Sanlando from investigating the reasons why Longwood claims the right to serve the same areas, and preparing appropriate or structuring reasonable alternatives, all to its detriment.

8. Sanlando has been prejudiced, and will continue to be prejudiced, in the pursuit of its Application unless Longwood is required to provide meaningful responses to Sanlando's First Set of Interrogatories and Second Request for Production.

9. Longwood's failure to respond to Sanlando's legitimate discovery is without justification and an award of Sanlando's expenses will promote justice and the purpose and

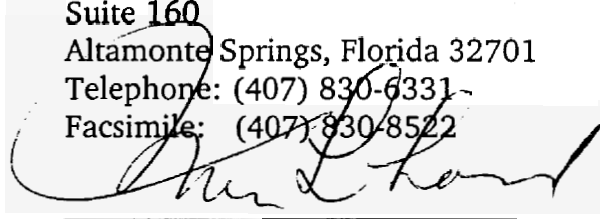
intention of Rule 1.380, Florida Rules of Civil Procedure. Pursuant to Rule 1.380(a)(4), Sanlando is entitled to an award of its expenses, including attorneys' fees, incurred in obtaining the Order Compelling Discovery.

WHEREFORE, SANLANDO UTILITIES CORPORATION respectfully requests that this Court grant this Motion for Order Compelling Discovery and, after hearing, require the City of Longwood to pay Sanlando its expenses, including attorneys' fees, incurred in obtaining the Order.

Respectfully submitted on this 9th day of June, 2005.

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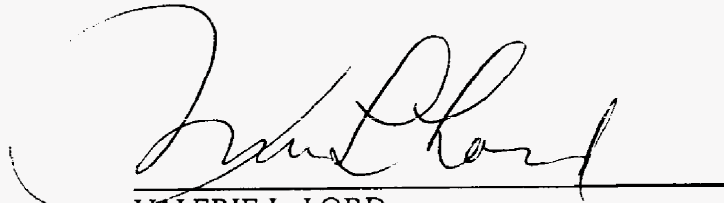
**CERTIFICATE OF SERVICE
DOCKET NO. 040384-WS**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Order Compelling Discovery has been furnished by Facsimile and U.S. Mail on the 9th day of June, 2005, to the following:

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