

ORIGINAL

MEMORANDUM

December 5, 2005

RECEIVED-FPSC

05 DEC -5 PM 3:27

COMMISSION  
CLERK

TO: DIVISION OF THE COMMISSION CLERK AND ADMINISTRATIVE SERVICES

FROM: OFFICE OF THE GENERAL COUNSEL (BRUBAKER) *JSB*

RE: DOCKET NO. 040384-WS - APPLICATION FOR AMENDMENT TO CERTIFICATES 247-W AND 189-S IN SEMINOLE COUNTY BY SANLANDO UTILITIES CORPORATION.

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Attached is a copy of Staff's first set of discovery to Sanlando Utilities Corporation and the City of Longwood sent to Pepe L. Gaibor to the address on file, 1383 Orange Ridge Road, Longwood, FL 32750, which has been returned by U.S. Mail (No such street). Staff will attempt to obtain the correct street address. Please file in the above-referenced docket.

DATE DOCUMENT SENT TO CCA 12/05/05

JSB/pz  
Attachment  
Pepe Gaibor - returned mail

- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- RCA \_\_\_\_\_
- SCR \_\_\_\_\_
- SGA \_\_\_\_\_
- SEC
- OTH \_\_\_\_\_

DOCUMENT NUMBER-DAT

11433 DEC-5 05

FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Application for amendment to Certificates 247-W and 189-S in Seminole County by Sanlando Utilities Corporation.     DOCKET NO. 040384-WS  
DATED: NOVEMBER 28, 2005

STAFF'S FIRST SET OF INTERROGATORIES TO  
SANLANDO UTILITIES CORPORATION (NOS. 1-10)

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, propounds the following interrogatories, pursuant to Rule 1.340, Florida Rules of Civil Procedure, to Sanlando Utilities Corporation (Sanlando). These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure, and within the time period set out in Order No. PSC-05-1001-PCO-WS. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Give the name, address, and relationship to Sanlando of those persons providing the answers to each of the following interrogatories.

If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided to the Commission through a Commission audit, please so state, indicating the date provided and the audit document/record request number.

DEFINITIONS

“You”, “your”, “Utility” or “Sanlando” refers to Sanlando Utilities Corporation, its employees and authorized agents.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

“Identify” means:

- (a) With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) to the Utility;
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

INTERROGATORIES

1. Please discuss whether any of the lots in the disputed area (i.e., the area in Seminole County to which the City of Longwood (City) is objecting in this docket and to which Seminole County objected) currently receive water and wastewater service through their own well and septic tank? If so, please identify how many lots have wells and septic tanks.

2. Please provide a timeline, and the steps involved including system upgrades and DEP permits that Sanlando would take or has taken to provide water service to the disputed area. Please include the size of water and wastewater lines that would serve the area, and advise as to the number of hydrants, if any, that would be installed.

STAFF'S FIRST SET OF INTERROGATORIES TO  
SANLANDO UTILITIES CORPORATION (NOS. 1-10)  
DOCKET NO. 040384-WS  
PAGE 4

3. Please provide the following information about Sanlando's wells:
  - A. The number of wells.
  - B. Size in inches of the well diameters.
  - C. The maximum capacity in gallons per minute (gpm) and gallons per day (gpd) of the water treatment system (please provide your calculations).
  - D. The existing peak hour and peak day water flows in gpm of the wells.
  - E. The remaining capacity of the water wells in gpm and gpd.
  - F. Please identify how much of the water plant capacity in gpm and gpd is currently reserved for future growth outside the disputed area.
  - G. Please discuss how much demand in gpm and gpd the customers in the disputed area will place on the water system (please show your calculations).
  - H. Please discuss whether Sanlando's water treatment plant provides fire flow.
  - I. The number and capacity of each high service pump.
  - J. The number and size of the hydropneumatic tank(s).
  - K. The size of the ground storage tank, if applicable.

STAFF'S FIRST SET OF INTERROGATORIES TO  
SANLANDO UTILITIES CORPORATION (NOS. 1-10)  
DOCKET NO. 040384-WS  
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4. Please provide the following information about Sanlando's wastewater treatment plant:
  - A. Type of wastewater treatment (example: extended air, contact stabilization).
  - B. Type of effluent disposal system used.
  - C. The capacity of the wastewater treatment plants, and the disposal system, according to your Department of Environmental Protection (DEP) operating permit.
  - D. The amount of wastewater capacity currently being used, based on the permitted capacity by DEP.
  - E. The amount of wastewater treatment capacity currently reserved for future growth outside the disputed area, based on the permitted capacity by DEP (please show your calculations).
  - F. The amount of wastewater treatment capacity the customers in the disputed area will place on the wastewater system, based on the permitted capacity by DEP (please show your calculations).

STAFF'S FIRST SET OF INTERROGATORIES TO  
SANLANDO UTILITIES CORPORATION (NOS. 1-10)  
DOCKET NO. 040384-WS  
PAGE 6

5. Please discuss the size of the water lines, wastewater collection system, and size of force main that are currently in place to serve the disputed area. Also, please discuss the proposed water lines, wastewater collection system, and size of force main that would be needed to provide service to the disputed area.

6. Please discuss whether Sanlando's water system that would serve the disputed area is in compliance with all its permit(s) from the DEP, Water Management District, and the EPA.

STAFF'S FIRST SET OF INTERROGATORIES TO  
SANLANDO UTILITIES CORPORATION (NOS. 1-10)  
DOCKET NO. 040384-WS  
PAGE 7

7. Please discuss whether Sanlando's wastewater system that would serve the disputed area is in compliance with all of its permit(s) from the DEP and the EPA.

8. Please provide the DEP identification numbers for Sanlando's water and wastewater plants that would serve the disputed area.



STAFF'S FIRST SET OF INTERROGATORIES TO  
SANLANDO UTILITIES CORPORATION (NOS. 1-10)  
DOCKET NO. 040384-WS  
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9. A portion of the total area which Sanlando is requesting to serve in Docket 040384-WS consists of territory which Sanlando is currently serving, but for which Sanlando is not currently certificated to serve, in apparent violation of Section 367.045, Florida Statutes. Please describe when and under what circumstances the utility began serving the customers not included in its authorized service territory, and any other circumstances which would mitigate the utility's apparent violation of Section 367.045, Florida Statutes.

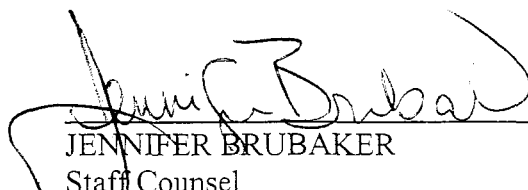
10. Please review the following charts on service availability charges and monthly water service charges, and either affirm that the rates and charges are correct for customers to be served in the **proposed** area, or else provide the correct rates and charges:

<b>Water Service Availability Charges for a 5/8" x 3/4" Meter</b>	
Description	Sanlando Utilities Corporation Water System <b>Water</b>
Main Extension Charge	\$ N/A
Meter Installation Charge	\$ 60.00
Customer Connection (Tap-in)	\$ N/A
Plant Capacity Charge	\$ 225.00
Other Charges	
<b>Total</b>	<b>\$ 285.00</b>

<b>Water Monthly Service Rates for a 5/8" x 3/4" Meter</b>	
	Sanlando Utilities Corporation <b>Water</b>
Base Facility Charge	4.15
Gallonage/1,000 gallons	\$.425
<b>Typical Bills:</b>	
0 gallons	\$4.15
5,000 gallons	\$6.28
10,000 gallons	\$8.40

<b>Wastewater Service Availability Charges for a 5/8" x 3/4" Meter</b>	
Description	Sanlando Utilities Corporation <b>Wastewater</b>
Main Extension Charge	\$ N/A
Meter Installation Charge	\$
Customer Connection (Tap-in)	\$ N/A
Plant Capacity Charge	\$ 225.00
Other Charges	
Total	\$ 225.00

<b>Wastewater Monthly Service Rates for a 5/8" x 3/4" Meter</b>	
	Sanlando Utilities Corporation <b>Water</b>
Base Facility Charge	11.12
Gallage/1,000 gallons	\$1.48
<b>Typical Bills:</b>	
0 gallons	\$11.12
5,000 gallons	\$18.52
10,000 gallons	\$25.62

  
 \_\_\_\_\_  
 JENNIFER BRUBAKER  
 Staff Counsel  
 FLORIDA PUBLIC SERVICE COMMISSION  
 2540 Shumard Oak Blvd.  
 Tallahassee, FL 32399-0850  
 (850) 413-6228

**AFFIDAVIT**

STATE OF FLORIDA)

COUNTY OF \_\_\_\_\_)

I hereby certify that on this \_\_\_\_\_ day of \_\_\_\_\_, 2005, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared \_\_\_\_\_, who is personally known to me, and he/she acknowledged before me that he/she provided the answers to interrogatory number(s) \_\_\_\_\_ from in Docket No. 040384-WS, and that the responses are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this \_\_\_\_\_ day of \_\_\_\_\_, 2005.

\_\_\_\_\_  
Notary Public  
State of Florida, at Large

My Commission Expires:  
\_\_\_\_\_

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Application for amendment to DOCKET NO. 040384-WS  
Certificates 247-W and 189-S in Seminole  
County by Sanlando Utilities Corporation. DATED: NOVEMBER 28, 2005

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one correct copy of STAFF'S FIRST SET OF INTERROGATORIES TO SANLANDO UTILITIES CORPORATION (NOS. 1-10) has been served by U. S. Mail and electronic mail to Martin S. Friedman, Esquire, and Valerie Lord, Esquire, Rose, Sundstrom & Bentley, LLP, 600 S. North Lake Blvd., Suite 160, Altamonte Springs, FL 32701, and that a true copy thereof has been furnished to the following by U. S. Mail this 28<sup>th</sup> day of November, 2005:

James M. Kinsella III  
228 Markham Woods Road  
Longwood, FL 32779

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

Thomas M. Artingstall  
1630 Overlook Road  
Longwood, FL 32750

Pepe L. Gaibor  
1383 Orange Ridge Road  
Longwood, FL 32750

City of Longwood  
Richard Taylor  
175 West Warren Avenue  
Longwood, FL 32750-4197

Sanlando Utilities Corporation  
Patrick C. Flynn  
200 Weathersfield Avenue  
Altamonte Springs, FL 32714-4027

  
JENNIFER BRUBAKER

Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION

2540 Shumard Oak Blvd.

Tallahassee, FL 32399-0850

(850) 413-6228

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Application for amendment to Certificates 247-W and 189-S in Seminole County by Sanlando Utilities Corporation. | DOCKET NO. 040384-WS  
| DATED: NOVEMBER 28, 2005

STAFF'S FIRST SET OF INTERROGATORIES TO THE  
CITY OF LONGWOOD (NOS. 1-14)

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, propounds the following interrogatories, pursuant to Rule 1.340, Florida Rules of Civil Procedure, to the City of Longwood (Longwood or City). These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure, and within the time period set out in Order No. PSC-05-1001-PCO-WS. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Give the name, address, and relationship to Longwood of those persons providing the answers to each of the following interrogatories.

DEFINITIONS

“You”, “your”, “City” or “Longwood” refers to City of Longwood, its employees and authorized agents.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

“Identify” means:

- (a) With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) to the City;
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

INTERROGATORIES

1. Please provide a metes and bounds description of the portions of Sanlando Utilities Corporation's (Sanlando) proposed amended water and wastewater territory as filed in Docket 040384-WS, of which the City objects to Sanlando serving ("disputed area"). Commission staff has included "Instructions for Preparation of Territory Description and Map" for your convenience.



2. Please provide the following information about the City's water treatment facilities:
  - A. The number of wells.
  - B. Size in inches of the well diameters.
  - C. The maximum capacity in gallons per minute (gpm) and gallons per day (gpd) of the water treatment system (please provide your calculations).
  - D. The existing peak hour and peak day water flows in gpm of the wells.
  - E. The remaining capacity of the water wells in gpm and gpd.
  - F. Please identify how much of the water plant capacity in gpm and gpd is currently reserved for future growth outside the disputed area?
  - G. Please describe how much of a demand in gpm and gpd will the customers in the disputed area place on the water system (please show your calculations).
  - H. Please describe whether the water treatment plant provides fire flow.
  - I. The number and capacity of each high service pump.
  - J. The number and size of the hydropneumatic tank(s).
  - K. The size of the ground storage tank, if applicable.

3. Please provide the following information about the City's wastewater treatment plant:
  - A. Type of wastewater treatment (Example: extended air, contact stabilization).
  - B. Type of effluent disposal system used.
  - C. The capacity of the wastewater treatment plants, and the disposal system, according to the City's Department of Environmental Protection (DEP) operating permit.
  - D. The amount of wastewater capacity currently being used, based on the permitted capacity by the DEP.
  - E. The amount of wastewater treatment capacity currently reserved for future growth outside the disputed area, based on the permitted capacity by the DEP (please show your calculations).
  - F. The amount of wastewater treatment capacity the customers in the disputed area will place on the wastewater system, based on the permitted capacity by the DEP (please show your calculations).

STAFF'S FIRST SET OF INTERROGATORIES TO  
THE CITY OF LONGWOOD (NOS. 1-14)  
DOCKET NO. 040384-WS  
PAGE 6

4. Please discuss the size of the water lines, wastewater collection system, and size of force main that are currently in place to serve the disputed area. Also, please discuss the proposed water lines, wastewater collection system, and size of force main that will be needed to provide service to the disputed area.

5. Please discuss or provide information with respect to the City's technical ability to serve the disputed area, including the qualification of its management, operation and maintenance staff.

STAFF'S FIRST SET OF INTERROGATORIES TO  
THE CITY OF LONGWOOD (NOS. 1-14)  
DOCKET NO. 040384-WS  
PAGE 7

6. Please provide a timeline and the steps involved including system upgrades and DEP permits that the City would take to provide water service to the disputed area. Please include the size of water and wastewater lines that would serve the area, and the number of fire hydrants, if any, that would be installed.

7. Please discuss whether the City intends to provide fire protection in the disputed area.

STAFF'S FIRST SET OF INTERROGATORIES TO  
THE CITY OF LONGWOOD (NOS. 1-14)  
DOCKET NO. 040384-WS  
PAGE 8

8. Please provide a timeline and the steps involved including system upgrades and DEP permits that the City would take to provide wastewater service to the disputed area.

9. Please discuss whether the City's water system that would serve the disputed area is in compliance with all its permit(s) from the DEP, Water Management District, and the EPA.

STAFF'S FIRST SET OF INTERROGATORIES TO  
THE CITY OF LONGWOOD (NOS. 1-14)  
DOCKET NO. 040384-WS  
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10. Please discuss whether the City's wastewater system that would serve the disputed area is in compliance with all its permit(s) from the DEP and the EPA.

11. Please identify the DEP identification numbers for the City's water and wastewater treatment plants that would serve the disputed area.

STAFF'S FIRST SET OF INTERROGATORIES TO  
THE CITY OF LONGWOOD (NOS. 1-14)  
DOCKET NO. 040384-WS  
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12. Please provide detailed costs estimates for the City to extend water and wastewater service to the disputed area (show the number of units and cost for each unit in the details).

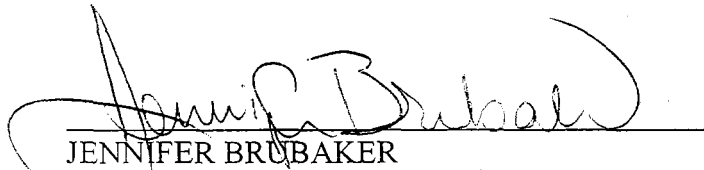
13. Please discuss whether existing Sanlando customers would be required to pay service availability charges, impact fees, or other fees or charges to the City in order to obtain service from the City for water or wastewater, if the City were to extend service to the disputed area.

14. Please complete the following charts on service availability charges and monthly water service charges for customers to be served in the proposed area. If the City has different rates, please indicate which rates would apply to each area that is being protested.

<b>Service Availability Charges            for a 5/8" x 3/4" Meter</b>		
Description	City of Longwood Water	City of Longwood Wastewater
Plant Capacity Charge		
Main Extension Charge		
Meter Installation Charge		
Water - Service Installation Charge per connection		
Wastewater - Service Installation Charge per connection		
Other Charges		
Other Charges		
Totals		



<u>Water Monthly Service Rates</u> for a 5/8" x 3/4" Meter		
	City of Longwood Water	City of Longwood Wastewater
<b>Base Facility Charge</b>		
<b>Gallonge Charge per 1,000 gallons:</b>		
Other Charges		
Other Charges		
<b>Typical Bills:</b>		
0 gallons		
5,000 gallons		
10,000 gallons		

  
 \_\_\_\_\_  
 JENNIFER BRUBAKER  
 Staff Counsel  
 FLORIDA PUBLIC SERVICE COMMISSION  
 2540 Shumard Oak Blvd.  
 Tallahassee, FL 32399-0850  
 (850) 413-6228

**AFFIDAVIT**

STATE OF FLORIDA)

COUNTY OF \_\_\_\_\_)

I hereby certify that on this \_\_\_\_\_ day of \_\_\_\_\_, 2005, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared \_\_\_\_\_, who is personally known to me, and he/she acknowledged before me that he/she provided the answers to interrogatory number(s) \_\_\_\_\_ from in Docket No. 040384-WS, and that the responses are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this \_\_\_\_\_ day of \_\_\_\_\_, 2005.

\_\_\_\_\_  
Notary Public  
State of Florida, at Large

My Commission Expires:  
\_\_\_\_\_

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Application for amendment to DOCKET NO. 040384-WS  
Certificates 247-W and 189-S in Seminole  
County by Sanlando Utilities Corporation. DATED: NOVEMBER 28, 2005

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one correct copy of STAFF'S FIRST SET OF INTERROGATORIES TO THE CITY OF LONGWOOD (NOS. 1-14) has been served by U. S. Mail and electronic mail to Richard Taylor, City of Longwood, 175 West Warren Avenue, Longwood, FL 32750-4197, and that a true copy thereof has been furnished to the following by U. S. Mail this 28<sup>th</sup> day of November, 2005:

Mr. James M. Kinsella III  
228 Markham Woods Road  
Longwood, FL 32779

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

Mr. Thomas M. Artingstall  
1630 Overlook Road  
Longwood, FL 32750

Pepe L. Gaibor  
1383 Orange Ridge Road  
Longwood, FL 32750

Rose, Sundstrom & Bentley, LLP  
Martin S. Friedman/Valerie Lord  
600 S. North Lake Blvd., Suite 160  
Altamonte Springs, FL 32701

Sanlando Utilities Corporation  
Patrick C. Flynn  
200 Weathersfield Avenue  
Altamonte Springs, FL 32714-4027



JENNIFER BRUBAKER

Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION  
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Tallahassee, FL 32399-0850  
(850) 413-6228

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Application for amendment to Certificates 247-W and 189-S in Seminole County by Sanlando Utilities Corporation. | DOCKET NO. 040384-WS  
| DATED: NOVEMBER 28, 2005

STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO  
THE CITY OF LONGWOOD (NOS. 1-16)

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, the Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby serves the following Request for Production of Documents upon City of Longwood (Longwood or City).

Please produce the following documents at the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, with the answers being served as provided by the Rules of Civil Procedure, and within the time period set out in Order No. PSC-05-1001-PCO-WS after service of this request for the purpose of inspection and copying.

DEFINITIONS

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice, handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet or data processing card, computer printout, or any other written, recorded, transcribed, filed or graphic matter, however produced or reproduced.

As used herein, "disputed area" refers to that portion(s) of the territory requested in Sanlando Utilities Corporation (Sanlando) Application for amendment to Certificates 247-W and 189-S in Docket 040384-WS, which the City contends should not be granted to Sanlando by the Florida Public Service Commission pursuant to Section 367.045, Florida Statutes.


DOCUMENTS REQUESTED

1. Please provide a copy of a system map(s) for the City of Longwood with the current water line(s) and the proposed water lines to the disputed area plotted thereon. Please identify all fire hydrants, label the size in inches of all water lines and other proposed distribution items such as fire hydrants, if any. Please superimpose the Section(s), Township(s) and Range(s) on these map(s).
2. Please provide a copy of a system map(s) for the City with the current wastewater line(s) and the proposed wastewater lines to the disputed area plotted thereon. Please label the size in inches of all wastewater collection lines, force mains and other proposed collection items such as manholes and lift stations. Please superimpose the Section(s), Township(s) and Range(s) on these map(s).
3. Please provide detailed drawings of the City's water treatment systems that would provide service to the disputed area. If service to the disputed area will be provided through a bulk service arrangement, please provide a copy of the bulk service agreement.
4. Please provide detailed drawings of City's wastewater treatment systems that would provide service to the disputed area. If service to the disputed area will be provided through a bulk service arrangement, please provide a copy of the bulk service agreement.

STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO  
THE CITY OF LONGWOOD (NOS. 1-16)  
DOCKET NO. 040384-WS  
PAGE 3

5. Please provide a copy of the most recent 12 months of the Department of Environmental Protection's (DEP) monthly operating reports for the City's water system.
6. Please provide a copy of the most recent 12 months of the DEP monthly Discharge Monitoring Report reports for the City's wastewater system.
7. Please provide any past DEP notices of violation, corrective orders or letters for the City's water and wastewater systems in the last 5 years.
8. Please provide a copy of the current City wastewater treatment plant operating permits issued by DEP.
9. Please provide a copy of any current water and wastewater tariffs, policies, manuals or ordinances that detail the City's water and wastewater policy for new and existing connections.
10. Please provide a copy of any feasibility studies, engineering calculations, plans, or maps regarding provision of water and wastewater service to the disputed area. Please superimpose the map over the disputed area labeling the Section(s), Township(s) and Range(s) on these map(s)
11. Please provide copies of any agreement(s) that the City and Sanlando and/or any other party have drafted or executed with respect to any portion of the disputed area.

12. Please provide any written correspondence or other documentation which relates or refers any agreement produced in conjunction with Production Request Number 11, above.
13. Please provide a copy of the City's Consumptive Use Permit (CUP).
14. Please provide any developer agreements, letters or correspondence from residents or developers who have inquired about or requested service in the disputed area.
15. Please provide a current income statement for the City (or other appropriate documentation which reflects the City's financial viability).
16. Please provide a current balance sheet statement for the City (or other appropriate documentation which reflects the City of Longwood's financial viability).



JENNIFER BRUBAKER  
Staff Counsel  
FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
(850) 413-6228

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Application for amendment to DOCKET NO. 040384-WS  
Certificates 247-W and 189-S in Seminole  
County by Sanlando Utilities Corporation. DATED: NOVEMBER 28, 2005

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one correct copy of STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO THE CITY OF LONGWOOD (NOS. 1-16) has been served by U. S. Mail and electronic mail to Richard Taylor, City of Longwood, 175 West Warren Avenue, Longwood, FL 32750-4197, and that a true copy thereof has been furnished to the following by U. S. Mail this 28<sup>th</sup> day of November, 2005:

James M. Kinsella III  
228 Markham Woods Road  
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Seminole County  
J. Kevin Grace, County Manager  
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Altamonte Springs, FL 32701

Sanlando Utilities Corporation  
Patrick C. Flynn  
200 Weathersfield Avenue  
Altamonte Springs, FL 32714-4027



JENNIFER BRUBAKER

Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION

2540 Shumard Oak Blvd.

Tallahassee, FL 32399-0850

(850) 413-6228



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In re: Application for amendment to Certificates 247-W and 189-S in Seminole County by Sanlando Utilities Corporation. | DOCKET NO. 040384-WS  
| DATED: NOVEMBER 28, 2005

STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO  
SANLANDO UTILITIES CORPORATION (NOS. 1-14)

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, the Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby serves the following Request for Production of Documents upon Sanlando Utilities Corporation (Sanlando).

Please produce the following documents at the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, with the answers being served as provided by the Rules of Civil Procedure, and within the time period set out in Order No. PSC-05-1001-PCO-WS after service of this request for the purpose of inspection and copying.

DEFINITIONS

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice, handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet or data processing card, computer printout, or any other written, recorded, transcribed, filed or graphic matter, however produced or reproduced.

As used herein, "disputed area" refers to that portion(s) of the territory requested in Sanlando's Application for amendment to Certificates 247-W and 189-S in Docket 040384-WS, which the City of Longwood (City) and Seminole County (County) contend should not be

granted to Sanlando by the Florida Public Service Commission pursuant to Section 367.045, Florida Statutes.

DOCUMENTS REQUESTED

1. Please provide a copy of a system map(s) for the Sanlando with the current water line(s) and the proposed water lines plotted thereon that includes the proposed agreement with Seminole County. Please identify all fire hydrants, and label the size in inches of all water lines, and other proposed distribution items such as fire hydrants, if any. Please superimpose Section 36, Township 20 and Range 29 East on these map(s).
2. Please provide a copy of a system map(s) for the Sanlando with the current wastewater line(s) and the proposed wastewater lines plotted thereon that includes the proposed agreement with Seminole County. Please label the size in inches of all wastewater collection lines, force mains, and other proposed collection items such as manholes and lift stations. Please superimpose Section 36, Township 20 and Range 29 East on these map(s).
3. Please provide a territory description of the proposed additions and deletions to the water and wastewater territory description, along with the proposed composite water and wastewater territory descriptions, which Sanlando has requested in Docket 040384-WS.
4. Please provide detailed drawings of Sanlando's water treatment systems that would provide service to the disputed area.

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5. Please provide detailed drawings of Sanlando's wastewater treatment systems that would provide service to the disputed area.
6. Please provide a copy of the most recent 12 months of the Department of Environmental Protection's (DEP) monthly operating reports for Sanlando's water system.
7. Please provide a copy of the most recent 12 months of DEP's monthly Discharge Monitoring Report reports for Sanlando's wastewater system.
8. Please provide any past DEP notices of violation, corrective orders or letters for Sanlando's water and wastewater systems in the last 5 years.
9. Please provide a copy of the current Sanlando wastewater treatment plant operating permits issued by DEP.
10. Please provide copies of any feasibility studies, engineering calculations, plans, or maps which discuss or were developed regarding provision of water and wastewater service to residents in the disputed area, but to whom Sanlando will not ultimately provide service. Please superimpose the map over the disputed area labeling the Section(s), Township(s) and Range(s) on these map(s)

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11. Please provide copies of any agreement(s) that Sanlando and the City and/or any other party have drafted or executed with respect to any portion of the disputed area.
  
12. Please provide any written correspondence or other documentation which relates or refers any agreement produced in conjunction with Production Request Number 11, above.
  
13. Please provide a copy of Sanlando's Consumptive Use Permit (CUP).
  
14. Please provide any developer agreements, letters, or correspondence from residents or developers who have inquired or requested service in past or recently in the disputed area (Township 20 South, Range 29 East and Section 36).



JENNIFER BRUBAKER  
Staff Counsel  
FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
(850) 413-6228

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Application for amendment to DOCKET NO. 040384-WS  
Certificates 247-W and 189-S in Seminole  
County by Sanlando Utilities Corporation. DATED: NOVEMBER 28, 2005

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one correct copy of STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO SANLANDO UTILITIES CORPORATION (NOS. 1-14) has been served by U. S. Mail and electronic mail to Martin S. Friedman, Esquire, and Valerie Lord, Esquire, Rose, Sundstrom & Bentley, LLP, 600 S. North Lake Blvd., Suite 160, Altamonte Springs, FL 32701, and that a true copy thereof has been furnished to the following by U. S. Mail this 28<sup>th</sup> day of November, 2005:

James M. Kinsella III  
228 Markham Woods Road  
Longwood, FL 32779

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

Thomas M. Artingstall  
1630 Overlook Road  
Longwood, FL 32750

Pepe L. Gaibor  
1383 Orange Ridge Road  
Longwood, FL 32750


City of Longwood  
Richard Taylor  
175 West Warren Avenue  
Longwood, FL 32750-4197

Sanlando Utilities Corporation  
Patrick C. Flynn  
200 Weathersfield Avenue  
Altamonte Springs, FL 32714-4027



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Pepe L. Gaibor  
1383 Orange Ridge Road  
Longwood, FL 32750

 R1 8  
Carr. Inq.  
Date

Not Delivered As Addressed

Unable To Forward

Insufficient Address

Moved, Left No Address

Unclaimed  Refused

Attempted - Not Known

No Such Street  Number

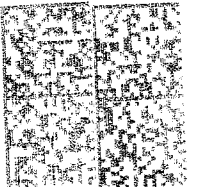
Vacant  Illegible

No Mail Recipients

Box Closed - No Order

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