



ORIGINAL

City of Longwood

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February 6, 2006

RECEIVED FPSC
06 FEB - 8 AM 10:09
COMMISSION
CLERK

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

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

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket is the original City of Longwood's
Request to Produce to Sanlando Utilities Corporation and City of Longwood's Notice of
Serving Interrogatories to Sanlando Utilities Corporation.

Should you have any questions regarding this filing, please do not hesitate to contact

CMP _____me.

COM _____

CTR _____

ECR _____

GCL _____

OPC _____

RCA _____ RST/ps

SCR _____ Enclosures

SGA _____ cc: Jennifer Brubaker, Esquire (with enclosures)

SEC | _____ Valerie Lord, Esquire (with enclosures)

OTH _____

Sincerely,

Richard S. Taylor, Jr.

DISTRIBUTION CENTER
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DOCUMENT NUMBER - DATE

01089 FEB - 8 2006

FPSC-COMMISSION CLERK

City Mission:

"Enhancing the Quality of Life for Our Citizens"

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO.: 040384-WS

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

REQUEST TO PRODUCE TO SANLANDO UTILITIES CORPORATION

Pursuant to Florida Rule of Civil Procedure 1.350, you, the above-named party (hereinafter referred to as "you" or "your") are hereby instructed to produce the following items for inspection and copying. Production shall be made within thirty (30) days from the date of service, at the law offices of Richard S. Taylor, Jr., 531 Dog Track Road, Longwood, Florida 32750. Please read carefully the "Instructions" which follow:

INSTRUCTIONS

1. Any documents and things described herein which are in your possession, custody or control shall be produced as herein directed. Any described document or thing which is not in your immediate physical possession, but in regard to which you have a right to compel production from a third person or which is otherwise subject to your control, shall
CMP _____
COM _____ be obtained and produced as directed.
CTR _____

2. Every document for which production is sought shall be produced in and with
ECR _____
GCL _____ the original file folder and other movable documents container (e.g., envelope, file cabinet
OPC _____
RCA _____ market, etc.) in which such documents are located when this document request was served.

3. Documents responsive to this document request shall be produced in the

SCR _____
SGA _____
SEC _____
OTH _____

DOCUMENT NUMBER-DATE

01089 FEB-88

condition and order of arrangement in which they existed when this document request was served and shall not be shuffled or otherwise rearranged when produced.

4. Documents attached to other documents or materials shall not be separated unless sufficient records are kept to permit reconstruction of the grouping.

TIME AND PLACE OF PRODUCTION

All items requested herein shall be produced within thirty (30) days from the date of service, at the office of Richard S. Taylor, Jr., Esquire, 531 Dog Track Road, Longwood, Florida 32750, for the purpose of inspecting and copying said items.

PRIVILEGE

If you maintain that a claim of privilege exists as to any of the discovery requests contained herein, you are instructed to fully and completely identify the specific privilege which you are asserting.

Each document, in whole or in part, which you fail to decline to produce because of an assertion that it is privileged or that it is "work product" shall be labeled as "privileged", placed in a sealed envelope or container and preserved for an in camera inspection by the Court to determine the validity of the claim of privilege.

AMBIGUITIES

If you allege that any request for discovery contained herein is, in any manner, ambiguous, you are instructed to describe in detail the reasons for your allegations that the request is ambiguous including, but not limited to, each interpretation which you allege the specific request for discovery is subject to. Further, you are instructed to respond, to the best

of your ability, to the discovery request(s) as to each interpretation which you allege may be given to the discovery request question.

OBJECTIONS

If you object to any of the discovery requests contained herein, you are instructed to identify, with specificity, the specific procedural rule(s) or substantive law(s) upon which you base your objection.

You are requested to produce the original versions, and all drafts or copies thereof or true and correct copies thereof if the originals cannot be located, of the following items:

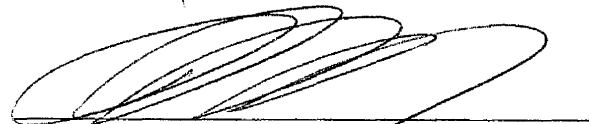
1. All monthly operating reports covering water and wastewater operations for 2004 through the present for all of the water and wastewater plants owned, operated or utilized by Sanlando in connection with the provision of water and wastewater service to customers.
2. All water and wastewater permits 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 Sanlando in connection with the provision of water and wastewater service to customers in the Application area.
3. All notices of violation, notices of non-compliance, 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 Sanlando in connection with

the provision of water and wastewater service to customers.

4. All documents relating to the qualifications of any non-expert witness whom you expect to call or may call at the hearing of this application, and the subject matter about which he or she is expected to or may testify.
5. All deeds, contracts, instruments and other documents by which Sanlando claims the right to provide water and wastewater services to the area described in the Application.
6. All surveys of the land described in Sanlando's response to Interrogatory No. 2.
7. All documents on which Sanlando has relied in responding to Interrogatory No. 4.
8. All documents relating to the subject matter about which each of Sanlando's non-expert witnesses identified in response to Interrogatory No. 3 is expected to or may testify.
9. All documents relating to the subject matter about which each of Sanlando's expert witnesses identified in response to Interrogatory No. 3 is expected to or may testify.
10. All water and wastewater systems analyses, reports, and other evaluations of any kind performed between 1998 and the present for all of the water and wastewater plants owned, operated or utilized by Sanlando in connection with the provision of water and wastewater service.

11. All engineering plans for any water and wastewater facilities to be constructed to provide service to the customers in the areas of Sanlando Application which are also included in the service area described by the Applicant and included in the Application.
12. Sanlando's current schedules of rates, fees and charges to customers to water and wastewater service.
13. All documents reflecting the inspection and/or servicing of fire hydrants in the Application area.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail and FAX delivery to: Valerie L. Lord, Esquire, Rose, Sundstrom & Bentley, LLP, Sanlando Center, 2180 West State Road 434, Suite 2118, Longwood, FL 32779 and Jennifer Brubaker, Esquire, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 this 6th day of February, 2006.



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Telephone: (407) 339-7888
Attorney for City of Longwood