

**ORIGINAL**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

COMMISSION  
CLERK

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

Docket No. 040384-WS

AMENDED NOTICE OF TAKING DEPOSITION DUCES TECUM

PLEASE TAKE NOTICE that on Tuesday, the 25<sup>th</sup> day of April, 2006, at 10:00 a.m., the undersigned counsel will take the deposition of RICHARD KORNBLUH, upon oral examination, at the offices of Richard S. Taylor, Esquire, 531 Dog Track Road, Longwood, FL 32752-1117, in accordance with the Florida Rules of Civil Procedure.

The deposition will be conducted before a duly designated representative of Seminole Reporting, or some other notary public authorized by law to take depositions in the State of Florida, for the purpose of discovery, for use a trial, or for such other purposes are permitted under the Florida Rules of Civil Procedure, Florida Administrative Code, and Florida Statutes.

This deposition will continue from day to day until completed.

The matters on which examination is requested are:

→ The circumstances and facts surrounding the decision by the City of Longwood to request bulk wastewater service for the customers in the Sleepy Hollow, Windsor Manor, Devonshire and Moorings subdivisions ("Disputed Area").

→ The technical and financial ability of the City of Longwood to provide water and wastewater service to customers in the Disputed Area during the period August 30, 2001 to December 31, 2001.

→ The City of Longwood's technical and financial ability to provide water and wastewater service to customers in the Disputed Area, as of January 1, 2006.

- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR   1
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- RCA \_\_\_\_\_
- SCR \_\_\_\_\_
- SGA \_\_\_\_\_
- SEC   1
- OTH \_\_\_\_\_

- The City's existing water and wastewater rates, fees and charges and the rates, fees and charges that the City of Longwood proposes to charge to its customers after the integration of the customers in the Disputed Area.
- The effect, if any, on the City's rates by the integration of the customers in the Disputed Area into the City's existing system.
- The estimated cost of integrating the customers in the Disputed Area into the City's existing system.
- How the cost of integrating the customers in the Disputed Area into the City's existing system will be borne and who will bear them.
- The City's estimates, as of 2006, of the cost of constructing the facilities necessary to maintain adequate hydraulic capacity and operational capability to enable Sanlando to maintain the current level of water, wastewater and fire service to its customers after disconnection of the customers in the Disputed Area.
- How the remaining customers of Sanlando will be provided with continuous and uninterrupted water and wastewater service should water and wastewater service to the customers in the Disputed Area be transferred from Sanlando's facilities to the City's facilities.
- The decision by the City of Longwood to object to Sanlando's Application at this time, rather than at any previous time.
- The capacity of the City of Longwood's water and wastewater treatment plants, and the disposal system, according to its Department of Environmental Protection (DEP) Operating permit.
- The amount of water and wastewater capacity currently being used, based on the permitted capacity by DEP.
- The amount of water and wastewater treatment capacity currently reserved for future growth outside of the Disputed Area, based on the permitted capacity by DEP.
- The amount of wastewater treatment capacity the customers in the Disputed Area will place on the City of Longwood's water and wastewater system, based on the permitted capacity by DEP.
- The size and capacity of the City of Longwood's water transmission system, wastewater collection system, and size of force mains that are currently in

place to serve the Disputed Area.


- The size, location and capacity of any proposed water lines and wastewater collection system, and size of force main that would be needed to provide service to the Disputed Area.
- The City of Longwood's record of compliance with all permit(s) from the DEP, Water Management District, and the EPA.
- The DEP identification numbers for the City of Longwood's water and wastewater systems and plants that would serve the Disputed Area.
- The City of Longwood's experience in operating water and wastewater facilities.
- Any other matter which have been the subject of discovery by the Commission Staff and Sanlando.

The witness shall bring with him and produce at his deposition all items listed on Exhibit "A" attached hereto.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Respectfully submitted this 28<sup>th</sup> day of February, 2006, by:

ROSE, SUNDSTROM & BENTLEY, LLP  
Sanlando Center  
2180 W. State Road 434, Suite 2118  
Longwood, Florida 32779  
(407) 830-6331  
(407) 830-8522 Fax

By: 

MARTIN S. FRIEDMAN  
VALERIE L. LORD  
For the Firm


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished  
by U.S. Mail on this 28<sup>th</sup> day of February, 2006, to:

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

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

Susan Dietrich, Assistant County Attorney  
Seminole County, Florida  
1101 East First Street  
Sanford, FL 32771-1468

By:   
MARTIN S. FRIEDMAN  
VALERIE L. LORD

cc: Seminole Reporting (via facsimile)

## EXHIBIT "A"

1. Any and all letters, writings, memoranda, or similar or analogous documentation that the City of Longwood reviewed, relied upon, or referenced in relation to the matters which will be examined at this deposition.
2. Any and all letters, writings, memoranda, or similar or analogous documentation that the City of Longwood reviewed, relied upon, or referenced in its position in this case.
3. Any and all letters, writings, memoranda, or similar or analogous documentation that the City of Longwood reviewed, relied upon, or referenced in relation to the matters on which the City of Longwood will testify at the hearing.