

ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition for recovery of intrastate costs and expenses relating to repair, restoration and replacement of facilities damaged by Hurricane Dennis, by GTC, Inc. d/b/a GT Com.

DOCKET NO. 060300-TL

DATED: June 21, 2006

**GT COM'S OBJECTIONS AND RESPONSES TO STAFF'S SECOND SET OF INTERROGATORIES (NOS. 29 - 42)**

GTC, Inc. d/b/a GT Com ("GT Com") by and through its undersigned counsel, hereby serves its Objections and Responses to Staff's Second Set of Interrogatories to GTC, Inc. d/b/a GT Com (Nos. 29-42).

**OBJECTIONS**

GT Com objects to each interrogatory to the extent that it requests budgets, budgeted expenses or revenues, budget variances, financial statements, revenues, net operating income or loss, cost of capital, depreciation status, incremental costs or any information not specified in §364.051(4)(b), Florida Statutes. Such information is not relevant to GT Com's request for cost recovery under §364.051(b)(4), Florida Statutes, nor is it reasonably calculated to lead to the discovery of admissible evidence.

Section 364.051(4)(b), Florida Statutes, permits recovery of "intrastate costs and expenses relating to repairing, restoring, or replacing the lines, plants, or facilities damaged by a

CMP \_\_\_\_\_ named tropical system." Recovery is conditioned upon verification of the Company's costs and  
COM \_\_\_\_\_  
CTR \_\_\_\_\_ a determination that those costs are reasonable under the circumstances for the particular storm.  
ECR \_\_\_\_\_ The statute does not in any way predicate recovery of costs upon (or define recoverable costs in  
GCL ★ \_\_\_\_\_ terms of or with reference to) budgets, budgeted expenses or revenues, budget variances,  
OPC \_\_\_\_\_  
RCA \_\_\_\_\_ financial statements, revenues, net operating income or loss, cost of capital, depreciation status,  
SCR \_\_\_\_\_ incremental costs or any information not specified in §364.051(4)(b), Florida Statutes. In

SGA \_\_\_\_\_  
SEC 1 (pgs)  
OTH 1-2

*★ Pages 3-7 and affidavit detached and forwarded to GCL.*

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addition, GT Com is a price-regulated small local exchange company. GT Com's rates for basic local telecommunications services are not based on traditional rate base, rate of return regulation or oversight of GT Com's revenues and expenses. GT Com therefore objects to each interrogatory to the extent that it requests such information because such information is not relevant to GT Com's request for cost recovery under §364.051(b)(4), Florida Statutes, nor is it reasonably calculated to lead to the discovery of admissible evidence.

The Commission must decide this case on an expedited basis under §364.051(4)(b), Florida Statutes. Accordingly, in an effort to be responsive and to allow timely preparation for hearing under the expedited procedural schedule in this case, GT Com will respond to Staff's interrogatories subject to and without waiver of any objection the Company raises or may raise, or positions the Company may or could take, regarding the relevance, admissibility, or use of any responsive information contained herein at the final hearing or otherwise in this proceeding. GT Com fully intends to object to any attempt by any person, party or entity to introduce into evidence in this proceeding or otherwise bring before the Commission for consideration any documents or information that relate to matters irrelevant to this proceeding, including but not limited to those listed herein.

Subject to and without waiving objections as set forth above, GT Com responds to staff's interrogatories as follows: