

TALLAHASSEE  
Suite 200  
1500 Mahan Drive  
Tallahassee, Florida 32308  
(850) 224-4070 Tel  
(850) 224-4073 Fax

Nabors  
Giblin &  
Nickerson P.A.  
ATTORNEYS AT LAW

TAMPA  
The Pointe, Suite 1060  
2502 Rocky Point Drive  
Tampa, Florida 33607  
(813) 281-2222 Tel  
(813) 281-0129 Fax

August 15, 2006

By Hand Delivery

Ms. Blanca S. Bayo, Director  
Division of Commission Clerk  
And Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. 030458-WU: Amended And Restated Application For Transfer Of  
Majority Organizational Control And Amendment To Certificate

Dear Ms. Bayo:

Transmitted herewith is an original and six copies of the interrogatories in support of the request of Holiday Waterworks Corporation for an amendment of its Certificate of Authority.

Please acknowledge receipt of this testimony by date-stamping the enclosed copy of this letter and returning it to the person filing this information.

Thank you for your assistance in connection with this matter.

Very truly yours,



Brian P. Armstrong

cc: Joseph Richards, Esq. by FedEx

DOCUMENT NUMBER-DATE

07347 AUG 16 06

FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Application for transfer of majority organizational control of Holiday Utility Company, Inc. in Pasco County to Holiday Waterworks Corporation and amendment of Certificate No. 224-W

DOCKET NO. 030458-WU  
ORDER NO. PSC-06-0198-PCO-WU  
ISSUED: MARCH 13, 2006

**FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS TO HOLIDAY UTILITY COMPANY, INC.**

PASCO COUNTY, a political subdivision of the State of Florida, by and through its undersigned attorney, hereby requests that Holiday Utility Company, Inc. produce all of the following items within thirty (30) days after service of this Request at the office of the undersigned attorney:

**DEFINITIONS**

As used throughout this First Request for Production (these "**Requests**"), the following terms will have the following corresponding meanings:

1. The terms "**Holiday Utility Company, Inc.**" and "**You**" will mean Holiday Utility Company, Inc., and will include your present or former officers, directors, owners, employees and agents when referring to actions taken by you.
2. The term "**your**" will mean pertaining or belonging to you.
3. The term "**document**" refers to and will include, without limitation and in the singular as well as in the plural, any handwritten, sketched, painted, drawn, traced, illustrated, typed, printed, recorded, graphical, electronic, digital, analog, optical, and/or other depiction, delineation, portrayal, reflection, projection, description, reproduction, representation or presentation of information of any kind whatsoever, however created, depicted or stored (e.g., on computer, disk, diskette, CD, CDROM, DVD, tape, Zip<sup>®</sup>, Jaz<sup>®</sup>, hard, network or other drive; and/or by photographic, mechanical, digital, optical, electronic, or any other means), of any type or description, including all drafts, originals, identical and non-identical copies (in whole or in part), and includes, without limitation: all memoranda, letters, postcards, facsimile messages, telex messages, telegrams, intra-office and interoffice communications, electronic mail, correspondence, notes, pamphlets, diaries, records of every kind, tapes and other sound recordings, transcripts, contracts, agreements, books, reports, catalogs, financial statements, books of account, journals, ledgers, data processing cards, other data processing materials, data sheets, photographs, photostats, microfilm, videotapes, maps, directives, bulletins,

circulars, notices, messages, tabulations, economic or statistical studies, surveys, statements, summaries, opinions, analyses, evaluations, diaries, lists, polls, transcripts, minutes, agendas, instructions, requests, cancelled checks, calendars, desk pads, appointment books, scrapbooks, notebooks, specifications, drawings, diagrams, sketches and writings, documents, and evidences of other Communications of every kind and character. This request includes any meta-data related to a Document.


4. All other words not specifically defined herein will have the meaning given to them in the Pasco County Land Development Code, Pasco County Code of Ordinances, or if not defined therein, such meaning as common usage would prescribe

### REQUESTS

1. Please provide documentation showing the parcel identification number, owner name and address of all property owned by the Bartley L. Mickler Estate ("Mickler Estate") or any entities owned or controlled by the Mickler Estate or the family of Bartley L. Mickler located within the requested service territory.
2. Please provide documentation including but not limited to correspondence with the Southwest Florida Water Management District, the City of Tarpon Springs or other entities, relating to your efforts to plan for or secure additional sources or supplies of water needed to serve the requested service territory or your current service area.

### Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Service of Interrogatories was served via regular U.S. Mail upon Holiday Utility Company, Inc., c/o Brian Armstrong, Esquire, Nabors, Giblin & Nickerson, The Pointe, Suite 1060, 2502 Rocky Point Drive, Tampa, FL 33607 this 19 day of May, 2006.

  
\_\_\_\_\_  
Joseph D. Richards  
Assistant County Attorney  
Florida Bar No.: 0777404  
Office of the County Attorney  
West Pasco Government Center  
7530 Little Road, Suite 340  
New Port Richey, FL 34654  
Telephone: (727) 847-8120  
Facsimile: (727) 847-8021  
Attorney for Pasco County, Florida

1. Please provide documentation showing the parcel identification number, owner name and address of all property owned by the Bartley L. Mickler Estate ("Mickler Estate") or any entities owned or controlled by the Mickler Estate or the family of Bartley L. Mickler located within the requested service territory.

Response. See copy of search results, attached, from Pasco County Property Appraiser's Office.

2. Please provide documentation including but not limited to correspondence with the Southwest Florida Water Management District, the City of Tarpon Springs or other entities, relating to your efforts to plan for or secure additional sources or supplies of water needed to serve the requested service territory or your current service area.

Response. The requested documents are available at applicant's office in Port Richey.

Welcome : Records Search : Name Search

**Search Results**

Showing Records 1 thru 19 of 19

Map	Parcel	Name *	Address
X	25-26-15-0010-02900-0000	MICKLER B L	(No Physical Address) 3130 SHIPWATCH DR
X	25-26-15-0010-03000-0000	MICKLER B L	(No Physical Address) 3130 SHIPWATCH DR
X	35-26-15-0020-00100-0011	MICKLER B L	(No Physical Address) 3130 SHIPWATCH DR
X	26-26-15-0010-00100-0011	MICKLER B L	(No Physical Address) 3130 SHIPWATCH DR
X	26-26-15-0010-00900-0000	MICKLER B L	(No Physical Address) 3130 SHIPWATCH DR
X	19-26-16-0010-05700-0000	MICKLER B L	(No Physical Address) 3130 SHIPWATCH DR
X	23-26-15-0000-00200-0000	MICKLER B L EST OF MICKLER MELODY PER REP	(No Physical Address) 3130 SHIPWATCH DR
X	34-26-15-0000-00300-0010	MICKLER B L ESTATE OF MICKLER MELODY PERSONAL REP	1335 CALVARY RD
X	34-26-15-0000-00300-0010	MICKLER B L ESTATE OF MICKLER MELODY PERSONAL REP	1413 CALVARY RD
X	36-26-15-0010-05500-0000	MICKLER BART L	(No Physical Address) 3130 SHIPWATCH DR
X	30-26-16-0010-02300-0000	MICKLER BART LELAND	(No Physical Address) 3130 SHIPWATCH DR
X	25-26-15-0000-00100-0000	MICKLER BARTLEY REVOCABLE INTER VIVOS TRUST MICKLER MELODY SUCCESSOR TTEE	(No Physical Address) 1335 CALVARY RD
X	25-26-15-0010-00100-0020	MICKLER BARTLEY REVOCABLE INTER VIVOS TRUST MICKLER MELODY SUCCESSOR TTEE	(No Physical Address) 1335 CALVARY RD
X	24-26-15-0000-00400-0000	MICKLER BARTLEY REVOCABLE INTER VIVOS TRUST MICKLER MELODY SUCCESSOR TTEE	(No Physical Address) 1335 CALVARY RD
X	19-26-16-0010-06100-0000	MICKLER BARTLEY REVOCABLE INTER VIVOS TRUST MICKLER MELODY SUCCESSOR TTEE	(No Physical Address) 1335 CALVARY RD
X	30-26-16-0010-01900-0000	MICKLER BARTLEY REVOCABLE INTER VIVOS TRUST MICKLER MELODY SUCCESSOR TTEE	(No Physical Address) 1335 CALVARY RD
X	26-23-21-0000-04600-0000	MICKLER CLAY H & LAURA M	38615 OLD MICKLER RD
X	23-26-15-0000-00200-0010	MICKLER ELAINE E	3130 SHIPWATCH DR

X	26-23-21-0000-04600-0010	MICKLER GERTRUDE L	(No Physical Address) PO BOX 915
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Search Again

[Welcome](#) | [Records Search](#) | [Appraisals](#) | [Exemptions](#) | [Dates](#) | [Information](#) | [Contact](#)

Pasco County Property Appraiser  
Page Layout Modified: 8/29/2005 2:58:52 PM  
The Local Time Is: 8/15/2006 12:37:38 AM

BEFORE THE PUBLIC SERVICE COMMISSION

fm  
May 19

In re: Application for transfer of majority organizational control of Holiday Utility Company, Inc. in Pasco County to Holiday Waterworks Corporation and amendment of Certificate No. 224-W

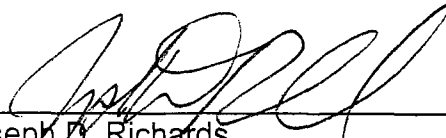
DOCKET NO. 030458-WU  
ORDER NO. PSC-06-0198-PCO-WU  
ISSUED: MARCH 13, 2006

**PASCO COUNTY'S**  
**NOTICE OF SERVICE OF FIRST INTERROGATORIES**  
**TO HOLIDAY UTILITY COMPANY, INC.**

PASCO COUNTY, a political subdivision of the State of Florida, by and through its undersigned attorney, hereby propounds the following set of First Interrogatories numbered 1 through 2 to Holiday Utility Company, Inc. Holiday Utility Company, Inc. must answer or object to each Interrogatory in writing within thirty (30) days after the date of service of said Interrogatories.

**Certificate of Service**

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Service of Interrogatories was served via regular U.S. Mail upon Holiday Utility Company, Inc., c/o Brian Armstrong, Esquire, Nabors, Giblin & Nickerson, The Pointe, Suite 1060, 2502 Rocky Point Drive, Tampa, FL 33607 this 19 day of May, 2006.



Joseph B. Richards  
Assistant County Attorney  
Florida Bar No.: 0777404  
Office of the County Attorney  
West Pasco Government Center  
7530 Little Road, Suite 340  
New Port Richey, FL 34654  
Telephone: (727) 847-8120  
Facsimile: (727) 847-8021  
Attorney for Pasco County, Florida

## INSTRUCTIONS

1. In accordance with the provisions of Chapter 120, Florida Statutes, and the relevant provisions of Chapter 367, Florida Statutes, Rules 25-22 and 28-106, Florida Administrative Code and the Florida Rules of Civil Procedure (as applicable), Holiday Utility Company, Inc. is required to serve answers, in writing and under oath, to the attached interrogatories within thirty (30) days from service.

2. Holiday Utility Company, Inc. is required to serve separate and individual responses as indicated to these interrogatories.

3. In answering these interrogatories, Holiday Utility Company, is required to furnish all information, including hearsay, in its possession and in the possession of its attorneys, agents, representatives, employees, and all other persons acting on behalf of Holiday Utility Company, Inc.

4. Information supplied in the answers to these interrogatories shall reflect all information available to Holiday Utility Company, Inc., up to and including the date of service of Holiday Utility Company, Inc.'s answers to these interrogatories.

5. The term "you" or "your" means the party or parties to whom these interrogatories are addressed, including its divisions, departments, subsidiaries, affiliates, predecessors, present or former officers, directors, owners, agents, attorneys, and all other persons acting or purporting to act on its behalf, as well as each partnership in which it is a partner.

6. The term "witness" means any natural person, individual, proprietorship, partnership, corporation, association, organization, joint venture, firm, other business enterprise, governmental body, group of natural persons or other entity, including its divisions, departments, subsidiaries, affiliates, predecessors, present or former officers, directors, owners, agents, attorneys, and all other persons acting or purporting to act on its behalf, as well as each partnership in which it is a partner.

7. To "identify" a document means to state its date, its author, the type of document (e.g. letter, memorandum, telegram, chart, photograph, sound reproduction, video tape, etc.), or, if the preceding information is not available, some other means of identifying it, its present location, and the name of any present custodian of it. In lieu of identifying any document, a complete and accurate copy may be attached to the answers to these interrogatories.

8. The term "identify" when used with reference to a natural person means:
- a. The full name and address (or, if the current address is not known, the last known address) of the person.
  - b. The full name and address of each employer, each corporation of



which the person is an officer or director, and each business in which the person is a principal.

- c. The person's present (or, if the present is not known, the last known) position and the position or positions at the time of the act to which the interrogatory answer relates.
- d. Each position the person has ever held with you and the date such positions were held.
- e. Such other information sufficient to provide full identification of the person.

9. The term "identify" when used with reference to any entity other than a natural person means:

- a. The full name of the entity, the type of entity (e.g., corporation, partnership, etc.), the address of its principal place of business, its principal business activity and, if it is a corporation, the jurisdiction under the laws of which it has been organized and the date of such organization.
- b. Each of the entity's officers, directors, shareholder or other principals, along with the information to identify such natural persons.
- c. For a governmental body, the identity of all natural persons acting on behalf of the governmental body, along with the information to identify such natural persons.
- d. Any other available information concerning the existence or identity of the entity.

10. The term "document" means the original and copies, regardless of origin or location, of any writing or records of any type or description, including, but not limited to, the original and any copy of any letter, memorandum, telegram, report, record, interoffice, intraoffice, intercompany, or intracompany communication, handwritten or other note, tape recording, telephone call, video tape, or any other written, recorded, transcribed, filed, or graphic matter whether produced or reproduced to which you or any of your agents, attorneys, investigators, employees, independent contractors, or any other persons acting on your behalf, have or have had access.

11. If all the information furnished in answer to all or part of an interrogatory is not within the personal knowledge of the affiant, identify each person to whom all or part of

the information furnished is a matter of personal knowledge and each person who communicated to the affiant any part of the information furnished.

12. If the answer to all or any part of the interrogatory is not presently known or available include a statement to that effect, furnish the information known or available, and respond to the entire interrogatory by supplemental answer, in writing, under oath, within ten (10) days from the time the entire answer becomes known or available, and in no event, less than five (5) days prior to trial.

13. Whenever, in any answer to any interrogatory, a reference is made to one or more persons, specify by name, the particular person to whom reference is intended.

**FIRST INTERROGATORIES TO HOLIDAY COMPANY UTILITY, INC.**

1. Please provide the parcel identification number, owner name and address of all property owned by the Bartley L. Mickler Estate ("Mickler Estate") or any entities owned or controlled by the Mickler Estate or the family of Bartley L. Mickler located within the requested service territory.

2. Please provide a description of all efforts, including but not limited to discussions or correspondence with the Southwest Florida Water Management District, the City of Tarpon Springs or other entities, to plan for or secure additional sources or supplies of water needed to serve the requested service territory or your current service area.

1. Please provide the parcel identification number, owner name and address of all property owned by the Bartley L. Mickler Estate ("Mickler Estate") or any entities owned or controlled by the Mickler Estate or the family of Bartley L. Mickler located within the requested service territory.

Response. Please see response to County Document Request No. 1.

2. Please provide a description of all efforts, including but not limited to discussions or correspondence with the Southwest Florida Water Management District, the City of Tarpon Springs or other entities, to plan for or secure additional sources or supplies of water needed to serve the requested service territory or your current service area.

Response. They system currently has an interconnection with the City of Tarpon Springs to supplement its existing supply of groundwater withdrawals, in the southern service area known as the "Anclote System." In the Northern Service area known as the "Westwood System," the utility owns approximately 14 permitted existing wells that are currently on stand-by and not used at this time. The Utility is in the process of activating four of these wells to increase system capacity for future growth and to provide additional fire protection to this area. Holiday has already designed, permitted and constructed the additional distribution system improvements in the Anclote System necessary to deliver water from the existing Tarpon Springs interconnection to facilitate growth and improved fire protection to this area. In the Westwood System 12 inch diameter distribution mains already exist to provide water supply to the future customers south of Westwood subdivision. All of the Utility's existing investments and some of the proposed investments have been included in the most recent FPSC rate case and have been approved.

HOLIDAY UTILITY COMPANY, INC.

By: *[Signature]*  
Gary Deven  
 Print Name  
 Its: President  
 Title

STATE OF )  
COUNTY OF )

On this 15<sup>th</sup> day of August, 2006,  
 personally appeared before me, the undersigned authority,  
Gary Deven, as President of HOLIDAY  
 UTILITY COMPANY, INC., who is  personally known to me, or,  who produced  
 as identification who executed the  
 foregoing instrument and acknowledged that he/she has read the foregoing Answers to  
 First Interrogatories; that they are true and correct to the best of his/her knowledge and  
 belief; that he/she is authorized to execute said interrogatories on behalf of Plaintiff, and  
 that he/she executed same as his/her free act and deed.

*[Signature]*  
 Notary Public  
 My commission expires:

NOTARY PUBLIC-STATE OF FLORIDA  
 Cecil Delcher  
 Commission # DD531419  
 Expires: MAY 01, 2010  
 Bonded Thru Atlantic Bonding Co., Inc.