

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

**SECOND 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[®], Jaz[®], 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 the system map identified on page 4, lines 4-5 of the Deremer testimony and provide any other documentation that identifies the size and/or capacity of the wells, lines and valves of the system.
2. Please provide all documents relating to the "professional engineering analysis" of the entire system as identified on page 4, line 8 of the Deremer testimony.
3. Please provide all documents (including plans and construction drawings) relating to the interconnection with the City of Tarpon Springs referenced on page 11, line 5 of the Deremer testimony and provide any and all agreements with the City to supply water to Holiday.

Certificate of Service

I HEREBY CERTIFY that I filed the foregoing Second Request for Production of Documents electronically with the Florida Public Service Commission at filings@psc.state.fl.us and a true and correct copy of the foregoing was served via Electronic Mail and regular U.S. Mail upon Holiday Utility Company, Inc., c/o Brian P. Armstrong, Esquire, Nabors, Giblin & Nickerson, 1500 Mahan Drive, Suite 200, Tallahassee, FL 32308, barmstrong@ngn-tally.com and Katherine E. Fleming, Senior Attorney, keflemin@psc.state.fl.us and Jennifer Brubaker, Esquire, jbrubake@psc.state.fl.us, Office of General Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399 keflemin@psc.state.fl.us, this 18 day of September, 2006.



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