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REPLY TO CENTRAL FLORIDA OFFICE

November 9, 2006

MARTIN S. FRIEDMAN, P.A.
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Ms. Blanca Bayo
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

HAND DELIVERY

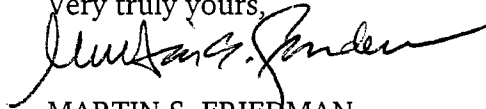
Re: Docket No. 060253-WS; Utilities, Inc. of Florida's Application for Rate Increase in Marion, Orange, Pasco, Pinellas and Seminole Counties, Florida
Our File No. 30057.108

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket is Utilities, Inc. of Florida's Objections to Citizen's First Request for Production of Documents.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,



MARTIN S. FRIEDMAN
For the Firm

CMP _____

COM _____ MSF/tlc

CTR _____

- cc: Ralph Jaeger, Esquire, Office of General Counsel (by hand delivery)
- Mr. Troy Rendell, Division of Economic Regulation (by hand delivery)
- Steven M. Lubertozi, Chief Regulatory Officer (by U.S. Mail)
- Kirsten Weeks, CPA (by U.S. Mail)
- John Hoy, Regional Vice President for Operations (by U.S. Mail)
- Patrick C. Flynn, Regional Director (by U.S. Mail)
- Ms. Deborah Swain (by U.S. Mail)
- Mr. Frank Seidman (by U.S. Mail)
- Stephen Reilly, Esquire, Office of Public Counsel (by hand delivery)

SEC 1 M:\1 ALTAMONTE\UTILITIES INC\UIF\(.108) 2005 RATE CASE\PSC Clerk 07.ltr (Objection to Citizen's 1st RTD).wpd

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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application of
UTILITIES, INC. OF FLORIDA
for an increase in water and wastewater
rates in Marion, Orange, Pasco, Pinellas,
and Seminole Counties, Florida

DOCKET NO. 060253-WS

UTILITIES, INC. OF FLORIDA'S OBJECTIONS TO CITIZEN'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 2)

UTILITIES, INC. OF FLORIDA (*Utility*), by and through its undersigned attorneys, hereby objects to Request No. 2 of Citizen's First Request for Production of Documents, filed by and through the Office of Public Counsel (*OPC*), served on November 1, 2006, and shows as follows:

1. Request No. 2 of Citizen's First request for Production of Documents stated:
2. Please provide a copy of any due diligence studies conducted by or for Utilities, Inc. or any of its affiliates or subsidiaries or for or by Hydro Star with regards to the acquisition by Hydro Star of Utilities, Inc.
2. The only such study was prepared by HydroStar, LLC and is not the property of Utilities, Inc.
3. The Utility also objects to the production of such studies because any such documents are confidential. Further, such documents are irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.
4. OPC failed to intervene in the proceedings in which Utilities, Inc. requested authority to transfer majority organizational control to HydroStar, LLC., although they had the right

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to do so.

5. The information requested by OPC is proprietary confidential business information which is protected from disclosure under Section 367.156(3), Sub-sections (a), (d), (e) and (f), Florida Statutes.

6. The disclosure of these studies will not serve any reasonable purpose, other than to harass the Utility and increase rate case expense.

7. The disclosure of such studies will not reveal anything that would or could affect the decision of this Commission in this rate case, which is to determine just and reasonable rates for the services provided by this Utility.

Respectfully submitted this 8 day of
November, 2006, by:

ROSE, SUNDSTROM & BENTLEY, LLP
Sanlando Center
2180 W. State Road 434, Suite 2118
Longwood, FL 32799
Telephone: (407) 830-6331



MARTIN S. FRIEDMAN
VALERIE L. LORD
For the Firm

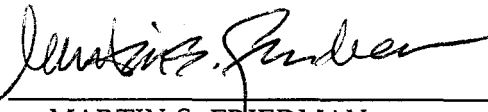
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Objections to Citizens' First Request for Production (No. 2) has been served upon the following parties by

U.S. Mail this 8 day of November, 2006:

Stephen C. Reilly, Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400

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

By: 

MARTIN S. FRIEDMAN
Florida Bar No.: 199060
VALERIE L. LORD
Florida Bar No.: 710989