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From: Marsha Rule [Marsha@reuphlaw.com]
Sent: Friday, May 11, 2007 12:22 PM
To: Filings@psc.state.fl.us
Cc: klpape@aquaamerica.com; kmburns@aquaamerica.com; BURGESS.STEVE@leg.state.fl.us; REILLY.STEVE@leg.state.fl.us; Katherine Fleming; Rosanne Gervasi; Ralph Jaeger; Ken Hoffman; ROXANNE LEVINGSTON
Subject: Docket No. 060368-WS
Attachments: Objs to OPC's 2nd ROGs & PODs - Supp 05 11 2007.pdf

The full name, address, telephone number, and e-mail address of the person responsible for the electronic filing:

MARSHA E. RULE
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The docket number and title of docket:

Docket No. 060368-WS

In re: Application for increase in water and wastewater rates in Alachua, Brevard, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc.

The name of the parties on whose behalf the document is filed:

Aqua Utilities Florida, Inc.

The total number of pages in the attached document: 5

A brief but complete description of each attached document.

Cover letter and

Aqua Utilities, Florida, Inc.'s Objections to OPC's Second Set of Interrogatories (No. 97 of Nos. 44-99) and Second Set of Document Requests (No. 48 of Nos. 46-126)

Marsha E. Rule, Esq.
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May 11, 2007

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MARGARET A. MENDUNI

Ms. Ann Cole, Director
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

Re: Docket No. 060368-WS
In re: Application for increase in water and wastewater rates in Alachua,
Brevard, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk,
Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua
Utilities Florida, Inc.

Dear Ms. Cole:

Attached to this electronic filing please find the following documents for filing on
behalf of Aqua Utilities, Florida, Inc., in the above-referenced docket:

Aqua Utilities, Florida, Inc.'s Objections to OPC's Second Set of Interrogatories
(No. 97 of Nos. 44-99) and Second Set of Document Requests (No. 48 of Nos.
46-126)

Parties to this docket are being served by email and U.S. Mail as indicated on the
certificate of service. As always, thank you for your assistance with this filing and please
do not hesitate to contact me if you have any questions.

Sincerely,



Marsha E. Rule

MER/tc

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Cc:

Rosanne Gervasi, Esq.

Ralph Jaeger, Esq.

Katherine Fleming, Esq.

Stephen C. Reilly, Esq.

Steve Burgess, Esq.

Kathy L. Pape, Esq.

In Re: Application for increase in water and)
wastewater rates in Alachua, Brevard,)
Highlands, Lake, Lee, Marion, Orange,)
Palm Beach, Pasco, Polk, Putnam,)
Seminole, Sumter, Volusia, and Washington)
Counties by Aqua Utilities Florida, Inc.)
_____)

Docket No. 060368-WS

Filed: May 11, 2007

**AQUA UTILITIES FLORIDA, INC.'S OBJECTIONS
TO OPC'S SECOND SET OF INTERROGATORIES (NO. 97 of NOS. 44-99)
AND SECOND SET OF DOCUMENT REQUESTS (NO. 48 of NOS. 46-126)**

Aqua Utilities Florida, Inc. ("AUF"), by and through its undersigned counsel, and pursuant to Order No. PSC-07-0219-PCO-WS, hereby files its Objections to and Requests for Clarification of Interrogatory No. 97 of OPC's Second Set of Interrogatories (Nos. 44-99) and Document Request No. 48 of OPC's Second Set of Document Requests (Nos. 46-126). These Objections and Requests for Clarification are in addition to, and not in lieu of, those previously filed on May 7, 2007.

Interrogatory No. 97:

97. For each plant addition in the 2006 and 2007 capital budget, please provide the following:
- a. A discussion of the status of the addition.
 - b. The original estimated date of completion, the current estimated date of completion, and the actual date of completion if applicable.
 - c. The status of the engineering and permitting efforts, if the plant addition has not been through the bidding process.
 - d. The actual cost to complete the addition, the amount expended as of April 2007 if the addition is not complete, and the current estimate of the completed cost of the addition.
 - e. A statement if any of the pro forma plant if required by the Florida Department of Environmental Protection, and explain why it is required.

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Objection:

AUF requests clarification of the minimum or threshold dollar amount of plant additions to which this interrogatory refers. To the extent that this interrogatory refers to or requests information regarding all plant additions in the 2006 and 2007 capital budget without limitation as to a minimum or threshold dollar amount, AUF objects that this interrogatory is overbroad and overly burdensome in that it requires an excessive amount of staff time and effort to research and respond in connection with minor investment amounts.

Subject to discussion with OPC and determination of a minimum or threshold dollar amount, and without waiving the foregoing objection and request for clarification, AUF will respond to this interrogatory in connection with major capital expenditures estimated to exceed \$20,000 in total project cost, as defined and discussed in the Direct Testimony and Exhibits of Gerard P. Connolly, Jr.

Document Request No. 48:

48. Please provide all documents supporting the pro-forma plant additions/improvements to Plant in Service, including but not limited to: invoices, budgets, signed contracts, bids if the project has not been completed, and any requirements of the DEP for the proposed plant additions. Please provide the data in electronic format.

Objection:

AUF requests clarification of the minimum or threshold dollar amount of plant additions/improvements and time period to which this document request refers. To the extent that this interrogatory refers to or requests information regarding all plant additions/improvements to Plant in Service, without limitation as to a minimum or threshold dollar amount or time period, AUF objects that this document request is overbroad and overly burdensome in that it requires an excessive amount of staff time and effort to research and respond in connection with minor investment amounts and an unlimited time period.

Subject to discussion with OPC and determination of a minimum or threshold dollar amount and applicable time period, and without waiving the foregoing objection and request for clarification, AUF will provide documents regarding pro-forma additions/improvements for the years 2006 and 2007 that exceed or are estimated to exceed \$20,000 in total project cost.

Respectfully submitted this 11th day of May, 2007.



Kenneth A. Hoffman, Esquire
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by email and U.S. Mail this 11th day of May, 2007 to the following:

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Attorney