

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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.

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DOCKET NO. 060368-WS

JULY 16, 2007

**CITIZENS' MOTION TO COMPEL**

The Citizens of the State of Florida ("Citizens"), by and through undersigned counsel, hereby file this motion to compel Aqua Utilities, Florida (AUF or Aqua), by July 20<sup>th</sup>, 2007, to answer all outstanding discovery that has become due by that time, unless Aqua obtains a protective order from this Commission. As grounds, the Citizens submit:

1. In this docket, Aqua filed minimum filing requirements (MFRs) for fifty-six water systems and twenty-four wastewater systems. Pursuant to Commission Order, the Citizens' direct testimony must be filed on August 7, 2007. Office of Public Counsel (OPC) has propounded numerous discovery requests on Aqua to obtain the level of detailed information necessary to properly determine the revenue requirement to which Aqua is entitled. OPC and Aqua have worked cooperatively to reach compromises on a number differences that have arisen throughout the discovery process. Nevertheless, a large portion of the discovery requests which OPC needs to complete its direct testimony remain outstanding and past due. The overdue OPC discovery falls into two basic categories: (1) OPC discovery to which Aqua has

specifically objected, but on which OPC has filed a pleading to dispute the grounds for Aqua's objection; (2) OPC discovery to which Aqua has not specifically objected, but which is overdue for response.

2. The amount of OPC discovery on which Aqua's responses are overdue, as well as the amount of time by which the responses are overdue, is very substantial. Of the 183 OPC interrogatories that are beyond the due date, 99 remain unanswered (more than half). On average, the responses are more than 40 days overdue. Of the 174 requests for production of documents (PODs) that are beyond the due date, 91 remain unanswered (more than half). On average, the responses are 33 days overdue. Attachment 1 appended to this pleading is a complete catalog of the status of all discovery propounded by OPC to date. The discovery for which answers are past due are highlighted in yellow.

3. In addition to the OPC discovery, Aqua is overdue in its response to a substantial portion of the discovery propounded by PSC Staff. OPC does not duplicate Staff's discovery to avoid redundancy, but OPC relies on the much of the same information sought by Staff in its discovery. Aqua is overdue in its responses to Staff's fifth set of interrogatories, to Staff's seventh set of interrogatories, to Staff's seventh set of PODs, and to Staff's eighth set of PODs. Some of these responses are overdue by more than a month.

4. At this point, OPC's foremost concern must be its own direct testimony that will be presented for input to the Commission. In order to be assimilated into the direct testimony, the discovery information must be obtained with enough time to be digested, analyzed and formulated into written testimony. In addition, the witnesses

must coordinate testimony to make a cohesive presentation for the Commission's benefit. To assure assimilation into the initial direct testimony, information must be in the possession of OPC no later than July 20<sup>th</sup>. Accordingly, July 20<sup>th</sup>, is the date that Citizens seek as the deadline for Aqua to submit responses due at that time.

WHEREFORE, the Citizens of the State of Florida hereby respectfully move the Public Service Commission to compel Aqua to answer all discovery propounded by Office of Public Counsel and by PSC Staff that has become due by July 20<sup>th</sup>, 2007.

Respectfully submitted,

CHARLIE BECK  
Interim Public Counsel

s/Stephen C. Burgess  
Stephen C. Burgess  
Associate Public Counsel  
Florida Bar No.0286321

Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street  
Tallahassee, FL 32300-1400

(850) 488-9330

Attorneys for Florida's Citizens

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 060368-WS**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by E-mail and by U.S. Mail to the following parties this 16<sup>th</sup> day of July, 2007:

Kenneth A. Hoffman, Esquire  
Marsha E. Rule, Esquire  
Rutledge Law Firm  
215 South Monroe St., Suite 420  
Tallahassee, FL 32301

Ralph Jaeger, Esquire  
Katherine Fleming, Esquire  
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Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

s/Stephen C. Burgess  
Stephen C. Burgess  
Associate Public Counsel

## Status of Aqua Utilities Florida, Inc. Responses to OPC's Interrogatories

### Aqua Utilities Florida, Inc. Interrogatory Inventory

No.	OPC Filing Date	Response Filed	Due Date	Days Overdue	Notes/Comments
<b>Set 1</b>					
1	3/20/2007	4/23/2007	4/20/2007	3	Objection filed 3/30/07: OPC Response Filed 4/18/07. This Interrogatory seeks to identify each witness that will sponsor each response. The Company provided the name(s) of the individual(s) providing the response, not the sponsoring witness; therefore, their answer is not responsive.
2	3/20/2007		4/20/2007	84	Objection filed 3/30/07: OPC Response Filed 4/18/07.
3	3/20/2007		4/20/2007	84	
4	3/20/2007	4/23/2007	4/20/2007	3	
5	3/20/2007	4/23/2007	4/20/2007	3	Objection filed 3/30/07: OPC Response Filed 4/18/07. The Interrogatory is applicable to years 2002 through 2006. The company provided a response for only 2004 and early 2005, not the time period requested; therefore, their answer is not responsive.
6	3/20/2007	5/2/2007	4/20/2007	12	Objection filed 3/30/07: OPC Response Filed 4/18/07. This Interrogatory applies to the last five years. The Company responded only with information regarding property sold on April 18, 2005. Because the Company did not provide a response to all years requested, this answer is non responsive.
7	3/20/2007	5/2/2007	4/20/2007	12	
8	3/20/2007	5/2/2007	4/20/2007	12	
9	3/20/2007	4/23/2007	4/20/2007	3	
10	3/20/2007	5/2/2007	4/20/2007	12	
11	3/20/2007	5/2/2007	4/20/2007	12	
12	3/20/2007	6/18/2007	4/20/2007	59	
13	3/20/2007		4/20/2007	84	
14	3/20/2007	5/2/2007	4/20/2007	12	
15	3/20/2007	6/18/2007	4/20/2007	59	Informal response provided 5/17/07.
16	3/20/2007	6/18/2007	4/20/2007	59	Informal response provided 5/17/07.
17	3/20/2007	5/2/2007	4/20/2007	12	
18	3/20/2007	6/18/2007	4/20/2007	59	Informal response provided 5/17/07.
19	3/20/2007	6/18/2007	4/20/2007	59	Informal response provided 5/17/07.
20	3/20/2007	5/2/2007	4/20/2007	12	
21	3/20/2007	5/2/2007	4/20/2007	12	
22	3/20/2007	6/19/2007	4/20/2007	60	
23	3/20/2007	5/2/2007	4/20/2007	12	Informal response provided 5/17/07.
24	3/20/2007	5/2/2007	4/20/2007	12	
25	3/20/2007	4/23/2007	4/20/2007	3	
26	3/20/2007		4/20/2007	84	
27	3/20/2007	4/23/2007	4/20/2007	3	
28	3/20/2007	4/23/2007	4/20/2007	3	
29	3/20/2007	5/2/2007	4/20/2007	12	

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### Aqua Utilities Florida, Inc. Interrogatory Inventory

No.	OPC Filing Date	Response Filed	Due Date	Days Overdue	Notes/Comments
30	3/20/2007		4/20/2007	84	
31	3/20/2007		4/20/2007	84	Objection filed 3/30/07: OPC Response Filed 4/18/07.
32	3/20/2007	4/23/2007	4/20/2007	3	
33	3/20/2007	4/23/2007	4/20/2007	3	
34	3/20/2007		4/20/2007	84	
35	3/20/2007		4/20/2007	84	
36	3/20/2007	6/18/2007	4/20/2007	84	Objection filed 3/30/07: OPC Response Filed 4/18/07. Partially responded to. AUF provided a partial response, but did not provided the data requested for 2001-2003 for the FWS systems.
37	3/20/2007		4/20/2007	84	
38	3/20/2007	6/18/2007	4/20/2007	59	Informal response provided 5/17/07.
39	3/20/2007	6/18/2007	4/20/2007	59	Informal response provided 5/17/07.
40	3/20/2007	6/18/2007	4/20/2007	59	Objection to Parts (a) through (d) filed 3/30/07; OPC Response Filed 4/18/07. Informal response provided 5/17/07 by e-mail; Aqua Responded on 6/18/07; but failed to provide date for the years 2003 and 2004; therefore is not-responsive.
41	3/20/2007	4/23/2007	4/20/2007	3	
42	3/20/2007	4/23/2007	4/20/2007	3	
43	3/20/2007	6/18/2007	4/20/2007	59	
<b>Set 2</b>					
44	4/27/2007	5/29/2007	5/28/2007	1	
45	4/27/2007	5/29/2007	5/28/2007	1	
46	4/27/2007	5/29/2007	5/28/2007	1	
47	4/27/2007	5/29/2007	5/28/2007	1	
48	4/27/2007	5/29/2007	5/28/2007	1	
49	4/27/2007	5/29/2007	5/28/2007	1	
50	4/27/2007	5/29/2007	5/28/2007	1	
51	4/27/2007	5/29/2007	5/28/2007	1	
52	4/27/2007	5/29/2007	5/28/2007	1	
53	4/27/2007	5/29/2007	5/28/2007	1	
54	4/27/2007	5/29/2007	5/28/2007	1	
55	4/27/2007	5/29/2007	5/28/2007	1	
56	4/27/2007		5/28/2007	46	
57	4/27/2007	5/29/2007	5/28/2007	1	
58	4/27/2007	5/29/2007	5/28/2007	1	
59	4/27/2007	5/29/2007	5/28/2007	1	
60	4/27/2007	5/29/2007	5/28/2007	1	
61	4/27/2007	5/29/2007	5/28/2007	1	
62	4/27/2007	5/29/2007	5/28/2007	1	
63	4/27/2007	5/29/2007	5/28/2007	1	
64	4/27/2007	5/29/2007	5/28/2007	1	
65	4/27/2007	5/29/2007	5/28/2007	1	

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### Aqua Utilities Florida, Inc. Interrogatory Inventory

No.	OPC Filing Date	Response Filed	Due Date	Days Overdue	Notes/Comments
66	4/27/2007	5/29/2007	5/28/2007	1	
67	4/27/2007	5/29/2007	5/28/2007	1	
68	4/27/2007	5/29/2007	5/28/2007	1	
69	4/27/2007	5/29/2007	5/28/2007	1	
70	4/27/2007	5/29/2007	5/28/2007	1	
71	4/27/2007	5/29/2007	5/28/2007	1	
72	4/27/2007	5/29/2007	5/28/2007	1	
73	4/27/2007	5/29/2007	5/28/2007	1	
74	4/27/2007		5/28/2007	46	
75	4/27/2007		5/28/2007	46	
76	4/27/2007	5/29/2007	5/28/2007	1	
77	4/27/2007		5/28/2007	46	
78	4/27/2007		5/28/2007	46	
79	4/27/2007		5/28/2007	46	
80	4/27/2007		5/28/2007	46	
81	4/27/2007		5/28/2007	46	
82	4/27/2007		5/28/2007	46	
83	4/27/2007		5/28/2007	46	
84	4/27/2007		5/28/2007	46	
85	4/27/2007		5/28/2007	46	
86	4/27/2007		5/28/2007	46	
87	4/27/2007		5/28/2007	46	
88	4/27/2007		5/28/2007	46	
89	4/27/2007		5/28/2007	46	
90	4/27/2007		5/28/2007	46	
91	4/27/2007		5/28/2007	46	
92	4/27/2007		5/28/2007	46	
93	4/27/2007	5/29/2007	5/28/2007	1	
94	4/27/2007		5/28/2007	46	
95	4/27/2007		5/28/2007	46	
96	4/27/2007		5/28/2007	46	
97	4/27/2007		5/28/2007	46	Objection Filed 05/11/07; OPC and Aqua have discussed; However OPC's Interrogatory stands as written.
98	N/A	N/A	N/A		Number Inadvertently omitted.
99	N/A	N/A	N/A		Number Inadvertently omitted.
<b>Set 3</b>					
100	5/10/2007		6/10/2007	33	
101	5/10/2007		6/10/2007	33	
102	5/10/2007	6/12/2007	6/10/2007	2	
103	5/10/2007	6/12/2007	6/10/2007	2	
104	5/10/2007	6/18/2007	6/10/2007	8	
105	5/10/2007	6/18/2007	6/10/2007	8	
106	5/10/2007	6/12/2007	6/10/2007	2	
107	5/10/2007		6/10/2007	33	
108	5/10/2007		6/10/2007	33	
109	5/10/2007		6/10/2007	33	

## Status of Aqua Utilities Florida, Inc. Responses to OPC's Interrogatories

### Aqua Utilities Florida, Inc. Interrogatory Inventory

No.	OPC Filing Date	Response Filed	Due Date	Days Overdue	Notes/Comments
110	5/10/2007		6/10/2007	33	Objection filed 5/02/07: OPC Response Filed 6/12/07.
111	5/10/2007		6/10/2007	33	
112	5/10/2007	6/12/2007	6/10/2007	2	
113	5/10/2007		6/10/2007	33	
114	5/10/2007	6/12/2007	6/10/2007	2	
115	5/10/2007	6/12/2007	6/10/2007	2	
116	5/10/2007		6/10/2007	33	
117	5/10/2007		6/10/2007	33	
118	5/10/2007	6/18/2007	6/10/2007	8	
119	5/10/2007	6/12/2007	6/10/2007	2	
120	5/10/2007	6/18/2007	6/10/2007	8	
121	5/10/2007		6/10/2007	33	Objection filed 5/02/07: OPC Response Filed 6/12/07.
122	5/10/2007	6/18/2007	6/10/2007	8	
123	5/10/2007		6/10/2007	33	
124	5/10/2007	6/18/2007	6/10/2007	8	
125	5/10/2007	6/12/2007	6/10/2007	2	
126	5/10/2007		6/10/2007	33	
127	5/10/2007		6/10/2007	33	
128	5/10/2007		6/10/2007	33	
129	5/10/2007		6/10/2007	33	Objection filed 5/02/07: OPC Response Filed 6/12/07.
130	5/10/2007		6/10/2007	33	
131	5/10/2007	6/12/2007	6/10/2007	2	
132	5/10/2007	6/18/2007	6/10/2007	8	
133	5/10/2007		6/10/2007	33	
134	5/10/2007		6/10/2007	33	Objection filed 5/02/07: OPC Response Filed 6/12/07.
135	5/10/2007		6/10/2007	33	
136	5/10/2007	6/12/2007	6/10/2007	2	
137	5/10/2007		6/10/2007	33	
138	5/10/2007	6/12/2007	6/10/2007	2	
139	5/10/2007		6/10/2007	33	
<b>Set 4</b>					
140	5/23/2007		6/23/2007	20	Objection filed 6/04/07: OPC Response Filed 6/12/07.
141	5/23/2007		6/23/2007	20	
142	5/23/2007		6/23/2007	20	
143	5/23/2007		6/23/2007	20	
144	5/23/2007		6/23/2007	20	
145	5/23/2007		6/23/2007	20	
146	5/23/2007		6/23/2007	20	
147	5/23/2007		6/23/2007	20	
148	5/23/2007		6/23/2007	20	
149	5/23/2007		6/23/2007	20	
150	5/23/2007		6/23/2007	20	
151	5/23/2007		6/23/2007	20	
152	5/23/2007		6/23/2007	20	
153	5/23/2007		6/23/2007	20	
154	5/23/2007		6/23/2007	20	
155	5/23/2007		6/23/2007	20	
156	5/23/2007		6/23/2007	20	



## Status of Aqua Utilities Florida, Inc. Responses to OPC's Interrogatories

### Aqua Utilities Florida, Inc. Interrogatory Inventory

No.	OPC Filing Date	Response Filed	Due Date	Days Overdue	Notes/Comments
157	5/23/2007		6/23/2007	20	
158	5/23/2007		6/23/2007	20	
159	5/23/2007		6/23/2007	20	
160	5/23/2007		6/23/2007	20	
161	5/23/2007		6/23/2007	20	
162	5/23/2007		6/23/2007	20	
163	5/23/2007		6/23/2007	20	
164	5/23/2007		6/23/2007	20	
165	5/23/2007		6/23/2007	20	
166	5/23/2007		6/23/2007	20	
167	5/23/2007		6/23/2007	20	
168	5/23/2007		6/23/2007	20	
169	5/23/2007		6/23/2007	20	
170	5/23/2007		6/23/2007	20	
171	5/23/2007		6/23/2007	20	
172	5/23/2007		6/23/2007	20	
173	5/23/2007		6/23/2007	20	
174	5/23/2007		6/23/2007	20	
175	5/23/2007		6/23/2007	20	
176	5/23/2007		6/23/2007	20	
177	5/23/2007		6/23/2007	20	
178	5/23/2007		6/23/2007	20	
179	5/23/2007		6/23/2007	20	
180	5/23/2007		6/23/2007	20	
181	5/23/2007		6/23/2007	20	
182	5/23/2007		6/23/2007	20	
183	5/23/2007		6/23/2007	20	
<b>Set 5</b>					
184	6/15/2007		7/16/2007		General Objections filed 6/25/2007; No Specific Objections Filed by Aqua.
185	6/15/2007		7/16/2007		
186	6/15/2007	7/9/2007	7/16/2007	-7	
187	6/15/2007		7/16/2007	-7	
188	6/15/2007	7/9/2007	7/16/2007	-7	
189	6/15/2007	7/9/2007	7/16/2007	-7	
190	6/15/2007	7/9/2007	7/16/2007	-7	
191	6/15/2007	7/9/2007	7/16/2007	-7	
192	6/15/2007		7/16/2007		
193	6/15/2007		7/16/2007		

## Status of Aqua Utilities Florida, Inc. Responses to OPC's Interrogatories

### Aqua Utilities Florida, Inc. Interrogatory Inventory

No.	OPC Filing Date	Response Filed	Due Date	Days Overdue	Notes/Comments
Set 6					
194	6/21/2007		7/22/2007		General Objections filed 6/28/2007; No Specific Objections Filed by Aqua.
195	6/21/2007		7/22/2007		

Responses Still Outstanding: Average Days Over Due

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## Status of Aqua Utilities Florida, Inc. Responses to OPC's Production of Documents

### Aqua Utilities Florida, Inc. POD Inventory

No.	OPC Filing Date	Response Filed	Due Date	Days Overdue	Notes/Comments
<b>Set 1</b>					
1	3/20/2007	4/23/2007	4/20/2007	3	
2	3/20/2007	4/23/2007	4/20/2007	3	
3	3/20/2007	5/2/2007	4/20/2007	12	
4	3/20/2007	5/2/2007	4/20/2007	12	
5	3/20/2007	6/18/2007	4/20/2007	59	Informal response provided 5/17/07.
6	3/20/2007	4/23/2007	4/20/2007	3	
7	3/20/2007	5/2/2007	4/20/2007	12	
8	3/20/2007	4/23/2007	4/20/2007	3	
9	3/20/2007	4/23/2007	4/20/2007	3	
10	3/20/2007	4/23/2007	4/20/2007	3	
11	3/20/2007	4/23/2007	4/20/2007	3	
12	3/20/2007	4/23/2007	4/20/2007	3	
13	3/20/2007	4/23/2007	4/20/2007	3	
14	3/20/2007	6/18/2007	4/20/2007	59	
15	3/20/2007	4/23/2007	4/20/2007	3	
16	3/20/2007	4/23/2007	4/20/2007	3	Informal response provided 5/17/07.
17	3/20/2007		4/20/2007	84	Objection filed 3/30/07: OPC Response Filed 4/18/07.
18	3/20/2007	5/2/2007	4/20/2007	12	
19	3/20/2007	5/2/2007	4/20/2007	12	
20	3/20/2007	6/18/2007	4/20/2007	59	
21	3/20/2007	4/23/2007	4/20/2007	3	
22	3/20/2007	4/23/2007	4/20/2007	3	
23	3/20/2007	4/23/2007	4/20/2007	3	
24	3/20/2007	4/23/2007	4/20/2007	3	
25	3/20/2007	5/2/2007	4/20/2007	12	
26	3/20/2007	6/18/2007	4/20/2007	59	
27	3/20/2007	4/23/2007	4/20/2007	3	
28	3/20/2007		4/20/2007	84	
29	3/20/2007	5/2/2007	4/20/2007	12	
30	3/20/2007	5/2/2007	4/20/2007	12	
31	3/20/2007	5/2/2007	4/20/2007	12	
32	3/20/2007	4/23/2007	4/20/2007	3	
33	3/20/2007	4/23/2007	4/20/2007	3	
34	3/20/2007	4/23/2007	4/20/2007	3	
35	3/20/2007	4/23/2007	4/20/2007	3	
36	3/20/2007	4/23/2007	4/20/2007	3	
37	3/20/2007	5/2/2007	4/20/2007	12	
38	3/20/2007	4/23/2007	4/20/2007	3	
39	3/20/2007		4/20/2007	84	
40	3/20/2007		4/20/2007	84	Objection filed 3/30/07: OPC Response Filed 4/18/07.
41	3/20/2007	4/23/2007	4/20/2007	3	
42	3/20/2007		4/20/2007	84	Objection filed 3/30/07: OPC Response Filed 4/18/07.
43	3/20/2007	5/2/2007	4/20/2007	12	
44	20-Mar	5/2/2007	4/20/2007	12	
45	20-Mar		4/20/2007	84	

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**Aqua Utilities Florida, Inc.**  
**POD Inventory**

No.	OPC Filing Date	Response Filed	Due Date	Days Overdue	Notes/Comments
Set 2					
46	4/27/2007	6/18/2007	5/28/2007	21	
47	4/27/2007	5/29/2007	5/28/2007	1	
48	4/27/2007	6/18/2007	5/28/2007	21	Objection filed 5/117/07; OPC & Aqua are working together towards a mutual resolution.
49	4/27/2007	5/29/2007	5/28/2007	1	
50	4/27/2007	5/29/2007	5/28/2007	1	
51	4/27/2007	5/29/2007	5/28/2007	1	
52	4/27/2007		5/28/2007	46	
53	4/27/2007	5/30/2007	5/28/2007	2	
54	4/27/2007	5/29/2007	5/28/2007	1	
55	4/27/2007	5/30/2007	5/28/2007	2	
56	4/27/2007	5/29/2007	5/28/2007	1	
57	4/27/2007	5/30/2007	5/28/2007	2	
58	4/27/2007	5/30/2007	5/28/2007	2	
59	4/27/2007	5/30/2007	5/28/2007	2	
60	4/27/2007	5/30/2007	5/28/2007	2	
61	4/27/2007	5/30/2007	5/28/2007	2	
62	4/27/2007	5/30/2007	5/28/2007	2	
63	4/27/2007	5/29/2007	5/28/2007	1	
64	4/27/2007	5/29/2007	5/28/2007	1	
65	4/27/2007	5/30/2007	5/28/2007	2	
66	4/27/2007	5/30/2007	5/28/2007	2	
67	4/27/2007	5/30/2007	5/28/2007	2	
68	4/27/2007	5/30/2007	5/28/2007	2	
69	4/27/2007	5/30/2007	5/28/2007	2	
70	4/27/2007	5/29/2007	5/28/2007	1	
71	4/27/2007	5/29/2007	5/28/2007	1	
72	4/27/2007	5/30/2007	5/28/2007	2	
73	4/27/2007		5/28/2007	46	
74	4/27/2007		5/28/2007	46	
75	4/27/2007		5/28/2007	46	
76	4/27/2007	6/18/2007	5/28/2007	21	
77	4/27/2007	6/18/2007	5/28/2007	21	
78	4/27/2007	6/18/2007	5/28/2007	21	
79	4/27/2007	6/18/2007	5/28/2007	21	
80	4/27/2007	6/18/2007	5/28/2007	21	
81	4/27/2007		5/28/2007	46	
82	4/27/2007		5/28/2007	46	
83	4/27/2007		5/28/2007	46	
84	4/27/2007		5/28/2007	46	
85	4/27/2007		5/28/2007	46	
86	4/27/2007		5/28/2007	46	
87	4/27/2007		5/28/2007	46	
88	4/27/2007		5/28/2007	46	
89	4/27/2007		5/28/2007	46	
90	4/27/2007		5/28/2007	46	
91	4/27/2007		5/28/2007	46	
92	4/27/2007		5/28/2007	46	
93	4/27/2007		5/28/2007	46	
94	4/27/2007		5/28/2007	46	

## Status of Aqua Utilities Florida, Inc. Responses to OPC's Production of Documents

### Aqua Utilities Florida, Inc. POD Inventory

No.	OPC Filing Date	Response Filed	Due Date	Days Overdue	Notes/Comments
95	4/27/2007	6/18/2007	5/28/2007	21	
96	4/27/2007		5/28/2007	46	
97	4/27/2007		5/28/2007	46	
98	4/27/2007		5/28/2007	46	
99	4/27/2007		5/28/2007	46	
100	4/27/2007		5/28/2007	46	
101	4/27/2007		5/28/2007	46	
102	4/27/2007		5/28/2007	46	
103	4/27/2007		5/28/2007	46	
104	4/27/2007		5/28/2007	46	
105	4/27/2007		5/28/2007	46	
106	4/27/2007		5/28/2007	46	
107	4/27/2007		5/28/2007	46	
108	4/27/2007		5/28/2007	46	
109	4/27/2007		5/28/2007	46	
110	4/27/2007		5/28/2007	46	
111	4/27/2007		5/28/2007	46	
112	4/27/2007		5/28/2007	46	
113	4/27/2007		5/28/2007	46	
114	4/27/2007		5/28/2007	46	
115	4/27/2007	6/18/2007	5/28/2007	21	
116	4/27/2007		5/28/2007	46	
117	4/27/2007		5/28/2007	46	
118	4/27/2007		5/28/2007	46	
119	4/27/2007		5/28/2007	46	
120	4/27/2007		5/28/2007	46	
121	4/27/2007		5/28/2007	46	
122	4/27/2007		5/28/2007	46	
123	4/27/2007	6/18/2007	5/28/2007	21	
124	4/27/2007		5/28/2007	46	
125	4/27/2007		5/28/2007	46	
126	4/27/2007		5/28/2007	46	
<b>Set 3</b>					
127	5/10/2007		6/10/2007	33	
128	5/10/2007		6/10/2007	33	Objection filed 5/02/07: OPC Response Filed 6/12/07.
129	5/10/2007		6/10/2007	33	
130	5/10/2007		6/10/2007	33	Objection filed 5/02/07: OPC Response Filed 6/12/07.
131	5/10/2007		6/10/2007	33	
132	5/10/2007		6/10/2007	33	
133	5/10/2007	6/18/2007	6/10/2007	8	
134	5/10/2007	6/18/2007	6/10/2007	8	
135	5/10/2007	6/18/2007	6/10/2007	8	
136	5/10/2007		6/10/2007	33	
137	5/10/2007		6/10/2007	33	
138	5/10/2007		6/10/2007	33	
139	5/10/2007		6/10/2007	33	
140	5/10/2007		6/10/2007	33	
141	5/10/2007		6/10/2007	33	
142	5/10/2007		6/10/2007	33	

## Status of Aqua Utilities Florida, Inc. Responses to OPC's Production of Documents

**Aqua Utilities Florida, Inc.**  
**POD Inventory**

No.	OPC Filing Date	Response Filed	Due Date	Days Overdue	Notes/Comments
143	5/10/2007	6/18/2007	6/10/2007	8	
144	5/10/2007	6/18/2007	6/10/2007	8	
145	5/10/2007		6/10/2007	33	
146	5/10/2007	6/18/2007	6/10/2007	8	
147	5/10/2007		6/10/2007	33	
148	5/10/2007		6/10/2007	33	
149	5/10/2007		6/10/2007	33	
150	5/10/2007		6/10/2007	33	
151	5/10/2007		6/10/2007	33	
152	5/10/2007		6/10/2007	33	
153	5/10/2007		6/10/2007	33	
154	5/10/2007		6/10/2007	33	
155	5/10/2007		6/10/2007	33	
156	5/10/2007	7/9/2007	6/10/2007	29	
157	5/10/2007		6/10/2007	33	
158	5/10/2007		6/10/2007	33	
159	5/10/2007		6/10/2007	33	
160	5/10/2007		6/10/2007	33	
161	5/10/2007		6/10/2007	33	
162	5/10/2007		6/10/2007	33	
163	5/10/2007		6/10/2007	33	
164	5/10/2007		6/10/2007	33	
165	5/10/2007	7/9/2007	6/10/2007	29	
166	5/10/2007		6/10/2007	33	
167	5/10/2007		6/10/2007	33	
168	5/10/2007		6/10/2007	33	
169	5/10/2007		6/10/2007	33	
<b>Set 4</b>					
170	5/23/2007		6/23/2007	20	Objection filed 6/04/07; OPC Response Filed 6/12/07.
171	5/23/2007		6/23/2007	20	
172	5/23/2007	7/9/2007	6/23/2007	16	
173	5/23/2007		6/23/2007	20	
174	5/23/2007		6/23/2007	20	
<b>Set 5</b>					
175	6/15/2007	7/9/2007	7/16/2007	-7	General Objections filed 6/25/2007; No Specific Objections Filed by Aqua
176	6/15/2007		7/16/2007		
177	6/15/2007		7/16/2007		
178	6/15/2007	7/9/2007	7/16/2007	-7	
179	6/15/2007		7/16/2007		
180	6/15/2007		7/16/2007		
<b>Set 6</b>					
181	6/21/2007		7/22/2007		General Objections filed 6/28/2007; No Specific Objections filed by Aqua
182	6/21/2007		7/22/2007		
183	6/21/2007		7/22/2007		
184	6/21/2007		7/22/2007		
185	6/21/2007		7/22/2007		

## Status of Aqua Utilities Florida, Inc. Responses to OPC's Production of Documents

**Aqua Utilities Florida, Inc.**  
**POD Inventory**

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No.	OPC Filing Date	Response Filed	Due Date	Days Overdue	Notes/Comments
186	6/21/2007		7/22/2007		
187	6/21/2007		7/22/2007		
188	6/21/2007		7/22/2007		
189	6/21/2007		7/22/2007		
190	6/21/2007		7/22/2007		
191	6/21/2007		7/22/2007		
192	6/21/2007		7/22/2007		
193	6/21/2007		7/22/2007		
194	6/21/2007		7/22/2007		
195	6/21/2007		7/22/2007		
196	6/21/2007		7/22/2007		
197	6/21/2007		7/22/2007		
198	6/21/2007		7/22/2007		
199	6/21/2007		7/22/2007		
200	6/21/2007		7/22/2007		
201	6/21/2007		7/22/2007		

Responses Still Outstanding: Average Days Over Due

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