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REPLY TO CENTRAL FLORIDA OFFICE

<u>Central Florida Office</u>
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2180 W. State Road 434, Suite 2118
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Martin S. Friedman, P.A. Valerie L. Lord Brian J. Street

November 19, 2007

#### **E-FILING**

Ann Cole, Commission Clerk Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

RE: Docket No.: 070183-WS; In re: Proposed adoption of Rule 25-30.4325, F.A.C., Water

Treatment Plant Used and Useful Calculations

Our File No.: 30057.147

Dear Ms. Cole:

Enclosed for filing in the above-referenced docket are Utilities, Inc.'s Notice of Service of First Set of Interrogatories to Citizens of the State of Florida (No. 1) and Notice of Service of First Request to Produce to Citizens of the State of Florida (Nos. 1-4)

MARTIN'S. FRIEDMAN

For the Firm

Very truly yours,

MSF/mp Enclosures

cc: Ralph Jaeger, Esquire, Office General Counsel (w/enclosures) (via e-mail)
Stephen Reilly, Esquire, Office of Public Counsel (w/enclosures) (via Facsimile)
Kenneth A. Hoffman, Esquire (w/enclosures)

John P. Hoy, Chief Regulatory Officer (w/enclosures)

Rick Durham, Regional Vice President for Operations (w/enclosures)

Patrick C. Flynn, Regional Director (w/enclosures)

Frank Seidman (w/enclosures)

In re: Proposed adoption of Rule 25-30.4325,	)	DOCKET NO.: 070183-WS
F.A.C., Water Treatment Plant Used and	)	
Useful Calculations.	)	

# UTILITIES, INC.'S NOTICE OF SERVICE OF FIRST SET OF INTERROGATORIES TO CITIZENS OF THE STATE OF FLORIDA (NO. 1)

UTILITIES, INC., by and through its undersigned attorney and pursuant to Rule 28-106.206 of the Florida Administrative Code and Rule 1.340 of the Florida Rules of Civil Procedure, hereby gives notice of propounding its First Set of Interrogatories (No. 1) on the Citizens of the State of Florida.

Respectfully submitted this 19<sup>th</sup> day of November, 2007, by:

Rose, Sundstrom & Bentley, LLP 2180 W. State Road 434 Suite 2118

Longwood, FL 32779 PHONE: (407) 830-6331 FAX: (407) 830-6331

mfriedman@rsbattorneys.com

MARTIN S. FRIEDMAN

# CERTIFICATE OF SERVICE DOCKET NO.: 070183-WS

I HEREBY CERTIFY that a copy of the foregoing Notice along with original First Set of Interrogatories have been furnished by Facsimile and U. S. Mail this 19<sup>th</sup> day of November, 2007, to:

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

### with copies to:

Ralph Jaeger, Esquire Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Kenneth Hoffman, Esquire Post Office Box 551 Tallahassee, FL 32302

MARTIN S. FRIEDMAN

In re: Proposed adoption of Rule 25-30.4325, F.A.C., Water Treatment Plant Used and	)	DOCKET NO.: 070183-WS
Useful Calculations.	)	

# UTILITIES, INC.'S FIRST SET OF INTERROGATORIES TO CITIZENS OF THE STATE OF FLORIDA (NO. 1)

UTILITIES, INC., by and through its undersigned attorney and pursuant to Rule 28-106.206 of the Florida Administrative Code and Rule 1.340 of the Florida Rules of Civil Procedure, propounds the following First Set of Interrogatories (No. 1) upon the Citizens of the State of Florida, to be answered under oath within the time set forth in the foregoing Rules:

### <u>Interrogatory</u>

- 1. Identify all water treatment and/or storage systems designed by Mr. Woodcock, or in which he provided permitting functions, including:
  - A. Client
  - B. Date
  - C. Agency design was filed with.
  - D. Detailed Description of the system designed and/or permitted.

#### **AFFIDAVIT**

## STATE OF FLORIDA

#### COUNTY OF SEMINOLE

COUNTI OF SEN	IIIIOLL					
BEFORE	ME,	the	undersigned	authority,	personally	appeared
		, who	deposed and sta	nted that he/sl	ne provided the	e answers to
Utilities, Inc.'s Fi	rst Set o	of Inter	rogatories (No. 1	1) served on t	he Citizens of	the State of
Florida on Nover	nber 19	, 2007,	and that the res	ponses are tru	e and correct to	o the best of
his/her informati	on and	belief.				
Sworn to a	and subs	scribed	before me this _	day of		, 2007.
			NOTAR	Y PUBLIC - St	ate of Florida	***************************************
			Printed	Name:		
			My con	nmission expir	es:	

In re: Proposed adoption of Rule 25-30.4325,	)	DOCKET NO.: 070183-WS
F.A.C., Water Treatment Plant Used and	)	
Useful Calculations.	)	

# <u>UTILITIES, INC.'S NOTICE OF SERVICE OF FIRST REQUEST TO PRODUCE</u> <u>TO CITIZENS OF THE STATE OF FLORIDA (NOS. 1-4)</u>

UTILITIES, INC., by and through its undersigned attorney and pursuant to Rule 28-106.206 of the Florida Administrative Code and Rule 1.350 of the Florida Rules of Civil Procedure, hereby gives notice of serving its First Request to Produce (Nos. 1-4) on the Citizens of the State of Florida.

Respectfully submitted this 19<sup>th</sup> day of November, 2007, by:

Rose, Sundstrom & Bentley, LLP 2180 W. State Road 434

**Suite 2118** 

Longwood, FL 32779

PHONE: (407) 830-6331 FAX: (407) 830-6331

mfriedman@rsbattorneys.com

MARTIN S. FRIEDMAN

# CERTIFICATE OF SERVICE DOCKET NO.: 070183-WS

I HEREBY CERTIFY that a copy of the foregoing Notice along with original First Request to Produce (Nos. 1-4) has been furnished by Facsimile and U. S. Mail this 19<sup>th</sup> day of November, 2007, to:

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

### with copies to:

Ralph Jaeger, Esquire Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Kenneth Hoffman, Esquire Post Office Box 551 Tallahassee, FL 32302

MARTIN S. FRIEDMAN

In re: Proposed adoption of Rule 25-30.4325,	)	DOCKET NO.: 070183-WS
F.A.C., Water Treatment Plant Used and	)	
Useful Calculations.	)	

# UTILITIES, INC.'S FIRST REQUEST TO PRODUCE (NOS. 1-4) TO CITIZENS OF THE STATE OF FLORIDA

UTILITIES, INC., by and through its undersigned attorney and pursuant to Rule 28-106.206 of the F. A. C. and Rule 1.350 of the Fla. R. Civ. P., hereby requests that the Citizens of the State of Florida produce the following documents at the office of Martin S. Friedman, Esquire, Rose, Sundstrom & Bentley, LLP, 2180 W. State Road 434, Suite 2118, Longwood, FL 32779, within the time set forth in the Rules of Civil Procedure.

### Requests to Produce

- 1. Copies of all plans and specifications for all water treatment and storage systems designed by Mr. Woodcock and/or for which he provided permitting functions.
- 2. Copies of all requests from DEP for additional information for those applications which Mr. Woodcock provided the design of the water treatment and/or storage system or in which he provided permitting functions.
- 3. Copies of all responses to DEP's requests for additional information for those applications which Mr. Woodcock provided the design of the water treatment and/or storage system or in which he provided permitting functions.
- 4. Copies of all permits granted for those water treatment and storage systems designed and/or permitted by Mr. Woodcock.

Rose, Sundstrom & Bentley, LLP 2180 W. State Road 434, Suite 2118 Longwood, FL 32779 PHONE: (407) 830-6331 mfriedman@rsbattorneys.com

MARTIN SYFRIEDMAN