

Dorothy Menasco

From: Ann Bassett [abassett@lawfla.com]
Sent: Monday, May 16, 2011 11:42 AM
To: Filings Electronic <Filings@PSC.STATE.FL.US
Cc: William Rish; Keino Young; Michael McKenzie
Subject: Docket No. 100128-WU
Attachments: 2011-05-16-100128, Ltr to K Young on Data Request.pdf

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The Docket No. is 100128-WU - Application for Increase in Water Rates in Gulf County by Lighthouse Utilities Company, Inc.

This is being filed on behalf of Lighthouse Utilities Company, Inc.

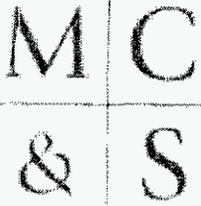
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Letter from Norman H. Horton, Jr. to Keino Young, Esq.

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May 16, 2011

VIA ELECTRONIC MAIL AND U. S. MAIL

Keino Young, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 100128-WU

Dear Mr. Young:

We have received Staff's Fifth Data Request sent by letter dated May 13, 2011 consisting of four items.

Item 4 requests Lighthouse to respond to the "concerns" raised by Office of Public Counsel ("OPC") in their letter of May 11, 2011. OPC is not a party to this proceeding yet has filed what amounts to discovery that is being routed through Staff. Allowing OPC to conduct discovery in this manner is contrary to the Rules of this Commission and the Rules of Civil Procedure. Moreover, this approach raises some overall reservations and concerns. Notwithstanding the concerns, Lighthouse will respond to the issues raised with one exception but in so doing does not accept or agree with this approach.

The exception to the extent of the response is with respect to Item 18 which essentially requests that Schedule E-14 be prepared again with sixteen (16) additional months. Due to software limitations, data by month has to be expanded and re-formatted since reports by meter size cannot be produced automatically, only manually. This process would be time consuming and unnecessarily add additional expense to the case.

Sincerely,

Norman H. Horton, Jr.

NHH:amb

cc: Mr. Jay Rish
Mr. Ralph Roberson
Docket File

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