

**Dorothy Menasco**

**From:** jennifer.gillis@hklaw.com  
**Sent:** Monday, November 14, 2011 4:53 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Andrew.McBride@arlaw.com; Caroline Klancke; Cecilia.Bradley@myfloridalegal.com; David.Bernstein@arlaw.com; jrichards@pascocountyfl.net; KELLY.JR@leg.state.fl.us; kenneth.curtin@arlaw.com; Larry Harris; Lisa Bennett; CHRISTENSEN.PATTY@leg.state.fl.us; Ralph Jaeger  
**Subject:** 100330-WS -- Electronic Filing  
**Attachments:** RESP YES RFA.pdf

a. Person responsible for this electronic filing:

Gigi Rollini  
Holland & Knight LLP  
Post Office Drawer 810  
Tallahassee, FL 32302-0810  
(850) 224-7000  
[Gigi.rollini@hklaw.com](mailto:Gigi.rollini@hklaw.com)

b. Docket number and title for electronic filing are: Docket No. 100330-WS - In Re: Application for increase in water and wastewater rates in Alachua, Brevard, DeSoto, Hardee, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc.

c. The name of the party on whose behalf the document is filed: Aqua Utilities Florida, Inc. ("AUF").

d. Total number of pages: 4

e. Brief description of filing: AQUA UTILITIES FLORIDA, INC. 'S RESPONSES TO FIRST REQUEST FOR ADMISSIONS TO AQUA UTILITIES FLORIDA, INC. SERVED BY YES COMMUNITIES, INC. D/B/A ARREDONDO FARMS

**Jennifer Gillis | Holland & Knight**

Sr Legal Secretary  
315 South Calhoun Street, Suite 600 | Tallahassee FL 32301  
Phone 850.425.5605 | Fax 850.224.8832  
[jennifer.gillis@hklaw.com](mailto:jennifer.gillis@hklaw.com) | [www.hklaw.com](http://www.hklaw.com)

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11/14/2011

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

DOCKET NO. 100330-WS

Dated: November 14, 2011

**AQUA UTILITIES FLORIDA, INC.'S RESPONSES TO FIRST REQUEST FOR  
ADMISSIONS TO AQUA UTILITIES FLORIDA, INC. SERVED BY  
YES COMMUNITIES, INC. D/B/A ARREDONDO FARMS**

Aqua Utilities Florida, Inc. ("AUF"), by and through its undersigned counsel and pursuant to Order Establishing Procedure No. PSC-11-0309-PCO-WS, as modified by Order No. PSC-11-0384-PCO-WS ("Procedural Order"), Rule 28-106.206, Florida Administrative Code, and Rule 1.370, Florida Rules of Civil Procedure, hereby serves its responses to the First Request for Admissions propounded by Yes Communities, Inc. d/b/a Arredondo Farms ("YES") on October 14, 2011.

**GENERAL OBJECTIONS**

1. By responding to YES' Request for Admissions, AUF does not concede that the responses are relevant or material to the subject matter of this action or admissible as evidence, and AUF reserves the right to object to their admissibility at final hearing.

2. AUF objects to YES' Request for Admissions to the extent the requests are intended to solicit information protected from disclosure by the attorney-client privilege, accountant-client privilege, work product doctrine, or any other privilege.

3. AUF objects to YES' Requests for Admissions to the extent that they request admissions as to conclusions of law.

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4. AUF's failure to object on a particular ground or grounds shall not be construed as a waiver of its rights to object on any additional grounds. In making these objections, AUF does not in any way waive or intend to waive, but rather intend to preserve and is preserving any additional applicable objections.

5. AUF continues to investigate the matters that are the subject of this matter. The responses set forth herein are at all times subject to such additional or different information that discovery or further investigation may disclose.

6. AUF objects to the instructions to the extent they purport to impose duties not contemplated by the Florida Rules of Civil Procedure.

7. Subject to and without waiving these General Objections, AUF sets forth its responses to the numbered requests of YES' First Request for Admissions as follows:

**RESPONSES TO REQUESTS FOR ADMISSIONS**

**REQUEST NO. 1:** Admit that Aqua employs Steven Grisham as an employee in the State of Florida.

**RESPONSE:** Admit that Steven Grisham is an employee of Aqua Utilities Florida, Inc.

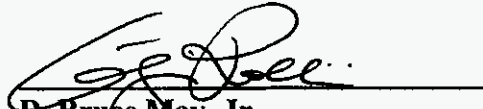
**REQUEST NO. 2:** Admit that Steven Grisham has authority to act on behalf of Aqua in the performance of his job duties.

**RESPONSE:** Admit that Steven Grisham has authority to act on behalf of Aqua Utilities Florida, Inc., when performing his job duties within the course and scope of his employment.

**REQUEST NO. 3:** Admit that Steven Grisham sometimes performs work at Arredondo Farms as part of his job duties with Aqua.

**RESPONSE: Admitted.**

**HOLLAND & KNIGHT LLP**



**D. Bruce May, Jr.**

Fla. Bar No. 354473

**Gigi Rollini**

Fla. Bar No. 684491

Holland & Knight LLP

Post Office Drawer 810

Tallahassee, Florida 32302-0810

Phone: (850) 224-7000

Fax: (850) 224-8832

E-Mail: [bruce.may@hklaw.com](mailto:bruce.may@hklaw.com)

[gigi.rollini@hklaw.com](mailto:gigi.rollini@hklaw.com)

-and-

**Kimberly A. Joyce, Esquire**

Aqua America, Inc.

762 West Lancaster Avenue

Bryn Mawr, PA 19010

(610) 645-1077 (Telephone)

(610) 519-0989 (Facsimile)

**Attorneys for Aqua Utilities Florida, Inc.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was furnished by electronic mail and U.S. Mail this 14<sup>th</sup> day of November, 2011 to:


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

J.R. Kelly  
Patricia Christensen  
Office of Public Counsel  
c/o The Florida Legislature  
111 W Madison St, Room 812  
Tallahassee, FL 32399-1400

Joseph D. Richards  
Senior Assistant County Attorney  
Pasco County Attorney's Office  
8731 Citizens Drive, Suite 340  
New Port Richey, FL 34654

Kenneth M. Curtin  
Adams and Reese LLP  
150 Second Avenue North, Suite 1700  
St. Petersburg, Florida 33701

Cecilia Bradley  
Senior Assistant Attorney General  
Office of the Attorney General  
The Capitol - PL01  
Tallahassee, FL 32399-1050

  
\_\_\_\_\_  
Attorney