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Sent: Friday, December 21, 2012 11:37 AM
To: Filings@psc.state.fl.us
Cc: 'Gene Brown'; Martha Barrera; 'Marty Friedman'; Saylor, Erik; Vandiver, Denise; Roberts, Brenda; Michael Lawson; Christensen, Patty; Roberts, Brenda
Subject: 110200-WU CITIZENS' INITIAL OBJECTIONS TO WMSI's 1st POD's TO OPC (NOS. 1-5)
Attachments: OPC's Objections to WMSI's 1st POD's to OPC (Nos. 1-5).pdf

Electronic Filing

a. Person responsible for this electronic filing:

Erik L. Saylor, Associate Public Counsel
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b. Docket No. 110200-WU

In re: Application for increase in water rates in Franklin County by Water Management Services, Inc.

c. Document being filed on behalf of the Office of Public Counsel

d. There are a total of 5 pages.

e. The document attached for electronic filing is CITIZENS' INITIAL OBJECTIONS TO WATER MANAGEMENT SERVICES, INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO THE OFFICE OF PUBLIC COUNSEL (NOS. 1-5).

Thank you for your attention and cooperation to this request.

Monica R. Woods
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WMSI-110200-0117

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for increase in water rates in
Franklin County by Water Management
Services, Inc.

Docket No: 110200-WS

Dated: December 21, 2012

**CITIZENS' INITIAL OBJECTIONS TO WATER MANAGEMENT SERVICES, INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO THE OFFICE OF
PUBLIC COUNSEL (NOS. 1-5)**

Office of Public Counsel, (Citizens or OPC), by the requirements set forth in Commission Order No. PSC-12-0526-PCO-WU, Rule 1.340(a), Florida Rule of Civil Procedure, submit the following initial objections to the First Request For Production (Nos. 1-5) (Requests) propounded by Water Management Services, Inc. (WMSI or Utility) on December 18, 2012.

GENERAL OBJECTIONS

With respect to the "Definitions" and "Instructions" in the requests, Citizens object to any definitions or instructions that are inconsistent with Citizens' discovery obligations under applicable rules. If some question arises as to Citizens' discovery obligations, Citizens will comply with applicable rules and not with any of WMSI's definitions or instructions that are inconsistent with those rules.

Citizens object to each and every request to the extent it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such discovery requests. Any responses provided by Citizens are provided subject to, and without waiver of, the foregoing objection.

Citizens also object to any request that purports to require Citizens or its experts to prepare studies, analyses, or to do work for OPC that has not been done for Citizens.

Citizens generally object to any request that calls for information prepared in anticipation of litigation or hearing, for data or information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law.

Citizens reserve the right to supplement any of its responses if Citizens cannot locate the answers immediately due to their magnitude and the work required to aggregate them, or if Citizens later discover additional responsive information in the course of this proceeding. By making these general objections at this time, Citizens do not waive or relinquish its right to assert additional general and specific objections to WMSI's discovery.

By making these responses herein, Citizens do not concede that any request is relevant to this action or is reasonably calculated to lead to the discovery of admissible evidence. Citizens expressly reserve the right to object to further discovery into the subject matter of any of these requests, to the introduction of evidence of any response or portion thereof, and to supplement its responses should further investigation disclose responsive information.

In responding to these Requests, Citizens have made a reasonable inquiry of those persons likely to possess information responsive thereto and has conducted a reasonable search of those records in Citizens' possession, custody, or control where the requested information would likely be maintained in the ordinary course of business. To the extent that WMSI's requests ask Citizens to go to greater lengths, Citizens object because such requests are overly broad, unduly burdensome, and unreasonable.

Citizens object to providing information to the extent that such information is already in the public record before the Florida Public Service Commission and available to WMSI through normal procedures.

In responding to these Requests, Citizens do not waive the foregoing objections, or the specific objections that are set forth in the responses to particular requests.

ADDITIONAL SPECIFIC OBJECTIONS

In addition to the general objections which apply to every request for production, Citizens provide the following objections to specific Requests:

Request 1. Please provide a copy of the contract or engagement letter by which OPC engaged Larkin & Associates, P.L.L.C., and/or Helmuth Schultz III to assist OPC in this proceeding.

Objection: No additional specific objection at this time.

Request 2. Please provide a copy of all invoices or bills rendered by Larkin & Associates, P.L.L.C., and/or Helmuth Schultz III to assist OPC in this proceeding.

Objection: No additional specific objection at this time.

Request 3. Please provide a copy of all documents from Larkin & Associates, P.L.L.C., and/or Helmuth Schultz III estimating the amount of time they would incur in assisting OPC in this proceeding.

Objection: No additional specific objection at this time.

Request 4. Please provide a copy of all documents which OPC believes show the Tallahassee lots that OPC asserts in this proceeding should be amortized have ever been in rate base, or otherwise paid for by the customers.

Objection: No additional specific objection at this time.

Request 5. Please provide a copy of all documents supporting OPC's argument that even if the Tallahassee lots had been in rate base that they (sic) gain on sale has not been fully amortized.

Objection: No additional specific objection at this time.

J.R. KELLY
PUBLIC COUNSEL



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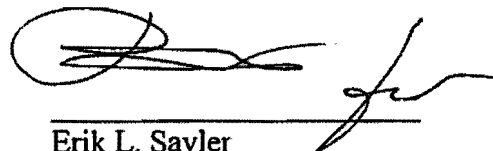
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing **CITIZENS' INITIAL OBJECTIONS TO WATER MANAGEMENT SERVICES, INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO THE OFFICE OF PUBLIC COUNSEL (NOS. 1-5)** has been furnished electronically and/or by U.S. Mail on this 21st day of December, 2012, to the following:

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