

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Analysis of UTILITIES, INC.'S financial
accounting and customer service computer
system

Docket No.: 120161-WS

UTILITIES, INC.'S OBJECTIONS TO CITIZENS' SECOND REQUEST TO PRODUCE

UTILITIES, INC. ("UI"), by and through its undersigned attorneys, files this objection to Citizens' Second Request to Produce, Numbered 8, 10 and 12, and states as follows:

8. Please provide a copy of all RFPs that were issued by Utilities, Inc. or Highstar Capital for professional services related to a new accounting and customer service computer prior to contracting with Deloitte Consulting for the design and installation of Project Phoenix.

Objection: UI Objects to providing this documentation. This Docket is not all-encompassing for all Project Phoenix issues. This docket was opened pursuant to UI's Petition for Establishment of Generic Docket "to address the impact of divested systems on the recovery of the cost of UI's financial accounting and customer service system referred to as 'Project Phoenix,' " and the request for relief was limited to addressing "the impact of divested systems on the Project Phoenix costs." Seeking this documentation goes beyond the scope of the Docket. This documentation falls into the same category as Interrogatory 2b, and Request to Produce 1 to which Utilities, Inc. objected, which objection was upheld by the Prehearing Commissioner.

10. Please provide timesheets for Utilities, Inc. employees including other affiliate employees whose labor was capitalized into Project Phoenix.

Objection: This is essentially the same as Interrogatory 2j to which Utilities, Inc. objected, which objection was upheld by the Prehearing Commissioner,

12. Please provide a copy all of the board of director minutes from 2006 to 2013 that discuss any aspect of Project Phoenix.

Objection: UI Objects to providing this documentation. This Docket is not all-encompassing for all Project Phoenix issues. This docket was opened pursuant to UI's Petition for Establishment of Generic Docket "to address the impact of divested systems on the recovery of the cost of UI's financial accounting and customer service system referred to as 'Project Phoenix,' " and the request for relief was limited to addressing "the impact of divested systems on the Project Phoenix costs." Seeking this documentation goes beyond the scope of the Docket. This documentation falls into the same category as Interrogatories 2b, c, d and e to which Utilities, Inc. objected, which objection was upheld by the Prehearing Commissioner. This is a text book example of a fishing expedition discovery request.

Respectfully submitted this 19th day of
March, 2014, by:

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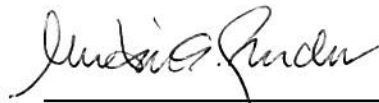
CERTIFICATE OF SERVICE
DOCKET NO. 120161-WS

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

U.S. Mail and E-Mail to the following parties this 19th day of March, 2014:

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