

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for increase in water and wastewater rates in Charlotte, Highlands, Lake, Lee, Marion, Orange, Pasco, Pinellas, Polk, and Seminole Counties, by Sunshine Water Services Company.

DOCKET NO.: 20240068-WS

FILED: November 19, 2024

**CITIZENS' SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS
TO SUNSHINE WATER SERVICES COMPANY (NOS. 45-46)**

Pursuant to § 350.0611(1), F.S., Rule 28-106.206, Fla. Admin. Code, and Rule 1.350, Fla. R. Civ. P., the Citizens of the State of Florida, through the Office of Public Counsel, request Sunshine Water Services Company (“Sunshine” or “Company”) to produce the following documents for inspection and copying at the Office of Public Counsel, Claude Pepper Building, 111 West Madison Street, Suite 812, Tallahassee, Florida 32399-1400, or at such other mutually agreed place, within twenty (20) days. **In lieu of hard copy responses, OPC requests that the Company provide the responses electronically as described below in the Instructions.**

DEFINITIONS

As used herein, the following words shall have the meanings indicated:

“You”, “your”, “Company” or “Sunshine” refers to Sunshine Water Services Company, its employees, consultants, agents, representatives, attorneys of the Company, and any other person or entity acting on behalf of the Company, including the Parent or Affiliate. “Parent” means the holding company or ultimate owner of the Florida regulated Company. “Affiliate” means the affiliates or sister companies regulated in or operated in Florida or which are regulated by, or operate primarily in, another jurisdiction.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software. The terms "document" and "documents" are meant to have the broadest possible meaning under applicable law and includes, but is not necessarily limited to, any written, recorded, filmed or graphic matter, whether produced, reproduced, or on paper, e-mail, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, memoranda, notes, minutes, records, photographs, correspondence, communications, telegrams, diaries, bookkeeping

entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, and notes, any of which are in your possession, custody, or control.

INSTRUCTIONS

1. If any document is withheld under any claim to privilege, please furnish a list identifying each document for which privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
2. Responsive documents available in an electronic format shall be provided in their native electronic format, unless the parties have reached a specific agreement in advance for production of the documents in a different, agreed-upon format or medium. OPC requests that responses for each production of document request be provided in separate electronic folders that include the documents responsive to the request.
3. If you have possession, custody, or control of the original of the documents requested, please produce a copy of the originals and all versions that are different in any way from the original, whether by interlineation, receipt stamp or notation. If you do not have possession, custody, or control of the originals of the documents requested, please produce a copy of the version(s) in your possession, custody, or control, however, made.
4. In providing documents, the Company, is requested to furnish all documents or items in its physical possession or custody, as well as those materials under the physical possession, custody or control of any other person acting or purporting to act on behalf of the Company or any of the employees or representatives, whether as an agent, independent contractor, attorney, consultant, witness, or otherwise, of the Company.
5. Please construe “and” as well as “or” either disjunctively or conjunctively as necessary to bring within the scope of this production of documents any document which might otherwise be construed to be outside the scope.

6. Please provide all responses that include workpapers, data, calculations and spreadsheets in non-password protected and executable PC-compatible computer program/models/software. Formulae, links, and cells, formatting, metadata and any other original features assisting in calculation should be intact. For example, Excel documents and documents of a similar format shall be produced in their native electronic format, with all spreadsheets, formulas, and links unlocked and intact. To the extent the data requested does not exist in the form requested, please notify the undersigned counsel so that the parties can confer to reach a resolution for timely production.
7. Documents should be produced in an OCR (Optical Character Recognition) searchable format.
8. Pursuant to the Commission's order establishing procedure, each page of every document produced pursuant to requests for production of documents shall be identified individually through the use of a Bates Stamp or other equivalent method of sequential identification.

DOCUMENTS REQUESTED

45. Please provide copies of all Sunshine Water Services Company's board committee minutes and presentations in 2022, 2023, and 2024 to-date.

46. Please provide copies of all Sunshine Water Services Company's parent's board committee minutes and presentations in 2022, 2023, and 2024 to-date.

Respectfully submitted,

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Public Counsel

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*Attorneys for the Citizens
of the State of Florida*

CERTIFICATE OF SERVICE
DOCKET NO. 20240068-WS

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 19th day of November, 2024, to the following:

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