## 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

## SUNSHINE WATER SERVICES COMPANY'S OBJECTION TO OFFICE OF PUBLIC COUNSEL'S DISCOVERY

Sunshine Water Services Company "SWS"), by and through its undersigned counsel, hereby objects to Office of Public Counsel's ("OPC") Eleventh Request for Production of Documents (Nos. 57-62), and as a basis therefore states:

On January 2, 2025, OPC served its Eleventh Request for Production of Documents on SWS. Pursuant to the Order Establishing Procedure, Order No. PSC-2024-0259-PCO-WS, responses to discovery must be served within twenty days of receipt of discovery request, which as to this discovery would be January 22, 2025. This discovery is not related to SWS's rebuttal testimony, thus the shorter response deadline does not apply. The discovery deadline in the original OEP was January 16, 2025. At the request of OPC, the OEP was modified by Order No. PSC-2024-0437-PCO-WS, which included, among other things, extending the discovery deadline to January 21, 2025.

Since the responses to OPC's Eleventh Request for Production of Documents are due past the discovery deadline they are untimely, and thus objectionable. Respectfully submitted this 24th day of January, 2025.

DEAN MEAD 420 South Orange Ave., Suite 700 Orlando, FL 32801 Telephone: (407) 841-1200 Friedman Direct Telephone: (407) 310-2077 Fax: (407) 423-1831 mfriedman@deanmead.com

<u>/s/ Martin S. Friedman</u> Martin S. Friedman, Esquire John L. Wharton, Esquire

## **CERTIFICATE OF SERVICE**

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

ctronic mail to the following parties this 24th day of January, 2025:

Walt Trierweiler, Esquire Charles J. Rehwinkel, Esquire Octavio Simoes-Ponce, Esquire Austin Watrous, Esquire Office of Public Counsel c/o Florida Legislature 111 West Madison Street, Suite 812 Tallahassee, FL 32399-1400 <u>TRIERWEILER.WALT@leg.state.fl.us</u> rehwinkel.charles@leg.state.fl.us PONCE.OCTAVIO@leg.state.fl.us WATROUS.AUSTIN@leg.state.fl.us Ryan Sandy, Esquire Saad Farooqi, Esquire Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <u>sfarooqi@psc.state.fl.us</u> <u>rsandy@psc.state.fl.us</u>. <u>discovery-gcl@psc.state.fl.us</u>

<u>/s/ Martin S. Friedman</u> Martin S. Friedman