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MARTIN S. FRIEDMAN, P.A. VALERIE L. LORD BRIAN J. STREET

December 7, 2006

#### HAND DELIVERY

Ms. Blanca Bayo Commission Clerk and Administrative Services Director Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

RE: Docket No.: 060255-SU; Tierra Verde Utilities, Inc.'s Application for Rate Increase

in Pinellas County, Florida Our File No.: 30057.111

Dear Ms. Bayo:

CMP	Enclosed for filing in the above-referenced docket are Tierra Verde Utilities, Inc.'s Notices of Service of (1) Responses to Citizen's First Request for Production of Documents (Nos. 1-4) and (2) Answers to Citizen's First Set of Interrogatories (Nos. 1-12).
	(1100.1 1) and (2) into to didden bring bet of interrogatories (1100.1 12).
COM	Should you have any questions regarding this filing, please do not hesitate to give me
CTR	_a call.
ECR	
GCL	very littly yours,
OPC	
RCA	_ (In I Koert
SCR	VALERIE L. LORD
SGA	For the Firm
1	PQD's 1209'S
SEC 1	—VLL/tlc DOCUMENT NUMBER-DATE DOCUMENT NUMBER-DATE
OTH	Enclosures

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FPSC-COMMISSION CLERK

Ms. Blanca Bayo Commission Clerk and Administrative Services Director Florida Public Service Commission December 7, 2006 Page 2

cc: Martha Brown, Esquire, Office of General Counsel (w/enc. - by hand delivery)
Mr. Troy Rendell, Division of Economic Regulation (w/o enc. - by hand delivery)
Ms. Cheryl Bulecza-Banks, Div. of Economic Regulation (w/o enc. - by hand delivery)
Ms. Shannon Hudson, Div. of Economic Regulation (w/o enc. - by hand delivery)
Ms. Mahnaz Massoudi, Div. of Economic Regulation (w/o enc. - by hand delivery)
Stephen Reilly, Esquire, Office of Public Counsel (w/enc. - by hand delivery)
Steven M. Lubertozzi, Chief Regulatory Officer (w/enclosures - by U.S. Mail)
Kirsten Weeks, CPA (w/o enclosures - by U.S. Mail)
John Hoy, Regional Vice President for Operations (w/o enclosures - by U.S. Mail)
Patrick C. Flynn, Regional Director (w/o enclosures - by U.S. Mail)
Ms. Deborah Swain (w/o enclosures - by U.S. Mail)
Mr. Frank Seidman (w/o enclosures - by U.S. Mail)

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## ORIGINAL

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application of TIERRA VERDE UTILITIES, INC. for an increase in wastewater rates in Pinellas County, Florida

**DOCKET NO. 060255-SU** 

# NOTICE OF SERVICE OF RESPONSE TO CITIZEN'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-4)

TIERRA VERDE UTILITIES, INC., by and through its undersigned counsel, hereby gives notice of serving its response to Citizen's First Request for Production of Documents (Nos. 1-4).

Respectfully submitted this 7<sup>th</sup> day of November, 2006, by:

ROSE, SUNDSTROM & BENTLEY, LLP Sanlando Center 2180 W. State Road 434, Suite 2118 Longwood, FL 32799 Telephone: (407) 830-6331

MARTIN S. FRIEDMAN Florida Bar No.: 199060

VALERIE L. LORD

Florida Bar No.: 710989

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Service of response to Citizens' First Request for Production of Documents (Nos. 1-4) has been served upon the following parties by hand delivery this 7<sup>th</sup> day of November, 2006:

Stephen C. Reilly, Deputy Public Counsel Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400

Martha Brown, Esquire Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

MARTIN S. FRIEDMAN

VALERIE L. LORD

For the Firm