

**Ruth Nettles**

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**From:** Ansley Watson, JR. [AW@macfar.com]  
**Sent:** Monday, September 08, 2008 4:33 PM  
**To:** Filings@psc.state.fl.us  
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**Subject:** Docket No. 080318-GU  
**Attachments:** 080318 - PGS Obj to OPC 2nd PODs.pdf

- a. Ansley Watson, Jr.  
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- b. Docket No. 080318-GU – Petition for rate increase by Peoples Gas System
- c. Peoples Gas System
- d. Total of 3 pages
- e. The attached document is Peoples' Objections to Citizens' Second Request for Production of Documents (Nos. 56-75).

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DOCUMENT NUMBER-DATE

0834 | SEP-8 8

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase )  
by Peoples Gas System. )

DOCKET NO. 080318-GU

Submitted for Filing:  
9-8-08

**PEOPLES GAS SYSTEM'S OBJECTIONS TO CITIZENS'  
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 56-75)**

Peoples Gas System ("Peoples" or the "Company") submits the following Objections to Citizens' Second Requests for Production of Documents (Nos. 56-75):

1. Peoples asserts, as if fully set forth herein, paragraphs 1 through 10 of the General Objections set forth in its Preliminary Response and Objections to Citizens' First Request for Production of Documents (Nos. 1-55), served herein on September 5, 2008.

2. Peoples objects to the time and place designated for production on grounds that producing documents that may be responsive to the requests at the specified time and place would require the Company to transport, or to copy and ship, voluminous documents to Tallahassee, copies of which the OPC may not even elect to request be copied after inspection. Further, voluminous documents responsive to Citizens' First Request for Production of Documents (Nos. 1-55) will be made available for inspection by the Office of Public Counsel at Peoples' offices in Tampa. Such documents will include certain documents responsive to at least seven categories of Citizens' Second Request for Production of Documents (Nos. 56-75). As such, Peoples' compliance with the time and place designated for production would be burdensome on Peoples and counterproductive for all parties.

DOCUMENT NUMBER-DATE

08341 SEP-8 08

FPSC-COMMISSION CLERK

DATED this 8th day of September, 2008.

Respectfully submitted,



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Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Objections to Citizens' Second Request for Production of Documents (Nos. 56-75), filed on behalf of Peoples Gas System, has been furnished electronically and by regular mail to the following, this 8th day of September, 2008:

Caroline M. Klancke, Esquire  
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