

Diamond Williams

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Sent: Friday, October 14, 2011 4:02 PM
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Subject: AQUA UTILITIES FLORIDA, INC. RATE ACTION (Docket. No. 100330-WS): INTERVENER, YES COMPANIES, LLC D/B/A ARREDONDO FARMS', FIRST SET OF REQUEST FOR ADMISSIONS TO APPLICANT, AQUA UTILITIES FLORIDA, INC.

Attachments: YES 1ST REQUEST FOR ADMISSIONS TO AUF.pdf

Electronic Filing

a. Person Responsible for this electronic filing:

David S. Bernstein, Esq.
 Adams and Reese LLP
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 St. Petersburg, Florida 33701
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b. Docket No. 100330-WS

In Re: Application for increase in water/wastewater rates in Alachua, Brevard, DeSoto, Hardee, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc.

c. Document being filed on behalf of YES COMPANIES, LLC d/b/a ARREDONDO FARMS

d. There are a total of 3 pages

e. The document attached for electronic filing is Intervener, YES Companies, LLC d/b/a Arredondo Farms', FIRST SET OF REQUEST FOR ADMISSIONS TO APPLICANT, AQUA UTILITIES FLORIDA, INC.

Thank you for your cooperation and attention to this matter.

Sue

Susan G. Sherman, CP, FRP
 Certified Paralegal
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 150 Second Avenue North, Suite 1700
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DOCUMENT NUMBER-DATE

07568 OCT 14 =

10/14/2011

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10/14/2011

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for increase in water/wastewater Rates in Alachua, Brevard, DeSoto, Hardee, Highlands, Lake, Lee Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc.

DOCKET NO. 100330-WS

Filed: October 14, 2011

**INTERVENER, YES COMPANIES, LLC D/B/A
ARREDONDO FARMS', FIRST SET OF REQUEST FOR
ADMISSIONS TO APPLICANT, AQUA UTILITIES FLORIDA, INC.**

Intervener, Yes Companies, LLC d/b/a Arredondo Farms ("YES"), by and through its undersigned counsel, and in accordance with Rule 28-106.206, Fla.Admin.C., and the Rules 1.280-1.400, Fla.R.Civ.P., propounds its Third Set of Interrogatories to be answered by Applicant, Aqua Utilities Florida, Inc ("Aqua").

Respectfully submitted,

ADAMS AND REESE, LLP
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By: s/ Andrew J. McBride
Andrew J. McBride
FL Bar No. 0067973
David S. Bernstein, Esquire.
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Attorneys for Intervener

CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished via email (where provided below) and U.S. Mail on October 14, 2011 to: **Kimberley A. Joyce, Esq.**, Aqua American, Inc., 762 West Lancaster Avenue, Bryn Mawr, PA 19010 kajoyce@aquaamerica.com; **D. Bruce May, Jr., Esq.**, P.O. Box 810, Tallahassee, Florida 32302-0810 (bruce.may@hkllaw.com); **J.R. Kelly, Esq. and Patty Christensen, Esq.**, Office of Public Counsel, c/o Florida Legislature, 111 W. Madison Street, Room 812, Tallahassee, Florida 32399-1400 (KELLY.JR@leg.state.fl.us) and CHRISTENSEN.PATTY@leg.state.fl.us ; **Robert Lloyd**, P.O. Box 63, Captiva, Florida 33924 (Rlloyd1@aol.com); **William Coakley**, 5934 Lake Osborne Drive, Lantana, Florida 33461 (wdco@comcast.net); **David L. Bussey**, 4948 Britni Way, Zephyrhills, Florida 33541 (dbussey@hotmail.com); **Kelly Sullivan, Esquire**, 570 Osprey Lakes Circle, Chuluota, Florida 32766-6658 (Kelly.Sullivan.Woods@gmail.com); **Ralph Jaeger**, Florida Public Service Commission, 2540 Shumard Oak Blvd., Tallahassee, Florida 32399-0850 (RJaeger@Psc.State.fl.us); **Joseph D. Richards, Esquire**, Pasco County Attorney's Office, 8731 Citizens Drive, Suite 340, New Port Richey, Florida 34654 (jrichards@pascocountyfl.net); **Cecilia Bradley, Esquire**, Office of the Attorney General, The Capitol – PL01, Tallahassee, Florida 32399 (Cecilia.Bradley@myfloridalegal.com)

s/ Andrew J. McBride
Attorney

A. DEFINITIONS

1. The term "Aqua" shall mean the Applicant, Aqua Utilities Florida, Inc., and any of its employees, predecessors-in-interests, assigns, officers, directors, attorneys, and agents of any kind.

2. The term "Arredondo Farms" shall mean the manufactured home community known as Arredondo Farms located at 7117 S.W. Archer Road, Gainesville, Florida 32608 in Alachua County, Florida to which Aqua provides water and wastewater services thereto and which is part of the Application. This includes both the water and wastewater systems known as Arredondo Estates and Arredondo Farms.

REQUESTS FOR ADMISSIONS

1. **Admit that Aqua employs Steven Grisham as an employee in the State of Florida.**
2. **Admit that Steven Grisham has authority to act on behalf of Aqua in the performance of his job duties.**
3. **Admit that Steven Grisham sometimes performs work at Arredondo Farms as part of his job duties with Aqua.**