

Eric Fryson

From: Vandiver, Denise [VANDIVER.DENISE@leg.state.fl.us]
Sent: Friday, May 04, 2012 2:50 PM
To: Filings@psc.state.fl.us; Martin Friedman Esquire (mfriedman@sflaw.com)
Cc: gdb5@comcast.net; Todd Brown; sandymchase@comcast.net; Bart Fletcher; Sayler, Erik; Vandiver, Denise; Ralph Jaeger; Martha Barrera
Subject: Docket No. 110200-WU; Application for increase in water rates in Franklin County by Water Management Services, Inc.

Attachments: WMSI Letter 05-04-12.pdf

a. The full name, address, telephone number, and e-mail address of the person responsible for the electronic filing:

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b. The docket number and title if filed in an existing docket:

Docket No. 110200-WU
Application for increase in water rates in Franklin County by Water Management Services, Inc.

c. The name of the party on whose behalf the document is filed:

Office of Public Counsel (OPC)

d. The total number of pages in each attached document:

2 pages

e. A brief but complete description of each attached document:

Copy of letter to Martin S. Friedman regarding discovery. Original sent by U.S. Mail.

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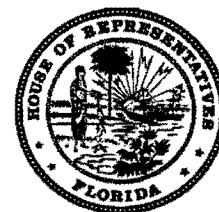
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May 4, 2012

Martin S. Friedman
Sundstrom, Friedman & Fumero. LLP
766 North Sun Drive, Suite 4030
Lake Mary, Florida 32746

Re: Docket No. 110200-WU; In Re: Application for increase in water rates in Franklin County by Water Management Services, Inc.

Dear Mr. Friedman:

Pursuant to Water Management Services, Inc.'s (Utility's) request, dated April 13, 2012, that the Office of Public Counsel (OPC) indicate which of the First Set of Interrogatories served by OPC that the Utility should answer, the short answer is all interrogatories, eventually. In the near future, OPC will be filing a motion with the Commission requesting an enlargement of the number of discovery questions which may be propounded upon parties similar to the number authorized in the prior rate case.

In the meantime, by this letter, OPC is supplying a list of interrogatories, totaling less than 30 interrogatories, which it requests be answered within 20 days of the date of this request. The 20-day timeframe is consistent with the procedural order issued in the last rate case. Further, the Utility has had more than 45 days to consider its potential responses to OPC's First Set of Interrogatories served on or about March 14, 2012. Thus, 20 days or less to respond to this abbreviated list of interrogatories should not be onerous or otherwise a hardship for the Utility. OPC is willing to work with Counsel for the Utility in satisfying this request.

OPC disagrees with the Utility's assertion that OPC served 91 interrogatories with subparts. While some interrogatories do contain subparts (i.e., seeking separate answers for each of the subparts identified), many do not. Please note that some of the interrogatories with "subparts" should be considered one interrogatory because the "subparts" merely indicate the *scope of the response* OPC is seeking and/or suggest a manner in which the response should be organized to supply a complete response. For these interrogatories, OPC is not seeking separate responses for each subpart but a "global response" which contains a full and meaningful response answered in the most efficient manner possible. If the Utility has a better way to organize its global response to these interrogatories and believes it can fully answer the substance of the global interrogatory request by some other means, OPC asks the Utility to respond in such manner. Otherwise, please consider the subparts in those interrogatories as a template for providing a global response.

Below is the list of interrogatories from OPC's First Set of Interrogatories to which OPC asks the Utility to respond. Under the "Subpart Explanation" in the list below, OPC identifies the interrogatories with

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subparts that fit this description of “global response” and also identifies the interrogatories which truly are seeking separate answers for each subpart.

OPC Interrogatory No.	Subpart Explanation	No. of Interrogatories Responses
1.	No subparts	1
2.	b. and c.	2
3.	No subparts	1
5.	No subparts	1
6.	No subparts	1
9.	a. and c. – 2 subparts	2
10.	c. and d. – 2 subparts	2
11.	a. – g. – OPC is seeking a global response; not separate individual responses.	1
12.	a. – i. – OPC is seeking a global response; not separate individual responses.	1
13.	c. – f. – 4 subparts	4
14.	a. – g. – OPC is seeking a global response; not separate individual responses.	1
15.	a. – f. – 6 subparts	6
16.	b. and c. – 2 subparts	2
22.	No subparts	1
15 of 26 Interrogatories from OPC First Set		26 of 30 Interrogatories with subparts

This interrogatory matrix for requested responses is keyed to OPC’s First Set of Interrogatories served on or about March 14, 2012.

Please let me know if you have any questions regarding this letter, the interrogatory matrix for responses OPC is seeking, or the explanation of the “global response” interrogatory discussed above.

Sincerely,

/s/ Erik L. Sayler

Erik L. Sayler
Associate Public Counsel

CC: Ann Cole, Director, Office of Commission Clerk (via e-file)
Gene Brown, President, Water Management Services, Inc. (via email)
Todd Brown, Div. Economic Regulation (via email)
Ralph Jaeger, Office of General Counsel (via email)
Martha Barrera, Office of General Counsel (via email)