

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Analysis of UTILITIES, INC.'S financial
accounting and customer service computer
system

Docket No.: 120161-WS

UTILITIES, INC.'S AMENDED OBJECTIONS TO CITIZENS' FIRST REQUEST TO PRODUCE

(This Amended Objection is being filed to eliminate language which may have implied unethical conduct by OPC, which was not the intent of the Objection)

UTILITIES, INC. ("UI"), by and through its undersigned attorneys, files this objection to Citizens' First Request to Produce which was served on January 28th, 2014, and states as follows:

At the outset, UI would point out that the "Instructions" will be ignored to the extent they exceed the requirements of Fla. R. Civ. P. 1.350

1. Please provide a copy of all contracts related to Project Phoenix, including the contract(s) to design and implement Project Phoenix, any subsequent Project Phoenix contracts, and any contracts for on-going maintenance and operations of Project Phoenix.

Objection: UI Objects to providing any subsequent Project Phoenix contracts, and contracts for on-going maintenance and operations of Project Phoenix. This docket was opened pursuant to UI's Petition For Establishment of Generic Docket "to address the impact of divested systems on the recovery of the cost of UI's financial accounting and customer service system referred to as 'Project Phoenix'", and the request for relief was limited to addressing "the impact of divested systems on the Project Phoenix costs." Seeking documentation of on-going operation and maintenance costs goes beyond the scope of the Docket.

2. Please provide a copy of all documents supporting the capitalization of additional Project Phoenix costs since June 2008 referenced in Interrogatory No. 7. These documents should include contracts, work orders, invoices, timesheets, allocation calculations and the basis of allocation, and all electronic or Excel worksheets with all formulas intact with no encryptions or pass-word protections. For any capitalized labor, please provide supporting timesheets or documentation to verify that the capitalized time was spent on the referenced project.

Objection: UI Objects to providing this documentation. This Docket is not an all encompassing for all Project Phoenix issues. This docket was opened pursuant to UI's Petition For Establishment of Generic Docket "to address the impact of divested systems on the recovery of the cost of UI's financial accounting and customer service system referred to as 'Project Phoenix' ", and the request for relief was limited to addressing "the impact of divested systems on the Project Phoenix costs." Seeking this documentation goes beyond the scope of the Docket.

3. Please provide a copy of documents that support how the general ledger was adjusted or subsidiary ledgers or worksheets were maintained to record or reflect the impact of the Commission ordered adjustments related to Project Phoenix referenced in Interrogatory No. 8.

Objection: UI Objects to providing this documentation. This Docket is not an all encompassing all Project Phoenix issues. This request has nothing to do with the divestitures. In fact, this docket was opened pursuant to UI's Petition For Establishment of Generic Docket "to address the impact of divested systems on the recovery of the cost of UI's financial accounting and customer service system referred to as 'Project Phoenix' ", and the request for relief was limited to addressing "the

impact of divested systems on the Project Phoenix costs.” Seeking this documentation goes beyond the scope of the Docket. Further, until this Commission rules on this issue adjustments to the general ledger are irrelevant.

4. Please provide a copy of all documents and electronic worksheets in Excel format that support the calculations used to determine the costs included in the balance of the regulatory asset, by system, as permitted by the Eagle Ridge Settlement referenced in Interrogatory No. 9. These documents should include contracts, work orders, invoices, timesheets, allocation calculations and the basis of allocation, and all electronic or Excel worksheets with all formulas intact with no encryptions or password protections. For any capitalized labor, please provide supporting timesheets or documentation to verify that the capitalized time was spent on the referenced project.

Objection: UI Objects to providing this documentation. This Docket is not an all encompassing all Project Phoenix issues. This docket was opened pursuant to UI’s Petition For Establishment of Generic Docket “to address the impact of divested systems on the recovery of the cost of UI’s financial accounting and customer service system referred to as ‘Project Phoenix’ ”, and the request for relief was limited to addressing “the impact of divested systems on the Project Phoenix costs.” Seeking this documentation goes beyond the scope of the Docket. Further, until this Commission rules on this issue adjustments to the general ledger are irrelevant.

5. Regarding Interrogatories Nos. 1-15, please provide any documents identified or referenced in the response to those interrogatories, or any documents otherwise responsive to those interrogatories.

Objection: UI Objects to providing this documentation. This Docket is not an all encompassing all Project Phoenix issues. This request has nothing to do with the

divestitures. In fact, this docket was opened pursuant to UI's Petition For Establishment of Generic Docket "to address the impact of divested systems on the recovery of the cost of UI's financial accounting and customer service system referred to as 'Project Phoenix' ", and the request for relief was limited to addressing "the impact of divested systems on the Project Phoenix costs." Seeking this documentation goes beyond the scope of the Docket.

Respectfully submitted this 27th day of
February, 2014, by:

FRIEDMAN, FRIEDMAN & LONG, P.A.
766 North Sun Drive, Suite 4030
Lake Mary, FL 32746
Phone: (407) 830-6331
Fax: (407) 878-2178
mfriedman@ffllegal.com
drudolf@friedmanfriedmanandlong.com
jhamel@friedmanfriedmanandlong.com



MARTIN S. FRIEDMAN
Florida Bar No.: 474797
For the Firm

CERTIFICATE OF SERVICE
DOCKET NO. 130161-WS

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished
by U.S. Mail and E-Mail to the following parties this 27th day of February, 2014:

Erik Sayler, Esquire
OFFICE OF PUBLIC COUNSEL
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400
SAYLER.ERIK@leg.state.fl.us

Martha Barrera, General Counsel
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
MBARRERA@PSC.STATE.FL.US



MARTIN S. FRIEDMAN
Florida Bar No.: 474797
For the Firm