

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for amendment
of Certificate No. 226-S to add
territory in Seminole County by
Florida Water Services
Corporation.

DOCKET NO. 971638-SU
FILED: DECEMBER 9, 1998

COMMISSION STAFF'S SECOND SET OF INTERROGATORIES TO
FLORIDA WATER SERVICES CORPORATION

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby propounds the following interrogatories, numbered seven through eight, to the Florida Water Services Corporation (FWSC or utility), pursuant to Rule 1.340, Florida Rules of Civil Procedure. These interrogatories shall be answered under oath by the Florida Water Services Corporation or its agent who is qualified to answer and who shall be fully identified, within thirty (30) days.

INSTRUCTIONS

A. FWSC shall answer these interrogatories to the fullest extent possible and shall furnish all information which is reasonably available to FWSC, its principals, agents, attorneys, affiliates or other representatives. FWSC may respond to an interrogatory by indicating that the requested information is reported on a specific schedule in the minimum filing requirements.

B. If FWSC cannot answer a particular interrogatory in full, after exercising due diligence to secure the information to do so, it should state the answer to the extent possible and specify why it is unable to answer the remainder. In addition, FWSC shall state whatever information or knowledge that it has concerning the unanswered portion.

C. If the requested information is not applicable, that response should be reported as well as the reason why. If the requested information is not available, that response should be reported as well as the reason why.

DOCUMENT NUMBER-DATE

13868 DEC-98

REGISTRATION REPORTING

COMMISSION STAFF'S SECOND SET OF INTERROGATORIES
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D. If financial information is requested for the utility's parent organization(s), and, if possible, that information should coincide with the approved test period. The most recent financial period should be used if "test year" information is not available for the parent company.

E. If the utility is an operating division of a larger company, but separate records permit isolation of the subject utility system, the utility's response to these interrogatories may reflect such information. For example, cost of capital information for the utility may be on a divisional basis and similar information for the combined company will be reported under the heading "parent company." This adaptation should be disclosed in the utility's response.

F. Please report the name(s) of each person responding to each of the following interrogatories, the business address and telephone number of each such person, and the relationship of each person to FWSC. Also, identify which interrogatory each such person has answered.

G. If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided to the Commission through a Commission audit, please so state, indicating the date provided and the audit document/record request number.

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INTERROGATORIES

7. The territory which FWSC requested to serve in its amendment application is currently served by septic tanks. Please describe any circumstances which would indicate that there are any problems with the septic service currently in existence.
8. Please describe any circumstances which would indicate that there is a need for central sewer service in the requested territory.

DATED: December 9, 1998 Jennifer Brubaker
Jennifer S. Brubaker, Staff Attorney
Bureau of Water and Wastewater
Division of Legal Services
Florida Public Service Commission

I HEREBY DECLARE that the responses to the above interrogatories are true and correct to my best knowledge and belief.

Florida Water Services Corporation
c/o Matthew Feil, Esquire
1000 Color Place
Apopka, Florida 32703-7797

By: _____

STATE OF FLORIDA

COUNTY OF _____

SWORN to and subscribed before me at _____,
County, Florida, this _____ day of _____, 19__.

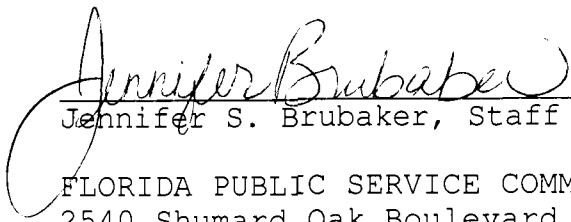
Notary Public
State of Florida
My Commission Expires:

(S E A L)

JSB

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the Commission Staff's Second Set of Interrogatories to Florida Water Services Corporation, numbered seven through eight, has been furnished to Matthew Feil, Esquire, 1000 Color Place, Apopka, Florida 32703-7797 and that a true and correct copy thereof has been furnished to Richard S. Taylor, Esquire, 531 Dog Track Road, Longwood, Florida 32752-1117 by U.S. Mail, this 9th day of December, 1998.



Jennifer S. Brubaker, Staff Attorney

FLORIDA PUBLIC SERVICE COMMISSION
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Tallahassee, Florida 32399-0850
(850) 413-6199