

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into ratemaking)
considerations of gain on sale from sale)
of facilities of Florida Water Services)
Corporation to Orange County.)
_____)

Docket No. 980744-WS

Filed: December 11, 2000

**FLORIDA WATER SERVICES CORPORATION'S
OBJECTIONS TO OFFICE OF PUBLIC COUNSEL'S THIRD
SET OF INTERROGATORIES AND THIRD SET OF
REQUEST FOR PRODUCTION OF DOCUMENTS**

Florida Water Services Corporation ("Florida Water"), by and through its undersigned counsel, and pursuant to Order No. PSC-00-1170-PCO-WS, issued June 27, 2000, Rule 28-106.206, Florida Administrative Code, and Rule 1.280, Florida Rules of Civil Procedure, files its objections to certain of the interrogatories and requests for production of documents contained in the Third Set of Interrogatories and Third Set of Request for Production of Documents served on Florida Water by the Office of Public Counsel on November 30, 2000. Florida Water's objections are as follows:

1. Interrogatory Number 37 provides:

Please list all companies that provide services similar to EnviroLab in central and south Florida.

Florida Water objects to this interrogatory as being overbroad and vague in terms of both the geographic area covered and the services included. This interrogatory is also unduly burdensome to the extent that it seeks to require Florida Water to determine the services provided by all laboratories in central and south Florida.

2. Request for Production of Documents numbers 35 and 36 state:

35. Provide all documents provided to Mr. Hughes' by Florida Water Services that Mr. Hughes' relied upon in developing his testimony.

DOCUMENT NUMBER-DATE

15856 DEC 11 8

TRIP-REGULATORY REPORTING

36. Provide all written communications provided to Mr. Hughes by Florida Water Services that Mr. Hughes' relied upon in developing his testimony.

Florida Water objects to these document production requests to the extent they seek to compel the production of documents protected by the attorney/client or work product privileges. Subject to and without waiving its objections, Florida Water will produce responsive documents to the extent they exist.

Respectfully submitted,



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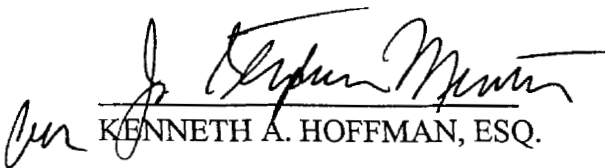
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 11 day of December, 2000:

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