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November 29, 2000

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

Re: Docket No. 980744-WS

Dear Ms. Bayo:

HAND DELIVERY

RECOLUS AND

Enclosed herewith for filing in the above-referenced docket on behalf of Florida Water Services Corporation ("Florida Water") are the original and fifteen copies of Florida Water's Objections to Office of Public Counsel's Third Set of Interrogatories and Third Set of Request for Production of Documents.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

Stephen Menton

JSM/knb Enclosures

cc: Counsel of Record

Trib.3

RECEIVED & FILED

ERRO HUMEAU OF RECORDS

DOCUMENT NUMBER-DATE

15856 DEC 118

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into ratemaking)	
considerations of gain on sale from sale)	Docket No. 980744-WS
of facilities of Florida Water Services)	
Corporation to Orange County.)	Filed: December <u>11</u> , 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 日 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,

KENNETH A. HOFFMAN, ESQ.

J. SŤEPHEN MENTON, ESQ.

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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 ____/_ day of December, 2000:

Jennifer Brubaker, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 370
Tallahassee, FL 32399-0850

Charles Beck, Esq.
Office of Public Counsel
111 West Madison Street
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Orange\objection.int

ENNETH A. HOFFMAN, ESQ