

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for amendment of Certificate No. 106-W to add and delete territory in Lake County by Florida Water Services Corporation.

DOCKET NO. 990054-WU

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the Commission Staff's First Request for Production of Documents to Florida Water Services Corporation, numbered one through three, has been furnished to Matthew J. Feil, Esquire, P.O. Box 609520, Orlando, Florida 32860-9520 and that a true and correct copy thereof has been furnished to Martin Friedman, Esquire, Rose, Sundstrom & Bentley, LLP, 2548 Blairstone Pines Drive, Tallahassee, Florida 32301 by U.S. Mail, this 3rd day of December, 1999.

Samantha Cibula, Staff Attorney FLORIDA PUBLIC SERVICE COMMISSION 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 (850) 413-6199

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DOCUMENT NUMBER-DATE

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DOCKET NO. 990054-WU ISSUED: DECEMBER 3, 1999

# COMMISSION STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA WATER SERVICES CORPORATION

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby requests that Florida Water Services Corporation produce copies of the following documents, pursuant to Rule 1.350, Florida Rules of Civil Procedure, at the office of Samantha Cibula, Esquire, Division of Legal Services, Florida Public Service Commission, Room 370, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, within thirty (30) days of service of this request.

## DEFINITION

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice memorandum, memorandum reflecting an oral communication, handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet or data processing card, computer printout, or any other written, recorded, transcribed, filed or graphic matter, however produced or reproduced.

- 1. Please provide a copy of the most recent 12 months of monthly operating permits for water for the Silver Lakes/Western Shore System.
- 2. Please provide any past Department of Environmental Protection (DEP) notices of violation or corrective orders in the last 5 years.

COMMISSION STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA WATER SERVICES CORPORATION DOCKET NO. 990054-WU

3. Please provide another version of Exhibit CLS-2 that is between 2 to 5 times larger in size than the current exhibit, for purposes of reference for the hearing. This map should also identify the location of current and proposed water lines and fire hydrants.

Dated: 12-3-99

Samantha Cibula, Staff Attorney FLORIDA PUBLIC SERVICE COMMISSION 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 (850) 413-6199