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SERVICE COMMISSION

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January 10, 2000

Via Federal Express

Ms. Blanca Bayo
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 970657-WS; Application for certificates to operate a water and wastewater utility in Charlotte and DeSoto Counties by Lake Suzy Utilities, Inc.

Docket No. 980261-WS; Application for Amendment of Certificate Nos. 570-W and 496-S in Charlotte County by Florida Water Services Corporation.

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket, please find an original and one copy of Florida Water Services Corporation's Notice of Filing its Responses to Staff's Second Set of Interrogatories.

Please acknowledge filing of this item by date stamping the enclosed extra copy of this letter and returning it in the postage paid envelope provided.

Sincerely yours,

Carlyn H. Kowalsky, Esq.

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
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- WAW _____
- OTH _____

Enclosures

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for)	
certificates to operate a water)	
and wastewater utility in)	Docket No. 970657-WS
Charlotte and DeSoto Counties)	
by Lake Suzy Utilities, Inc.)	
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In Re: Application for amendment)	
of Certificates Nos. 570-W and)	Docket No. 980261-WS
496-S to add territory in)	
Charlotte County by Florida)	
Water Services Corporation)	Filed: January 10, 2000
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FLORIDA WATER SERVICES CORPORATION'S NOTICE OF FILING ITS RESPONSES TO STAFF'S SECOND SET OF INTERROGATORIES

Florida Water Services Corporation ("Florida Water"), by and through its undersigned counsel, hereby files this Notice that it has served Responses to Staff's Second Set of Interrogatories numbers 13,14,15,and 17 to Tim Viccaro, Florida Public Service Commission, 2540 Shumard Oak Blvd., Tallahassee, Florida 32399 on this 10th day of January, 2000. Copies of Florida Water's Responses have been served on the other parties of records in the manner set forth in the attached Certificate of Service.

Respectfully submitted,



BRIAN P. ARMSTRONG, ESQ.
Florida Bar No.: 888575
MATTHEW J. FEIL, ESQ.
Florida Bar No.: 822744
CARLYN H. KOWALSKY, ESQ.
Florida Bar No.: 0558672
FLORIDA WATER SERVICES CORPORATION
P.O. BOX 609520
Orlando, Florida 32860-9520
(407)880-0058

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing NOTICE OF FILING RESPONSES TO STAFF'S SECOND SET OF INTERROGATORIES has been delivered via Federal Express on January 10, 1999 to the following:

Charlotte County
c/o County Attorney
18500 Murdock Circle
Port Charlotte, FL 33948

Marty Friedman, Esq.
Rose, Sundstrom & Bentley
2548 Blairstone Pines Drive
Tallahassee, FL 32301

John Marks, Esq.
Knowles, Marks & Randolph
215 South Monroe Street
Tallahassee, FL 32301

Woodward Pires Law Firm
Anthony P. Pires, Jr.
801 Laurel Oak Drive, Ste 710
Naples, FL 34108

Ms. Charlotte L. Sopko
Haus Development, Inc.
603 N. Eastwood Avenue
Mount Prospect, IL 60056-2007

Lake Suzy Utilities, Inc.
12408 S.W. Sheri Avenue
Lake Suzy, FL 33821

Rutledge, Ecenia et al
Mr. Kenneth Hoffman
215 South Monroe St., Suite 420
Tallahassee, FL 32302


CARLYN H. KOWALSKY, ESQ.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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RECORDS AND
REPORTING

In Re: Application for)
certificates to operate a water)
and wastewater utility in) DOCKET NO. 970657-WS
Charlotte and DeSoto Counties)
by Lake Suzy Utilities, Inc.)

In Re: Application for)
Amendment of Certificate Nos.)
570-W and 496-S in Charlotte) DOCKET NO. 980261-WS
County by Florida Water Services)
Corporation.)

LAKE SUZY UTILITIES, INC.'S
MOTION FOR PROTECTIVE ORDER

LAKE SUZY UTILITIES, INC. ("Lake Suzy"), by and through its undersigned attorneys, files this Motion for Protective Order with regard to the Notice of Taking Deposition of a corporate representative filed by Florida Water Service Corporation ("FWSC") and in support thereof states:

1. FWSC noticed the taking of the deposition of a corporate

representative of Lake Suzy as to Lake Suzy's corporate parent's "acquisition plans, strategies, criteria, evaluation process, impact analysis, projected or budgeted capital improvements, and regulatory acquisition adjustment philosophies, plans and policies for operations in the State of Florida".

AFA
ADD
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2. None of these areas of inquiry have any relevancy to the instant proceeding, nor are they calculated to lead to the discovery of admissible evidence. Further, most of the areas of inquiry would involve the disclosure of proprietary confidential business information to a direct competitor of AquaSource Utilities, Inc. The Commission should not sanction the use of this proceeding for such an illegitimate purpose.

3. The only possible area of legitimate inquiry would be the projected or budgeted capital improvements as it relates to Lake Suzy. And as to this issue, FWSC in its First Request for Production of Documents, requested this information to which Lake Suzy has responded that no such budgets have been prepared. Thus, there are no budgets about which to question a witness.

WHEREFORE, Lake Suzy requests this Commission to enter an Order that Lake Suzy need not produce a witness in response to FWSC's Notice of Taking Deposition of a corporate representative.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Expedite Hearing has been furnished by U.S. Mail to Matthew J. Feil, Esquire, Florida Water Services Corporation, P.O. Box 609520, Orlando, Florida 32860-9520, Ms. Charlotte L. Sopko, Haus Development, Inc., 603 North Eastwood Avenue, Mount Prospect, Illinois 60056-2007, John Marks, Esquire, Knowles, Marks & Randolph, 215 South Monroe Street, Tallahassee, Florida 32301, Anthony P. Pires, Jr., Woodward, Pires & Lombardo, P.A., 801

Laurel Oak Drive, Suite 710, Naples, Florida 34108 and by hand delivery to Tim Vaccaro, Esquire, Florida Public Service Commission, Legal Division, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 this 14th day of January, 2000.

Respectfully submitted this 14th day of January, 2000, by:

ROSE, SUNDSTROM & BENTLEY, LLP
2548 Blairstone Pines Drive
Tallahassee, FL 32301
(850) 877-6555
(850) 656-4029 FAX



MARTIN S. FRIEDMAN
FL Bar ID No. 0199060
For the Firm

aqua\lakesuzy\protectiveord.mot