

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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COMMISSION
CLERK

IN RE: Petition by Customers of)
ALOHA UTILITIES, INC., for deletion of)
portion of territory in Seven Springs) Docket No. 020896-WS
Area in Pasco County, Florida.)

IN RE: Application for increase in water)
rates for Seven Springs System in Pasco)
County by **ALOHA UTILITIES, INC.**) Docket No. 010503-WU

**ALOHA UTILITIES, INC.'S RESPONSE TO STAFF'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Aloha Utilities, Inc. ("Aloha"), by and through undersigned counsel, hereby files its
Response to Staff's First Request for Production of Documents.

RESPONSE TO DOCUMENT PRODUCTION

1. Aloha objects to the request. The request is not reasonably calculated to
lead to the discovery of admissible evidence, seeks documents and information which are
irrelevant, which would require the disclosure of information considered by customers to
be private, and is tendered by an entity (the Commission's Staff) who does not have the
power or authority to tender discovery in this proceeding, and is for that basis and

otherwise improper discovery. The request seeks the disclosure of information which is
confidential and proprietary and is afforded protection from disclosure under Florida law.

Aloha hereby incorporates, by this reference as if fully set forth herein, its Response to
Staff's Motion to Compel. For the reasons set forth herein, and in said Response, Aloha
objects.

- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- RCA _____
- SCR _____
- SEC 1 _____
- OTH _____

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FPSC-BUREAU OF RECORDS

Rose, Sundstrom & Bentley, LLP
2548 Blairstone Pines Drive, Tallahassee, Florida 32301

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2. Aloha objects to the request. The request is not reasonably calculated to lead to the discovery of admissible evidence, seeks documents and information which are irrelevant, which would require the disclosure of information considered by customers to be private, and is tendered by an entity (the Commission's Staff) who does not have the power or authority to tender discovery in this proceeding, and is for that basis and otherwise improper discovery. The request seeks the disclosure of information which is confidential and proprietary and is afforded protection from disclosure under Florida law. Aloha hereby incorporates, by this reference as if fully set forth herein, its Response to Staff's Motion to Compel. For the reasons set forth herein, and in said Response, Aloha objects.

Respectfully submitted this 4th
day of November, 2004, by:



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail and hand delivery (*) to the following on this 28th day of October, 2004:

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