

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application of Palm Coast) Docket No. 951056-WS
Utility Corporation for an Increase)
in Water and Wastewater Rates in) Filed: May 13, 1996
Flagler County, Florida)

MOTION FOR EXPEDITED RESPONSE
TO INTERROGATORY

Palm Coast Utility Corporation (PCUC), by and through its undersigned counsel, requests issuance of an order requiring an expedited response to an interrogatory propounded by it to Commission Staff and in support states the following.

1. On May 6, 1996, PCUC received by regular mail a copy of the FPSC Audit Report prepared by Robert F. Dodrill, Sr. for this proceeding. Among the areas addressed is valuation of utility plant using trended original cost.

2. On May 9, 1996, counsel for PCUC contacted Staff Counsel asking for PSC docket numbers in which Mr. Dodrill had previously testified regarding valuation of utility plant using trended original cost calculations.

3. On May 13, 1996, Staff Counsel advised counsel for PCUC that a formal discovery request would be required to obtain such information. Counsel for PCUC thereupon asked whether such information would be provided in response to formal discovery on an expedited basis. Staff Counsel stated that it could be provided within five days of service of a formal discovery request and a motion requesting such an expedited response, and that Staff would not oppose such a motion.

4. The hearing is scheduled for July 1 - 2, 1996. Expedited

DOCUMENT NUMBER-DATE

05391 MAY 13 96

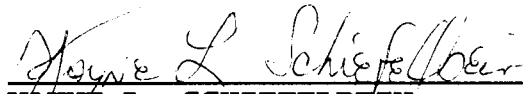
FPSC-REGULATORY/REPORTING

provision of such information will enable PCUC to timely prepare for and schedule the deposition of Mr. Dodrill and to otherwise prepare rebuttal on the subject matter.

5. A copy of the interrogatory is attached hereto for ease of reference.

Based on the foregoing, PCUC requests issuance of an order requiring an expedited response to the attached interrogatory, on or before Monday, May 20, 1996.

Respectfully submitted,



WAYNE L. SCHIEFELBEIN
Gatlin, Woods & Carlson
1709-D Mahan Drive
Tallahassee, Florida 32308
(904) 877-7191

Attorneys for Palm Coast Utility
Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Palm Coast Utility Corporation's Motion for Expedited Response to Interrogatory has been furnished by hand delivery to Mr. Scott Edmonds, Esquire, Division of Legal Services, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, and to Mr. Stephen C. Reilly, Associate Public Counsel, Office of Public Counsel, Claude Pepper Building, Room 812, 111 West Madison Street, Tallahassee, Florida 32399-1400 and to on this 13th day of May, 1996.



WAYNE L. SCHIEFELBEIN

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

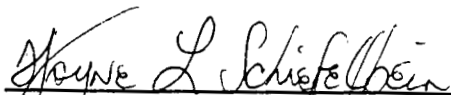
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PALM COAST UTILITY CORPORATION'S
FIRST INTERROGATORY TO
COMMISSION STAFF

Palm Coast Utility Corporation by and through its undersigned counsel, propounds the following interrogatory to the Staff of the Florida Public Service Commission, and requests that it be answered under oath by Commission Staff within seven (7) days of the date of service, pursuant to the accompanying Motion for Expedited Response to Interrogatory.

1. Please list the docket numbers for each Florida Public Service Commission proceeding in which Robert F. Dodrill, Sr. has provided testimony (prefiled and/or live) and/or exhibits regarding valuation of utility plant (including land) using trended original cost calculation(s).

Dated: May 13th, 1996



WAYNE L. SCHIEFELBEIN
Gatlin, Woods & Carlson
1709-D Mahan Drive
Tallahassee, Florida 32308
(904) 877-7191

Attorneys for Palm Coast Utility
Corporation