



JACK SHREVE
PUBLIC COUNSEL

STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400
904-488-9330

FILE 8317

March 10, 1994

Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

Re: Docket No. [REDACTED]

Dear Mr. Tribble:

Enclosed for filing in the above-captioned proceedings on behalf of the Citizens of the State of Florida are the original and 15 copies of the Citizens' First Set of Requests for Admission.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Harold McLean
Associate Public Counsel

- ACK
- AFA _____
- APP _____
- CAF Enclosures
- COM _____
- CON _____
- CRS _____
- DES 1
- DIR 4
- DIS _____
- FIN _____
- GEN 1
- W/S 1
- OTH _____

RECEIVED & FILED
MAS
DIVISION OF RECORDS

DOCUMENT NUMBER-DATE
02383 MAR 10 1994
FPSC-RECORDS REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Interim and)
Permanent Rate Increase in)
Franklin County, Florida by)
ST. GEORGE ISLAND UTILITY)
COMPANY, LTD.)

DOCKET NO. 940109-WU

Filed: March 10, 1994

CITIZENS' FIRST SET OF
REQUESTS FOR ADMISSION

The Citizens of the State of Florida (Citizens), by and through JACK SHREVE, Public Counsel, pursuant to Rule 1.370, Florida Rules of Civil Procedure, and Rule 25-22.034, Florida Administrative Code, request ST. GEORGE ISLAND UTILITY COMPANY, LTD. to admit the following matters:

1. St. George Island Utility Company, Ltd., does not have in its possession, custody, or control the documentation to establish the original cost of the utility's investment in the water system at the time it was devoted to public service.
2. St. George Island Utility Company, Ltd., produced no time records for Mr. Brown in response to the Office of the Public Counsel's First Request for Production of Documents, Item 18, in Docket No. 930770-WU.

3. During more than half of 1993 Mr. Brown maintained no time records of how his time was spent managing St. George Island Utility Company, Ltd.

4. During the test year (1992) Mr. Brown maintained no time records of how his time was spent managing St. George Island Utility Company, Ltd.

5. During 1991 Mr. Brown maintained no time records of how his time was spent managing St. George Island Utility Company, Ltd.

6. During 1990 Mr. Brown maintained no time records of how his time was spent managing St. George Island Utility Company, Ltd.

7. During more than half of 1993 Mr. Brown maintained no time records of how his time was spent providing legal services to St. George Island Utility Company, Ltd.

8. During the test year (1992) Mr. Brown maintained no time records of how his time was spent providing legal services to St. George Island Utility Company, Ltd.

9. During 1991 Mr. Brown maintained no time records of how his time was spent providing legal services to St. George Island Utility Company, Ltd.

10. During 1990 Mr. Brown maintained no time records of how his time was spent providing legal services to St. George Island Utility Company, Ltd.

11. During the test year Mr. Brown rendered no legal bills for legal services he allegedly provided to St. George Island Utility Company, Ltd.

12. St. George Island Utility Company, Ltd., produced no time records for Ms. Chase in response to the Office of the Public Counsel's First Request for Production of Documents, Item 18, in Docket No. 930770-WU.

13. During 1993 Ms. Chase maintained no time records of how her time was spent working for St. George Island Utility Company, Ltd.

14. During the test year (1992) Ms. Chase maintained no time records of how her time was spent working for St. George Island Utility Company, Ltd.

15. During 1991 Ms. Chase maintained no time records of how her time was spent working for St. George Island Utility Company, Ltd.

16. During 1990 Ms. Chase maintained no time records of how her time was spent working for St. George Island Utility Company, Ltd.

17. St. George Island Utility Company, Ltd., produced no time records for Ms. Hill in response to the Office of the Public Counsel's First Request for Production of Documents, Item 18, in Docket No. 930770-WU.

18. During 1993 Ms. Hill maintained no time records of how her time was spent working for St. George Island Utility Company, Ltd.

19. During the test year (1992) Ms. Hill maintained no time records of how her time was spent working for St. George Island Utility Company, Ltd.

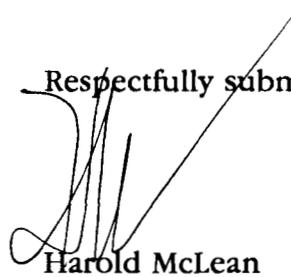
20. St. George Island Utility Company, Ltd., has no documents in its possession, custody, or control which substantiate the mileage estimates used to determine the mileage allowance expenses requested for the test year.

21. St. George Island Utility Company, Ltd., does not have in its possession, custody, or control the purchase agreement, or like documents, between Leisure Properties and the State of Florida concerning the \$6.5 million sale of land to the State in 1973.

22. Mr. Brown received no W-2 forms during 1991 or the test year.

23. Each of the following corporations, professional associations, or other business entities lists with the Florida Secretary of State 3848 Killearn Court, Tallahassee, Florida as its principal place of business: G. Brown & Company, Gene D. Brown, P.A., Armada Bay Company, Leisure Properties, Leisure Development, Plantation Realty, St. George's Planation, Inc., The Tallahassee Yacht Club, Inc., St. George Island Utility Company, Ltd.
24. Attorney Gene D. Brown lists 3848 Killearn Court, Tallahassee, Florida as the address of his law practice.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'H. McLean', is written over the typed name. The signature is stylized with a large initial 'H' and a long, sweeping underline that extends to the right.

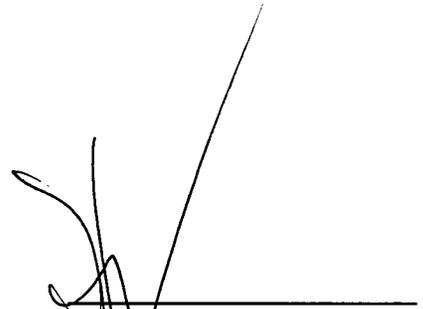
Harold McLean

**CERTIFICATE OF SERVICE
DOCKET NO. 940109-WU**

I HEREBY CERTIFY that a correct copy of the foregoing has been furnished
by U.S. Mail or hand-delivery to the following parties on this 10th day of March, 1994.

J. Lorenzo
Division of Legal Services
Florida Public Service Commission
101 E. Gaines St.
Tallahassee, FL 32301

Gene D. Brown, Esq.
3848 Killearn Court
Tallahassee, FL 32308



Harold McLean
Associate Public Counsel