LAW OFFICES

# MESSER, VICKERS, CAPARELLO, MADSEN, LEWIS, GOLDMAN & METZ A PROFESSIONAL ASSOCIATION

OMGMAL FILE COPY

SUITE 701, FIRST FLORIDA BANK BUILDING 215 SOUTH MONROE STREET POST OFFICE BOX 1876

TALLAHASSEE, FLORIDA 32302-1876

TELEPHONE (904) 222-0720 TELECOPIER (904) 224-4359 SUITE 900

2000 PALM BEACH LAKES BOULEVARD
WEST PALM BEACH, FLORIDA 33409

TELEPHONE (407) 640-0820 TELECOPIER (407) 640-8202

\* TPSC-RECORDS/REPORTS.

Tallahassee

July 24, 1992

REPLY TO:

HAND DELIVERY

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

Re: FPSC Docket No. 920199-WS

Dear Mr. Tribble:

Enclosed herewith for filing in the above-referenced docket are the original and one copy of Southern States Utilities, Inc. and Deltona Utilities, Inc.'s Notice of Service of Responses to Portion of Public Counsel's First Set of Interrogatories and First Request for Production of Documents.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

				Sincerely,	
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CAF				Kenneth A. Hoffman	
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CTR					
EAG	Enclo	sures			
LEG	<del></del>	Brian P.	Armstrong,	Esq.	
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CPC					
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#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application of Southern
States Utilities, Inc. and Deltona
Utilities, Inc. for Increased
Water and Wastewater Rates in
Citrus, Nassau, Seminole, Osceola,
Duval, Putnam, Charlotte, Lee,
Lake, Orange, Marion, Volusia,
Martin, Clay, Brevard, Highlands,
Collier, Pasco, Hernando, and
Washington Counties.

Docket No. 920199-WS Filed: July 24, 1992

# SOUTHERN STATES UTILITIES, INC. AND DELTONA UTILITIES, INC.'S NOTICE OF SERVICE OF RESPONSES TO PORTION OF PUBLIC COUNSEL'S FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

SOUTHERN STATES UTILITIES, INC. and DELTONA UTILITIES, INC., (hereinafter referred to collectively as "SOUTHERN STATES") by and through its undersigned counsel, hereby files and serves Notice that it has served by hand delivery on Harold McLean, Esq., 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400, on this 24th day of July, 1992, SOUTHERN STATES' responses and documents in response to the following numbered interrogatories and requests for production of documents contained in the Office of Public Counsel's First Set of Interrogatories and First Request for Production of Documents:

#### First Set of Interrogatories

Nos. 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 24, 25, 26, 28, 31, 32, 34, 35, 37, 40, 41, 71, 78, 79, 91, 94, 99, 100, 101, 104, 105, 111, 112, 116, 142, 148, 149, 150, 151, 152, 153 and 159.

DOCUMENT NUMBER-DATE

08167 JUL 24 1992

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## Pirst Request for Production of Documents

Nos. 4, 5, 6, 8, 11, 12, 15, 16, 17, 20, 22, 23, 24, 26, 27, 35, 42, 47, 50, 61 and 62.

Copies of said Responses to Interrogatories and Documents have also been served by hand delivery on counsel for the Commission Staff reflected on the attached Certificate of Service on this same date.

Respectfully submitted,

KENNETH A. HOFFMAN, ESQUIRE LAURA L. WILSON, ESQUIRE Messer, Vickers, Caparello, Madsen, Lewis, Goldman & Metz, P.A. P. O. Box 1876 Tallahassee, Florida 32302-1876 (904) 222-0720

and

BRIAN P. ARMSTRONG, ESQUIRE Southern States Utilities, Inc. 1000 Color Place Apopka, Florida 32703 (407) 880-0058

Attorneys for Applicant Southern States Utilities, Inc.

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Southern States Utilities, Inc. and Deltona Utilities, Inc.'s Notice of Service of Responses to Portion of Public Counsel's First Set of Interrogatories and First Request for Production of Documents were furnished by hand delivery, this 24th day of July, 1992, to the following:

Harold McLean, Esq.
Office of Public Counsel
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400

Matthew Feil, Esq.
Catherine Bedell, Esq.
Florida Public Service Commission
Division of Legal Services
101 East Gaines Street
Room 226
Tallahassee, Florida 32399

By: KENNETH A. HOVEMAN, ESQ.