# 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 28, 1992

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## SOUTHERN STATES UTILITIES, INC. AND DELTONA UTILITIES, INC.'S SECOND 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 its Second Notice that on July 27, 1992, it served SOUTHERN STATES' responses to the following numbered interrogatories and documents in response ACK 🛛 to the following numbered requests for production of documents AFA Ann -----contained in the Office of Public Counsel's First Set of €°`` Interrogatories and First Request for Production of Documents, by C: J ...... CTR \_\_\_\_hand delivery, on analysts/representatives of the Office of Public 200 ---- Counsel who were inspecting documents provided by Southern States at its home office at 1000 Color Place, Apopka, Florida 32703:

# CT First Set of Interrogatories

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Nos. 18, 22, 23, 30, 33, 36, 42, 43, 44, 45, 46, 47, 48, 49, 55, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 0TH <u>67, 69, 70, 72, 73, 74, 75, 76, 82, 86, 89, 95, 97, 98, 102, 103, 108, 109, 110, 114, 115, 119, 120, 121, 122, 124, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 143, COCUMENT MEMORY PARAMETERS.
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144, 145, 146, 147, 154, 155, 156, 157, 158, 160, 161, 162, 163, 164, 165, 166, 167, 168.

### First Request for Production of Documents

Nos. 2, 3, 7, 9, 13, 18, 21, 25, 29, 30, 31, 33, 34, 36, 37, 38, 39, 40, 43, 44, 45, 46, 48, 49, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 63, 64, 68.

Copies of said Responses to Interrogatories and Documents have also been served on July 28, 1992, by hand delivery on counsel for the Commission Staff reflected on the attached Certificate of Service.

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 Second Notice of Service of Responses to Portion of Public Counsel's First Set of Interroga-tories and First Request for Production of Documents were furnished by hand delivery, this 28th 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: <u>KENNETH A. HØ</u> FMAN, ESQ.