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REPLY TO:

HAND DELIVERY

November 5, 1992

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 fifteen copies of Southern States Utilities, Inc.'s Revisions to Prehearing Order.

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.

ACK	7	Sincerely,
AFA	3_	V (6/10/10)
Vibb		Jew & Half
$C_{\mathcal{A}}(\mathbb{R}^n)$	····	Kenneth A. Hoffman
$C_{i, j, j, j}$	KAH/1	c1
C^{-1}	Enclo	osures
ET 10 10	cc:	Matthew J. Feil, Esq. (hand delivery) Catherine Bedell, Esq. (hand delivery) Harold McLean, Esq. (hand delivery)
	4	Honorable Thomas M. Beard (hand delivery)
(* * .		Commissioner Betty Easley (hand delivery) Commissioner Susan F. Clark (hand delivery)
î.		Mr. Bill Gibson (hand delivery) Mr. Mark Laux (hand delivery)
· · · · · · · · · · · · · · · · · · ·		Brian P. Armstrong, Esq.
(VV.)		

13006 NOV -5 1992

FPSC-RECORDS/REPORTING

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: November 5, 1992

SOUTHERN STATES UTILITIES, INC.'S REVISIONS TO PREHEARING ORDER

SOUTHERN STATES UTILITIES, INC. and DELTONA UTILITIES, INC. (hereafter collectively referred to as "Southern States"), hereby submits its revisions to Order No. PSC-92-1265-PHO-WS (Prehearing Order) issued on November 4, 1992. In accordance with the request of the Prehearing Officer, these revisions provide further explanation of Southern States' position on specific issues where Southern States had previously provided a response of "Per the MFRs". These revisions also revise or correct Southern States' position on specific issues (some of which have been previously provided), the name of the witness responsible for addressing a specific issue, and other miscellaneous revisions. The revisions are as follows:

VI. ISSUES AND POSITIONS

Issue 6: Southern States' witness should be Hartman - not
Lewis.

Issue 10: Southern States' position should be deleted in its
entirety and replaced with a position of "Yes".

Issue 11: The following should be added to Southern States'
position: "Since the Company's deferred taxes are a net debit

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balance, it is appropriate to include the deferred taxes as a component of rate base. The taxes in Account 281 and Account 190 other than CIAC should be allocated on the basis of plant since they are primarily plant related items. Deferred taxes related to CIAC accounts should be allocated based on the activity in the CIAC accounts during the test year. The deferred taxes related to the SFAS 106 costs are allocated based on the number of customers to conform to the allocation of the SFAS 106 expense to the systems.

<u>Issue 16:</u> Southern States' witness should be Wood - not Hartman.

Issue 21: Southern States' position of "No" should be deleted
and replaced with: "Agree with Staff."

Issue 37: Add the following to Southern States' position:
"The cost rate should be the weighted cost rate of long-term debt,
preferred stock and common stock."

Issue 38: Add the following to Southern States' position:
"The Company's deferred taxes are a net debit balance. Such
balance should be a component of rate base. Therefore, there are
no deferred taxes to be included in the capital structure."

Issue 40: Add the following to Southern States' position:
"... and followed by the Commission in Order No. 23841 issued
December 7, 1990."

Issue 68: The word "accept" in Southern States' position
should be "except".

Issue 71: Southern States' witness should be Kimball - not
Phillips.

Issue 85: Add the following to Southern States' position:
"ITC amortization should be above the line. The amount of
amortization should be \$27,862 for the water systems and \$24,812
for the wastewater systems."

Issue 87: Southern States' position should be deleted and
replaced with the following: "Yes. The proper amount is shown on
Schedule B-16 for each system."

Issue 88: The number \$9,745 should be replaced by \$9,308 in
Southern States' position.

VII. EXHIBIT LIST

Please add the following: "Southern States will submit a late-filed composite exhibit containing all written responses to customer complaints raised at the service hearings which have been filed with the Commission."

VIII. PROPOSED STIPULATIONS

Based on Southern States' revised position in response to Issue No. 21, Southern States believes the issue should be stipulated.

IX. PENDING MOTIONS

Please add the following:

4. SSU's November 3, 1992 Motion for Leave to Submit Revised Rebuttal Testimony of Scott W. Vierima.

Respectfully submitted,

KENNETH A. HOFFMAN, ESQUIRE
FLOYD R. SELF, ESQUIRE
LAURA L. WILSON, ESQUIRE
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and

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

Attorneys for Applicants Southern States Utilities, Inc. and Deltona Utilities, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Southern States Utilities, Inc.'s Revisions Prehearing Statement was furnished by hand delivery (*) and/or U. S. Mail, this 5th day of November, 1992, to the following:

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y: Kenth

NNETH A. HOPFMAN, ESQ