

ORIGINAL
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Comprehensive Review of the)
Revenue Requirements and Rate)
Stabilization Plan of Southern)
Bell Telephone & Telegraph Company)

Docket No. 920260-TL
Filed: January 15, 1993

MOTION TO ALLOW CONTINUATION OF DISCOVERY

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, request the Prehearing Officer to allow discovery to continue in this case.

1. The order establishing procedure states that discovery should be completed by January 15, 1993. However, that order contemplated hearings beginning on January 25, 1993.

2. Hearings are now set to begin on March 18, 1993, so there is no urgency to ending discovery on January 15.

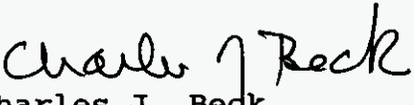
3. The company filed rebuttal testimony to the staff just days ago, and the Citizens first obtained access to the staff audits and workpapers on January 5. We need to conduct discovery on these recently raised matters in order to prepare for hearings.

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WHEREFORE, the Citizens request the Prehearing Officer to allow discovery to continue in this case.

Respectfully submitted,

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CERTIFICATE OF SERVICE
DOCKET NO. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 15th day of January, 1993.

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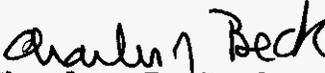
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