BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for a rate) increase for Orange-Osceola) Utilities, Inc. in Osceola County,) and in Bradford, Brevard, Charlotte,) Citrus, Clay, Collier, Duval,) Highlands, Lake, Lee, Marion,) Martin, Nassau, Orange, Osceola,) Pasco, Putnam, Seminole, St. Johns,) St. Lucie, Volusia, and Washington) Counties by Southern States) Utilities, Inc.)

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Docket No. 950495-WS Filed: July 18, 1995

MOTION TO PERMIT ADDITIONAL INTERROGATORIES

The Citizens of the State of Florida, (Citizens) by and though JACK SHREVE, Public Counsel, move the Commission to permit additional interrogatories and as grounds therefor show:

1. Rule 1.340(a), Florida Rules of Civil Procedure, restricts the Citizens to the serving of thirty (30) interrogatories, except where good cause is shown;

2. This application is voluminous, and complex: it is by any measure the largest water and sewer case presented to the commission;

3. Limiting the Citizens to thirty (30) interrogatories would substantially prejudice the Citizens because it would interfere with their discovering whether and to what extent their interests are affected;

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WHEREFORE, the Citizens move the Commission to permit the Citizens to exceed thirty interrogatories.

Respectfully submitted,

Hatold McLean

Ha**fold** McLean Associate Public Counsel

Office of Public Counsel The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400

Attorney for the Citizens of the State of Florida

CERTIFICATE OF SERVICE DOCKET NO. 950495-WS

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 18th day of July, 1995.

Ken Hoffman
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302-0551

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Kjell W. Petersen Director Marco Island Civic Association P.O. Box 712 Marco Island, FL 33969

*Lila Jaber Division of Legal Services Fla. Public Service Commission 2540 Shurmard Oak Blvd. Tallahassee, FL 32399

Brian Armstrong Southern States Utilities General Offices 1000 Color Place Apopka, FL 32703

Harold McLean Associate Public Counsel



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

July 18, 1995

Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Docket No. 950495-WS

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of Citizens' Motion to Permit Additional Interrogatories.

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

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