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August 31, 1995

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center  
Room 110  
Tallahassee, Florida 32399-0850

**HAND DELIVERY**

Re: Docket No. 950495-WS

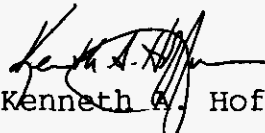
Dear Ms. Bayo:


Enclosed herewith for filing in the above-referenced docket on behalf of Southern States Utilities, Inc. are the original and fifteen copies of SSU's First Motion for Temporary Protective 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.

Sincerely,

  
Kenneth A. Hoffman

ACK  \_\_\_\_\_  
AFA 3 \_\_\_\_\_  
APP \_\_\_\_\_ KAH/rl  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG 1 \_\_\_\_\_  
LIN 5 \_\_\_\_\_  
OPC \_\_\_\_\_  
RCH \_\_\_\_\_   
SEC 1 \_\_\_\_\_  
WAS Willis \_\_\_\_\_  
OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE  
**08553 AUG 31 95**  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 950495-WS

Filed: August 31, 1995

SSU'S FIRST MOTION FOR TEMPORARY PROTECTIVE ORDER

Southern States Utilities, Inc. ("SSU"), pursuant to Rule 25-22.006, Florida Administrative Code, moves the Florida Public Service Commission for a Temporary Protective Order in this docket, and as grounds therefor, states as follows:

1. On July 18, 1995, the Office of Public Counsel ("OPC") served its First Set of Interrogatories and First Set of Requests for Production of Documents to SSU.

2. The materials and documents responsive to the OPC discovery requests identified below contain information which SSU claims is proprietary confidential business information, and is of a type this Commission has found in past dockets to be confidential:

- a. Appendices 14-A and 14-C to SSU's Response to OPC's Interrogatory No. 14.
b. SSU's Response to OPC Interrogatory No. 26.
c. SSU's Response to OPC Interrogatory No. 60.
d. SSU's Response to OPC Interrogatory No.

DOCUMENT NUMBER-DATE 08553 AUG 31 95

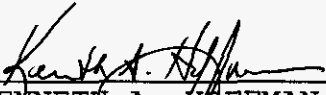
e. SSU's Response to OPC Document Request No. 69.

SSU believes that these documents are within the scope of Section 367.156(3), Florida Statutes, and must be afforded protection as proprietary confidential business information.

3. By this Motion, SSU requests that the information and materials made available for inspection in response to OPC's First Set of Interrogatories and First Set of Requests for Production of Documents be granted the protection of a Temporary Protective Order as provided for by Rule 25-22.006(5)(c), Florida Administrative Code. This Temporary Protective Order will protect the materials and information from disclosure until OPC completes its review of the materials and information. Once the review is completed, OPC will notify SSU of the materials and information it intends to use in this docket, and SSU, in accordance with Rule 25-22.006(5)(a), will request proprietary confidential treatment of those portions of the materials and information which are, in its opinion, entitled to such treatment. The remainder of any such materials and information which OPC has taken possession of pursuant to this Temporary Protective Order will be returned to SSU by OPC pursuant to Rule 25-22.006(5)(c).

WHEREFORE, SSU respectfully moves the Commission for a Temporary Protective Order covering the above described information and documents produced in response to OPC Interrogatory Nos. 14, 26, 60 and 74 and in response to OPC Document Request No. 69.

Respectfully submitted,

  
\_\_\_\_\_  
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(407) 880-0058

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing SSU's First Motion for Temporary Protective Order was furnished by hand-delivery (\*) and/or U. S. Mail to the following this 31st day of August, 1995:

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Room 370  
Tallahassee, FL 32399-0850

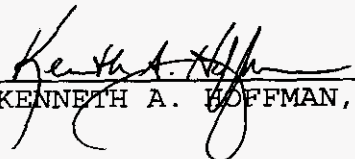
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