RUTLEDGE, ECENIA, UNDERWOOD, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA KENNETH A. HOFFMAN THOMAS W. KONRAD R. DAVID PRESCOTT HAROLD F. X. PURNELL GARY R. RUTLEDGE R. MICHAEL UNDERWOOD WILLIAM B. WILLINGHAM POST OFFICE BOX 551, 32302-0551 215 SOUTH MONROE STREET, SUITE 420 TALLAHASSEE, FLORIDA 32301-1841

> TELEPHONE (904) 681-6788 TELECOPIER (904) 681-6515

October 26, 1995

GOVERNMENTAL CONSULTANTS PATRICK R. MALOY AMY J. YOUNG

HAND DELIVERY

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

Re: Docket No. 950495-WS

Dear Ms. Bayo:

ACK ~

AFA 2

Enclosed herewith for filing in the above-referenced docket on behalf of Southern States Utilities, Inc. ("SSU") are the following documents:

1. Original and fifteen copies of SSU's Eighth 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,

Willia B. Willy D

Kenneth A. Hoffman

APP	1					Kenne
CAF	KAH/	rl				
CMU						
CTR	cc:	All	Parties	of	Recor	rd
EAG	Trib.3					
LEG	1					
LIN	5					
OPC			OF AFILING		11	
RCH			RECEIVED	81	ILEO	
SEC	1		men			
WAS	10 And Wel	Vio	EPSC-BUR	REAU	OF REC	ORDS
OTH						

DOCUMENT NUMBER-DATE

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: October 26, 1995

SSU'S EIGHTH 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 this date, SSU has provided documents responsive to the Office of Public Counsel's ("OPC") Interrogatory No. 263, which includes Appendices 263-A and 263-B that contain information regarding labor and overtime budgeted in 1995 for SSU. Appendices 263-A and 263-B 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. SSU believes that this information is within the scope of Section 367.156(3), Florida Statutes, and must be afforded protection as proprietary confidential business information.

2. By this Motion, SSU requests that the information and materials identified above and provided to OPC be granted the protection of a Temporary Protective Order as provided for by RATE

10565 OCT 26 % FPSC-RECORDS/REPORTING 3025 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 documents and information provided to OPC in response to the OPC discovery requests identified above.

Respectfully submitted,

the B. Will

KENNETH A. HOFFMAN, ESQ. WILLIAM B. WILLINGHAM, ESQ. Rutledge, Ecenia, Underwood, Purnell & Hoffman, P.A. P. O. Box 551 Tallahassee, FL 32302-0551 (904) 681-6788

and

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

CERTIFICATE_OF_SERVICE

I HEREBY CERTIFY that a copy of the foregoing SSU's Eighth Motion for Temporary Protective Order was furnished by handdelivery (*) and/or U. S. Mail to the following on this 26th day of October, 1995:

Lila Jaber, Esq. Division of Legal Services 2540 Shumard Oak Boulevard Gerald L. Gunter Building Room 370 Tallahassee, FL 32399-0850

Charles J. Beck, Esq.* Office of Public Counsel 111 W. Madison Street Room 812 Tallahassee, FL 32399-1400

Michael B. Twomey, Esq. P. O. Box 5256 Tallahassee, FL 32314-5256

Mr. Kjell Pettersen P. O. Box 712 Marco Island, FL 33969

Mr. Morty Miller President Spring Hill Civic Asso., Inc. P. O. Box 3092 Spring Hill, FL 34606 Mr. W. Allen Case President Sugarmill Woods Civic Asso. 91 Cypress Blvd., West Homosassa, FL 34446

Robert Bruce Snow, Esq. 20 N. Main Street Room 462 Brooksville, FL 34601-2850

Donald Odom, Esq. P. O. Box 1110 Tampa, FL 33601

KENNETH A. HOFFMAN, ESQ