



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

March 6, 1996

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

**ORIGINAL  
FILE COPY**

Re: Docket No. 950495-WS

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are 3 copies of Citizens' Notice of Deposition Duces Tecum.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

*Charles J. Beck*

Charles J. Beck  
Deputy Public Counsel

- ACK \_\_\_\_\_ CJB:bsr
- AFA \_\_\_\_\_ Enclosures
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- CTU \_\_\_\_\_

DOCUMENT NUMBER-DATE

02732 MAR-6

FPSC-RECORDS/REPORTING

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, ) Docket No. 950495-WS  
Highlands, Lake, Lee, Marion, )  
Martin, Nassau, Orange, Osceola, ) Filed: March 6, 1996  
Pasco, Putnam, Seminole, St. Johns, )  
St. Lucie, Volusia, and Washington )  
Counties by Southern States )  
Utilities, Inc. )

NOTICE OF DEPOSITION DUCES TECUM

To: Kenneth A. Hoffman, Esquire  
Rutledge, Ecenia, Underwood, Purnell & Hoffman  
Post Office Box 551  
Tallahassee, Florida 32302-0551

Brian Armstrong, Esquire  
Matthew Feil, Esquire  
Southern States Utilities, Inc.  
1000 Color Place  
Apopka, Florida 32703

NOTICE IS HEREBY GIVEN that the Citizens of Florida, by and through Jack Shreve, Public Counsel, will take the deposition of:

(1) Mr. Tracy Smith at the offices of Southern States Utilities, Inc., 1000 Color Place, Apopka, Florida on Wednesday, March 20, 1996, beginning at 9:30 a.m.,

(2) Dr. John Cirella at the offices of Southern States Utilities, Inc., 1000 Color Place, Apopka, Florida on Wednesday, March 20, 1996, beginning at 1:00 p.m., and

(3) Ms. Karla Olson Teasley at the offices of Southern States Utilities, Inc., 1000 Color Place, Apopka, Florida on Wednesday, March 20, 1996, beginning at 3:00 p.m.

Mr. Smith, Dr. Cirella, and Ms. Teasley are directed to bring with them all documents (including drafts) containing, discussing, referring to, or evaluating the following:

1. Communications from, to, or about Mr. Jeff Sharkey, Capital Strategies, Inc., or Chiles Communications, Inc..
2. Contracts or agreements between Southern States Utilities, Inc., and Capital Strategies, Inc., or Chiles Communications, Inc.
3. Communications with the Governor of Florida or his staff, the Lieutenant Governor of Florida or his staff, or the Florida Secretary of Commerce or his staff.
4. Communications with members of the Florida legislature or their staff.
5. Communications with members of the Florida Public Service Commission or any member of its staff,
6. Communications with any government agency or any member of its staff,
7. Communications, contacts, meetings, or notices to customers concerning this case or uniform rates.
8. Letters, memoranda, correspondence, or other documents provided to the Governor of Florida or his staff, the Lieutenant Governor of Florida or his staff, the Florida Secretary of Commerce or his staff, members of the Florida legislature or their staff, members of the Florida Public Service Commission or its staff, or customers.
9. Documents provided to any person or organization whatsoever that consist of draft documents addressed to the chairman or any member of the Florida Public Service Commission.

These depositions will be taken for the purpose of discovery,  
use at hearing, or any other purpose allowed by law.

*Charles J. Beck*

Charles J. Beck  
Deputy Public Counsel

Office of Public Counsel  
c/o 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 6th day of March, 1996.

\*Ken Hoffman, Esq.  
William B. Willingham, Esq.  
Rutledge, Ecenia, Underwood  
Purnell & Hoffman, P.A.  
P.O. Box 551  
Tallahassee, FL 32302-0551

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

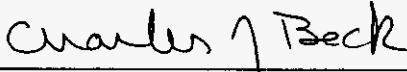
Brian Armstrong, Esq.  
Matthew Feil, Esq.  
Southern States Utilities  
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1000 Color Place  
Apopka, FL 32703

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

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

Arthur Jacobs, Esq.  
Jacobs & Peters, P.A.  
Post Office Box 1110  
Fernandina Beach, FL  
32035-1110

Larry M. Haag, Esq.  
County Attorney  
111 West Main Street  
Suite B  
Inverness, Florida 34450

  
\_\_\_\_\_  
Charles J. Beck  
Deputy Public Counsel