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ORIGINAL  
FILE COPY

March 29, 1996

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 Require Discovery Responses by April 22, 1996.

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
- AFA 3 CJB:bsr
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1
- LIN 6
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS Willis
- OTH \_\_\_\_\_

RECEIVED & FILED  
*[Signature]*  
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03702 MAR 29 8 7902

EPSC-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, )  
Highlands, Lake, Lee, Marion, )  
Martin, Nassau, Orange, Osceola, )  
Pasco, Putnam, Seminole, St. Johns, )  
St. Lucie, Volusia, and Washington )  
Counties by Southern States )  
Utilities, Inc. )  
\_\_\_\_\_ )

Docket No. 950495-WS

Filed: March 29, 1996

MOTION TO REQUIRE DISCOVERY RESPONSES BY APRIL 22, 1996

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, move the Commission to require Southern States Utilities, Inc., to answer the Citizens' 22nd set of interrogatories and 26th set of requests for production of documents by no later than Monday, April 22, 1996.

1. The prehearing officer's order PSC-95-1506-PCO-WS issued December 5, 1995, requires discovery to be complete by Monday, April 22, 1996.

2. The Citizens received Southern States' rebuttal testimony last Friday, March 22, 1996. In order to meet the requirement to complete discovery by Monday, April 22, 1996, the Citizens would have been required to hand serve discovery concerning the rebuttal testimony on the same day that we received it.

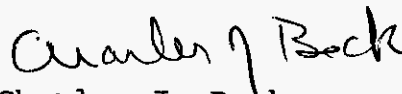
3. The Citizens' 22nd set of interrogatories and 26th set of requests for production of documents all relate to the rebuttal testimony filed by Southern States.

4. It would not impose an undue burden or hardship on Southern States to respond to this discovery in twenty four days instead of the usual period of thirty days.

WHEREFORE, the Citizens move the Commission to require Southern States Utilities, Inc., to answer the Citizens' 22nd set of interrogatories and 26th set of requests for production of documents by no later than Monday, April 22, 1996.

Respectfully submitted,

JACK SHREVE  
PUBLIC COUNSEL



Charles J. Beck  
Deputy Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
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Attorneys 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 party representatives on this 29th day of March, 1996.

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