

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for Increase in )  
rates and service )  
availability charges in Lee )  
County by Gulf Utility Company. )  
\_\_\_\_\_ )

Docket No. 960329-WS  
Filed: October 25, 1996

MOTION TO PERMIT ADDITIONAL INTERROGATORIES

The Citizens of the State of Florida (Citizens), by and through their undersigned attorney, move the Commission to permit additional interrogatories and as grounds therefore 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. Unlike the last rate case in 1990, this application involves both the water and wastewater operations. This proceeding will also consider increases and decreases to the utility's service availability charges for wastewater and water services respectively
3. The permanent rate increase request is based in part upon budgeted rather than strictly historical figures, requiring more verification to determine the validity of the numbers. The proposed rate increase request is also based upon both actual and projected plant additions which must be scrutinized
4. The Citizens do not believe we can adequately prepare for hearing with a limit of thirty (30) interrogatories
5. The Citizens resolve to utilize interrogatories as judiciously as possible. We believe that a maximum of one hundred (100) interrogatories will permit the Citizen to accomplish sufficient discovery so that the issues of this case will be adequately identified and defined so that the Commission's hearing time will be as productive as possible

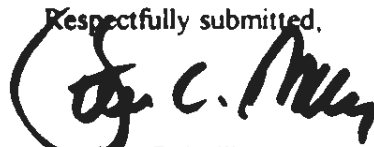
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11-376 OCT 25 88  
FPSC-RECORDS/REPORTING

WHEREFORE, the Citizens move the Commission to permit the Citizens to propound a maximum of one hundred (100) interrogatories in this proceeding

Respectfully submitted,



Stephen C. Reilly  
Associate Public Counsel

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The Florida Legislature  
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Attorney for the Citizens  
of the State of Florida

**CERTIFICATE OF SERVICE  
DOCKET NO. 960329-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 25th day of October, 1996

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