



JACK SHREVE
PUBLIC COUNSEL

STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
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ORIGINAL
FILE COPY

June 2, 1992

Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

Re: Docket No. 920199-WS

Dear Mr. Tribble:

Enclosed for filing in the above-captioned proceeding on behalf of the Citizens of the State of Florida are the original and 15 copies of Citizens' Motion to Permit Additional Interrogatories.

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

- ACK
- AFA
- APP _____
- CAF _____
- CMU _____
- CTR _____
- ENG _____
- LEG 12/01
- LIN 4
- OPC _____
- ROH _____
- SEC 1
- WAS 1
- OTH _____

Sincerely,

Harold McLean
Associate Public Counsel

Enclosure

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

05679 JUN-2 1992

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Application of Southern States)
Utilities, Inc. for increased)
water and sewer rates)

Docket No. 920199-WS

Filed: June 2, 1992

MOTION TO PERMIT ADDITIONAL INTERROGATORIES

The Citizens of the State of Florida, (Citizens) by and through JACK SHREVE, Public Counsel, move the Commission to permit additional interrogatories and as grounds therefor 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. This application is voluminous, and complex: it is by any measure the largest water and sewer case presented to the commission;
3. Limiting the Citizens to thirty (30) interrogatories would substantially prejudice the Citizens because it would interfere with their discovering whether and to what extent their interests are affected;
4. Permitting liberal discovery will serve parties and the commission because it will

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FPSC-RECORDS/REGISTRATION

permit all parties and the commission staff to define and sharpen issues so that hearing time can be used efficiently.

WHEREFORE, the Citizens move the Commission to permit the Citizens to exceed thirty interrogatories.

Respectfully submitted,



Harold McLean
Associate 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. 920199-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 2nd day of June, 1992.

Ken Hoffman
Messer, Vickers, Caparello,
Madsen, Lewis, Goldman & Metz
215 S. Monroe St., Suite 701
P.O. Box 1876
Tallahassee, FL 32302-1876

Mat Feil
Division of Legal Services
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

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Fla. Public Service Commission
101 East Gaines Street
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Harold McLean
Associate Public Counsel