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REPLY TO:

August 12, 1992

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

HAND DELIVERY

ORIGINAL  
FILE COPY

Re: FPSC Docket No. 920199-WS

Dear Mr. Tribble:

Enclosed herewith for filing in the above-referenced docket are an original and one copy of Southern States' Fifth Notice of Service of Responses to Public Counsel's Interrogatories and Requests for Production of Documents.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

ACK  Thank you for your assistance with this filing.

AFM \_\_\_\_\_

APP \_\_\_\_\_

CAP \_\_\_\_\_

CVM \_\_\_\_\_

CTB \_\_\_\_\_

KAH/rl

EAG  Enclosures

LEA  cc: Brian P. Armstrong, Esq.

LIN \_\_\_\_\_

CFC \_\_\_\_\_

ROM \_\_\_\_\_

SEC 1

WAS \_\_\_\_\_

OTH \_\_\_\_\_

Sincerely,

*Kenneth A. Hoffman*  
Kenneth A. Hoffman

RECEIVED & FILED

*[Handwritten signature]*

DOCUMENT NUMBER-DATE

09064 AUG 12 1992

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application of Southern )  
States Utilities, Inc. and Deltona )  
Utilities, Inc. for Increased )  
Water and Wastewater Rates in )  
Citrus, Nassau, Seminole, Osceola, )  
Duval, Putnam, Charlotte, Lee, )  
Lake, Orange, Marion, Volusia, )  
Martin, Clay, Brevard, Highlands, )  
Collier, Pasco, Hernando, and )  
Washington Counties. )

Docket No. 920199-WS  
Filed: August 12, 1992

**SOUTHERN STATES' FIFTH NOTICE OF  
SERVICE OF RESPONSES TO PUBLIC COUNSEL'S  
INTERROGATORIES AND REQUESTS FOR  
FOR PRODUCTION OF DOCUMENTS**

SOUTHERN STATES UTILITIES, INC. and DELTONA UTILITIES, INC.,  
(hereinafter referred to collectively as "Southern States") by and  
through its undersigned counsel, hereby files and serves its Fifth  
Notice of Service of Responses to the Office of Public Counsel's  
("Public Counsel") Interrogatories and Requests for Production of  
Documents and states as follows:

**A. NON-CONFIDENTIAL INFORMATION**

On August 12, 1992, Southern States served responses to the  
following numbered interrogatories and documents in response to the  
following numbered requests for production of documents contained  
in Public Counsel's First, Second, Third, Fourth, Fifth and Sixth  
Sets of Interrogatories and First, Second, Third and Amended Fifth  
Sets of Requests for Production of Documents, by hand delivery, on  
Harold McLean, Associate Public Counsel, Office of Public Counsel,  
111 West Madison Street, Room 812, Tallahassee, Florida 32399-  
1400.

DOCUMENT NUMBER-DATE

09064 AUG 12 1992

FPS-C-RECORDS/REPORTING

**First Set of Interrogatories**

Nos. 27, 33, 39, 85 and 92.

**Second Set of Interrogatories**

Nos. 170, 176, 178, 186, 192, 194, 195, 196, 198, 199, 200  
(supplemental), 201, 202 and 203.

**Third Set of Interrogatories**

Nos. 204, 205-1, 205-2, 206, 209, 211, 212, 215, 217, 218,  
219, 220, 221 and 222.

**Fourth Set of Interrogatories**

Nos. 224, 225, 226, 227, 228, 229, 230, 232, 233, 234, 235,  
236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248,  
249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259 and 260.

**Fifth Set of Interrogatories**

Nos. 277 and 279.

**Sixth Set of Interrogatories**

No. 286.

**First Set of Requests for Production of Documents**

No. 21 (revised).

**Second Set of Requests for Production of Documents**

Nos. 70, 73, 76, 80, 82, 83, 89, 90 and 91.

**Third Set of Requests for Production of Documents**

Nos. 115, 116 and 117.

**Amended Fifth Set of Requests for Production of Documents**

Nos. 139, 140 and 141.<sup>1</sup>

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<sup>1</sup>The cover pages for these documents refer to Request Nos. 11, 12 and 13 of Public Counsel's Fifth Set of Requests for Production of Documents which were subsequently renumbered as Request Nos.

Copies of said responses to interrogatories and documents have also been served on August 12, 1992 by hand delivery on counsel for the Commission Staff reflected on the attached Certificate of Service.

**B. CONFIDENTIAL INFORMATION**

On August 12, 1992, Southern States served responses and documents which contain alleged proprietary and confidential information as more specifically discussed in Southern States' Motion for Temporary Protective Order for Confidential Information filed on August 7, 1992.<sup>2</sup> These responses and documents were also served by hand delivery to Mr. McLean of the Office of Public Counsel. The specific responses and documents served by Southern States which it maintains are confidential are set forth below:

**First Set of Interrogatories**

Appendix 6-A to Interrogatory No. 6.

Response to Interrogatory No. 42 and Appendices 42-A and 42-

B.

Response to Interrogatory No. 132 and Appendix 132-A.

Appendix 206-C to Interrogatory No. 206

**First Set of Requests for Production of Documents**

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139, 140 and 141 in Public Counsel's Amended Fifth Set of Requests for Production of Documents.

<sup>2</sup>Appendix 206-C to Interrogatory No. 206 is not mentioned in Southern States' Motion for Temporary Protective Order for Confidential Information filed on August 7, 1992. The information provided in Appendix 206-C is salary information which Southern States maintains is proprietary and confidential as more fully discussed in its Motion for Temporary Protective Order. Southern States will file an Amended Motion for Temporary Protective Order for Confidential Information to include Appendix 206-C.


Response to Request No. 28 and Appendices 28-A and 28-B.

Response to Request No. 41 and Appendices 41-A through 41-J.

Response to Request No. 53 and Appendices 53-A through 53-C.

Copies of the foregoing proprietary and confidential responses to interrogatories and documents will be served on counsel for the Commission Staff on or before August 14, 1992 in accordance with procedures set forth under Rule 25-22.006, Florida Administrative Code.

Respectfully submitted,

  
KENNETH A. HOFFMAN, ESQUIRE  
LAURA L. WILSON, ESQUIRE  
Messer, Vickers, Caparello,  
Madsen, Lewis, Goldman & Metz, P.A.  
P. O. Box 1876  
Tallahassee, Florida 32302-1876  
(904) 222-0720

and

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

Attorneys for Applicants Southern  
States Utilities, Inc. and  
Deltona Utilities, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Southern States Fifth Notice of Service of Responses to Public Counsel's Interrogatories and Requests for Production of Documents were furnished by hand delivery, this 12th day of August, 1992, to the following:

Harold McLean, Esq.  
Office of Public Counsel  
111 West Madison Street  
Room 812  
Tallahassee, Florida 32399-1400

Matthew Feil, Esq.  
Catherine Bedell, Esq.  
Florida Public Service Commission  
Division of Legal Services  
101 East Gaines Street  
Room 226  
Tallahassee, Florida 32399

By:   
KENNETH A. HOFFMAN, ESQ.