

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: September 1, 1992

SOUTHERN STATES' EIGHTH NOTICE OF SERVICE OF RESPONSES TO PUBLIC COUNSEL'S INTERROGATORIES AND REQUESTS 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 Eighth Notice of Service of Responses to the OFFICE OF PUBLIC COUNSEL'S ("Public Counsel") Interrogatories and states that on September 1, 1992, it served its responses to the following discovery requests of Public Counsel by hand delivery, on Harold McLean, Esq., Office of Public Counsel, 111 West Madison Street,

ACK Room 812, Tallahassee, Florida 32399-1400:

APP Public Counsel's Sixth Set of Interrogatories

CDF Nos. 280, 281, 282, 283, 284, 285, and 287.1

CDF Public Counsel's Amended Fifth Set of Requests for Production

LDH Nos. 129, 130, 131, 132, 133, 134, 135, 136, 137, and 138.2

REC 'Southern States' response to Interrogatory No. 286 was previously served on all parties on August 12, 1992.

SEC 'Southern States' responses are numbered 1 through 10 in accordance with Public Counsel's original Fifth Set of Requests for Production. These responses correspond to Request Nos. 129 through 138 in Public Counsel's Amended Fifth Set of Requests for Production (which simply renumbered the document requests included in the original Fifth Set).

DOCUMENT NUMBER-DATE

09983 SEP -1 1992


FPSC-RECORDS/REPORTING

Public Counsel's On-Site Discovery Request

Three internal cost separation audits prepared by Minnesota Power and Light Company which Southern States maintains are proprietary and confidential under Section 367.156, Florida Statutes.

Copies of said Responses and documents also were served on September 1, 1992, by hand delivery on counsel for the Commission Staff and by U. S. Mail on Mr. Harry C. Jones, Cypress and Oak Villages Association, whose addresses are reflected on the attached Certificate of Service.

Respectfully submitted,


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and

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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' Eighth Notice of Service of Responses to Public Counsel's Interrogatories and Requests for Production of Documents was furnished by hand delivery(*) and/or U. S. Mail this 1st day of September, 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

Mr. Harry C. Jones, P.E. President
Cypress and Oak Villages Association
91 Cypress Boulevard West
Homosassa, FL 32646

By: 
KENNETH A. HOFFMAN, ESQ.