LAW OFFICES

# MESSER, VICKERS, CAPARELLO, MADSEN, LEWIS, GOLDMAN & METZ

SUITE 701, FIRST FLORIDA BANK BUILDING 215 SOUTH MONROE STREET POST OFFICE BOX 1876

TALLAHASSEE, FLORIDA 32302-1876

TELEPHONE (904) 222-0720 TELECOPIER (904) 224-4359 SUITE 900
2000 PALM BEACH LAKES BOULEVARD
WEST PALM BEACH, FLORIDA 33409
TELEPHONE (407) 640-0820
TELECOPIER (407) 640-8202

Tallahassee

REPLY TO:

September 28, 1992

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

HAND DELIVERY

Re: FPSC Docket No. 920199-WS

Dear Mr. Tribble:

Enclosed herewith for filing in the above-referenced docket are the original and one copy of Southern States' Second Notice of Service of Responses to Staff'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.

Thank you for your assistance with this filing.

· · Humpy	Sincerely,
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The research	Jewik J. Hoffman Kenneth A. Hoffman

KAH/rl
Enclosures
CC: Brian P. Armstrong, Esq.

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TPSC-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: September 28, 1992

# SOUTHERN STATES' SECOND NOTICE OF SERVICE OF RESPONSES TO STAFF'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 Second Notice of Service of Responses to the FLORIDA PUBLIC SERVICE COMMISSION STAFF'S ("Staff") Interrogatories and Requests for Production of Documents and states that on September 28, 1992, it served its responses to the following Staff Interrogatories and Requests for Production of Documents by hand delivery, on Matthew J. Feil, Esq., and Catherine Bedell, Esq., Division of Legal Services, 101 East Gaines Street, Room 212, Tallahassee, Florida 32399-0850:

### Staff's First Set of Interrogatories

Nos. 1, 4, 5, 8, 9, 10, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 26, 28, 29, 30, 31, 33, 35, 36, 37, 39, 40, 41, 42, 44, 46, 48, 52, 53, 54, 55, 59, 60, 61, 62, 63, 65, 66, 67, 71, 74, 77, 78, 79, 80, 85, 87, 88, 91, 92, 93, 94, 95, 96, 98, 101, 102, 103, 108, 111, 112, 113, 114, 116 and 117.

DOCUMENT MUNICIPE DATE

11291 SEP 28 ELE

FPSC-RECORDS/REPORTED

# Staff's Second Set of Interrogatories

Nos. 119, 120, 124, 125, 127, 128, 132, 133, 136, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 150, 151, 152, 153, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 169, 171, 172, 173, 175, 176, 177, 179, 180, 181, 182, 183, 184, 185, 186, 188, 189, 190, 191, 192, 193, 197, 198, 199, 200, 201, 202, 203, 204, 205, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 219, 222, 225, 226 and 227.

# Staff's First Request for Production of Documents

No. 1 and 3.

## Staff's Second Request for Production of Documents

No. 4.

Copies of Southern States' responses to the above listed Interrogatories and Requests for Production of Documents were also served on September 28, 1992, by hand delivery on counsel for the Office of Public Counsel 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,

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' Second Notice of Service of Responses to Staff's Interrogatories and Requests for Production of Documents was furnished by hand delivery(\*) and/or U. S. Mail, this 28th 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 Homasassa, Florida 32646

> : KUMAK-NUSO-KENNETH A. HOFFMAN. ESO.