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REPLY TO:

October 14, 1992

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

HAND DELIVERY

RECEIVED
OCT 14 1992
RECORDS & REPORTING

Re: FPSC Docket No. 920199-WS

Dear Mr. Tribble:

Enclosed herewith for filing in the above-referenced docket are the following documents:

1. Original and fifteen copies of Southern States' Motion for Expedited Responses to Discovery; and
2. Original and one copy of Southern States' Notice of Service of Its First Set of Interrogatories and Requests for Production of Documents to Public Counsel.

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

ACK _____
AFA 3 _____
APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG 1 _____
LIN 4 _____
OPC _____
RCH _____
SEC 1 _____
WAS _____
OTH _____

Thank you for your assistance with this filing.

Sincerely,

Kenneth A. Hoffman
Kenneth A. Hoffman

cc: Brian P. Armstrong, Esq.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12096 OCT 14 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: October 14, 1992

**SOUTHERN STATES' MOTION FOR
EXPEDITED RESPONSES TO DISCOVERY**

TO: HONORABLE BETTY EASLEY
Commissioner and Prehearing Officer
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

SOUTHERN STATES UTILITIES, INC. and DELTONA UTILITIES, INC.
(hereinafter referred to collectively as "Southern States"), by and
through its undersigned counsel, hereby requests the Prehearing
Officer to enter an Order requiring OFFICE OF PUBLIC COUNSEL
("Public Counsel") to serve its responses to Southern States' First
Set of Interrogatories and Requests for Production of Documents to
Public Counsel, by hand delivery, on or before October 28, 1992.
In support of its request for an Order requiring service of
expedited responses to its discovery, Southern States states as
follows:

1. On October 6, 1992, counsel for Southern States received
copies of the Prefiled Testimony of Kimberly H. Dismukes and
Victoria Montanaro filed on October 5, 1992 on behalf of Public
Counsel.

2. Prior to October 6, 1992, Southern States had no basis
upon which to propound specific interrogatories directed to the

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FPSC-RECORDS/REPORTING

prefiled testimony of Public Counsel's witnesses.

3. On this date, Southern States has served by hand delivery its First Set of Interrogatories and Requests for Production of Documents to Public Counsel. These discovery requests primarily address the prefiled testimony of Ms. Dismukes. As previously mentioned, Southern States had no basis to propound such discovery requests prior to receipt and review of Ms. Dismukes' prefiled testimony.

4. Under the Order Establishing Procedure issued in this docket (Order No. PSC-92-0638-PCO-WS) and the Case Assignment and Scheduling Record, discovery actions are to be completed by October 28, 1992.

5. The purpose of a discovery deadline is to: (1) bring on-going discovery to a close at a date certain in order to ensure that discovery does not continue into the dates scheduled for final hearing, and (2) provide parties with a reasonable period of time between the discovery deadline and final hearing to digest the information gained through discovery and prepare for final hearing.

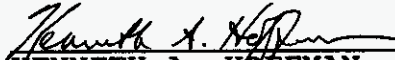
6. Southern States has propounded its First Set of Interrogatories and Requests for Production of Documents to Public Counsel in an expeditious manner following receipt and review of Ms. Dismukes' prefiled testimony and exhibits. Southern States requires responses to its First Set of Interrogatories and Requests for Production of Documents to Public Counsel by hand delivery on or before October 28, 1992 in order to have reasonable time to use such information to prepare for hearing which begins on November

6, 1992.

7. Southern States requests the Prehearing Officer to require Public Counsel to respond to its First Set of Interrogatories and Requests for Production of Documents by serving responses on the undersigned counsel for Southern States by hand delivery on or before October 28, 1992. Southern States maintains that in light of the scheduling restrictions in this docket, a period of fourteen (14) days provides a reasonable amount of time to respond to Southern States' First Set of Interrogatories and Requests for Production of Documents.

WHEREFORE, Southern States requests the Prehearing Officer to enter an Order requiring Public Counsel to serve its responses to Southern States' First Set of Interrogatories and Requests for Production of Documents, by hand delivery, on or before October 28, 1992.

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

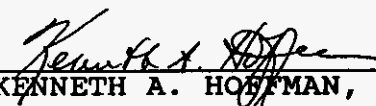
I HEREBY CERTIFY that a copy of the foregoing Southern States' Motion for Expedited Responses to Discovery was furnished by hand delivery(*) and/or U. S. Mail, this 14th day of October, 1992, to the following:

Harold McLean, Esq.*
Office of Public Counsel
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Catherine Bedell, Esq.*
Florida Public Service Commission
Division of Legal Services
101 East Gaines Street
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BY: 
KENNETH A. HOFFMAN, ESQ.