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ORIGINAL
FILE COPY

March 3, 1993

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

RE: Docket Nos. 900960-TL, 910163-TL, 910727-TL, 920260-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Public Counsel's Motion to Accept Testimony and Add Issues Relating to the Treatment of Costs from Hurricane Andrew which we ask that you file in the above-captioned dockets.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White (02)

Enclosures

cc: All Parties of Record
A. M. Lombardo
H. R. Anthony
R. D. Lackey

DOCUMENT NUMBER-DATE

02388 MAR-3 83

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

Docket No. 920260-TL

Docket No. 900960-TL

Docket No. 910163-TL

Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 3rd day of March, 1993 to:

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Nancy B. White
(12)

Hurricane Andrew. The request was included in Mr. Reid's rebuttal testimony because Hurricane Andrew did not occur until after the filing of Southern Bell's direct testimony.

2. In Public Counsel's motion, Public Counsel has requested that the Commission accept the filing of direct testimony by Victoria A. Montanaro concerning the treatment of costs from Hurricane Andrew. In addition, Public Counsel requested that two issues relating to Hurricane Andrew be added to the issue list in the above captioned dockets.

3. Southern Bell has no objection to Public Counsel's request that Ms. Montanaro's testimony be accepted. It is, in essence, rebuttal to Mr. Reid's testimony concerning Hurricane Andrew. Southern Bell would request, however, that it be given an opportunity to provide rebuttal to Ms. Montanaro's testimony. Rebuttal testimony is further needed by Southern Bell because of the additional issue raised by Public Counsel regarding insurance, which issue was not discussed in Mr. Reid's testimony.

4. With regard to the additional issues suggested by Public Counsel concerning Hurricane Andrew, Southern Bell has no objection to Issue (i) and sets forth below its response thereto:

Issue (i): How should Southern Bell's insurance proceeds from Hurricane Andrew be apportioned between Louisiana and Florida?

Southern Bell's Position: The insurance proceeds should be apportioned between Florida and Louisiana based on the proportional rate of the premium paid by

Florida as compared to Louisiana as evidence of the level of insured investment in the states.

5. With regard to Issue (ii), Southern Bell objects to the issue as worded. Public Counsel proposed this wording: How should Southern Bell account for the net cost of Hurricane Andrew? The issue as worded fails to recognize that the appropriate method of accounting necessarily follows the treatment of the casualty loss accorded for ratemaking purposes, not vice versa. Thus, Southern Bell would suggest the following wording:

Issue (ii): How should the net cost of Hurricane Andrew be treated for ratemaking purposes?

Southern Bell's Position: The net cost of Hurricane Andrew should be amortized over a five year period, beginning in 1992.

WHEREFORE, Southern Bell respectfully requests that the Commission allow Southern Bell a reasonable period of time to file rebuttal testimony to the testimony filed by Ms. Montanaro and to accept the issues related to Hurricane Andrew as reworded by Southern Bell.

Respectfully submitted this 3rd day of March, 1993.

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