



JACK SHREVE  
PUBLIC COUNSEL

STATE OF FLORIDA  
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, Florida 32399-1400  
904-488-9330

April 2, 1993

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

Re: Docket No. 920199-WS

Dear Mr. Tribble:

Enclosed for filing in the above-captioned proceeding on behalf of the Citizens of the State of Florida are the original and 15 copies of the Citizens' Motion for Waiver of Rule 25-22.060(3)(a) F.A.C.; Request for Additional Time in Which to File Motion for Reconsideration of Order PSC-93-0423-FOS-WS.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

*Harold McLean*  
Harold McLean  
Associate Public Counsel

ACK \_\_\_\_\_  
AFA 1 \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
Enclosure  
GTR \_\_\_\_\_  
SAC \_\_\_\_\_  
LEB 1 \_\_\_\_\_  
LIN 4 \_\_\_\_\_  
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SEC 1 \_\_\_\_\_  
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DOCUMENT NUMBER-DATE  
03649 APR-2 83  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

*In re:* Application for a rate increase )  
by Southern States Utilities, Inc. )

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Docket No. 920199-WS

Filed: April 2, 1993

CITIZENS' MOTION FOR WAIVER OF RULE 25-22.060(3)(a), F.A.C.:  
REQUEST FOR ADDITIONAL TIME IN WHICH TO FILE MOTION  
FOR RECONSIDERATION OF ORDER PSC-93-0423-FOS-WS

The Citizens of the State of Florida (Citizens), by and through JACK SHREVE, Public Counsel, move the Public Service Commission to waive the provisions of Rule 25-22.060(3)(a), Florida Administrative Code, in order to provide the Citizens sufficient time in which to file a meaningful motion for reconsideration of order PSC-93-0423-FOS-WS, and say:

1. Order PSC-93-0423-FOS-WS was issued by the Commission on March 22, 1993;
2. Rule 25-22.060(3)(a) provides that a motion for reconsideration of a final order shall be filed within fifteen (15) days of the issuance of the order;
3. Order PSC-93-0423-FOS-WS is more than a thousand pages in length; its provisions are complex and voluminous; it is the most voluminous order of the Florida Public Service Commission known to the Citizens;

4. The order covers 127 different systems with individual revenue requirements established for each system;
5. The order contains the results of individual regression analyses on more than 30 systems to establish margin reserves, even though there are no regression analyses in the record of this case;
6. The order contains the results of individual used and useful calculations for 90 different water treatment facilities, 35 wastewater treatment facilities, 127 different water and wastewater distribution and collection systems;
7. The Citizens need sufficient time to identify and explain any mistakes made by the Commission in its final order which, if corrected, would lead to a contrary result;
8. Counsel for Southern States has been notified, and he has informed the undersigned that the utility opposes this motion.

WHEREFORE, the Citizens move the Commission to waive the provisions of Rule 25-22.060(3)(a) and provide the Citizens an additional fifteen (15) days until April 21, 1993, in which to file a petition for reconsideration of order PSC-93-0423-FOS-WS.

Respectfully submitted,



JACK SHREVE  
Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400

Attorney for the Citizens  
of the State of Florida

**CERTIFICATE OF SERVICE  
DOCKET NO. 920199-WS**

I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 2nd day of April, 1993.

Ken Hoffman  
Messer, Vickers, Caparello,  
Madsen, Lewis, Goldman & Metz  
215 S. Monroe St., Suite 701  
P.O. Box 1876  
Tallahassee, FL 32302-1876


Chuck Hill  
Division of Water & Sewer  
Fla. Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32301

Harry C. Jones, P.E. President  
Cypress and Oak Villages Assn.  
91 Cypress Boulevard West  
Homosassa, FL 34446

Mat Feil  
Division of Legal Services  
Fla. Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32301

Brian Armstrong  
Southern States Utilities  
General Offices  
1000 Color Place  
Apopka, FL 32703

Michael Mullin, Esq.  
Nassau County Board of  
County Commissioners  
P.O. Box 1563  
Fernandina Beach, FL 32034

  
Harold McLean  
Associate Public Counsel

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