



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

February 11, 1994

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

ORIGINAL
FILE COPY

Re: Docket No. 940109-WU

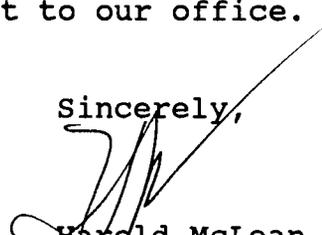
Dear Mr. Tribble:

Enclosed for filing in the above-captioned proceedings on behalf of the Citizens of the State of Florida are the original and 15 copies of the Citizens' Motion to Permit Additional Interrogatories.

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

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG Enclosures
- LEG 1 w/pm
- LIN H
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Sincerely,


Harold McLean
Associate Public Counsel

RECEIVED & FILED
FEB 11 1994
FPSC DIVISION OF RECORDS

DOCUMENT NUMBER-DATE
01404 FEB 11 94
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Interim and)
Permanent Rate Increase in)
Franklin County, Florida by)
ST. GEORGE ISLAND UTILITY)
COMPANY, LTD.)

DOCKET NO. 940109-WU

Filed: February 11, 1994

FILE COPY

MOTION TO PERMIT ADDITIONAL INTERROGATORIES

The Citizens of the State of Florida, (Citizens) by and through JACK SHREVE, Public Counsel, move the Commission to permit additional interrogatories and as grounds therefor show:

1. Rule 1.340(a), Florida Rules of Civil Procedure, restricts the Citizens to the serving of thirty (30) interrogatories, except where good cause is shown;
2. This application is voluminous and complex;
3. Limiting the Citizens to thirty (30) interrogatories would substantially prejudice the Citizens because it would interfere with their discovering whether and to what extent their interests are affected;
4. Permitting liberal discovery will serve parties and the commission because it

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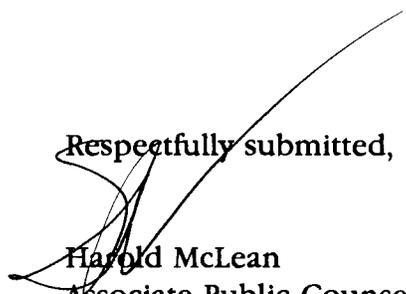
FPSC-RECORDS/REPORTING

022

will permit all parties and the commission staff to define and sharpen issues so that hearing time can be used more efficiently.

WHEREFORE, the Citizens move the Commission to permit the Citizens to exceed thirty interrogatories.

Respectfully submitted,


Harold McLean
Associate Public Counsel

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

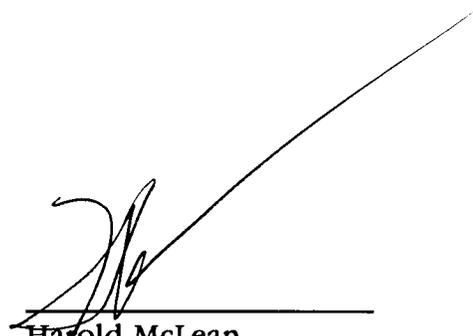
Attorney for the Citizens
of the State of Florida

**CERTIFICATE OF SERVICE
DOCKET NO. 940109-WU**

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 11th day of February, 1994.

Kathy Bedell
Division of Legal Services
Florida Public Service Commission
101 E. Gaines St.
Tallahassee, FL 32301

Gene D. Brown, Esq.
3848 Killearn Court
Tallahassee, FL 32308

A handwritten signature in black ink, appearing to read 'Harold McLean', is written over a horizontal line. The signature is stylized and extends upwards and to the right.

Harold McLean
Associate Public Counsel