



OFFICE OF THE ATTORNEY GENERAL

DEPARTMENT OF LEGAL AFFAIRS

THE CAPITOL

TALLAHASSEE, FLORIDA 32399-1050

ROBERT A. BUTTERWORTH
Attorney General
State of Florida

April 22, 1994

ORIGINAL
FILE COPY

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Docket No's. 920260-TL, 910163-TL, 910727-TL, 900960-TL and 930693-TL

Dear Ms. Bayo:

Enclosed for filing in the above-styled dockets are the original and fifteen (15) copies of the Attorney General's Motion for Leave to File Response to Southern Bell's Motion for Return of Documents Held in Camera.

Thank you for your assistance with this filing.

Sincerely,

Michael A. Gross
Assistant Attorney General

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BEFORE THE PUBLIC SERVICE COMMISSION

In re: Comprehensive review of revenue requirements and rate stabilization plan of SOUTHERN BELL. DOCKET NO. 920260-TL

In re: Investigation into the integrity of SOUTHERN BELL'S repair service activities and reports. DOCKET NO. 910163-TL

In re: Investigation into SOUTHERN BELL'S compliance with Rule 25-4.110(2), F.A.C., Rebates. DOCKET NO. 910727-TL

In re: Show cause proceeding against SOUTHERN BELL for misbilling customers. DOCKET NO. 900960-TL

In Re: Request for Approval of Proposed Tariff to Introduce Lifeline Assistance Plan by Bellsouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company DOCKET NO. 930693-TL

ATTORNEY GENERAL'S MOTION FOR LEAVE TO
FILE RESPONSE TO SOUTHERN BELL'S
MOTION FOR RETURN OF DOCUMENTS HELD IN CAMERA

The Office of the Florida Attorney General moves the Public Service Commission (the Commission) for leave to file a response to Southern Bell's Motion for Return of Documents Held In Camera and states:

1. Southern Bell filed its motion for return of documents on April 8, 1994.
2. The Attorney General is unequivocally a party to this

docket as defined in Rule 25-22.026(1), Florida Administrative Code, and entitled to service under Rule 25-22.028(2), Florida Administrative Code.

3. In fact, on March 25, 1994, Southern Bell served its Notice of Intent to Request Confidential Classification of the very same documents on all parties, including the Attorney General.

4. Inexplicably, the Attorney General was not served a copy of the motion for return of documents, and was excluded from the service list as were all parties other than Public Counsel and Commission staff. A copy of the service list is attached.

5. The Attorney General fortuitously learned of the subject motion and requested and received from Southern Bell's counsel a fax copy of the motion, excluding transmittal letter, service list, and attached affidavits on April 20, 1994.

6. The Attorney General obtained a complete copy of the motion on April 21, 1994.

7. Since the Attorney General did not receive notice as required by the rules of the Commission and due process, additional time is necessary to enable the Attorney General to prepare its response.

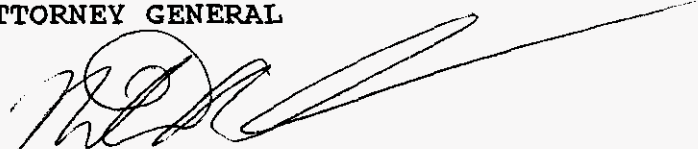
8. If the service list is accurate in reflecting that numerous other parties failed to receive notice, the Attorney General suggests that the Commission order Southern Bell to give proper notice to all parties and an opportunity to file a response.

WHEREFORE, the Attorney General respectfully requests the Commission to enter an order granting the Attorney General leave to file a response to the subject motion on or before May 2, 1994.

DATED this 22nd day of April, 1994.

Respectfully submitted,

ROBERT A. BUTTERWORTH
ATTORNEY GENERAL

A handwritten signature in black ink, appearing to read 'M. A. Gross', written over a horizontal line.

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DOCKET NOS. 920260-TL, 910163-TL, 910727-TL, 900960-TL, 911034-TL

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William S. Graessle
Attorney

CERTIFICATE OF SERVICE
Docket No. 910163-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 8th day of April, 1994,
to:

Charles J. Beck
Assistant Public Counsel
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Tracy Hatch
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