



JACK SHREVE
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STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
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ORIGINAL
FILE COPY

June 28, 1994

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

Re: Docket No. [REDACTED]

Dear Ms. Bayo:

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 for Leave to File Supplemental Testimony.

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

- ACK
- AFA _____
- APP _____
- CFE _____
- CRM _____
- CRS _____
- Enclosures
- Lierson*
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- OTI _____
- REC _____
- SEC 1
- Willis*
- OTH _____

Sincerely,

Harold McLean
Associate Public Counsel

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DOCUMENT NUMBER-DATE
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Interim and) DOCKET NO. 940109-WU
Permanent Rate Increase in)
Franklin County, Florida by) Filed: June 28, 1994
ST. GEORGE ISLAND UTILITY)
COMPANY, LTD.)
_____ /

MOTION FOR LEAVE TO FILE SUPPLEMENTAL TESTIMONY

The Citizens of the State of Florida, by JACK SHREVE, Public Counsel, move the Commission for leave to file supplemental testimony and as grounds therefore say:

1. Intervenor testimony of Kimberly H. Dismukes was duly and timely filed on May 25, 1994;
2. At the time of the filing of Ms. Dismukes testimony, the Citizens' discovery efforts were frustrated by SGU's resistance to discovery and by the unexpected limitation of discovery contained in PSC-94-0320-PCO-WU, Order Establishing Procedure. Both matters were addressed such that the Citizens' pending discovery was ruled permissible and SGU was ordered to comply, in Order PSC-94-0571-CFO-WU (Order resolving Discovery Motions) issued May 13, 1994, substantially after testimony was due.
3. The supplemental testimony will supplement existing testimony and issues.

WHEREFORE, the Citizens move the Commission for leave to file supplemental testimony.

Respectfully submitted,



Harold McLean
Associate Public Counsel

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111 West Madison Street
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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 telecopy, or both, to the following parties on this 27th day of June, 1994.

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