



Southern States Utilities • 1000 Color Place • Apopka, FL 32703 • 407/880-0058

DOCKET 950495-1N15
EXHIBIT NO. 67
CASE NO. 96-04227

June 27, 1995

Mr. Charles Hill, Director
Division of Water & Wastewater
c/o Ms. Blanca Bayó, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

by Federal Express

Re: Docket No. 950495-WS -- Application for rate increase for Orange-Osceola Utilities, Inc. in Osceola County, and in Bradford, Brevard, Charlotte, Citrus, Clay, Collier, Duval, Highlands, Lake Lee, Marion, Martin, Nassau, Orange, Pasco, Putnam, Seminole, St. Johns, St. Lucie, Volusia, and Washington Counties by Southern States Utilities, Inc.

Dear Mr. Hill:

Pursuant to Rule 25-30.442, Florida Administrative Code, Southern States Utilities, Inc. ("SSU") hereby requests that it be relieved from filing certain duplicate information as described hereinbelow.

Rule 25-30.440(6), Florida Administrative Code, requires that certain water and wastewater construction and operating permits be filed as additional engineering information. The index to Book 15 of 17 of Volume XI of SSU's MFRs lists a number of permits which SSU has previously filed with the Commission in prior cases. SSU represents that the permits referenced in the index as being previously filed are on file with the Commission in the docket numbers specified in the index and that those permits are still current and valid.

Rule 25-30.436(4)(i), Florida Administrative Code, requires a utility requesting rate relief to file copies of documents demonstrating the utility's interest in land recorded on the utility's books since rate base was last established. Several parcels of land have been added to SSU's books since rate base was established in a rate proceeding and are included in rate base in the instant filing. It should be noted that these parcels were obtained in acquisitions approved by the Commission and that the Commission also approved land values in establishing net book value at the time of transfer. SSU filed copies of the deeds whereby SSU acquired its interest in the referenced parcels in the following dockets: (1) Dockets Nos. 931122-WU - Application for Amendment of Certificate No. 189-W to include facilities of Lakeside Golf, Inc., and for limited proceedings to set rates in Osceola County by

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Southern States Utilities, Inc. and (2) Docket No. 940091-WS - Application for Transfer of Spring Gardens and Valencia Terrace from Lake Utilities, Ltd. to Southern States Utilities, Inc. SSU represents that the documents filed in those dockets are current and valid.

Although included in the 1996 projected test year rate base in SSU's rate filing, land to be acquired from Orange/Osceola Utilities, Inc. ("OOU") has not yet been conveyed to SSU, since closing cannot take place until the Commission approves the transfer now pending in Docket No. 941151-WS. Please refer to the filings made in said docket for more information regarding the SSU-OOU transfer.

If you have any questions or comments concerning the above, please call me at (407) 884-8777, ext. 260,

Sincerely yours,


Matthew Fell
Staff Counsel

c: Blanca Bayó (Records & Reporting) (correspondence file)
Lila Jaber (Legal Division)