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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Application for a 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, Osceola,)
Pasco, Putnam, Seminole, St. Johns,)
St. Lucie, Volusia, and Washington)
Counties by Southern States)
Utilities, Inc.)
_____)

Docket No. 950495-WS
Filed: November 2, 1995

CITIZENS' REQUEST FOR ORAL ARGUMENT

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, move the Commission to allow oral argument on the Citizens' motion for reconsideration of Commission order number PSC-95-1327-FOF-WS.

The Commission's order sets a precedent for water and wastewater utilities that violates section 367.082, Florida Statutes (1993). The Commission confused the term "rate base" (associated with balance sheets) with a forecasted income statement. The correct interpretation of "rate base" as a balance sheet item is consistent with the way that term is used in the statutes governing electric utilities and telecommunications companies. All of the interim statutes have allowed an accounting mismatch between the historic income statement used to determine a rate of return deficiency and the rate base to which that deficiency is applied.

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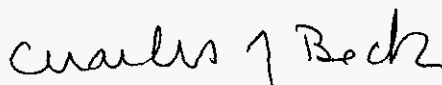
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For electric utilities and telecommunications companies, the mismatch occurs when applying an average historic rate of return deficiency to an end of period rate base. The mismatch is commonly used to accommodate companies experiencing extraordinary growth. The newly revised water and wastewater interim statute takes that mismatch one step further, allowing a forecasted rate base as well as an end of period rate base.

Oral argument is necessary to explain the interrelationship of the interim statutes affecting different industries and explain how a consistent pattern emerges for accommodating quickly growing utilities. It is also necessary to explain how the commission has misinterpreted a term associated with balance sheets and used it in a way never intended or permitted by the interim statute.

Respectfully submitted,

JACK SHREVE
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**CERTIFICATE OF SERVICE
DOCKET NO. 950495-WS**

I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U.S. Mail or hand-delivery* to the following persons on this 2nd day of November, 1995.

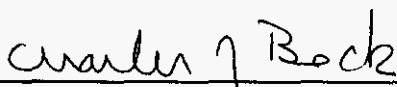
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