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THE LAW FIRM OF

### JACOBS & ASSOCIATES

PROFESSIONAL ASSOCIATION 401 CENTRE STREET THE HISTORIC POST OFFICE BUILDING SECOND FLOOR

POST OFFICE BOX IIIO FERNANDINA BEACH, FLORIDA 32035-1110 TELEPHONE (904) 261-3693 JACKSONVILLE DIRECT (904) 355-6070 FAX NO. (904) 261-7879

November 6, 1995

### VIA FEDERAL EXPRESS

Ms. Blanca S. Bayo' **Public Service Commission** Division of Records and Reporting 4075 Esplanade Way Tallahassee, Florida 32399

#### Re: Southern States Utilities, Inc. Case No.: 95-0495-WS

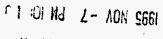
Dear Ms. Bayo'

Please find enclosed herewith an original and fifteen (15) copies of a Motion to Intervene to be filed in the above captioned case. This case is number 41 On the docket for November 7. Please file this Motion before the hearing.

ACK \_\_\_\_ If you have any questions, please let me know. AFA \_\_\_\_ APP \_\_\_\_\_ CAT \_\_\_\_\_ C' : ' CŤ. £ AIJ/bg / 5 Enclosures L l ŗ. 1 ŝ 1 WAS bull

Yours sincerely, Arthur I Jacobs

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SERVICE CONMESSION 01.1005 A0190-10 RECEIVED

DOCUMENT NUMBER-DATE

10974 NOV-78 FPSC-RECORDS/REPORTING

ARTHUR I. JACOBS

# BEFORE THE PUBLIC SERVICE COMMISSION



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, Putnan, Seminole, St. Johns, St. Lucie, Volusia, and Washington Counties by Southern States Utilities, Inc.

Docket No. 950495-WS

# **MOTION TO INTERVENE**

COMES NOW, Arthur I. Jacobs, Attorney-at-Law and request the Public Service Commission to appear on behalf of the citizens of Nassau County in this cause and for reasons thereof would state as follows:

1. The users of Southern States Utilities, Inc. located in Nassau County are substantially effected by any action taken by this commission in this cause.

2. Any rates that are increased will substantially impact these users of the utility located in Nassau County, Florida.

3. These users and citizens of Florida need to have their rights protected by being allowed to make this appearance in this cause.

WHEREFORE the undersigned attorney respectfully request that he be allowed to appear as intervenor on behalf of these users located in Nassau County, Florida of Southern States Utilities, Inc.

ARTHUR A JACOBS, ESQUIRE JACOBS & PETERS, P.A. Post Office Box 1110 Fernandina Beach, FL 32035-1110 (904)261-3693 or 355-6070

Florida Bar No. 108249

DOCUMENT NUMPER-DATE

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### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following this  $\frac{4^{+1}}{4}$  day of November, 1995.

Ken Hoffman, Esquire William B. Willingham, Esquire Rutledge, Ecenia, et al. Post Office Box 551 Tallahassee, Florida 32302-0551

Kjell W. Petersen, Director Marco Island Civic Association Post Office Box 712 Marco Island, Florida 33969

Michael B. Twomey, Esquire Post Office Box 5256 Tallahassee, Florida 32314-5256 Brian Armstrong, Esquire Matthew Feil, Esquire Southern States Utilities, Inc. 100 Color Place Apopka, Florida 32703

Lila Jaber, Esquire Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Charles J. Beck, Esquire Deputy Public Counsel Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 1023 Tallahassee, Florida 32399-1400

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