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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**ORIGINAL
FILE COPY**

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, Osceola, Pasco, Putnam,)
Seminole, St. Johns, St. Lucie, Volusia, and)
Washington Counties, by Southern States)
Utilities, Inc.)

DOCKET NO. 950495-WS
FILED: November 28, 1995

PETITION OF CONCERNED CITIZENS
OF LEHIGH ACRES FOR LEAVE TO INTERVENE

The Concerned Citizens of Lehigh Acres, by and through its undersigned attorney,
pursuant to Section 120.53, Florida Statutes, and Rules 25-22.036(7)(a) and 25-22.039, Florida
Administrative Code, petitions for leave to intervene in the above-styled proceeding, and in
support thereof states:

1. The name and address of petitioner is as follows:

Concerned Citizens of Lehigh Acres
1208 E. Third Street
Lehigh Acres, Florida 33936

Documents relating to this proceeding should be served on:

Michael B. Twomey, Esquire
Route 28, Box 1264
Tallahassee, Florida 32310
Telephone: (904) 421-9530
Fax: (904) 421-8543

and

Frank E. Kane
Chairman
Concerned Citizens of Lehigh Acres
1208 E. Third Street
Lehigh Acres, Florida 33936

ACK ✓
AFA 3
APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG 1
LIN 5
OPC _____
RCH _____
SEC 1
WAS Wallas
OTH origin

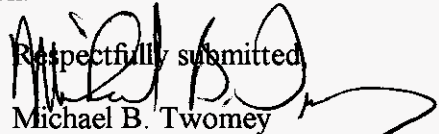
2. The Concerned Citizens of Lehigh Acres is an association of residents of Lehigh
Acres representing in excess of 1,000 residents in over 5,00 households in Lehigh Acres, Florida.

RECEIVED & FILED
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
11917 NOV 28 1995
FPSC-RECORDS/REPORTING 3882

Members of the Concerned Citizens of Lehigh Acres take their regulated water and wastewater service from Southern States Utilities, Inc.'s ("SSU") Lehigh water and wastewater plants, which are located solely in Lee County, Florida. In the above-styled docket SSU has requested a permanent increase in its annual revenues exceeding \$18.6 million and an interim revenue increase exceeding \$12 million on an annual basis. The Florida Public Service Commission ("PSC") is vested with the statutory authority and responsibility for setting "fair, just and reasonable" rates for SSU and its customers in this docket. SSU's rate petition requests that the sought-after revenue increases be applied to numerous SSU systems in Florida, specifically including the water and wastewater plants serving the members of the Concerned Citizens of Lehigh Acres. Accordingly, the Concerned Citizens of Lehigh Acres and its members are persons "whose substantial interests are being determined in [this] proceeding" within the definition of Section 120.52(12), Florida Statutes, and who are per se entitled to status as "parties" in this proceeding.

WHEREFORE, the Concerned Citizens of Lehigh Acres requests (a) that it be granted leave to intervene and be permitted to participate in this proceeding with full rights as a party, (2) that the Order Granting Intervention direct SSU to immediately serve the Concerned Citizens of Lehigh Acres with a full and complete copy of its petition, testimony and all supporting documentation filed with the PSC, its staff and other parties, and (3) that PSC staff and other parties to this case be directed to serve upon the Concerned Citizens of Lehigh Acres copies of all documents either filed with the PSC or served upon other parties up to, and including, the date of the Order Granting Intervention.

Respectfully submitted

Michael B. Twomey
Attorney for Concerned Citizens of
Lehigh Acres
(904) 421-9530

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing has been furnished by

U.S. Mail this 28th day of Nov, 1995 to the following persons:

Brian Armstrong, Esquire
General Counsel
Southern States Utilities, Inc.
1000 Color Place
Apopka, Florida 32703

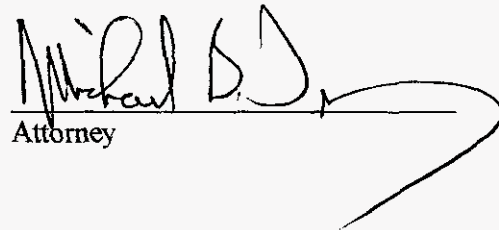
Morty Miller
President
Spring Hill Civic Association, Inc.
P.O. Box 3092
Spring Hill, Florida 34606

Kenneth A. Hoffman, Esquire
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
Post Office Box 551
Tallahassee, Florida 32302

Lila A. Jaber, Esquire
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0862

Harold McLean, Esquire
Associate Public Counsel
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison Street, Suite 812
Tallahassee, Florida 32399-1400

W. Allen Case, President
Sugarmill Woods Civic Association, Inc.
91 Cypress Boulevard West
Homosassa, Florida 34446



Attorney