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ORIGINAL
FILE COPY

December 4, 1995

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 950495-WS

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of Citizens' Motion to Cap SSU's Maximum Interim Rates.

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

Sincerely,

Charles J. Beck
Deputy Public Counsel

- ACK
- AFA 3 CJB:bsr
- APP _____ Enclosures
- DAF _____
- DMU _____
- CTR _____
- EAG _____
- LEG 1
- LIN 5
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- OTH _____

RECEIVED & FILED

DOCUMENT NUMBER-DATE

12063 DEC-4 95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA 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, Putnam, Seminole, St. Johns,
St. Lucie, Volusia, and Washington
Counties by Southern States
Utilities, Inc.

Docket No. 950495-WS

Filed: December 4, 1995

CITIZENS' MOTION TO CAP SSU'S MAXIMUM INTERIM RATES

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, move the Commission to cap interim rates in this proceeding to the rates SSU notifies its customers as its highest "proposed interim rates."

1. On September 15, 1995, the Citizens filed a motion seeking to cap SSU's interim and final rates to the rates requested by SSU. Other motions addressed inadequacies in the notices already provided by SSU.¹ The Citizens adopt the arguments contained in those motions.

2. The new notice SSU intends to submit to customers shows

¹ See Citizens' second motion to dismiss filed September 8, 1995; Citizens' third motion to dismiss filed September 14, 1995; Citizens' fourth motion to dismiss filed September 22, 1995; and Citizens' motion for reconsideration to the full Commission filed October 9, 1995.

the company's already rejected interim rate proposal as its "proposed interim rates."² SSU apparently does not consider the various alternatives set forth in its supplemental petition for interim revenue relief filed November 13, 1995, to be proposed interim rates.


3. For the reasons set forth in the Citizens' previous motions, the Commission should cap the maximum interim rate for each system at the highest rates shown in SSU's new notice to its

² Letter from Kenneth A. Hoffman to Maggie O'Sullivan dated November 30, 1995.

customers.³

Respectfully submitted,

JACK SHREVE
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Attorneys for the Citizens
of the State of Florida

³ SSU could cure this deficiency in its notice by showing the "proposed interim rates" for each system as the full range of possible interim rates included in the alternatives provided by SSU's supplemental petition.

**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 parties on this 4th day of December, 1995.

*Ken Hoffman, Esq.
William B. Willingham, Esq.
Rutledge, Ecenia, Underwood,
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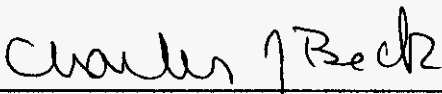
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Southern States Utilities
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Kjell W. Petersen
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