

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application by Southern States Utilities, Inc. for rate increase and increase in service availability charges for Orange-Osceola Utilities, Inc. in Osceola County, and in Bradford, Brevard, Charlotte, Citrus, Clay, Collier, Duval, Hernando, Highlands, Hillsborough, Lake, Lee, Marion, Martin, Nassau, Orange, Osceola, Pasco, Polk, Putnam, Seminole, St. Johns, St. Lucie Volusia and Washington Counties.

FILE COPY

Docket No. 950495-WS

Filed: December 26, 1995

SOUTHERN STATES UTILITIES, INC.'S OBJECTION TO INTERROGATORY REQUEST NO. 334 FROM THE COMMISSION STAFF'S SIXTH SET OF INTERROGATORIES AND MOTION FOR PROTECTIVE ORDER

SOUTHERN STATES UTILITIES, INC. ("SSU") by and through its undersigned attorneys, hereby files its objection to Interrogatory No. 334 propounded by the Commission Staff ("Staff") and requests entry of a protective order determining that SSU is not required to respond to the interrogatory. In support of its objection and motion for protective order, SSU states as follows:

1. On December 14, 1995, SSU received Staff's Sixth Set of Interrogatories. Interrogatory No. 334 states as follows:

This question relates to FPSC Audit Exception No. 9. Specifically, the document entitled "Request for Preliminary Survey/Investigation G/L Account" for the Spring Hill Wastewater Treatment Plant Expansion, indicates that the addition is to accommodate future loads:

- a) When did the company stop incurring costs associated with this project?
b) Why was this project abandoned?
c) What is SSU's position with regard to whether or not the costs associated with this abandoned project should be recorded above the line and

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recovered through rates, even though the project was to benefit future growth?

- d) Should the balance associated with this project be specifically identified to this plant as opposed to being allocated to all plants through working capital?

2. In its "Order Memorializing the Commission's Decision that the Facilities of Southern States Utilities, Inc., Located in the Counties of Hillsborough, Hernando and Polk are not Subject to a Rate Increase in this Rate Application,"¹ the Commission, on its own motion, removed from this docket the service areas served by SSU in Hillsborough, Hernando and Polk Counties.

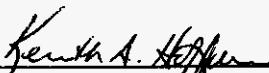
3. The area served by SSU's Spring Hill Wastewater Treatment Plant Expansion is located in Hernando County.

4. The revenue, costs, investments, rates and other information associated with the operation of SSU's facilities serving the Spring Hill service area are not relevant in this docket, nor is such information likely to lead to the production of relevant information. Given the enormous amount of discovery which has and which continues to be conducted in this docket, there is no rational basis for requiring SSU to provide information relating to service areas which are not included in this docket and can have no impact on SSU's requested revenue requirements.

¹Order No. PSC-95-1385-FOF-WS, issued November 7, 1995.

WHEREFORE, SSU respectfully requests than an order be entered determining that SSU is not required to respond to Staff's Interrogatory No. 334.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing SSU's Objection to Interrogatory Request No. 334 from the Commission Staff's Sixth Set of Interrogatories and Motion for Protective Order was furnished by hand delivery(*) and/or U. S. Mail to the following on this 26th day of December, 1995:

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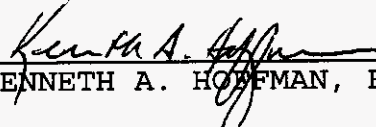
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