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March 25, 1996

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center  
Room 110  
Tallahassee, Florida 32399-0850

**HAND DELIVERY**

Re: Docket No. 950495-WS

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of the Southern States Utilities, Inc. ("SSU"), are the original and fifteen copies of Southern States Utility, Inc.'s Objections to Hidden Hill's First Request for Production of Documents.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

*Kenneth A. Hoffman*  
Kenneth A. Hoffman

- ACK
- AFA
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR  KAH/rl
- EAG  All Parties of Record
- LEG  1
- LIN  5
- CPC
- RCH \_\_\_\_\_
- SEC
- WAS *Willis*
- QTH \_\_\_\_\_

RECEIVED & FILED  
*JD*

DOCUMENT NUMBER-DATE

03519 MAR 25 88

FPSC-RECORDS/REPORTING

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, Highlands, )  
Lake, Lee, Marion, Martin, )  
Nassau, Orange, Osceola, Pasco, )  
Polk, Putnam, Seminole, St. Johns, )  
St. Lucie, Volusia and Washington )  
Counties. )  
\_\_\_\_\_ )  
)  
)

ORIGINAL  
FILE COPY

Docket No. 950495-WS

Filed: March 25, 1996

**SOUTHERN STATES UTILITIES, INC.'S OBJECTIONS  
TO HIDDEN HILLS' FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS**

SOUTHERN STATES UTILITIES, INC. ("SSU"), hereby files its objections to the First Request for Production of Documents served on SSU by Hidden Hills Civic Association ("Hidden Hills"), and as grounds for its objections states as follows:

1. Hidden Hills has served its First Request for Production of Documents pursuant to Rule 1.350, Florida Rules of Civil Procedure. Both Rule 1.350(a) and Rule 1.280(a), Florida Rules of Civil Procedure, clearly limit the propounding of discovery to parties to a proceeding. Hidden Hills has not been granted intervention and party status in this proceeding. Therefore, SSU objects to all discovery directed to it by Hidden Hills on the ground that SSU is not required to respond to discovery requests of non-parties, including Hidden Hills.

2. In addition to the above objection which pertains to each of the ten numbered document requests, SSU also specifically objects to Document Request Nos. 7 through 10 on the following

DOCUMENT NUMBER-DATE

03519 MAR 25 7743

FPSC-RECORDS/REPORTING

grounds:

a. Hidden Hills Document Request No. 7 states as follows:

7. Copies of all communications from either Southern States Utilities, Inc. or the Southern States Utilities, Inc. Political Action Committee ("PAC") (irrespective of its name) to Southern States Utilities, Inc.'s employees addressing the aims or goals of the PAC.

SSU objects to producing documents responsive to the above request on the grounds that the request is vague, ambiguous, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

b. Hidden Hills Document Request No. 8 states as follows:

8. Copies of all communications from either Southern States Utilities, Inc. or the PAC, to either SSU lobbyists or attorneys regarding criteria by which the PAC would make campaign contributions to political candidates at either the local, state or federal level.

SSU objects to producing documents responsive to the above request on the grounds that the request is vague, ambiguous, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

c. Hidden Hills Document Request No. 9 states as follows:

9. Copies of all documents indicating what campaigns the SSU PAC made contributions of cash, in-kind, or any other, by year, for each year beginning on January 1, 1990.

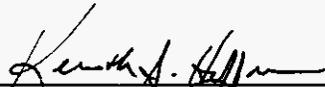
SSU objects to producing documents responsive to the above request on the grounds that the request is vague, ambiguous, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

d. Hidden Hills Document Request No. 10 states as follows:

10. Copies of all correspondence with the Rose, Sundstrum & Bentley law firm, or any of its attorneys or employees for the calendars years 1992, 1993, 1994, 1995 and to date during 1996.

SSU objects to producing documents responsive to the above request on the grounds that the request is vague, ambiguous, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Respectfully submitted,



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and

BRIAN P. ARMSTRONG, ESQ.  
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Southern States Utilities, Inc.  
1000 Color Place  
Apopka, Florida 32703  
(407) 880-0058

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of Southern States Utilities, Inc.'s Objections to Hidden Hills' First Request for Production of Documents was furnished by U. S. Mail to the following on this 25th day of March, 1996:

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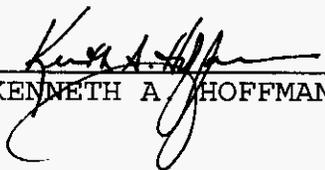
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\_\_\_\_\_  
KENNETH A. HOFFMAN, ESQ.

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