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ORIGINAL
FILE COPY

March 29, 1996

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

RE: Docket No. 951056-WS

Dear Ms. Bayo:

Enclosed for filing in the above-captioned proceeding on behalf of the Citizens of the State of Florida are the original and 15 copies of the Motion to Permit Additional Interrogatories.

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

Sincerely,

Stephen C. Reilly
Associate Public Counsel

SCR/bgm
Enclosures

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DOCUMENT NUMBER-DATE

03706 APR-1 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application of PALM COAST) Docket No. 951056-WS
UTILITY CORPORATION for Increased) Filed: March 29, 1996
Rates in Flagler County, Florida /

MOTION TO PERMIT ADDITIONAL INTERROGATORIES

The Citizens of the State of Florida (Citizens), by and through JACK SHREVE, Public Counsel, move the Commission to permit additional interrogatories and as grounds therefore show:

1. Rule 1.340(a), Florida Rules of Civil Procedure, restricts the Citizens to the serving of thirty (30) interrogatories, except where good cause is shown;

2. This application involves a utility with large and complex water and wastewater operations. Palm Coast represents one of the most extreme examples of non-used and useful distribution and collection lines as exists in the State of Florida. At Palm Coast there are extensive water distribution and wastewater collection lines serving vast areas with little or no active customers, presenting relatively unique and extreme problems to operate and maintain these systems.

3. The development company and its affiliated utility company have devised a variety of ways to collect monies from current and future customers to support a substantial amount of non-used and useful utility plant.

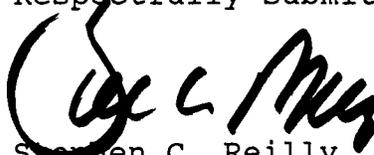
4. Given the size and complexity of this case it would be

impossible to adequately prepare for the hearing with a limit of thirty (30) interrogatories.

5. The Citizens resolve to utilize interrogatories as judiciously as possible. We believe that a maximum of one hundred (100) interrogatories will permit the Citizen to accomplish sufficient discovery so that the issues of this case will be adequately identified and defined so that the Commission's hearing time will be as productive as possible.

WHEREFORE, the Citizens move the Commission to permit the Citizens to propound a maximum of one hundred (100) interrogatories in this proceeding.

Respectfully submitted,



Stephen C. Reilly
Associate Public Counsel

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Attorney for the Citizens
of the State of Florida

**CERTIFICATE OF SERVICE
DOCKET NO. 951056-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 29th day of March, 1996.

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