

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: April 3, 1996

CITIZENS' RESPONSE TO SOUTHERN STATES' OBJECTIONS

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, file this response to the objections filed by Southern States Utilities, Inc. ("Southern States") on April 1, 1996.

1. Citizens' document request no. 320, served on March 20, 1996, asked for all documents responsive to Hidden (sic) Hills Civic Association's first request for production of documents dated March 15, 1996.

2. Southern States filed objections to Hidden Hills' discovery on March 25, 1996. These objections included one objection to the entire set of discovery based on the fact that Hidden Hills Civic Association had not yet been granted intervenor status in the case. Other objections related specifically to

requests no. 7 through 10.

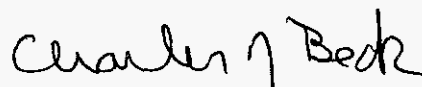
3. Citizens do not oppose the specific objections raised by Southern States to Hidden Hills' requests no. 7 through 10. However, we oppose the general objection to the remaining discovery based on the lack of intervenor status by the Hidden Hills Civic Association.

4. The remaining requests by Hidden Hills Civic Association (Hidden Hills requests no. 1 through 6) deal with the quality of the water provided by Southern States in Duval County, including important questions about the amount of lead in the water. The lack of intervenor status by the Hidden Hills Civic Association has no impact on the right of Citizens to obtain these documents. Southern States must be required to produce these documents.

WHEREFORE, Citizens request the Commission to enter an order compelling Southern States to produce all documents responsive to Hidden Hills Civic Association's first set of requests for production of documents, requests no. 1 through 6, since (1) these document requests were incorporated by the Citizens' document request no. 320, and (2) Southern States' objection to the non-party status of Hidden Hills Civic Association has no bearing on Citizens' right to obtain these documents.

Respectfully submitted,

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**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 party representatives on this 3rd day of April, 1996.

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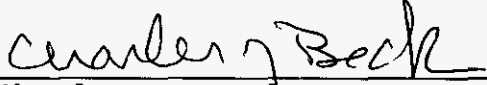
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