

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for rate increase in Brevard, Charlotte/Lee, Citrus, Clay, Duval, Highlands, Lake, Marion, Martin, Nassau, Orange, Osceola, Pasco, Putnam, Seminole, Volusia, and Washington Counties by SOUTHERN STATES UTILITIES, INC.; Collier County by MARCO SHORES UTILITIES (Deltona); Hernando County by SPRING HILL UTILITIES (Deltona); and Volusia County by DELTONA LAKES UTILITIES (Deltona)

DOCKET NO. 920199-WS
FILED: May 9, 1996

REQUEST FOR ORAL ARGUMENT

The City of Keystone Heights, the Marion Oaks Homeowners Association, and Burnt Store Marina (Intervenors), pursuant to Rule 25-22.058, Florida Administrative Code, request oral argument on their Petition to Intervene. As grounds therefore, Intervenors state:

1. Intervenors are customers of Southern States Utilities, Inc. (SSU).
2. Intervenors have sought leave to intervene to protect their rights regarding the refund and rate design issues now before the Commission. Unless intervention is permitted, the rights and positions of Intervenors will not be represented or protected. This is especially the case because it has been suggested that one group of customers (including Intervenors) be surcharged in order to effectuate a refund for another group of customers.
3. In this docket, the utility (who would avoid absorbing the refund if a surcharge on Intervenors is adopted) is

represented, as are the customers who would receive a refund. Intervenor's comprise part of the group of customers who would be most dramatically affected by this Commission's ruling on the issues pending herein. The Commission should have the benefit of argument regarding the affected customers' views on their right to intervene and address the important issues that will be considered in this docket so that all positions are represented before the Commission.

WHEREFORE, Intervenor's requests that they be granted oral argument on their Petition to Intervene.

Vicki Gordon Kaufman
Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin
Davidson, Rief & Bakas
117 South Gadsden Street
Tallahassee, Florida 32301

Attorneys for City of Keystone
Heights and The Marion Oaks
Homeowners Association

Darol H. M. Carr by vgh
Darol H. M. Carr
Farr, Farr, Emerich, Sifrit
Hackett and Carr, P.A.
2315 Aaron Street
Port Charlotte, FL 33949

Attorneys for Burnt Store Marina

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the City of Keystone Heights', Marion Oaks Homeowners Association's and Burnt Store Marina's Request for Oral Argument has been furnished by hand delivery* or by U.S. Mail to the following parties of record, this 9th day of May, 1996:

*Lila Jaber, Esq.
FL Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

John R. Howe, Esq.
County Attorney
111 W. Main Street, #B
Inverness, FL 34450-4852

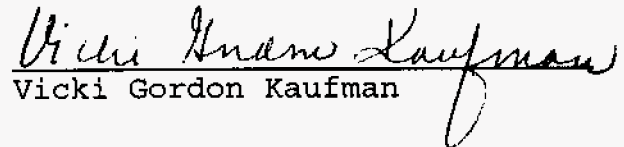
Jack Shreve, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., #812
Tallahassee, FL 32399-1400

*Kenneth Hoffman
Rutledge Law Firm
P. O. Box 551
Tallahassee, FL 32302

Mr. Harry C. Jones, President
Cypress and Oak Villages
Association
91 Cypress Boulevard West
Homasassa, Florida 32646

Michael B. Twomey, Esq.
Route 28, Box 1264
Tallahassee, Florida 31310

Arthur Jacobs
Post Office Box 1110
Fernandina Beach, FL 32035-1110


Vicki Gordon Kaufman

003553

3799