

JACK SHREVE PUBLIC COUNSEL

STATE OF FLORIDA

OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400 904-488-9330

April 2, 1993

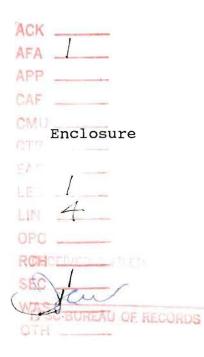
Steve Tribble, Director Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, FL 32399-0850

Re: Docket No. 920199-WS

Dear Mr. Tribble:

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 Citizens' Motion for Waiver of Rule 25-22.060(3)(a) F.A.C.; Request for Additional Time in Which to File Motion for Reconsideration of Order PSC-93-0423-FOS-WS.

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



Sincerely,

Harold McLean Associate Public Counsel

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FFSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for a rate increase) by Southern States Utilities, Inc.)

Docket No. 920199-WS

Filed: April 2, 1993

CITIZENS' MOTION FOR WAIVER OF RULE 25-22.060(3)(a), F.A.C.: REQUEST FOR ADDITIONAL TIME IN WHICH TO FILE MOTION FOR RECONSIDERATION OF ORDER PSC-93-0423-FOS-WS

The Citizens of the State of Florida (Citizens), by and through JACK SHREVE, Public Counsel, move the Public Service Commission to waive the provisions of Rule 25-22.060(3)(a), Florida Administrative Code, in order to provide the Citizens sufficient time in which to file a meaningful motion for reconsideration of order PSC-93-0423-FOS-WS, and say:

- 1. Order PSC-93-0423-FOS-WS was issued by the Commission on March 22, 1993;
- 2. Rule 25-22.060(3)(a) provides that a motion for reconsideration of a final order shall be filed within fifteen (15) days of the issuance of the order;
- 3. Order PSC-93-0423-FOS-WS is more than a thousand pages in length; its provisions are complex and voluminous; it is the most voluminous order of the Florida Public Service Commission known to the Citizens;

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- 4. The order covers 127 different systems with individual revenue requirements established for each system;
- 5. The order contains the results of individual regression analyses on more than 30 systems to establish margin reserves, even though there are no regression analyses in the record of this case;
- 6. The order contains the results of individual used and useful calculations for 90 different water treatment facilities, 35 wastewater treatment facilities, 127 different water and wastewater distribution and collection systems;
- 7. The Citizens need sufficient time to identify and explain any mistakes made by the Commission in its final order which, if corrected, would lead to a contrary result;
- 8. Counsel for Southern States has been notified, and he has informed the undersigned that the utility opposes this motion.

WHEREFORE, the Citizens move the Commission to waive the provisions of Rule 25-22.060(3)(a) and provide the Citizens an additional fifteen (15) days until April 21, 1993, in which to file a petition for reconsideration of order PSC-93-0423-FOS-WS.

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Respectfully submitted,

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ACK SHREVE

Office of Public Counsel c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400

Attorney for the Citizens of the State of Florida

CERTIFICATE OF SERVICE DOCKET NO. 920199-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 2nd day of April, 1993.

Ken Hoffman Messer, Vickers, Caparello, Madsen, Lewis, Goldman & Metz 215 S. Monroe St., Suite 701 P.O. Box 1876 Tallahassee, FL 32302-1876

Chuck Hill Division of Water & Sewer Fla. Public Service Commission 101 East Gaines Street Tallahassee, FL 32301

Harry C. Jones, P.E. President Cypress and Oak Villages Assn. 91 Cypress Boulevard West Homosassa, FL 34446 Mat Feil Division of Legal Services Fla. Public Service Commission 101 East Gaines Street Tallahassee, FL 32301

Brian Armstrong Southern States Utilities General Offices 1000 Color Place Apopka, FL 32703

Michael Mullin, Esq. Nassau County Board of County Commissioners P.O. Box 1563 Fernandina Beach, FL 32034

Aarold McLean Associate Public Counsel

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