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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Application for 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: July 24, 1995

PETITION OF SUGARMILL WOODS CIVIC
ASSOCIATION, INC. FOR FULL COMMISSION REVIEW
OF ORDER ESTABLISHING SERVICE HEARING
SCHEDULE AND REQUIRING NOTICE

The Sugarmill Woods Civic Association, Inc., by and through its undersigned attorney,
pursuant to Rule 25-22.038(2), Florida Administrative Code, moves the full commission to review
Order No. PSC-95-0829-PCO-WS Order Establishing Service Hearing Schedule and Requiring
Notice and to reschedule the customer service hearings scheduled therein until such later date as
will allow all customers time to adequately familiarize themselves with Southern States Utilities,
Inc.'s ("SSU") rate filing, MFR's and rate case synopsis and prepare objections for presentation
to the commissioners at hearing. In support thereof Sugarmill Woods Civic Association, Inc.

ACK _____ states:
AFA Vandiver

APP _____ 1. On June 28, 1995 SSU filed and an application for increased water and wastewater
CAF _____ rates, allowance for funds prudently invested, and service availability charges. The application is
CMU _____ massive, involving in excess of 130 separate water and wastewater systems in numerous counties,
CTR _____ and apparently comprising some 25,000 pages or more of petition, testimony and data. In
EAG _____
LEG 3
LIN 5
OPC _____ addition to involving multiple systems, the application apparently requests interim rates based
RCH _____
SEC 1

WAS Wells
JTH _____

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upon a projected test year, a rate structure involving the highly controversial and unlawful concept of uniform rates and other unusual or controversial issues to include weather normalization, price elasticity, a conservation adjustment clause, reuse issues, zero bills adjustment, and others.

2. To date, the PSC staff has not found SSU's rate filing to be sufficient and declared an "official filing date." Indeed, the PSC staff has declared the rate application to be deficient for a number of reasons, including the fact that SSU has not included with the filing its systems found in Hernando, Hillsborough, and Polk Counties. Staff has filed a recommendation urging the full commission to accept the finding that the filing is deficient, however, the commission is not scheduled to consider this recommendation until the August 1, 1995 Agenda Conference.

3. Rule 25-22.0407(3), Florida administrative Code provides that within 30 days after the official date of filing established by the commission, the utility shall place a copy of the rate petition and the MFR's at its business office within each service area, or the main county library if it does not have a business office within a given service area. Generally, Rule 25-22.0407, Florida Administrative Code provides that the utility shall also, within 30 days of the official filing date, provide a copy of its "rate case synopsis" at all locations where copies of the petition and MFR's were placed as well as provide copies of the rate case synopsis to the chief executive officer of each concerned municipality and county. Subsection (5)(a) of the same rule provides that within 50 days of the official date of filing the utility shall provide, in writing, an initial customer notice to all customers within the service area and prescribes specific and detailed information to be included in the notice.

4. To date, SSU has not filed the requisite complete rate petition, testimony and full MFR's at the prescribed locations, presumably because it has not yet received an "official filing date" from the commission staff. Likewise, SSU has not, indeed cannot until it knows the full extent of the systems to be included in its filing, met the rule requirements for filing its rate case synopsis or the initial written customer notice.

5. Without the full SSU rate petition, testimony and MFR's, and rate case synopsis, none of the customers substantially affected by this proceeding, including the members of the Sugarmill Woods Civic Association, Inc., can begin to understand how substantially affected they are by the rate filing and service availability request. Consequently, they can neither begin to defend themselves from the utility and commission staff, nor communicate to the commission their objections to the filing. Sugarmill Woods Civic Association, Inc. contends that even if the required information were available to them today, which it is not, there would be inadequate time to properly prepare for presentations at the currently scheduled customer service hearings.

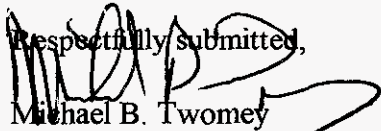
6. Notwithstanding the near total lack of utility, mandatory information to be supplied to, or otherwise be available to customers, the Order Establishing Service Hearing Schedule notices the first of twelve service hearings to begin on August 17, 1995, or a mere 16 days after the commission is to consider staff's recommendation on SSU's deficient filing.

7. SSU General Counsel Brain Armstrong has represented to the undersigned that SSU does not currently have extra copies of its complete rate filing. Further, he stated that SSU did not intend to make the additional copies until it had received its official filing date and knew what systems were to be incorporated within the complete filing.

8. If the customer service hearings to be held by the commission are to be meaningful in any sense the affected customers must have reasonable and timely access to the utility's complete rate filing and the opportunity to examine the same. The commission's rules provide for the timely, sequential distribution of such information by the utility after the utility has received its official filing date. It is not unreasonable under the circumstances that SSU has not fulfilled the rule requirements in this regard. In short, the time for the utility meeting these requirements has not yet begun to run.

9. The problem presented the customers is the commission's haste in scheduling the service hearings before the customers can possibly examine the documents and information they are entitled by commission rule to view. If the service hearings are not to be rendered a meaningless sham and total waste of customers' time and money, the commission must reset the hearings until such later dates as will allow the customers to both view the complete rate filing and meaningfully examine the same.

WHEREFORE, Sugarmill Woods Civic Association, Inc. requests that the full commission review the Order Establishing Service Hearing Schedule and Requiring Notice and reschedule the customer service hearings to begin not sooner than 60 full days after SSU's full rate filing and MFR's have been received by the local business office or main county library in each service area.

Respectfully submitted,

Michael B. Twomey
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Association, Inc.
(904) 421-9530

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing has been furnished by

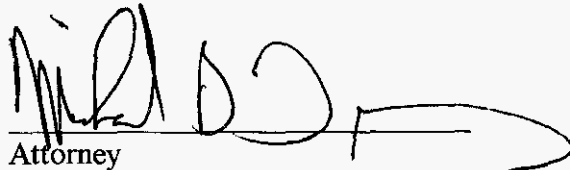
U.S. Mail this 24th day of July 1995 to the following persons:

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