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**ORIGINAL  
FILE COPY**

August 3, 1995

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center  
Room 110  
Tallahassee, Florida 32399-0850

**HAND DELIVERY**

Re: Docket No. 950495-WS

Dear Ms. Bayo:

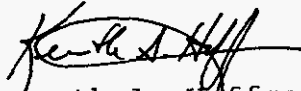
Enclosed herewith for filing in the above-referenced docket on behalf of Southern States Utilities, Inc. is an original and fifteen copies of the Response of Southern States Utilities, Inc. to the Petition of Sugarmill Woods Civic Association, Inc. for leave to Intervene.

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Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,



Kenneth A. Hoffman

KAH/rl

cc: All Parties of Record

*Willis  
orig Don*



DOCUMENT NUMBER-DATE  
07430 AUG-3 95  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application by Southern States Utilities, Inc. for rate increase and increase in service availability charges for Orange-Osceola Utilities, Inc. in Osceola County, and in Bradford, Brevard, Charlotte, Citrus, Clay, Collier, Duval, Hernando, Highlands, Hillsborough, Lake, Lee, Marion, Martin, Nassau, Orange, Osceola, Pasco, Polk, Putnam, Seminole, St. Johns, St. Lucie Volusia and Washington Counties.

ORIGINAL FILE 6

Docket No. 950495-WS

Filed: August 3, 1995

RESPONSE OF SOUTHERN STATES UTILITIES, INC. TO THE PETITION OF SUGARMILL WOODS CIVIC ASSOCIATION, INC. FOR LEAVE TO INTERVENE

Southern States Utilities, Inc. ("SSU"), by and through its undersigned counsel, hereby submits this Response to the Petition for Leave to Intervene ("Petition") filed on behalf of the Sugarmill Woods Civic Association, Inc. (the "Association") and states as follows:

1. SSU does not object to the intervention of the Association as a party in this docket.

2. Footnote 1 on page 3 of the Petition contains several inaccurate representations of a telephone conversation initiated by the Association's counsel on July 20, 1995 with SSU's General Counsel. Specifically, (1) SSU's General Counsel did not indicate that copies of the filed minimum filing requirements ("MFRs") and other information would not be provided to parties who intervene; (2) at the time of the conversation, the Association had not yet filed a petition to intervene in this matter; (3) the Association's counsel did not request a copy of the MFRs and other information;

07430 AUG-3 1995 FPSC-RECORDS/REPORTING

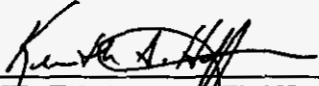
(4) the Association's counsel indicated that he did not wish to receive the MFRs and other information but rather indicated that it was likely that he would request that the MFRs and other information be provided to Mr. Bud Hansen, a member of the Association; (5) SSU's General Counsel requested that the Association's counsel place such request in writing to the General Counsel's attention once the Association was a party; (6) no confirmation of that request of the Association's counsel was received until the Petition was received by SSU on July 25, 1995; (7) SSU at no time refused to provide any party with a copy of the MFRs and other information; (8) a full and complete copy of the MFRs and other information filed with the Commission in this docket on June 28, 1995 also was filed with the Office of Public Counsel ("OPC") on that date -- there is no question of that; and (9) a second copy of the MFRs and other information, which happened to be Mr. Hoffman's copy, was given (not loaned for copying as suggested by Association's counsel) to OPC at OPC's request although the provision of a second copy is not required by Commission rule.

3. The Commission's rules provide that an intervenor takes the case as it finds it upon intervention. The Association's counsel informed SSU's General Counsel during the July 20 telephone conversation that he had reviewed the Commission's files in this docket. The Association's counsel had an opportunity to copy the documents in the Commission's file at that time. SSU has filed all documents pertaining to this docket with the Commission's Office of Records and Reporting. Upon receipt of party status, all rights

and privileges of discovery will be available to the Association.

WHEREFORE, apart from the inaccurate representations in the Association's Petition which have been corrected herein, SSU does not object to the intervention of the Association in this docket.

Respectfully submitted,

  
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and

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(407) 880-0058

CERTIFICATE OF SERVICE

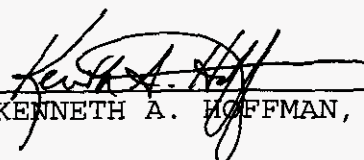
I HEREBY CERTIFY that a copy of the foregoing Response of Southern States Utilities, Inc. to the Petition of Sugarmill Woods Civic Association, Inc. for Leave to Intervene was furnished by U. S. Mail to the following this 3rd day of August, 1995:

Lila Jaber, Esq.  
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Marco Island, FL 33937

  
\_\_\_\_\_  
KENNETH A. HOFFMAN, ESQ.

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