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September 27, 1995

GOVERNMENTAL CONSULTANTS: PATRICK R. MALOY AMY J. YOUNG



HAND DELIVERY

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

Re: Docket No. 950495-WS

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Southern States Utilities, Inc. ("SSU") are the original and fifteen copies of SSU's Fourth Motion for Temporary Protective Order.

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,

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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.

Docket No. 950495-WS

Filed: September 27, 1995

SSU'S FOURTH MOTION FOR TEMPORARY PROTECTIVE ORDER

Southern States Utilities, Inc. ("SSU"), pursuant to Rule 25-22.006, Florida Administrative Code, moves the Florida Public Service Commission for a Temporary Protective Order in this docket, and as grounds therefor, states as follows:

- 1. On this date, SSU has provided documents responsive to specific discovery requests of the Office of Public Counsel ("OPC") identified below containing information which SSU claims is proprietary confidential business information, and is of a type this Commission has found in past dockets to be confidential:
- (1) SSU's one page Response to OPC's on-site audit request regarding calculation of SSU's 1994 executive bonuses.
- (2) SSU's four page Response to OPC's on-site audit request (also part of OPC Document Request No. 41) regarding severance pay.
 - (3) SSU's Response to OPC Document Request No. 76.
- (4) SSU's one page Response containing confidential information regarding the annual salary of an employee engaged in lobbying activities, provided in response to OPC Interrogatory No. DUCUMENT WIMBER-DATE

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SSU believes that these documents are within the scope of Section 367.156(3), Florida Statutes, and must be afforded protection as proprietary confidential business information.

By this Motion, SSU requests that the documents and information identified above and provided to OPC be granted the protection of a Temporary Protective Order as provided for by Rule 25-22.006(5)(c), Florida Administrative Code. This Temporary Protective Order will protect the documents and information from public disclosure until OPC completes its review of the materials and information. Once the review is completed, OPC will notify SSU of the documents and information it intends to use in this docket, and SSU, in accordance with Rule 25-22.006(5)(a), will request proprietary confidential treatment of those portions of the documents and information which are, in its opinion, entitled to The remainder of any such documents and such treatment. information which OPC has taken possession of pursuant to this Temporary Protective Order will be returned to SSU by OPC pursuant to Rule 25-22.006(5)(c).

WHEREFORE, SSU respectfully moves the Commission for a Temporary Protective Order covering the above described documents and information provided to OPC pursuant to the OPC discovery requests identified above.

Respectfully submitted,

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and

BRIAN P. ARMSTRONG, ESQ.
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Southern States Utilities, Inc.
1000 Color Place
Apopka, Florida 32703
(407) 880-0058

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing SSU's Fourth Motion for Temporary Protective Order was furnished by hand-delivery (*) and/or U. S. Mail to the following 27th day of September, 1995:

Lila Jaber, Esq. Division of Legal Services 2540 Shumard Oak Boulevard Gerald L. Gunter Building Room 370 Tallahassee, FL 32399-0850 Mr. W. Allen Case President Sugarmill Woods Civic Asso. 91 Cypress Blvd., West Homosassa, FL 34446

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Michael B. Twomey, Esq. P. O. Box 5256 Tallahassee, FL 32314-5256

Joseph Coriaci, Pres. Marco Island Civic Asso. 413 S. Barfield Drive Marco Island, FL 33937

Mr. Morty Miller President Spring Hill Civic Asso., Inc. P. O. Box 3092 Spring Hill, FL 34606

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