

October 18, 1995



Ms. Blanca S. Bayo Florida Public Service Commission Director of Records & Reporting 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Docket No. 950495-WS -- 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.

Dear Ms. Bayo:

Enclosed please find sixteen copies of Southern States' Twelfth Notice of Service of Responses to Public Counsel's Third, Fifth, Sixth, Seventh and Ninth Sets of Interrogatories and Fourth, Fifth, Sixth and Seventh Sets of Requests for Production of Documents in the above-referenced matter.

Please acknowledge filing of these documents by date stamping the enclosed copy of this letter and returning it in the postage paid, self-addressed envelope provided.

|        | Very truly yours,  |                        |        |
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| AFA    | Brian P. Armstrong   |                        |        |
| App    | General Counsel  |                        |        |
| Car    | Enclosures   |                        |        |
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#### 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        |   | Docket No. 950495-WS    |
| Bradford, Brevard, Charlotte, Citrus, Clay,      | ) |                         |
| Collier, Duval, Highlands, Lake, Lee, Marion,    |   | Filed: October 18, 1995 |
| Martin, Nassau, Orange, Osceola, Pasco,          | ) |                         |
| Putnam, Seminole, St. Johns, St. Lucie,          | ) |                         |
| Volusia, and Washington Counties.                | ) |                         |
|  | ) |                         |

SOUTHERN STATES UTILITIES, INC.'S TWELFTH NOTICE
OF SERVICE OF RESPONSES TO PUBLIC COUNSEL'S
THIRD, FIFTH, SIXTH, SEVENTH AND NINTH SETS OF
INTERROGATORIES AND FOURTH, FIFTH, SIXTH AND
SEVENTH SETS OF REQUESTS FOR PRODUCTION OF DOCUMENTS

SOUTHERN STATES UTILITIES, INC., by and through its undersigned counsel, hereby files its Notice that is has served its responses to the following interrogatories and production of document requests included in the Office of Public Counsel's Third, Fifth, Sixth, Seventh and Ninth Sets of Interrogatories and Fourth, Fifth, Sixth and Seventh Sets of Production of Document Requests by United Parcel Service to Harold McLean, Esq., Office of Public Counsel, Claude Pepper Building, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400, on this 18th day of October, 1995.

#### **OPC's Third Set of Interrogatories**

No. 117

#### **OPC's Fifth Set of Interrogatories**

Nos. 159, 161, 180

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## **OPC's Sixth Set of Interrogatories**

Nos. 192, 198

## **OPC's Seventh Set of Interrogatories**

Nos. 207, 243

## **OPC's Ninth Set of Interrogatories**

Nos. 256, 264

# **OPC's Fourth Set of Production of Documents**

No. 170

## **OPC's Fifth Set of Production of Documents**

No. 182

## **OPC's Sixth Set of Production of Documents**

No. 191

## **OPC's Seventh Set of Production of Documents**

No. 196

Copies of the Responses also have been served on all other parties of record in the manner reflected on the attached Certificate of Service on this same date.

Respectfully submitted,

BRIAN P. ARMSTRONG, ESQ.

MATTHEW FEIL, ESQ.

Southern States Utilities, Inc.

1000 Color Place

Apopka, Florida 32703

(407) 880-0058

and

KENNETH A. HOFFMAN, ESQ. WILLIAM B. WILLINGHAM, ESQ. Rutledge, Ecenia, Underwood, Purnell & Hoffman, P.A. P. O. Box 551
Tallahassee, Florida 32302-0551 (904) 681-6788

Attorneys for Southern States Utilities, Inc.

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by United Parcel Service to the following this 18th day of October, 1995:

Lila Jaber, Esq.
Division of Legal Services
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Room 370
Tallahassee, FL 32399-0850

Michael B. Twomey, Esq. Route 28, Box 1264 (Crawfordville Highway) Tallahassee, FL 32314-5256

Harold McLean, Esq.
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Claude Pepper Building
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BRIAN P. ARMSTRONG, ESQ.