

300  
pr

**RUTLEDGE, ECENIA, UNDERWOOD, PURNELL & HOFFMAN**

PROFESSIONAL ASSOCIATION  
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA  
KENNETH A. HOFFMAN  
THOMAS W. KONRAD  
R. DAVID PRESCOTT  
HAROLD F. X. PURNELL  
GARY R. RUTLEDGE  
R. MICHAEL UNDERWOOD  
WILLIAM B. WILLINGHAM

POST OFFICE BOX 551, 32302-0551  
215 SOUTH MONROE STREET, SUITE 420  
TALLAHASSEE, FLORIDA 32301-1841

**ORIGINAL  
FILE COPY**

GOVERNMENTAL CONSULTANTS:  
PATRICK R. MALOY  
AMY J. YOUNG

TELEPHONE (904) 681-6788  
TELECOPIER (904) 681-6515

December 4, 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:

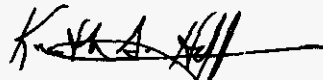
Enclosed herewith for filing in the above-referenced docket on behalf of Southern States Utilities, Inc. ("SSU") are the original and fifteen copies of SSU's Objection to Document Request No. 283 from the Office of Public Counsel's Sixteenth Set of Document Requests and Motion for Protective Order.

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.

3

Sincerely,



Kenneth A. Hoffman

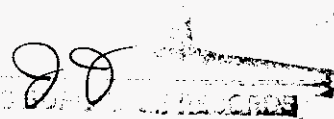
KAH/r1

cc: All Parties of Record

Trib. 3

WAS

OTH



DOCUMENT NUMBER-DATE  
12083 DEC-4 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 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.

Docket No. 950495-WS

Filed: December 4, 1995

ORIGINAL  
FILE COPY

**SOUTHERN STATES UTILITIES, INC.'S OBJECTION TO DOCUMENT REQUEST NO. 283 FROM THE OFFICE OF PUBLIC COUNSEL'S SIXTEENTH SET OF DOCUMENT REQUESTS AND MOTION FOR PROTECTIVE ORDER**

SOUTHERN STATES UTILITIES, INC. ("SSU") by and through its undersigned attorneys, hereby files its objection to Document Request No. 283 propounded by the Office of Public Counsel ("OPC") and requests entry of a protective order determining that SSU is not required to respond to the document request. In support of its objection and motion for protective order, SSU states as follows:

1. On November 30, 1995, SSU received OPC's Sixteenth Set of Document Requests. Document Request No. 283 states as follows:

According to DR16-A, page 40 of 112, Lake Gibson Estates WWTP has significant inflow/infiltration problems. Provide any documents in the Company's possession that discuss the level of inflow and infiltration and any corrective actions taken or planned.

2. In its Order Memorializing the Commission's Decision That The Facilities of Southern States Utilities, Inc., Located In The Counties Of Hillsborough, Hernando and Polk

DOCUMENT NUMBER-DATE

12083 DEC-4 95

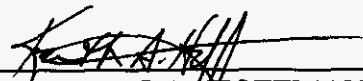
FPSC-RECORDS/REPORTING 4006

Are Not Subject To A Rate Increase In This Rate Application" ("Order No. PSC-95-1385-FOF-WS) issued on November 7, 1995, the Commission, on its own motion, removed the service areas served by SSU in Hillsborough, Hernando and Polk Counties from this docket.

3. The Lake Gibson Estates wastewater service area is located in Polk County.
4. The plant operations and revenue, costs, investments, rates and other information associated with the operation of the facilities serving the Lake Gibson Estates service area are not relevant in this docket nor is such information likely to lead to the production of relevant information. Given the enormous amount of discovery which has and which continues to be conducted in this docket, there is no rational basis for requiring SSU to provide information relating to service areas which are not included in this docket and can have no impact on SSU's requested revenue requirements.

WHEREFORE, SSU respectfully requests that an order be entered determining that SSU is not required to respond to OPC Document Request No. 283.

Respectfully submitted,

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

and

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Objection to Document Request No. 283 and Motion for Protective Order was furnished by U.S. Mail to the following this 4/16 day of December, 1995:

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

Charles J. Beck, Esq.  
Office of Public Counsel  
111 W. Madison Street  
Room 812  
Tallahassee, FL 32314-5256

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

Arthur I. Jacobs, Esq.  
Jacobs & Peters, P.A.  
401 Centre, 2nd Floor  
Fernandina Beach, FL 32034

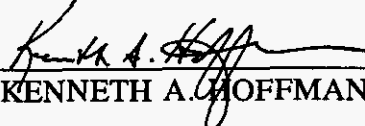
Mr. W. Allen Case  
President  
Sugarmill Woods Civic Asso.  
91 Cypress Blvd., West  
Homosassa, FL 34446

Mr. Kjell Pettersen  
P. O. Box 712  
Marco Island, FL 33969

Robert Bruce Snow, Esq.  
20 N. Main Street  
Room 462  
Brooksville, FL 34601-2850

Donald Odom, Esq.  
P. O. Box 1110  
Tampa, FL 33601

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

  
KENNETH A. HOFFMAN, ESQ.