JACK SHREVE

PUBLIC COUNSEL

STATE OF FLORIDA

OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400 904-488-9330

December 18, 1995

Sincerely,

Charles J. Beck

Deputy Public Counsel



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

Re: Docket No. 950495-WS

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of Citizens' Opposition to Southern States' Motion for Reconsideration of Order No. PSC-95-1504-PCO-WS.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

ACK

AFA 3

APP ___CJB:bsr

CAF __Enclosures

CMU ___

CTR ___

EAG __

LEG __I

LIN __S

OPC ___

RCH __

SEC __I

WAS ____

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DOCUMENT NUMBER-DATE

12705 DEC 18 #

FPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for a 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: December 18, 1995

CITIZENS' OPPOSITION TO SOUTHERN STATES' MOTION FOR RECONSIDERATION OF ORDER NO. PSC-95-1504-PCO-WS

Florida's Citizens ("Citizens"), by and through Jack Shreve, Public Counsel, file this response and opposition to the motion for reconsideration filed by Southern States Utilities, Inc. ("Southern States") on December 15, 1995.

1. Today marks exactly five months from the date that the Citizens served a request for production of documents on Southern States seeking to inspect and copy income tax returns of Minnesota Power & Light. Citizens still do not have copies of these documents, despite our right to obtain copies of these documents under the discovery rules adopted by the Florida Public Service Commission.

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- 2. Citizens have not consented, and do not now consent, to the attempts of Southern States to unilaterally impose a prohibition on our right to obtain copies of these documents.
- 3. The Citizens request the Commission to take up this matter as quickly as possible and deny Southern States' motion for reconsideration.

Respectfully submitted,

Charles 1BACK

JACK SHREVE PUBLIC COUNSEL

Charles J. Beck Deputy Public Counsel

Office of Public Counsel c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400

Attorneys for the Citizens of the State of Florida

CERTIFICATE OF SERVICE DOCKET NO. 950495-WS

I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U.S. Mail or hand-delivery* to the following parties on this 18th day of December, 1995.

*Ken Hoffman, Esq.
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Kjell W. Petersen Director Marco Island Civic Association P.O. Box 712 Marco Island, FL 33969 *Lila Jaber, Esq. Division of Legal Services Fla. Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399

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Charles J. Beck/

Deputy Public Counsel