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February 22, 1996

**ORIGINAL
FILE COPY**

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

HAND DELIVERY

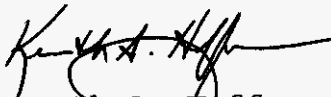
Re: Docket No. 950495-WS

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Southern States Utilities, Inc. ("SSU") are the original and one copy of SSU's Notice of Service of Second Request for Production of Documents to Office of Public Counsel.

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


Sincerely,


Kenneth A. Hoffman

✓ KAH/rl

cc: All Parties of Record

ABP
CAF
CML
CTR
EAG
EGG
FIN
H
JH

RECEIVED & FILED

LENS BUREAU OF RECORDS

DOCUMENT NO.
02183-96
2/22/96

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.

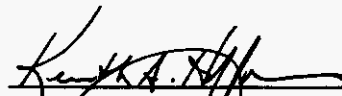
Docket No. 950495-WS

Filed: February 22, 1996

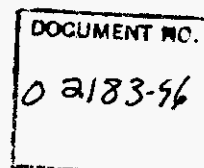
**SOUTHERN STATES UTILITIES, INC.'S NOTICE
OF SECOND REQUEST FOR PRODUCTION
OF DOCUMENTS TO OFFICE OF PUBLIC COUNSEL**

Southern States Utilities, Inc. ("SSU"), by and through its undersigned counsel, hereby files its Notice that it has served an original and one copy of its Second Request for Production of Documents to the Office of Public Counsel ("OPC") by hand delivery on Charles J. Beck, Esq., 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400, on this 22nd day of February, 1996. Copies of SSU's Second Request for Production of Documents to OPC have been served on the other parties of record in the manner set forth in the attached Certificate of Service.

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, Florida 32703
(407) 880-0058

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Southern States Utilities, Inc.'s Notice of Service of Second Request for Production of Documents to the Office of Public was furnished by hand delivery (*) and U. S. Mail to the following this 22nd day of February, 1996:

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 32399-1400

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

Arthur I. Jacobs, Esq.
P. O. Box 1110
Fernandina Beach, FL
32305-1110


KENNETH A. HOFFMAN, ESQ.

rate.2notice

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) Docket No. 950495-WS
County, and in Bradford, Brevard,)
Charlotte, Citrus, Clay, Collier,)
Duval, Highlands, Lake, Lee,)
Marion, Martin, Nassau, Orange,)
Osceola, Pasco, Polk, Putnam,)
Seminole, St. Johns, St. Lucie,)
Volusia, and Washington Counties.)
_____)

SOUTHERN STATES UTILITIES, INC.'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO
OFFICE OF PUBLIC COUNSEL

Pursuant to Rules 25-22.034 and 25-22.035(3), Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, Southern States Utilities, Inc. ("SSU") hereby submits its Second Request for Production of Documents to the Office of Public Counsel ("OPC").

SSU requests that the documents sought below be produced for inspection and copying at the office of its attorney, Rutledge, Ecenia, Underwood, Purnell & Hoffman, P.A., 215 South Monroe Street, Suite 420, Tallahassee, Florida 32301, at or before 5:00 p.m. on the thirtieth day after service or at such time and place as may be mutually agreed upon by counsel.

DEFINITIONS

1. "Documents" shall mean all written, printed, typed, recorded, or graphic matter of any kind, including, without limiting the foregoing, all notes, work papers, supporting or back

up materials, correspondence, memoranda, contracts, agreements, marginal notations, computer printouts, computer or word processing disks, magnetic tapes, or memory-stores materials, and includes without limitation, originals and all copies unless identical.

2. As used herein, "OPC" shall mean OPC together with its officers, employees, consultants, agents, representatives, attorneys, and any other person or entity acting on behalf of OPC.

3. As used herein, "you" and "your" shall mean OPC together with its officers, employees, consultants, agents, representatives, attorneys, and any other person or entity acting on behalf of OPC.

GENERAL INSTRUCTIONS

1. If any document is withheld, in whole or in part, because of a claim of privilege, please identify each document for which the privilege is claimed together with the following information: author, receipt(s), date, type of document, general subject matter, and the basis upon which such privilege is claimed.

2. If OPC or its attorneys have possession, custody, or control of the documents requested, please produce the originals or a complete copy of the originals and all copies which are different in any way from the original, whether by interlineation, receipt stamp or notation. If OPC or its attorneys do not have possession, custody or control of the originals of the documents requested, please produce copies, however made, in the possession, custody, or control of OPC or its attorneys.

3. SSU specifically requests OPC to make a review of the files of employees reasonably expected to have information responsive to these document requests. Correspondence and notes of meetings, whether typed or handwritten, are specifically requested. If a particular employee is in charge of an area related to a document request, SSU requests OPC to search the files both of the employee in charge of the area as well as each employee reporting directly or indirectly to such person if their areas of responsibility also include matters reasonably likely to be responsive to the document request.

4. In producing the documents requested, please indicate, by number, the Production Request to which each set of documents pertains.

5. Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to bring within the scope of this production of documents any document which might otherwise be construed to be outside of the scope.

6. If you object to any discovery requests, in whole or in part, on the basis of confidentiality, please follow the rule provisions of the Florida Public Service Commission requiring a motion for a protective order no later than ten days after service and urging all parties to seek mutual agreement before bringing a controversy to the Commission.

7. For any documents that you claim may be confidential, SSU is prepared to execute a nondisclosure agreement to facilitate the discovery process. Please forward a copy of your standard disclosure form to undersigned counsel prior to the discovery due date so there will be no delay in responding.

DOCUMENTS REQUESTED

33. Regarding Mr. Ted Bidby's participation in Docket No. 940109-WU, involving St. George Island Utility Company, Ltd., please provide the following documents:

(a) A copy of Mr. Bidby's prefiled testimony and exhibits and any hearing exhibits Mr. Bidby authenticated or sponsored.

(b) A copy of all workpapers, analyses, correspondence, memoranda, interrogatory and document request responses prepared by or for Mr. Bidby and a copy of any transcribed deposition testimony given by Mr. Bidby.

35. Please provide a copy of any and all documents prepared by or for Mr. Bidby in connection with the design or proposed design or the analysis of the design or proposed design of any facility owned or operated by St. George Island Utility Company, Ltd.

36. Please provide a copy of any water or wastewater system master plans prepared by or for Mr. Bidby within the past 3 years.

37. Please provide a copy of any correspondence, workpapers, analyses, memoranda prepared by any person who provided advice or services to OPC regarding engineering issues in connection

with the proposed rulemaking on used and useful in FPSC Docket No. 911082-WS.

38. Please provide a copy of any correspondence, workpapers, analyses, memoranda prepared by any person who provided advice or services to OPC regarding engineering issues in connection with the currently pending and undocketed FPSC matter concerning proposed used and useful rules.


39. Referring to Mr. Bidy's involvement in the design of water and wastewater facilities as stated beginning on page 1, line 19 of his direct testimony, please provide for each referenced water treatment facility and each wastewater treatment facility the following information:

A copy of all documents prepared by or for Mr. Bidy in connection with the projects including but not limited to: design drawings, design reports, preliminary designs, final designs, mater plans, and permit applications.

40. Please provide a copy of any documents prepared by or for Mr. Bidy that address alternative designs for the expansion of: water supply, water treatment equipment, water storage tanks, high service pumping equipment, wastewater treatment plants, and wastewater effluent disposal systems. Specifically include any documents that address the economy of scale considerations in constructing various size units.

41. For every water distribution system hydraulic model prepared by or for Mr. Bidy, provide a copy of any documents which address modeling assumptions, field calibration results, and techniques.

Respectfully submitted,



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WILLIAM B. WILLINGHAM, ESQ.
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& HOFFMAN, P.A.
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BRIAN P. ARMSTRONG, ESQ.
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