

## 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

March 12, 199

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 3 copies of Citizens' Amended Notice of Deposition Duces Tecum.

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

Sincerely,

Charles J. Beck

Deputy Public Counsel

Enclosures

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BULL TRANSPORTER OF THE CASE

DOCUMENT NUMBER-DATE

03022 MAR 12 8

### 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: March 12, 1996

#### AMENDED NOTICE OF DEPOSITIONS DUCES TECUM

To: Kenneth A. Hoffman, Esquire Rutledge, Ecenia, Underwood, Purnell & Hoffman Post Office Box 551 Tallahassee, Florida 32302-0551

Brian Armstrong, Esquire Matthew Feil, Esquire Southern States Utilities, Inc. 1000 Color Place Apopka, Florida 32703

This amended notice of deposition replaces the notice of deposition dated March 6, 1996.

NOTICE IS HEREBY GIVEN that the Citizens of Florida, by and through Jack Shreve, Public Counsel, will take the deposition of:

(1) Mr. Tracy Smith at the offices of Southern States Utilities, Inc., 1000 Color Place, Apopka, Florida on Thursday, March 28, 1996, beginning at 9:30 a.m.,

- (2) Dr. John Cirella at the offices of Southern States Utilities, Inc., 1000 Color Place, Apopka, Florida on Thursday, March 28, 1996, beginning at 1:00 p.m., and
- (3) Ms. Karla Olson Teasley at the offices of Southern States Utilities, Inc., 1000 Color Place, Apopka, Florida on Thursday, March 28, 1996, beginning at 3:00 p.m.

Mr. Smith, Dr. Cirella, and Ms. Teasley are directed to bring with them all documents (including drafts) containing, discussing, referring to, or evaluating the following:

- 1. Communications from, to, or about Mr. Jeff Sharkey, Capital Strategies, Inc., or Chiles Communications, Inc..
- Contracts or agreements between Southern States Utilities, Inc., and Capital Strategies, Inc., or Chiles Communications, Inc.
- 3. Communications with the Governor of Florida or his staff, the Lieutenant Governor of Florida or his staff, or the Florida Secretary of Commerce or his staff.
- 4. Communications with members of the Florida legislature or their staff.
- 5. Communications with members of the Florida Public Service Commission or any member of its staff,
- 6. Communications with any government agency or any member of its staff,
- 7. Communications, contacts, meetings, or notices to customers concerning this case or uniform rates.

- 8. Letters, memoranda, correspondence, or other documents provided to the Governor of Florida or his staff, the Lieutenant Governor of Florida or his staff, the Florida Secretary of Commerce or his staff, members of the Florida legislature or their staff, members of the Florida Public Service Commission or its staff, or customers.
- 9. Documents provided to any person or organization whatsoever that consist of draft documents addressed to the chairman or any member of the Florida Public Service Commission.

These depositions will be taken for the purpose of discovery, use at hearing, or any other purpose allowed by law. The "meet-me" line 904-921-6134 will be available to call for the depositions.

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 party representatives on this 12th day of February, 1996.

\*Ken Hoffman, Esq.
William B. Willingham, Esq.
Rutledge, Ecenia, Underwood
Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302-0551

Brian Armstrong, Esq.
Matthew Feil, Esq.
Southern States Utilities
General Offices
1000 Color Place
Apopka, FL 32703

Kjell W. Petersen Director Marco Island Civic Assoc. P.O. Box 712 Marco Island, FL 33969

Larry M. Haag, Esq. County Attorney 111 West Main Street Suite B Inverness, Florida 34450 \*Lila Jaber, Esq. Division of Legal Services Fla. Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399

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

Arthur Jacobs, Esq. Jacobs & Peters, P.A. Post Office Box 1110 Fernandina Beach, FL 32035-1110

Charles J. Beck

Deputy Public Counsel