LAW OFFICES

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REPLY TO:

HAND DELIVERY

July 30, 1992

Tallahassee

Dilling

FILE COPY

Mr. Steve Tribble, Director Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street

Tallahassee, Florida 32399-0850

FPSC Docket No. 920199-WS Re:

Dear Mr. Tribble:

Enclosed herewith for filing in the above-referenced docket are the original and one copy of Southern States Utilities, Inc. and Deltona Utilities, Inc.'s Third Notice of Service of Responses to Portion of Public Counsel's First Set of Interrogatories and First Request for Production of Documents.

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

Thank you for your assistance with this filing.

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Enclosures

Sincerely, Kenneth X. Safe

Kenneth A. Hoffman

189**1**0 RECEIVED & FREED FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE 08429 JUL 30 1992 PSC-RECORDSZREPORTE

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application of Southern ) States Utilities, Inc. and Deltona ) Utilities, Inc. for Increased ) Water and Wastewater Rates in ) Citrus, Nassau, Seminole, Osceola, ) Duval, Putnam, Charlotte, Lee, ) Lake, Orange, Marion, Volusia, ) Martin, Clay, Brevard, Highlands, ) Collier, Pasco, Hernando, and ) Washington Counties. )

<u>\_\_\_\_</u>

Docket No. 920199-WS Filed: July 30, 1992



# SOUTHERN STATES UTILITIES, INC. AND DELTONA UTILITIES, INC.'S THIRD NOTICE OF SERVICE OF RESPONSES TO PORTION OF PUBLIC COUNSEL'S FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

SOUTHERN STATES UTILITIES, INC. and DELTONA UTILITIES, INC., (hereinafter referred to collectively as "SOUTHERN STATES") by and through its undersigned counsel, hereby files and serves its Third Notice that on July 29, 1992, it served SOUTHERN STATES' responses to the following numbered interrogatories and documents in response to the following numbered requests for production of documents contained in the Office of Public Counsel's First Set of Interrogatories and First Request for Production of Documents, by hand delivery, on analysts/representatives of the Office of Public Counsel who were inspecting documents provided by Southern States at its home office at 1000 Color Place, Apopka, Florida 32703:

## First Set of Interrogatories

Nos. 29, 38, 65 (Revised), 84, 96, 107, 113, 117, 118, 123, 125 and 126.

### First Request for Production of Documents

Nos. 1, 10, 14, 19, 32, 41 and Appendix 62-A.

DOCUMENT NUMBER-DATE 08429 JUL 30 ISB PSC-RECORDS/REPORTS Copies of said Responses to Interrogatories and Documents have also been served on July 30, 1992, by hand delivery on counsel for the Commission Staff reflected on the attached Certificate of Service.<sup>1</sup>

Respectfully submitted,

 $l \land \checkmark \checkmark$ 

KENNETH A. HOFFMAN, ESQUIRE LAURA L. WILSON, ESQUIRE Messer, Vickers, Caparello, Madsen, Lewis, Goldman & Metz, P.A. P. O. Box 1876 Tallahassee, Florida 32302-1876 (904) 222-0720

and

BRIAN P. ARMSTRONG, ESQUIRE Southern States Utilities, Inc. 1000 Color Place Apopka, Florida 32703 (407) 880-0058

Attorneys for Applicant Southern States Utilities, Inc.

<sup>&</sup>lt;sup>1</sup>Appendix 62-A contains 1582 pages in response to Public Counsel's First Set of Requests for Production of Documents No. 62. The Appendix provides an up-to-date customer list including addresses and telephone numbers. Pursuant to stipulation with Staff counsel reached on July 29, 1992, Staff did not require Southern States to produce a copy of Appendix 62-A for Staff.

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Southern States Utilities, Inc. and Deltona Utilities, Inc.'s Third Notice of Service of Responses to Portion of Public Counsel's First Set of Interroga-tories and First Request for Production of Documents were furnished by hand delivery, this 30th day of July, 1992, to the following:

Harold McLean, Esq. Office of Public Counsel 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400

5 a 1 a

Matthew Feil, Esq. Catherine Bedell, Esq. Florida Public Service Commission Division of Legal Services 101 East Gaines Street Room 226 Tallahassee, Florida 32399

By: KENNETH A. MAN, ESQ.