

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 23, 1992

Steve Tribble, Director Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, FL 32399-0850

Re: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket on behalf of the Citizens of the State of Florida are the original and 15 copies of the Citizens' Motion to Require Production of Documents by January 8, 1993.

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

ACK ---AFA APP CAF Enclosure CAU -CTR ----EAG -123 171 ---020 --ROH -SEC W/S. OTHE and the states

Sincerely,

Charles J. Beck Deputy Public Counsel

DOCUMENT MUSICER-DATE 14334 DEC 23 FFF FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone & Telegraph Company

Docket No. 920260-TL Filed: December 23, 1992

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MOTION TO REQUIRE PRODUCTION OF DOCUMENTS BY JANUARY 8, 1993

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, request the Commission to order BellSouth Telecommunications, Inc., to produce the documents responsive to the Citizens' twenty-fourth request for production of documents by January 8, 1993.

 Southern Bell filed rebuttal testimony late in the day on Friday, December 18, 1992.

2. The Citizens' twenty-fourth request for production of documents consists of two requests for documents raised by the rebuttal testimony of Dr. Taylor. The documents requested should be easy to locate without a burdensome search.

3. The documents are needed by no later than Friday, January 8, 1993 in order to prepare the case in a timely manner.

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DOCUMENT NUMBER-DATE 14834 DEC 23 -----FPSC-RECORDS/REPORTIN WHEREFORE, the Citizens the Commission to order BellSouth Telecommunications, Inc., to produce the documents responsive to the Citizens' twenty-fourth request for production of documents by January 8, 1993.

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Respectfully submitted,

Jack Shreve Public ¢ounsel 0 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

(904) 488-9330

Attorneys for the Citizens of the State of Florida

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 23rd day of December, 1992.

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