

# Public Service Commission

-M-E-M-O-R-A-N-D-U-M-

**DATE:** July 8, 1993

TO: Susan Fox, Esquire

FROM: JoAnne Jackson, Division of Records and Reporting

RE: Dockets No. 920199-WS

Your filing was received by Records and Reporting on July 8, 1993.

### **PLEASE NOTE:**

<u> </u>	In order to	facilitate	distribution	to	the	Commissioners	and	Staff,	we	need	the
	original and	copies as	specified in	our	rul	es.					

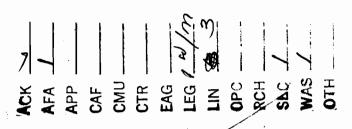
- When making filings which do not individually reflect a docket number or are not clearly titled, please include a copy of your cover letter of explanation with each copy of your filing.
- Commission rules require that prefiled testimony be submitted on 8-1/2 by 11-inch paper with no more than 25 numbered lines to a page, each line double spaced (including cites), with a sufficient left-hand margin to allow for binding (at least 1-1/4 inches between the edge of the paper and the line numbers). Additional lines between questions and answers are not to be used, nor bold type or all caps.

Your filing has been logged in as being received today, but the testimony will not be distributed until it is received in proper format.

Commission rules require that only a notice of interrogatories or responses, requests for production of documents or responses, depositions, or other pertinent discovery material be filed with the Division of Records and Reporting. Interrogatories or requests for production, requests for admissions, and answers thereto, should be sent to the attorney assigned to the docket with copies for each technical division assigned, i.e., Communications, Electric and Gas, Water and Wastewater, Auditing and Financial Analysis.

## YOUR COMPLIANCE ON FUTURE FILINGS WILL BE APPRECIATED.

/jj



# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for rate increase in Brevard, Charlotte/Lee, Citrus, Clay, Duval Highlands, Lake, Marion, Martin, Nassau, Orange, Osceola, Pasco, Putnam, Seminole, Volusia, and Washington Counties by SOUTHERN STATES UTILITIES, INC.; Collier County by MARCO SHORES UTILITIES (Deltona); Hernando County by SPRING HILL UTILITIES (Deltona); and Volusia County by DELTONA LAKES UTILITIES (Deltona).

Docket No. 920199-WS

Order No. PSC-93-0861-FOF-WS Issued: June 8, 1993

#### SUPPLEMENTAL MOTION FOR RECONSIDERATION

Cypress and Oaks Villages Association, Inc. ("COVA") hereby files this Supplemental Motion for Reconsideration on the following grounds:

1. COVA has just learned that the staff attorney responsible for preparation of the staff recommendation in this case has accepted employment with Southern States Utilities, and had applied for such employment prior to preparation of the staff recommendation. These facts create a clear appearance of impropriety, particularly in light of the fact that the proposal for statewide uniform rates was staff initiated. COVA requests a

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new review and recommendation by a disinterested staff attorney based on a review of the entire record.

Respectfully submitted,

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ATTORNEYS FOR CYPRESS AND
OAK VILLAGES ASSOCIATION

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail this Add day of July, 1993 to the following persons:

Larry M. Haag, Esquire County Attorney Citrus County 107 N. Park Avenue, Suite 8 Inverness, Florida 34450

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Chuck Hill, Esquire Division of Water & Sewer Florida Public Service Commission 101 E. Gaines Street Tallahassee, Florida 32301 Harold McLean, Esquire Associate Public Counsel Office of the Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, Florida 32399-1400

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Brian Armstrong, Esquire Southern States Utilities General Offices 1000 Color Place Apopka, Florida 32703

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ATTORNEY