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Tallahassee
REPLY TO:

November 17, 1993

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

HAND DELIVERY

Re: Docket No. 920199-WS

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket is the original Affidavit of Karen L. Shofter, Director of Rates, Southern States Utilities, Inc. ("Southern States"). This Affidavit is the attachment identified in Southern States' Response to Citrus County's Amended Request for Oral Argument filed November 16, 1993. In the filing made yesterday, a copy of the Affidavit was filed with the Commission and served on the parties but the original was unavailable at the time of filing.

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

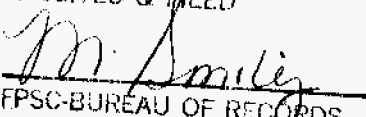
Thank you for your assistance with this filing.

Sincerely,


Floyd R. Self

FRS/rl
Enclosures

cc: Brian P. Armstrong, Esq.
Mr. Forrest L. Ludsen
Ms. Karen Shofter
Parties of Record

RECEIVED & FILED

FPS-C-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
12389 NOV 17 8
DIVISION OF RECORDS & REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

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.)
_____)

Docket No. 920199-WS
Filed: November 16, 1993

AFFIDAVIT

Karen L. Shofter, Director of Rates for Southern States Utilities, Inc. ("Southern States"), submits this Affidavit in support of the "Response of Southern Utilities, Inc., to Citrus County's Motion for Reduced Interim Rates Pending Judicial Review, For Recalculated Customer Bills, Refunds and Imposition of Penalties for Violating Automatic Stay" and states the following under penalties of perjury:

1. Pursuant to Commission Order Number PSC-93-0423-FOF-WS issued on March 22, 1993, Southern States submitted tariff pages to the Commission reflecting the final rate authorized in such Order.

2. Commission Staff reviewed the tariff pages and, upon determining that the charges were consistent with the Commission's Order, approved the tariff pages and made them effective for service rendered on and after September 15th, 1993.

3. In reliance upon the Commission's Order, the Commission denial of reconsideration requests filed by parties to this docket attacking the lawfulness of the uniform rates authorized therein and the receipt of Commission authorization to implement the rates, Southern States took the following actions:

DOCUMENT NUMBER-DATE
12389 00/11/93
RECORDS/REPORTING

- a. modified its billing system for the one hundred twenty seven (127) systems included in this docket to provide for billing under the uniform rates;
- b. modified and implemented changes to the billing cycles to accommodate the change to monthly billing authorized in the Commissioner's Order;
- c. modified and implemented changes to meter reading schedules to accommodate the change to monthly billing;
- d. implemented changes to the billings mechanisms to reflect pro rata billing required under the Commission authorized uniform rates;
- e. began billing customers for service rendered on or after September 15th, 1993, at the uniform rates authorized in the Commissions' Order, including assessments under such rates for customers who disconnected their service on or after September 15th, 1993 to date; and
- f. other actions related to the foregoing.

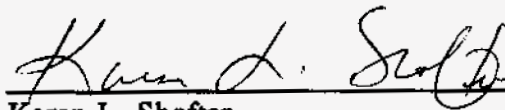
4. Exhibit 1, attached hereto, confirms that Southern States had processed nearly fifty (50) billing cycles on or prior to the date Citrus County filed a notice of appeal (October 8, 1993 corrected on October 12, 1993 at which time more than fifty (50) billing cycles were complete). These billing cycles related to customers located in all but 4 of the 21 counties included in the proceeding. The only counties (systems) which were not billed prior to the filing of the notice of appeal were Charlotte/Lee (Burnt Store), Collier (Marco Shores), Martin (Fisherman's Haven, Fox Run and Leilani Heights) and Washington (Sunny Hills).

5. Southern States did not know on September 15, 1993 and could not foresee at that time whether or not an appeal of the Commission's Order would be filed by any party

subsequent to the implementation of the Commission authorized uniform rates.

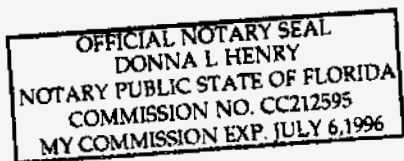
6. To my knowledge, rate subsidies exist under any utility rate structure in existence, including the interim rates previously authorized in the above referenced matter in Order Number PSC-92-0948-FOF-WS (issued December 8, 1992).


7. It is logical to assume that there are customers served by every system included in this case who are on fixed incomes.



Karen L. Shofter

Sworn to and subscribed before me this 16th day of November, 1993, by Karen L. Shofter, who is personally known to me and did take an oath.





Donna L. Henry
Notary Public, State of Florida at Large
My Commission Expires: 7-6-96
Commission Number: CC212515

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SYSTEMS BILLED BEFORE 10/08/93

<u>SYSTEM NAME</u>	<u>BILL DATE</u>
AMELIA ISLAND EXCLUDING BOOK 268	09/27/93
APACHE SHORES	09/29/93
BAY LAKE	10/08/93
BEACON HILLS	09/29/93
BEECHER'S POINT	09/27/93
CHULUOTA	10/01/93
CITRUS SPRINGS	09/28/93
CRYSTAL RIVER	09/27/93
DAETWYLER	10/01/93
DELTONA LAKES CYCLE 1	09/28/93
DELTONA LAKES CYCLE 2	09/28/93
DELTONA LAKES CYCLE 3	09/30/93
DELTONA LAKES CYCLE 4	10/05/93
GOLDEN TERRACE	09/29/93
HERMITS COVE	09/27/93
HOLIDAY HAVEN	09/27/93
HOLIDAY HEIGHTS	10/08/93
JUNGLE DEN	09/27/93
KEYSTONE HEIGHTS BOOKS 66 & 75	09/27/93
KINGSWOOD	09/29/93
LAKE CONWAY	10/01/93
LEISURE LAKES	09/29/93
MARION OAKS	09/28/93
MORNINGVIEW	10/08/93
OAKWOOD	09/29/93
PALISADES	10/08/93
PALM PORT	10/08/93
PALMS MOBILE HOMES	10/08/93
PARK MANOR	10/08/93
PICCIOLA ISLAND	10/08/93
PINE RIDGE	09/28/93
RIVER PARK	09/27/93
ROLLING GREEN	10/08/93
SALT SPRINGS	10/08/93
SAMIRA VILLAGE	10/08/93
SARATOGA HARBOUR	09/27/93
SILVER LAKES ESTATES	09/29/93
SOUTH 40	10/08/93
SPRING HILL CYCLE 5	09/30/93
SPRING HILL CYCLE 6	10/05/93
SPRING HILL CYCLE 7	10/07/93
STONE MOUNTAIN	10/08/93
SUGAR MILL	09/27/93
SUNSHINE PARKWAY	09/29/93
UNIVERSITY SHORES	09/27/93
WELAKA	09/27/93
WESTMONTE	10/01/93
WOOTEN	09/27/93
ZEPHYR SHORES	09/29/93

SYSTEMS BILLED BEFORE 10/12/93

<u>SYSTEM NAME</u>	<u>BILL DATE</u>
DELTONA LAKES CYCLE 5	10/12/93
SPRING HILL CYCLE 8	10/12/93

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