

RUTLEDGE, ECENIA, UNDERWOOD, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA
KENNETH A. HOFFMAN
THOMAS W. KONRAD
R. DAVID PRESCOTT
HAROLD F. X. PURNELL
GARY R. RUTLEDGE
R. MICHAEL UNDERWOOD
WILLIAM B. WILLINGHAM

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (904) 681-6788
TELECOPIER (904) 681-6515

GOVERNMENTAL CONSULTANTS
PATRICK R. MALOY
AMY J. YOUNG

October 16, 1995

**ORIGINAL
FILE COPY**

HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center
Room 110
Tallahassee, Florida 32399-0850

Re: Docket No. **950495-WS**

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Southern States Utilities, Inc. ("SSU") are the original and fifteen copies of SSU's Sixth Motion for Temporary Protective Order.

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

ACK Thank you for your assistance with this filing.

AFA 3

APP 1

CAF _____

CML _____

CTR KAH/rl

EAG _____

LEG cc: / All Parties of Record

LIN 5

OPC _____

RCH _____

SEC 1

WAS

OTH _____

Sincerely,

Bill Wilby
Kenneth A. Hoffman

RECEIVED & FILED
OCT 16 1995
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10223 OCT 16 95

EPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application by Southern States Utilities, Inc. for rate increase and increase in service availability charges for Orange-Osceola Utilities, Inc. in Osceola County, and in Bradford, Brevard, Charlotte, Citrus, Clay, Collier, Duval, Hernando, Highlands, Hillsborough, Lake, Lee, Marion, Martin, Nassau, Orange, Osceola, Pasco, Polk, Putnam, Seminole, St. Johns, St. Lucie Volusia and Washington Counties.

UNFILED FILE

Docket No. 950495-WS

Filed: October 16, 1995

SSU'S SIXTH MOTION FOR TEMPORARY PROTECTIVE ORDER

Southern States Utilities, Inc. ("SSU"), pursuant to Rule 25-22.006, Florida Administrative Code, moves the Florida Public Service Commission for a Temporary Protective Order in this docket, and as grounds therefor, states as follows:

1. On this date, SSU has provided documents responsive to specific discovery requests of the Office of Public Counsel ("OPC") identified below containing information which SSU claims is proprietary confidential business information, and is of a type this Commission has found in past dockets to be confidential:

(1) SSU's response to OPC's Document Request No. 193, which includes Appendix DR 193-A that contains information regarding SSU's strategic plans.

DOCUMENT NUMBER-DATE 10223 OCT 16 1995 2647 FPSC-RECORDS/REPORTING

(2) SSU's response to OPC's Document Request No. 161, including the attachment entitled "Southern States Utilities, Inc. Strategic Growth" and all of the exhibits and attachments thereto.

SSU believes that this information is within the scope of Section 367.156(3), Florida Statutes, and must be afforded protection as proprietary confidential business information.

2. By this Motion, SSU requests that the information and materials identified above and provided to OPC be granted the protection of a Temporary Protective Order as provided for by Rule 25-22.006(5)(c), Florida Administrative Code. This Temporary Protective Order will protect the materials and information from disclosure until OPC completes its review of the materials and information. Once the review is completed, OPC will notify SSU of the materials and information it intends to use in this docket, and SSU, in accordance with Rule 25-22.006(5)(a), will request proprietary confidential treatment of those portions of the materials and information which are, in its opinion, entitled to such treatment. The remainder of any such materials and information which OPC has taken possession of pursuant to this Temporary Protective Order will be returned to SSU by OPC pursuant to Rule 25-22.006(5)(c).

WHEREFORE, SSU respectfully moves the Commission for a Temporary Protective Order covering the above described documents and information provided to OPC in response to the OPC discovery requests identified above.

Respectfully submitted,



KENNETH A. HOFFMAN ESQ.
WILLIAM B. WILLINGHAM, ESQ.
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
P. O. Box 551
Tallahassee, FL 32302-0551
(904) 681-6788

and

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing SSU's Sixth Motion for Temporary Protective Order was furnished by hand-delivery (*) and/or U. S. Mail to the following on this 16th day of October, 1995:

Lila Jaber, Esq.
Division of Legal Services
2540 Shumard Oak Boulevard
Gerald L. Gunter Building
Room 370
Tallahassee, FL 32399-0850

Mr. W. Allen Case
President
Sugarmill Woods Civic Asso.
91 Cypress Blvd., West
Homosassa, FL 34446

Charles J. Beck, Esq.*
Office of Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

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

Joseph Coriaci, Pres.
Marco Island Civic Asso.
413 S. Barfield Drive
Marco Island, FL 33937

Mr. Morty Miller
President
Spring Hill Civic Asso., Inc.
P. O. Box 3092
Spring Hill, FL 34606


KENNETH A. HOFFMAN, ESQ.

1995\rate.3protect