



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 950495-WS

Filed: December 4, 1995

**CITIZENS' MOTION TO DISMISS SSU'S  
SUPPLEMENTAL PETITION FOR INTERIM REVENUE RELIEF**

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, move the Commission to dismiss the "supplemental petition of Southern States Utilities, Inc., for interim revenue relief" filed on November 13, 1995.

1. By order PSC-95-1327-FOF-WS issued November 1, 1995, the Commission denied SSU's original request for interim rates with leave to file another petition.

2. SSU's supplemental petition filed November 13, 1995, is simply another request for the same rates already rejected by the Commission. SSU carefully crafted its supplemental petition so that it did not actually request the Commission to grant any of the alternative rate proposals generally described at page 5 of the supplemental petition. Instead, the supplemental petition starts

off by stating that SSU "hereby provides the ... Commission ... with supplemental information and rate design alternatives."<sup>1</sup> The supplemental petition concludes by requesting interim revenue relief without actually requesting any rates other than the rates already rejected by the Commission.<sup>2</sup>

3. Indeed, in the new notice SSU intends to submit to its customers, SSU intends to show its already rejected interim rate proposal as its "proposed interim rates."<sup>3</sup>

4. Since SSU's supplemental petition only requests the same interim rates already rejected by the Commission, the supplemental

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<sup>1</sup> Supplemental petition at page 1.

<sup>2</sup> Supplemental petition at page 13.

<sup>3</sup> Letter from Kenneth A. Hoffman to Maggie O'Sullivan dated November 30, 1995.

petition should be dismissed.

Respectfully submitted,

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**CERTIFICATE OF SERVICE  
DOCKET NO. 950495-WS**

I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U.S. Mail or hand-delivery\* to the following parties on this 4th day of November, 1995.

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