

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, Highlands, Lake, Lee, Marion, Martin, Nassau, Orange, Osceola, Pasco, Polk, Putnam, Seminole, St. Johns, St. Lucie, Volusia and Washington Counties.

ORIGINAL FILE COPY

Docket No. 950495-WS

Filed: April 1, 1996

SOUTHERN STATES UTILITIES, INC.'S OBJECTIONS TO OPC'S DOCUMENT REQUEST NO. 320

Southern States Utilities, Inc. ("SSU"), by and through its undersigned counsel, hereby files its Objections to Document Request No. 320 included in the Twenty-Fifth Set of Requests for Production of Documents served by the Office of Public Counsel ("OPC"). In support of its Objections, SSU states as follows:

1. OPC Document Request No. 320 states as follows:

320. Please provide all documents responsive to Hidden (sic) Hills Civic Association's first request for production of documents to Southern States Utilities, Inc. dated March 15, 1996.

2. On March 25, 1996, SSU timely filed its Objections to Hidden Hills Civic Association's ("Hidden Hills") First Request for Production of Documents.


3. Based on SSU's Objections to Hidden Hills' First Request for Production of Documents, which objections are incorporated and adopted herein by reference, SSU objects to producing copies of the documents requested by Hidden Hills to OPC. A copy of SSU's Objections to Hidden Hills' First Request for Production of

DOCUMENT NUMBER-DATE 03742 APR-1 1996 FPSC-RECORDS/REPORTING

Documents is attached hereto and made a part hereof as Exhibit "A".

WHEREFORE, for the foregoing reasons, SSU objects to Document Request No. 320 served by the Office of Public Counsel.

Respectfully submitted,



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and

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of Southern States Utilities, Inc.'s Objections to OPC Document Request No. 320 was furnished by U. S. Mail to the following on this 1st day of April, 1996:

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Osceola County, and in Bradford,)
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Collier, Duval, Highlands,) Docket No. 950495-WS
Lake, Lee, Marion, Martin,)
Nassau, Orange, Osceola, Pasco,)
Polk, Putnam, Seminole, St. Johns,) Filed: March 25, 1996
~~St. Lucie, Volusia and Washington)~~
Counties.)
)
)
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SOUTHERN STATES UTILITIES, INC.'S OBJECTIONS
TO HIDDEN HILLS' FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS

SOUTHERN STATES UTILITIES, INC. ("SSU"), hereby files its objections to the First Request for Production of Documents served on SSU by Hidden Hills Civic Association ("Hidden Hills"), and as grounds for its objections states as follows:

1. Hidden Hills has served its First Request for Production of Documents pursuant to Rule 1.350, Florida Rules of Civil Procedure. Both Rule 1.350(a) and Rule 1.280(a), Florida Rules of Civil Procedure, clearly limit the propounding of discovery to parties to a proceeding. Hidden Hills has not been granted intervention and party status in this proceeding. Therefore, SSU objects to all discovery directed to it by Hidden Hills on the ground that SSU is not required to respond to discovery requests of non-parties, including Hidden Hills.

2. In addition to the above objection which pertains to each of the ten numbered document requests, SSU also specifically objects to Document Request Nos. 7 through 10 on the following

grounds:

a. Hidden Hills Document Request No. 7 states as follows:

7. Copies of all communications from either Southern States Utilities, Inc. or the Southern States Utilities, Inc. Political Action Committee ("PAC") (irrespective of its name) to Southern States Utilities, Inc.'s employees addressing the aims or goals of the PAC.

SSU objects to producing documents responsive to the above request on the grounds that the request is vague, ambiguous, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

b. Hidden Hills Document Request No. 8 states as follows:

8. Copies of all communications from either Southern States Utilities, Inc. or the PAC, to either SSU lobbyists or attorneys regarding criteria by which the PAC would make campaign contributions to political candidates at either the local, state or federal level.

SSU objects to producing documents responsive to the above request on the grounds that the request is vague, ambiguous, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

c. Hidden Hills Document Request No. 9 states as follows:

9. Copies of all documents indicating what campaigns the SSU PAC made contributions of cash, in-kind, or any other, by year, for each year beginning on January 1, 1990.

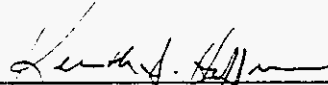
SSU objects to producing documents responsive to the above request on the grounds that the request is vague, ambiguous, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

d. Hidden Hills Document Request No. 10 states as follows:

10. Copies of all correspondence with the Rose, Sundstrum & Bentley law firm, or any of its attorneys or employees for the calendar years 1992, 1993, 1994, 1995 and to date during 1996.

SSU objects to producing documents responsive to the above request on the grounds that the request is vague, ambiguous, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of Southern States Utilities, Inc.'s Objections to Hidden Hills' First Request for Production of Documents was furnished by U. S. Mail to the following on this 25th day of March, 1996:

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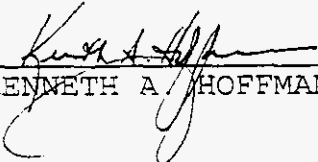
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