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REPLY TO: Tallahassee

August 25, 1992

HAND DELIVERY

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

Re: FPSC Docket No. 920199-WS

Dear Mr. Tribble:

| ACK iffteen | Enclosed herewith for filing in the above copies of Southern States' Response to | ve-referenced docket are the original and COVA's Application for Intervention. |
|-----------------------------|--|--|
| AA 3 | Please acknowledge receipt of these doc "filed" and returning the same to me. | uments by stamping the extra copy of this |
| | Thank you for your assistance with this | filing. |
| 778 <u> </u> | | Sincerely yours, |
| 140 140 / 14/25 140 / | | Kenneth A. Hoffman |
| KAH Enclo | /amb osures Parties of Record | |
| OTH Car | (Cen | |

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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: August 25, 1992

DATEMAL FILE COPY

SOUTHERN STATES' RESPONSE TO COVA'S APPLICATION FOR INTERVENTION

SOUTHERN STATES UTILITIES, INC. and DELTONA UTILITIES, INC. (hereinafter referred to collectively as "Southern States"), hereby files the following response to the Application for Intervention filed by Cypress and Oak Villages Association ("COVA") of Homosassa, Florida:

- 1. Southern States admits the allegations set forth in paragraph one of COVA's Application for Intervention.
- 2. Southern States is without knowledge as to the allegations in paragraph two of COVA's Application for Intervention.
- 3. Southern States denies the allegation in paragraph three of COVA's Application for Intervention.
- 4. Southern States denies the allegation in paragraph four of COVA's Application for Intervention. The Rate Case Synopsis available for study at various locations was approved by the Commission Staff prior to distribution. The Rate Case Synopsis does not contain deceptive material. Commission rules do not require the Rate Case Synopsis to include testimony of utility

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TPSC-RECORDS/REPORTAGE

personnel and consultants.

5. Southern States admits the allegation set forth in paragraph five of COVA's Application for Intervention.

Respectfully submitted,

KENNETH A. HOFFMAN, ESQUIRE LAURA L. WILSOM, ESQUIRE Messer, Vickers, Caparello, Madsen, Lewis, Goldman & Metz, P.A.

P.O. Box 1876 Tallahassee, Florida 32302-1876 (904)222-0720

and

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

Attorneys for Southern States Utilities, Inc. and Deltona Utilities, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Southern States' Response to COVA's Application for Intervention was furnished by hand delivery(*) and/or U.S. Mail, this 25th day of August, 1992, to the following:

Harold McLean, Esq.*
Office of Public Counsel
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400

Matthew Feil, Esq.*
Catherine Bedell, Esq.*
Florida Public Service Commission
Division of Legal Service
101 East Gaines Street
Room 226
Tallahassee, Florida 32399-0850

Mr. Harry C. Jones, P.E. President Cypress and Oak Villages Association 91 Cypress Boulevard West Sugarmill Woods Homosassa, FL 32646

By: KENNETH A. HOFFMAN, ESQ.