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Tallahassee

REPLY TO:

November 3, 1992

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

HAND DELIVERY

Re: FPSC Docket No. 920199-WS

Dear Mr. Tribble:

Enclosed herewith for filing in the above-referenced docket are the following documents:

- Original and fifteen copies of Southern States' Motion for Leave to Submit Revised Rebuttal Testimony of Scott W. Vierima; and
- Original and fifteen copies of the Revised Rebuttal Testimony of Scott W. Vierima.

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**DOCUMENT NUMBER-DATE** 12928 NOV -3 1997 FPSC-RECORDS/REPORTING

## 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: November 3, 1992

## SOUTHERN STATES' MOTION FOR LEAVE TO SUBMIT REVISED REBUTTAL TESTIMONY OF SCOTT W. VIERIMA

TO: HONORABLE BETTY EASLEY
Commissioner and Prehearing Officer
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

SOUTHERN STATES UTILITIES, INC. and DELTONA UTILITIES, INC., (hereinafter referred to collectively as "Southern States"), by and through its undersigned counsel, hereby respectfully requests the Prehearing Officer to enter an Order granting Southern States leave to submit Revised Prefiled Rebuttal Testimony of Scott W. Vierima in this proceeding. In support of its Motion, Southern States states as follows:

1. On October 27, 1992, Southern States filed the prefiled rebuttal testimony of Scott W. Vierima. On October 28-29, 1992, Mr. Vierima and the undersigned counsel for Southern States were involved in the final hearing in the Lehigh Utilities, Inc. Rate Case in Docket No. 911188-WS.

DOCUMENT NUMBER-DATE

12928 NOV -3 1992

FPSC-RECORDS/REPORTING

- 2. Following the conclusion of the final hearing in Docket No. 911188-WS, Mr. Vierima reviewed his prefiled rebuttal testimony filed on October 27, 1992 and found that a number of minor, clerical type changes which he understood had been incorporated in his rebuttal testimony prior to filing had not been so incorporated.
- 3. Rather than providing these changes to Mr. Vierima's prefiled rebuttal testimony during the hearing, Southern States believes that the Commissioners, Staff and all parties would benefit from the submission of revised rebuttal testimony incorporating such changes. The changes reflected in the revised rebuttal testimony are shown on the Errata Sheet attached hereto as Exhibit "A".
- 4. Southern States has filed an original and fifteen copies of Mr. Vierima's prefiled revised rebuttal testimony on this date and has served copies on all parties. In addition, counsel for Southern States has conferred with counsel for the Office of Public Counsel regarding this motion and the attached Errata Sheet and is authorized to represent that Public Counsel has no objection to the relief requested in this motion.

WHEREFORE, Southern States respectfully requests the Prehearing Officer to enter an Order granting Southern States leave to submit the prefiled revised rebuttal testimony of Scott W. Vierima in this proceeding.

# Respectfully submitted.

KENNETH A. HOFFMAN, ESQUIRE
FLOYD R. SELF, ESQUIRE
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#### and

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

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

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Southern States' Motion for Leave to Submit Revised Rebuttal Testimony of Scott W. Vierima was furnished by hand delivery(\*) and/or U. S. Mail, this 3rd day of November, 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 Services
101 East Gaines Street
Room 226
Tallahassee, Florida 32399

A. .

Mr. Harry C. Jones, P.E. President Cypress and Oak Villages Association 91 Cypress Boulevard West Homasassa, Florida 32646

Michael S. Mullin, Esq. P. O. Box 1563 Fernandina Beach, Florida 32304

V: KEWNETH A. HOPA

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REBUTTAL TESTIMONY 5 VIERIMA 920199-WS

# ERRATA SHEET

Page	Line	Correction/Change	
/	7	CHANGE ADMINISTRATION TO ADMINISTRATION	
a	21-22	CHANGE "WAS THIS EXHIBIT AND SUPERASION?"	
		TO "ARE YOU FAMILIAR WITH THIS EXHIBIT "	
a	23	CHANGE "IT WAS" TO "I AM"	
4	14	INSERT "POTENTIAL" BEFORE "EFFICIENCIES"	
4	18	INSERT "POTENTIAL" BEFORE "BENEFITS"	
4	19	DELETE "POTENTIAL"	
4	24	CHANGE OF ANY KIND TO "LINDER REASONABLE TERMS"	
5	19	CHANGE "WHICH" TO "PROJECTS"	
5	21-22	CHANGE "DOING BUSINESS" TO "CONTINUALLY	
		SEEKING WAYS TO MAINTAIN OR ENHANCE	
		OPERMING ESTICIENCY"	
8	1	CHANGE "BUT SHE APPLIES A DOUBLE STANDARDON	HEN
		TO "HER OBSERVATIONS IS NORE SITUATIONS WHERE"	4
6	a	CHANKE "AKE" TO "NAY BE"	
6	4	DELETE "THIS KLEGATION HIGHLIGHTS"	
6	7	DELETE ENTIRE LINE	
4	ड	DELETE "ADJUSTMENTS."	
6	24	INSCRT, THEREBY CREATING AN ENVIRONMENT	
		IN WHICH THE COMPANY IS DISCOVERGED FROM	1
		SEEKING NEW WAYS TO IMPROVE SERVICE AND	0
		CONTROL EXPENDITURES AFTER BENEFIT	5
8	12	CHANGE ACATIVE TO ACTIVE	
		EXHIBIT "A"	υ