NANCY B. WHITE General Attorney

Southern Bell Telephone and Telegraph Company Suite 400 150 South Monroe Street Tallahassee, Florida 32301 (404) 529-5387 ORIGINAL FILE COPY

May 3, 1993

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

RE: <u>Docket Nas. 920260-TL, 900960-TL, 910163-TL, 910727-TL</u>

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for Reconsideration of Order No. PSC-93-0644-PCO-TL. Please file this document in the above-captioned dockets.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White

Enclosures

cc: All Parties of Record

A. M. Lombardo H. R. Anthony

R. D. Lackey

Jan

DOCUMENT NUMBER-DATE
04799 MAY-38

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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company Docket No. 920260-TL

ONIGINAL FILE COPY

In re: Show cause proceeding against Southern Bell Telephone and Telegraph Company for misbilling customers

Docket No. 900960-TL

In re: Petition on behalf of Citizens of the State of Florida to initiate investigation into integrity of Southern Bell Telephone and Telegraph Company's repair service activities and reports

Docket No. 910163-TL

In re: Investigation into Southern Bell Telephone and Telegraph Company's compliance with Rule 25-4.110(2), F.A.C., Rebates Docket No. 910727-TL

Filed: May 3, 1993

## SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S MOTION FOR RECONSIDERATION OF ORDER NO. PSC-93-0644-PCO-TL

COMES NOW, BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and files, pursuant to Rule 25-22.038(2), Florida Administrative Code, its Motion for Reconsideration of Order No. PSC-93-0644-PCO-TL, issued on April 23, 1993 by the Prehearing Officer in the above-referenced dockets.

1. On April 23, 1993, the Prehearing Officer issued the Order Establishing Procedure in the above referenced dockets (Order No. PSC-93-0644-PCO-TL). In this procedural order, the Prehearing Officer set forth dates controlling the key activities of these dockets. Southern Bell, in this pleading, moves the Prehearing Officer for reconsideration of certain of these dates.

- 2. The order requires Southern Bell's direct testimony to be filed on July 2, 1993; intervenors' direct testimony to be filed on November 8, 1993; Staff's direct testimony to be filed on November 22, 1993; and rebuttal testimony to be filed on December 6, 1993. Southern Bell first asks for reconsideration of the date for filing of rebuttal testimony. The present date allows merely two weeks between the filing of the staff's direct and the rebuttal, during which time a major holiday (Thanksgiving) occurs. This provides Southern Bell with an inadequate amount of time to analyze and prepare rebuttal testimony to whatever issues the Staff may raise. In light of this, Southern Bell respectfully requests that the Prehearing Officer allow an additional two weeks, or until December 20, 1993, for the filing of rebuttal testimony.
- 3. Southern Bell also requests that an additional controlling date be inserted into the timetable for the filing of updates to Southern Bell's original direct testimony. Southern Bell is required to file direct testimony on July 2, 1993, some seven months prior to the hearings in these dockets. Southern Bell respectfully requests that the Prehearing Officer allow Southern Bell to file additional direct testimony, if necessary, to update the original filing. Southern Bell would propose the date of November 1, 1993 for accomplishment of this filing in keeping with the correspondence concerning the test year which is attached hereto.

Based on the foregoing, Southern Bell moves the Prehearing Officer to reconsider those portions of Order No.

PSC-93-0644-PCO-TL pertaining to the dates controlling the key activities of these dockets, and to find that Southern Bell's request for changes should be granted.

Respectfully submitted this 3rd day of May, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

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## Southern Beil

A. M. Lombardo Assistant Vice President - Regulatory Relations 180 South Monroe Street Suite 400 Taliahasses, Piorida 32301

March 26, 1993

Chairman J. Terry Deason Florida Public Service Commission 101 E. Gaines Street Tallahassee, Florida 32301

Dear Chairman Deason:

On March 5, 1993, the Florida Public Service Commission voted to postpone hearings in Docket No. 920260-TL until the January 1994 timeframe. The Commission also ordered that as a result of this delay in the proceedings, BellSouth Telephone Communications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell") file updated Minimum Filing Requirements ("MFRS") by July 2, 1993. This letter serves as Southern Bell's test year notification in this docket in compliance with Rule 25-4.140.

Southern Bell plans to file MFRs using Forecast Year 1993, adjusted for known and measurable changes to properly state the test year results on a going-level basis. These MFRs will bring the financial results to a basis that will be appropriate for use in the proceedings in Docket No. 920260-TL tentatively scheduled for the January, 1994 timeframe. This test period is a representative period subject to such adjustments as may be proper for ratemaking purposes.

Forecast Year 1993 contains the most appropriate data available to use as a basis for Southern Bell's MFRs. It is superior to a historical test year of 1992 because of the unusual nature of 1992 given the financial impact of Hurricane Andrew. In addition, by the time the hearings are held in early 1994, 1992 data will be stale. With regard to the possibility of using 1994 as a forecasted test year, Southern Bell does not yet have a Commitment View forecast of that year upon which reliance can be placed.

A BELLSOUTH Company

Southern Bell will file MFRs required for historical 1992 information in compliance with Rule 25-4.141. In addition, we will file certain MFR schedules using Forecast Year 1993. These schedules will be identified in our waiver letter which we plan to file shortly. Your concurrence on these schedules will be requested. In addition, we will file certain updates to the MFRs in late October 1993, using Calendar Year 1993 actual data which are then available.

If you or your staff have any questions regarding this notification, please contact me or members of my staff.

Sincerely,

A. M. Lombardo

C.M. Lowbordo

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CERTIFICATE OF SERVICE Docket No. 920260-TL Docket No. 900960-TL Docket No. 910163-TL Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 3rd day of May, 1993 to:

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