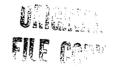
JACK SHREVE

PUBLIC COUNSEL

STATE OF FLORIDA

OFFICE OF THE PUBLIC COUNSEL



c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400 904-488-9330

June 28, 1994

Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, FL 32399-0850

Re: Docket No.

Dear Ms. Bayo:

OTH ____

Enclosed for filing in the above-captioned proceedings on behalf of the Citizens of the State of Florida are the original and 15 copies of the Citizens' Motion for Leave to File Supplemental Testimony.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Interim and)	DOCKET NO. 940109-WU
Permanent Rate Increase in)	
Franklin County, Florida by)	Filed: June 28, 1994
ST. GEORGE ISLAND UTILITY)	
COMPANY, LTD.)	
	/	

MOTION FOR LEAVE TO FILE SUPPLEMENTAL TESTIMONY

The Citizens of the State of Florida, by JACK SHREVE, Public Counsel, move the Commission for leave to file supplemental testimony and as grounds therefore say:

- 1. Intervenor testimony of Kimberly H. Dismukes was duly and timely filed on May 25, 1994;
- 2. At the time of the filing of Ms. Dismukes testimony, the Citizens' discovery efforts were frustrated by SGU's resistance to discovery and by the unexpected limitation of discovery contained in PSC-94-0320-PCO-WU, Order Establishing Procedure. Both matters were addressed such that the Citizens' pending discovery was ruled permissible and SGU was ordered to comply, in Order PSC-94-0571-CFO-WU (Order resolving Discovery Motions) issued May 13, 1994, substantially after testimony was due.
- 3. The supplemental testimony will supplement existing testimony and issues.

WHEREFORE, the Citizens move the Commission for leave to file supplemental testimony.

Respectfully/submitted,

Harold McLean Associate Public Counsel

Office of Public Counsel c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400

Attorney for the Citizens of the State of Florida

CERTIFICATE OF SERVICE DOCKET NO. 940109-WU

I HEREBY CERTIFY that a correct copy of the foregoing has been furnished

by U.S. Mail or telecopy, or both, to the following parties on this 27th day of June, 1994.

Robert Pierson, Esq.
Division of Legal Services
Florida Public Service Commission
101 E. Gaines St.
Tallahassee, FL 32301

Barbara Sanders, Esq. 53 C Avenue P.O. Box 157 Apalachicola, FL 32320

Gene D. Brown, Esq. 3848 Killearn Court Tallahassee, FL 32308

G. Steven Pfeiffer, Esq.Apgar, Pelham, Pheiffer & Theriaque909 East Park AvenueTallahassee, FL 32301

Harold McLean

Associate Public Counsel