

n States Utilities • 1000 Color Place • Apopka, FL 32703 • 407/880-0058

December 13, 1995

ORIGINAL FILE COPY

Ms. Blanca S. Bayo Florida Public Service Commission Director of Records & Reporting 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Docket No. 950495-WS -- 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, Putnam, Seminole, St. Johns, St. Lucie, Volusia, and Washington Counties.

Dear Ms. Bayo:

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Enclosed please find sixteen copies of Southern States' Thirty-First Notice of Service of responses to portions of the Office of Public Counsel's Sixteenth Set of Interrogatories and Fourteenth Set of Document Requests in the above-referenced matter.

Please acknowledge filing of these documents by date stamping the enclosed copy of this letter and returning it in the postage paid, self-addressed envelope provided.

ACK Very truly yours,	
AFA Maile	
APPMUTALW (/)	
CAF <u>Matthew</u> J. Feil	
CMU <u>Staff</u> Attorney	
CTR	
EAG Enclosures	
LEG	
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OPC	
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FPSC-RECORDS/REPORTING

# **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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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, Putnam, Seminole, St. Johns, St. Lucie, Volusia, and Washington Counties.

Docket No. 950495-WS

ORIGINAL

FILE COPY

Filed: December 13, 1995

## SOUTHERN STATES UTILITIES, INC.'S THIRTY-FIRST NOTICE OF SERVICE OF RESPONSES TO PUBLIC COUNSEL'S SIXTEENTH SET OF INTERROGATORIES AND FOURTEENTH SET OF PRODUCTION OF DOCUMENT REQUESTS

SOUTHERN STATES UTILITIES, INC., by and through its undersigned counsel, hereby

files its Notice that is has served its responses to the following interrogatories and document

requests included in the Office of Public Counsel's Sixteenth Set of Interrogatories and

Fourteenth Set of Production of Document Requests by United Parcel Service to Harold McLean,

Esq., Office of Public Counsel, Claude Pepper Building, 111 West Madison Street, Room 812,

Tallahassee, Florida 32399-1400, on this 13th day of December, 1995.

### **OPC's Sixteenth Set of Interrogatories**

No. 330

#### **OPC's Fourteenth Set of Document Requests**

No. 279

DOCUMENT NUMBER-DATE

4244

Copies of the Responses also have been served on all other parties of record in the

manner reflected on the attached Certificate of Service on this same date.

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Respectfully submitted,

BRIÁN P. ARMSTRONG, ESQ. MATTHEW FEIL, ESQ. Southern States Utilities, Inc. 1000 Color Place Apopka, Florida 32703 (407) 880-0058

and

KENNETH A. HOFFMAN, ESQ.
WILLIAM B. WILLINGHAM, ESQ.
Rutledge, Ecenia, Underwood, Purnell & Hoffman, P.A.
P. O. Box 551
Tallahassee, Florida 32302-0551
(904) 681-6788

Attorneys for Southern States Utilities, Inc.

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by United Parcel Service to the following this 13th day of December, 1995:

Lila Jaber, Esq. Division of Legal Services Gerald L. Gunter Building 2540 Shumard Oak Boulevard Room 370 Tallahassee, FL 32399-0850

Michael B. Twomey, Esq. Route 28, Box 1264 (Crawfordville Highway) Tallahassee, FL 32314-5256

Harold McLean, Esq. Office of Public Counsel Claude Pepper Building 111 W. Madison Street Room 812 Tallahassee, FL 32399-1400

Arthur I. Jacobs, Esq. Jacobs & Peters, P.A. 401 Centre, 2nd Floor Fernandina Beach, FL 32034

MATTHEW J. FEIL, ESQ.